

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



Cyngor Bwrdeistref Sirol  
**MERTHYR TUDFUL**  
**MERTHYR TYDFIL**  
County Borough Council

**GOFRESTR SYLWADAU'R CYNLLUN DATBLYGU SY'N YMWNEUD**  
**REPLACEMENT DEPOSIT PLAN REPRESENTATIONS REGISTER**

**Tachwedd 2018 | November 2018**

Miss J Jones  
Pennaeth Cynllunio a Chefn Gwlad/Head of Planning and Countryside  
Cyngor Bwrdeistref Sirol Merthyr Tudful | Merthyr Tydfil County Borough Council  
Uned 5 | Unit 5  
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CF48 4TQ

# Merthyr Tydfil Replacement Deposit LDP Representations Register

November 2018

## Introduction

This Representations Register provides a copy of the duly made representations that were received by the Council during the Replacement Deposit LDP public consultation that took place from 30th July to 10th September 2018.

The representations are ordered by representor number which you may have previously received if you have been in correspondence with the Council regarding the LDP.

An index list of representors names, organisations (where applicable) and ID numbers are provided overleaf. If you do not know the ID number, please search the list of representor names to find the relevant ID number and page number.

The Representations Register also contains bookmarks which will appear on the left hand side in Adobe Acrobat reader when selected. These will direct you to the desired representation when clicked on.

This document provides a factual record of the representations received on the Replacement Deposit LDP.

Please note that every effort has been made to redact personal information such as addresses, signatures and other private contact details.

Should you require further assistance, please contact the LDP Team on 01685 726279 / 01685 726277 / 01685 726220 / 01685 727053 or by emailing:

[devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk)



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21 August 2018

Dear Judith,

**Merthyr Tydfil County Borough Council – Deposit Plan 1<sup>st</sup> Revision –  
Regulation 17 Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Merthyr Tydfil County Borough Council Deposit Local Development Plan (LDP). We acknowledge that the preparation of a LDP and the supporting evidence is a significant undertaking and recognise the amount of work your authority has undertaken to date in moving the plan forward from Preferred Strategy to Deposit stage.

At Preferred Strategy (Regulation 15) our representations highlighted a range of issues that in our opinion needed to be addressed if your replacement plan was to be considered 'sound'. In moving the plan forward, we are pleased to see that your authority has taken into account the majority of our comments and prepared a Deposit plan and supporting evidence base that is clear and concise covering key aspects of each topic area. This approach is welcomed by the Welsh Government.

In moving forward to the LDP examination, demonstrating delivery of the strategy will be essential. The development planning system in Wales is evidence-led; demonstrating how a plan is shaped by this evidence is a key requirement of the examination. Showing the delivery and viability of all sites in the plan is critical, particularly development proposed on large scale regeneration sites and other large housing/employment allocations which are integral to the strategy/objectives of the plan.

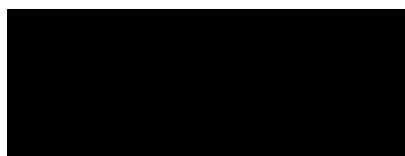
Without prejudice to the Welsh Minister's powers and the independent examination, the Welsh Government is committed to helping local planning authorities through the plan making process. With regard to the comprehensive evidence base supporting plan, we are pleased to inform you that **we have no fundamental objections on the soundness of the plan or its translation of national planning policy, a Category C objection**. Our representations set out below relate to matters of clarity which should be addressed in advance of the examination:



- **Hoover Strategic Regeneration Area (HSRA)** – To ensure comprehensive development and good design principles the authority should repeat the key principles from the Framework/Masterplan into Policy SW6. As parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15 and should be made clear in Policy EcW2.
- **Delivery and Implementation** – To ensure effective implementation and monitoring of the plan's housing delivery, both the housing trajectory (Figure 1) and housing land supply table (Table B) set out in the 'Housing Land Supply and Trajectory' paper should be included in the LDP appendices, with a cross-reference in the reasoned justification to Policy SW3. The phasing of housing allocations as set out in Table C of the above paper should also be included as an additional column to the table in Policy SW3.
- **Components of Housing Supply** – To clearly identify all housing components including those under construction and those with planning permission, the authority should replace Table 1 in the Deposit plan with Table 1 in the Preferred Strategy, updating this to April 2018. All components (in rows A-F) should be identified in the trajectory ensuring no double counting.
- **Affordable Housing Need and Target** – The affordable housing need of 5,505 units over the plan period should be set out in the reasoned justification to Policy SW2. The target to be delivered through the planning system (set out in Policy SW2) should be based on the housing requirement of 2,250 units, not the provision. Is the correct target a 25% reduction of the 261 units currently stated?
- **Gypsy Traveller Accommodation Needs Assessment (GTANA)** – The authority should ensure their GTANA Update (2018) is signed-off by Welsh Ministers in advance of the LDP examination with any need met, through site allocations, during the plan period.
- **Renewable Energy** – The REA is unclear on the constraints that have been applied and how this aligns with the Toolkit methodology and Welsh Government approach to designating Strategic Search Areas (SSAs), particularly in relation to solar energy and grid connectivity where distances of 2km have been applied as opposed to the standard 10km. The authority should clearly list the constraints and any buffers that have been applied along with the rationale for this approach. The summary tables for renewable heat and electricity set out in the addendum to the REA (Figures 12 & 13) should be inserted in the reasoned justification to Policy EcW8 and included in the monitoring framework.
- **Minerals Buffer Zones** – PPW Edition 10 (anticipated to be published later this year) only requires the safeguarding of primary coal resources which, if published before or during the examination, should be reflected in the plan.

The Welsh Government is committed to ensuring a plan-led approach to development in Wales. I trust that these representations will assist you in ensuring your LDP can be found 'sound' and adopted following independent examination. Please contact me if you wish to meet and discuss matters arising from this formal response to your Deposit LDP.

Yours sincerely,



**Mark Newey**  
**Head of Plans Branch**  
**Planning Directorate**



Judith Jones  
Pennaeth Cynllunio a Chefn Gwlad  
Planning and Countryside Department  
Cyngor Bwrdeistref Sirol Merthyr Tudful  
Uned 5, Parc Busnes Triangle  
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21 Awst 2018

Annwyl Judith,

**Cyngor Bwrdeistref Sirol Merthyr Tudful - Adolygiad 1af y Cynllun Adneuo -  
Ymgynghoriad Rheoliad 17: Ymateb Llywodraeth Cymru**

Diolch ichi am ymgynghori â Llywodraeth Cymru am Gynllun Datblygu Lleol wedi'i Adneuo Cyngor Bwrdeistref Sirol Merthyr Tudful (CDLI). Rydym yn sylweddoli bod paratoi CDLI a'r dystiolaeth ategol yn dipyn o dasg ac yn cydnabod yr holl waith a wnaed gan eich Awdurdod hyd yma o ran symud y Cynllun yn ei flaen o'r Strategaeth a Ffefrir i'r cam Adneuo.

Yn y Strategaeth a Ffefrir, (Rheoliad 15) roedd ein sylwadau yn tynnu sylw at amrywiol faterion oedd angen mynd i'r afael â hwy yn ein barn ni os oedd eich cynllun newydd i gael ei ystyried yn 'gadarn'. Wrth symud y cynllun ymlaen, rydym yn falch o weld bod eich awdurdod wedi ystyried mwyafrif y sylwadau ac wedi paratoi cynllun Adneuo a thystiolaeth ategol sy'n glir ac yn gryno, gan gynnwys prif agweddau pob maes pwnc. Mae'r dull hwn yn cael ei groesawu gan Llywodraeth Cymru.

Wrth symud ymlaen i archwilio'r Cynllun Datblygu Lleol, bydd dangos bod y strategaeth yn cael ei chyflawni yn hanfodol. Mae'r system gynllunio o ran datblygiadau yng Nghymru wedi'i harwain gan dystiolaeth; gan ddangos bod llunio cynllun yn ôl y dystiolaeth yn ofyniad allweddol i'r archwiliad. Mae dangos pob safle ar y cynllun wedi'u cyflawni, a'u bod yn hyfyw, yn hanfodol, yn enwedig datblygiad sy'n cael ei gynnig ar safleoedd adfywio ar raddfa fawr a dyraniadau tai/cyflogaeth mawr eraill sy'n hanfodol i strategaeth/amcanion y cynllun.

Heb ragfarnu'r archwiliad annibynnol na chwaith bwerau'r Gweinidog a'r archwiliad annibynnol, mae Llywodraeth Cymru wedi ymrwymo i helpu Awdurdodau Cynllunio Lleol ar y broses o lunio'r cynllun. O ran cynllun cefnogi y sylfaen dystiolaeth gynhwysfawr, rydym yn falch o'ch hysbysu **nad oes gennym unrhyw wrthwynebiadau sylfaenol ar pa mor gadarn yw'r cynllun na'i ddehongliad o'r**



**polisi cynllunio cenedlaethol, gwrthwynebiad Categori C.** Mae ein sylwadau isod yn gysylltiedig ag eglurder, y dylid eu hystyried cyn yr archwiliad:

- **Ardal Adfywio Strategol Hoover (HSRA)** - I sicrhau datblygiad cynhwysfawr ac egwyddorion dylunio da dylai'r awdurdod ail-adrodd prif egwyddorion y Fframwaith/Cynllun Meistr ym Mholisi SW6. Gan bod rhannau o'r safle wedi'u lleoli mewn ardal llifogydd C2, mae'r ardaloedd hynny yn anaddas ar gyfer cyfleusterau rheoli gwastraff yn unol â TAN 15 a dylid gwneud hyn yn glir ym Mholisi EcW2.
- **Darparu a Gweithredu** - I sicrhau bod y cyflenwad tai yn y cynllun yn cael ei ddarparu a'i fonitro yn effeithiol, dylai'r trywydd tai (Ffigur 1) a thabl y cyflenwad tir ar gyfer tai (Tabl B) a bennir yn y papur 'Cyflenwad a Thrywydd y Tir ar gyfer Tai' gael ei gynnwys yn atodiadau y CDLI, gan drawsgyfeirio yn y cyfiawnhad rhesymegol at Bolisi SW3. Dylai cyfnodau y dyraniadau tai fel a bennir yn Nhabl C y papur uchod gael eu cynnwys hefyd fel colofn ychwanegol i'r tabl ym Mholisi SW3.
- **Elfennau y Cyflenwad Tai** - I nodi'n glir yr holl elfennau yn y tai gan gynnwys y rhai sy'n cael eu hadeiladu a'r rhai sydd â chaniatâd cynllunio, dylai'r Awdurdod ddisodli Tabl 1 yn y cynllun Adneuo gyda Tabl 1 yn y Strategaeth a Ffefrir, gan ddiweddarau hwn i Ebrill 2018. Dylai pob elfen (yn rhesi A-F) gael eu nodi yn y llwybr gan sicrhau nad oes cyfrif dwbl.
- **Yr Angen a Tharged Tai Fforddiadwy** - Dylai'r angen am dai fforddiadwy o 5,505 uned dros gyfnod y cynllun gael ei amlinellu yn y cyfiawnhad rhesymegol i Bolisi SW2. Dylai'r targed i gael ei gyflawni drwy'r system gynllunio (a amlinellir ym Mholisi SW2) fod yn seiliedig ar y gofyniad o ran tai o 2,250 o unedau, nid y ddarpariaeth. A yw'r targed cywir yn ostyngiad o 25% o'r 261 o unedau sy'n cael eu nodi ar hyn o bryd?
- **Asesiad Anghenion Llety Sipsiwn a Theithwyr (GTANA)** - Dylai'r awdurdod sicrhau bod eu Diweddariad GTANA (2018) wedi ei lofnodi gan Weinidogion Cymru cyn yr archwiliad LDP gan fodloni unrhyw anghenion, drwy ddyrannu safleoedd, yn ystod cyfnod y cynllun.
- **Ynni Adnewyddadwy** - Nid yw'r Asesiad Cyflym o'r Dystiolaeth (REA) yn glir ar y cyfyngiadau sydd wedi'u defnyddio a sut y mae hyn yn cyd-fynd â'r fethodoleg Offer a dull Llywodraeth Cymru o ddynodi Ardaloedd Chwilio Strategol, yn enwedig mewn perthynas ag ynni solar a chysylltedd y grid ble y mae pellter o 2km wedi'u defnyddio yn hytrach na'r 10km safonol. Dylai'r awdurdod restru'n glir y cyfyngiadau ac unrhyw ardaloedd clustogi sydd wedi'u defnyddio yn ogystal â'r rhesymeg ar gyfer y dull hwn o weithio. Dylai'r tablau cryno ar gyfer gwres a thrydan adnewyddadwy sydd wedi'u hamlinellu yn yr atodiad i'r REA (Ffigurau 12 & 13) gael eu gosod yn y cyfiawnhad rhesymedig i Bolisi EcW8 a'i gynnwys yn y fframwaith monitro.
- **Clustogfa Mwynau** - Mae Polisi Cynllunio Cymru Rhifyn 10 (rhagwelir y caiff ei gyhoeddi yn ddiweddarach eleni) ond yn galw am ddiogelu adnoddau glo craidd, ac os y caiff ei gyhoeddi cyn neu yn ystod yr archwiliad, dylid adlewyrchu hyn yn y cynllun.

Mae Llywodraeth Cymru wedi ymrwymo i sicrhau dull o ddatblygu yn ôl cynllun yng Nghymru. Rwy'n hyderus y bydd y sylwadau hyn o fudd ichi i sicrhau y bydd eich Cynllun Datblygu Lleol yn 'gadarn' ac yn cael ei fabwysiadu yn dilyn archwiliad annibynnol. Cysylltwch â mi os ydych yn dymuno cyfarfod a thrafod materion sy'n codi o'r ymateb ffurfiol hwn i'ch Cynllun Datblygu Lleol wedi'i Adneuo.

Yn gywir,



**Mark Newey**  
**Pennaeth y Gangen Cynlluniau**  
**Y Gyfarwyddiaeth Gynllunio**



[REDACTED]  
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Judith Jones  
Head of Planning and Countryside  
Merthyr Tydfil County Borough Council  
Unit 5 Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

07 September 2018

Annwyl Ms Jones/Dear Ms Jones

**REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031: PUBLIC CONSULTATION ON DEPOSIT PLAN**

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales on the above, which was received on 30 July 2018.

We welcome the opportunity to provide comments on your Deposit Plan.

We have made written representations on matters of soundness within the relevant response form, attached to this letter. We also attach an annex where we have set out matters of clarity. These do not form part of written representations included in the submitted form and are not matters of soundness. In the annex we suggest edits to help improve the clarity and coherence of the plan. These have been set out in the order of the policies in the plan document in order to aid you with your considerations. We provide you with advice relating to the HRA Screening Report below.

**HRA Screening Report**

We advise that reference should be made to the Conservation of Habitats and Species Regulations 2017 as a more recent version of the 2010 regulations.

Please note, with regards to the information set out in TABLE 2: SCREENING 'APPROPRIATE ASSESSMENT' ON THE BASIS OF OBJECTIVE INFORMATION, the population of marsh fritillary butterflies present within Aberbargoed Grasslands SAC is considered distinct and separate from the Upper Cynon Valley Metapopulation and should be referred to as the 'Aberbargoed Grasslands Metapopulation' rather than supporting the 'Hirwaun meta-population'.

Based on the information available in the current version of the Deposit LDP and the proposals it describes, we agree with the conclusion of no likely significant effect on the relevant SACs (those within 15km of Merthyr Tydfil County Borough).

Given the limited detail on proposals contained within the Deposit Plan, we wish to highlight that undertaking a HRA at this stage does not remove the need to potentially carry out HRA for plans

[REDACTED]  
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[REDACTED]  
[REDACTED]

and projects in the future depending on the scale, nature and location of the proposals being put forward.

If you have any further queries, please don't hesitate to contact us. We would be happy to meet you to discuss our response further if you believe that this would be beneficial.

Yn gywir / Yours faithfully

**Gemma Beynon**

Rheolwr Cynllunio Datblygu, Gweithrediadau De Cymru / Development Planning Manager,  
Operations South

Cyfoeth Naturiol Cymru / Natural Resources Wales

[Redacted]

[Redacted]

**Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.**

**Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.**

[Redacted]  
[Redacted]



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	EcW1
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
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## **Policy EcW1: Provision of Employment Land & Allocation EcW1.1**

### **Rep:**

Allocation EcW1.1 is proposed to provide 5Ha of employment land, as per Policy EcW1. However, the site lies partially within Zone C2, as defined by the Welsh Government's Development Advice Map (DAM). The site is also shown to be at risk on our Flood Risk Map. Insufficient information has been provided to demonstrate the risks and consequences of flooding can be managed to an acceptable level, in accordance with Technical Advice Note 15: Development and Flood Risk (TAN15), July 2004, and therefore, it has not been proven that this site is suitable for inclusion as an allocation within the Plan.

Merthyr Tydfil CBC have undertaken a Strategic Flood Risk Assessment (SFCA) dated June 2018, in which the above site has been considered.

As stated in the SFCA (Section 2.2), TAN15 gives specific guidance on development plans. Section 10.5 of TAN15 states '*...Allocations should only be made in zone C if it can be justified that a development / use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1.*' Section 10.6 also states '*Where the local planning authority wishes to allocate a site, and can justify such an allocation, the local planning authority will need to undertake a broad level assessment of the consequences of flooding occurring on that site...(which)...should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way...*'

The information contained in the SFCA is not sufficient to fulfil the requirements of section 10 of TAN15 in respect of the above site.

The SFCA (Sections 4.1.6 & 4.1.10) confirms that flood modelling work has demonstrated part of the site to be at risk in both a 1% flood event (with an allowance for climate change) and a 0.1% event. It concludes that to manage this risk in line with TAN15, ground raising could be considered, providing there are no impacts on third parties. In addition, the SFCA considers access / egress matters should a flood event occur, noting that the existing Brandy Bridge over the River Taff is the only route to and from the site. The SFCA recommends that the viability of the Brandy Bridge as a suitable access and egress route should be confirmed further.

We provided comments to Merthyr Tydfil CBC on a draft version of the SFCA in June 2018. In our comments we advised that:

*Should the LPA wish to pursue this site further, additional modelling work will be required for the area of the site affected by flood risk from the River Taff, as identified in Section 4.1.10....it needs to be demonstrated that the less vulnerable development proposed can be delivered in accordance with TAN15 (i.e. that the development remains flood free in a 1% (+25% allowance for climate change) flood event and the flood conditions are tolerable in a 0.1% event, as per A1.14 & 15 of TAN15, with no increase in flood risk elsewhere).*

As a result of our comments, the final version of the SFCA concludes (Section 4.1.11) that:

*Should MTCBC wish to consider this site further as a potential allocation for the Deposit Plan, the following should be addressed as part of a site specific FCA:*

- If less vulnerable development (commercial and retail) is proposed in DAM Zone C2, ensure that the justification test is passed. This should include an analysis of third party impacts and acceptability of flood consequences in line with Table A1.15 of TAN15.*

However, no further information has been provided and therefore, based on the information available to date, it is not possible to conclude that it is appropriate to allocate the site is for 5ha of employment land.

2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

**Policy EcW1: Provision of Employment Land & Allocation EcW1.1**

**Suggested changes:**

As per the above, further information is required in respect of this site, to demonstrate that the risks and consequences of flooding can be properly managed, and therefore that the allocation is appropriate i.e. founded on a robust and credible evidence base, in accordance with national planning policy and deliverable. As stated above, information is required to demonstrate that the proposed employment land can be developed in accordance with TAN15 (i.e. so that the development remains flood free in a 1% (+25% allowance for climate change) flood event and the flood conditions are tolerable in a 0.1% event, with no increase in flood risk elsewhere). We also suggest the LPA give further consideration to the viability of Brandy Bridge as the access / egress route to serve the proposed development.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

We may wish to speak at the Hearing if new information is submitted in response to the representation we have made.

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	n/a
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**3d. If additional documents have been provided to support your representations, please list them below:**

Covering letter and annex setting out matters of clarity.

Once completed please sign and date your representation form:

<b>Signed:</b>	Gemma Beynon	<b>Dated:</b>	07/09/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

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Last Name	
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Address Line 1	
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Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	EcW8
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
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**Policy EcW8: Renewable Energy****Rep:**

We have concerns regarding the Local Search Areas for ground-mounted solar energy. Four Local Search Areas for Solar Energy have been identified; Ffos – y-Fran, North east of Trelewis, Merthyr Road and South west of Merthyr Vale.

The Local Search Areas information acknowledges potential visual impacts, including from the Brecon Beacons National Park for the Merthyr Road area. It also acknowledges that two areas (Merthyr Road & North east of Trelewis) are in/partly in Special Landscape Areas (SLAs). Several are in upland locations, on open access land, where there is very little built development or infrastructure. Therefore, large scale solar development would be in conflict with the relatively remote and undeveloped character. Merthyr Road, and to some extent Ffos-y-fran, are in open upland moorland locations with visibility from high ground, on open access land, with semi-natural vegetation and very limited opportunities for mitigation. The South west of Merthyr Vale area is more of a plateau and currently well screened by forestry. In this area it is acknowledged that there are potential views from elevated locations in SLAs. However, commercial forestry is subject to felling cycles which may impact the screening the forestry provides.

Whilst we understand that these are purely search areas and that individual proposals within these areas will be subject to further consideration to determine their acceptability, we are concerned that no assessment of landscape and visual sensitivity has been carried out to inform these search areas. The landscape and visual sensitivities of parts of these areas are highly likely to restrict the ability to accommodate large scale solar energy in an acceptable way, and may cause conflict between different LDP policies.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

**Policy EcW8: Renewable Energy****Suggested changes:**

We advise that further work is carried out to assess landscape and visual sensitivity to solar farms within the County Borough. The Renewable Energy Assessment Report has followed Welsh Government's 'Planning for Renewable & Low Carbon Energy - A Toolkit for Planners. However, it states that landscape impacts and cumulative impacts have not been considered. In our opinion, a landscape and visual sensitivity assessment is needed to inform the production of robust Local Search Areas in which there is a level of confidence that solar energy development is likely to be acceptable.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

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**3d. If additional documents have been provided to support your representations, please list them below:**

Covering letter and annex setting out matters of clarity.

Once completed please sign and date your representation form:

<b>Signed:</b>	Gemma Beynon	<b>Dated:</b>	07/09/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
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<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	EnW2
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

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## **Policy EnW2: Nationally Protected Sites and Species**

### **Rep:**

We are concerned that there is no mention of European Protected Species, as listed in Schedules 2 and 4 of Conservation of Habitats and Species Regulations 2017.

2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

## **Policy EnW2: Nationally Protected Sites and Species**

### **Suggested changes:**

We suggest the following amendments to policy EnW2 and its explanatory text to reflect the requirement for a development proposal to demonstrate that it will maintain the favourable conservation status of a European Protected Species (new text in red font);

In the second numbered list -

1. The population **size**, range, distribution and **long-term prospects** of the species will not be significantly adversely impacted

And,

4. Appropriate **conservation, enhancement**, avoidance, mitigation and compensation measures are provided.

Section 6.7.12 –

**‘...Protected species are those detailed within the **Schedules 2 and 4 of Conservation of Habitats and Species Regulations 2017, the Wildlife and Countryside Act 1981 (as amended...)****’

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Policy number (including site allocation number if appropriate)	EnW4,
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

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## **Policy EnW4: Environmental Protection (Part 1- Water Quality)**

### **Rep:**

Whilst we fully support the inclusion of the environmental protection policy EnW4, we are concerned that unlike the current LDP (2006-2021), the policy contains no provision to improve water quality.

Figure 1: Summary of key issues for the LDP to address states that *'Improvement is needed to ground, surface and water bodies in particular The Nant Morlais, due to a decline in water quality'*.

In addition, we note Objective 13\* of the Sustainability Appraisal, which is *'To minimise the demand for water and improve the water environment'*.

However, contrary to Section 5.12 of the Sustainability Appraisal Report, which states *'The Deposit Plan has planned for water efficiency, as well as ensured that water quality can be maintained and enhanced in the plan area'*, there appears to be no provision for securing enhancements to water quality within the Plan, as currently drafted. The LDP objectives, identified to address the key issues (Deposit Plan Section 3.5), do not include an objective to improve water quality and there is no Development Management Policy proposed. Furthermore, in respect of Site 121 (including Candidate Site 86): Bradley Gardens Two, the Sustainability Appraisal Report actually concludes that *'Two water-courses run through the site. The site option may lead to minor negative effects on water quality'*.

The latest published data we hold is the 2015 Cycle 2 classification data. For Merthyr Tydfil this shows that all 5 River and 2 lake surface water bodies are failing to meet good status as required by the Water Framework Directive - Directive 2000/60/EC. In terms of groundwater, while the quantity is classed as being good, the quality is classed as poor for a large proportion of the area.

We believe the planning system has a fundamental role to play in helping to achieve the objectives of the Water Framework Directive, not just in protecting waterbodies i.e. no deterioration but in providing enhancements, in order to help achieve Good Status in the future. There are numerous ways in which the planning system can help to secure water quality enhancements as part of development proposals (where practicable), for example: removal of obstructions to fish passage (weirs / culverts etc); removal / prevent spread of non-native species; provision of dedicated river access point(s), with appropriate fencing elsewhere to prevent stock / people / dogs accessing watercourses and causing disturbance to the bed and banks, damaging vegetation and releasing silt; and tree / vegetation planting / bank stabilisation works to reduce erosion and silt delivery to watercourse.

The current LDP addresses water quality improvements through Policy BW8, which states:

### ***Policy BW8: Development and the water environment***

#### ***Proposals for built development will only be permitted where:- <...>***

- they do not have an adverse effect on the quality and/or quantity of surface waters or groundwater resources, and where opportunities exist, they incorporate measures to improve existing water quality; and...***

2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

#### **Policy EnW4: Environmental Protection (Part 1- Water Quality)**

##### **Suggested changes:**

In our opinion, policy EnW4 requires amendment (with additional supporting text that is locally distinctive to Merthyr Tydfil, as indicated above) to address this omission and provide a mechanism to secure water quality improvements as part of future development proposals, wherever practicable, and therefore enable what has been identified as a key issue to be addressed. In seeking this amendment, we are satisfied there is no duplication of National policy. Planning Policy Wales, Edition 9, dated November 2016, simply states under Figure 13.1 that *'LDPs should establish land-use planning policies which contribute to minimising and managing environmental risks and pollution. They should formulate policies relating to flood risk and climate change, contaminated and unstable land, air and water quality, noise and light pollution'*. Furthermore, we believe this matter needs to be addressed in the overall context of delivering the sustainable development duty placed on all public bodies by the Well-being of Future Generations (Wales) Act 2015 and the provisions of the Environment (Wales) Act 2016.

**\* We note an error on page 204 of the SAR, whereby Objective 13 is incorrectly quoted as Objective 14.**

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I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

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Covering letter and annex setting out matters of clarity.

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<b>Signed:</b>	Gemma Beynon	<b>Dated:</b>	07/09/2018
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Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
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#### **Policy EnW4: Environmental Protection (Part 2- Flood Risk)**

**Rep:**

We are concerned that this policy, as currently drafted is contrary to Technical Advice Note 15 (TAN15): Development and Flood Risk, July 2004.

ENW4 states that ‘...*In respect of flood risk, new developments will be expected to avoid unnecessary flood risk...*’ The explanatory text in Section 6.7.24 states that ‘*Avoiding unnecessary flood risk will be achieved by strictly assessing the flood risk implications of development proposals within areas susceptible to fluvial flooding and preventing development that unacceptably increases risk*’ (emphasis added).

However, TAN15 is clear that for new development to be acceptable, there should be ‘no flooding elsewhere’.

2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

#### **Policy EnW4: Environmental Protection (Part 2- Flood Risk)**

**Suggested changes:**

Policy EnW4 should therefore be amended to accord with TAN15. We suggest the following amendments:

EnW4

‘...*In respect of flood risk, new developments will be expected to ~~avoid unnecessary flood risk and meet the requirements of TAN15...~~*’

Section 6.7.24

‘~~Avoiding unnecessary flood risk will be achieved by strictly assessing t~~ *The flood risk implications of development proposals within areas susceptible to fluvial flooding **will be strictly assessed** and ~~preventing development that unacceptably increases risk.~~ In accordance with TAN15...*’



If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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<b>Signed:</b>	Gemma Beynon	<b>Dated:</b>	07/09/2018
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## ANNEX 1- Matters of Clarity

**The below annex sets out matters of clarity that we have identified. These do not form part of the written representations included in the submitted forms and are not matters of soundness. Instead, we suggest the edits below to help improve the clarity and coherence of the plan. These have been set out in the order of the policies in the plan document in order to aid you with your considerations. We also provide separate advice on green infrastructure at the end of the annex.**

Please note, there appears to be two sets of paragraphs numbered 6.7.6 and 6.7.7 on pages number 48 and 49. The first set do not appear to follow the numbering convention for that section of the plan. We recommend that this is amended as it could cause confusion.

### **Policy SW10: Protecting and Improving Open Spaces**

We recommend that the wording of this policy is amended in order to provide a clear explanation of how the policy will achieve its purpose of 'Improving' Open Spaces. As currently drafted, the policy is limited to protection of open spaces only.

### **Policy SW11: Sustainable Design and Placemaking**

This policy sets out how development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design and includes a list of 10 requirements. We advise that 'colour' should be added to the list in requirement number 1 as this is appropriate to local context.

We also provide further detail on Green Infrastructure (GI) below.

### **Policy CW1: Historic Environment**

#### **Section 6.6.10**

This section states that green infrastructure and historic and cultural assessments should be used to identify and better understand historic landscapes to ensure their qualities are protected and enhanced. We advise that 'landscape character assessments' should be added to this list.

#### **Section 6.6.15**

This section references buildings, structures and archaeological remains of local interest which are not on the statutory lists. We advise adding Parks and Gardens and Historic Landscapes of local interest to this local list.

### **Policy EnW1: Nature Conservation and Ecosystem resilience**

We suggest further detail is provided in the explanatory text for this policy on what is meant by ecosystem resilience. This could include detail on where consideration of the four aspects of resilience (extent, diversity, connectivity and condition) can be taken into account. We also recommend that reference should be made to green infrastructure strategies and Area Statements when discussing ecosystem resilience. This will help the understanding of the existing ecosystem benefits delivered by, and within, a place to inform decisions on directing the right development to the right locations, and how nature-based solutions should

be considered to help ensure the resilience of ecosystems and new development. In setting out the biodiversity value of the proposed development site against the development need, reference should be made here to the need to consider both the inherent value of biodiversity and ecosystem resilience and the context of wider ecosystem services values, both financial and as public goods.

The explanatory text needs to consider GI provision in more detail. Currently, it implies that GI is only relevant when there are ecological interests on the site, whereas some sites may be positioned to form an important role in ecological connectivity and GI could be enhanced to deliver robust and beneficial outcomes. We provide further advice in relation to GI below, as this may be applicable to a number of policies.

#### Section 6.7.6

More detail should be included here to specify how the 'biodiversity value' of a site is established. We advise it is specified that it's likely that surveys will be expected from applicants to establish 'biodiversity value' and that these should be undertaken by suitably qualified ecological consultants and according to CIEEM guidelines. Your in-house ecologists will be able to advise on the scope of surveys necessary for a particular development.

#### Section 6.7.7

Reference should be made to the site being important because it supports a particular species or assemblage. It would also be useful to define the term 'stepping stone', in reference to habitat connectivity, species dispersal and so on, and to clarify what is meant by 'designated site' i.e. national, local or both.

#### Section 6.7.8

As mentioned above, the term 'biodiversity value' needs to be defined. This paragraph also implies that some sites have no biodiversity value. With the exception of some very rare cases, sites will contain some ecological interest - it is more a question of how much interest they contain, rather than whether or not they contain any.

#### Section 6.7.9

We advise the following amendments to this section;

*"....Compensation should ~~ideally~~ be located as close as possible to the original site and be on a like-for-like basis. Mitigation measures and compensation sites should be chosen so that they are **located appropriately to provide for ecological connectivity and resilience** and serve to maintain **and enhance** biodiversity features or resources".*

It would also be helpful to define what is meant by 'like-for-like' compensation. As an example, if 2ha of a particular habitat were to be lost as a result of development and the developer were to offer a 2ha field for habitat creation as compensation, it is unlikely that they will manage to create 2ha of the habitat lost in the 2ha field they have to work with. It may be the case that more land is required to successfully deliver 'like for like' compensation - for a loss of 2ha of species rich habitat, it may be that 4ha of land that is less species rich is required. The LDP should account for this, as habitat creation measures very rarely can be 100% guaranteed. It should also be noted that like-for-like compensation should be a minimum requirement, developers should not be discouraged from offering more than the minimum.

#### Section 6.7.10

The wording of this section needs to be clearer. It is confusing in that it seeks to set out a position regarding enhancement and then jumps to mitigation. This section states that the

level of enhancement should be commensurate with the level of impact. This suggests that major impacts schemes should also be subject to significant enhancements, which we agree with. However, we are concerned that as currently worded, it could deter developers from seeking to undertake enhancements when the impacts from their schemes are not significant.

We advise that '*nearly always*' is removed from the first line of this section, as it is always possible to provide enhancement on development sites. Also, the list of examples should be prefaced by the word 'enhancements' rather than 'mitigation features'.

We also advise that the paragraph should reflect that native planting schemes should be considered best practice and therefore not be listed as an enhancement.

## **Policy EnW2: Nationally Protected Sites and Species**

### **Section 6.7.12**

We recommend that this paragraph is re-worded to be more specific about the special interest of the two SSSI's that are present in Merthyr Tydfil County Borough. The site names should be listed in full for clarity: 'Cwm Glo a Glyndyrys SSSI' and 'Cwm Taf Fechan Woodlands SSSI'.

Also, the description for the two sites is too generic and could be misinterpreted as species are mentioned, some of which are site features and others are not. It would be better to include a sentence or two from the citation for each site:

Cwm Glo a Glyndyrys SSSI: Cwm Glo a Glyndyrys is of special interest for its extensive areas of marshy grassland, species-rich neutral grassland and acid grassland, and for the association of these habitats with others including woodland and heath. It is also of special interest for its outstandingly diverse assemblage of grassland fungi, including 32 species of waxcap *Hygrocybe* spp, making it one of the best sites in Britain.

Cwm Taf Fechan Woodlands SSSI: Mixed deciduous woodlands cover steep slopes and spoil from quarries with one of the few Glamorgan stations for *Gymnocarpium robertianum*. There are interesting plant communities in flushes around tufa springs and luxuriant growths of bryophytes in the splash zone of the river.

Where it is written; '*These sites are protected by national legislation...*' it would be preferable to specify the legislation, which is the Wildlife and Countryside Act 1981 (as amended).

### **Section 6.7.13**

As you are aware NRW normally only provide advice in respect of matters that are included on our Development Planning [checklist](#) and so will not be providing advice on all cases being considered under this policy. The wording of this section needs amendment to reflect the fact that there is an obligation on the LPA to seek to address the conservation of these species with or without our advice. We suggest the following wording:

'...When assessing any development proposal which if carried out would be likely to result in harm to a protected species or its habitat, **if Natural Resources Wales has provided advice in relation to the proposals**, the Council will be guided by **its** advice ~~received from Natural Resources Wales.~~

### **Section 6.7.14**

This paragraph is confusing and seems to introduce conflict with previous statements made e.g. 6.7.12 ‘...there is a presumption against development likely to damage a SSSI.’ There is suggestion in this section that when the importance of a development is being ‘weighed up’ against the importance of conservation value of a protected site / species, that the site / species will still be maintained and enhanced. However, the implication of the development is that the site / species is liable to be damaged or lost and therefore, it is unclear how there can be a stated objective to preserve / enhance. We advise that this is re worded.

### **Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation and Priority Habitats and Species**

We recommend that the following text, highlighted in red, is added to the wording of this policy, in order to clarify that it also includes features of Regionally Important Geological Sites.

*“4. The development maintains and where possible enhances biodiversity **and/or geodiversity** interests.”*

*“6.7.19 As stated above it is nearly always possible to provide biodiversity **and/or geodiversity** enhancement on development sites. Development proposals should therefore demonstrate how biodiversity **and/or geodiversity** interests will be maintained and where possible enhanced. Levels of mitigation and compensation should be appropriate and proportionate with the level of adverse impact and the scale of development.”*

### **Policy EnW4: Environmental Protection**

We note that this policy encourages consideration of a developments potential to pollute. We suggest that the explanatory text explicitly mentions SuDS, as this would encourage the long-term reduction of diffuse pollution. We consider diffuse pollution to be one of the biggest factors impacting the water quality in the River Taff and as a major urban area, we believe that the importance of Sustainable Drainage should receive emphasis in this plan.

### **Monitoring Framework**

page 119, Ref No. 5.3

We recommend that you amend the Indicator, Target and Trigger Point text to remove references to meeting TAN15 tests, as TAN15 is clear that highly vulnerable development should not be permitted in zone C2; the justification tests are not applicable.

page 123, Ref No. 9.1-9.3

We recommend that you amend the Indicators for 9.1-9.3, as LDP Objective 10 is to improve ecosystem resilience and connectivity, however indicators 9.1-9.3 are all designed to measure harm / loss. Therefore, it is unclear how it will be possible to determine if the objective to ‘improve’ is being met.

### **Green infrastructure (GI)**

GI has the ability to deliver space for recreation, clean air and water, transport corridors for cycling and walking, resilience against effect of climate change such as flooding and heat, as well as providing important spaces for nature.

We note GI is listed as one of the key objectives for the LDP. However, although it is referred to in the LDP, the multidisciplinary aspect of green infrastructure isn't discussed fully in a specific policy.

We note that GI is mentioned in Policy SW11: Sustainable Design and Placemaking and it states that;

*"....Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. New development will be required to:.....*

*4. contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected."*

However, there is no context as to what green infrastructure is or what is expected of the developer. We advise that this is expanded and some examples included of what would be expected, as a minimum, within developments. A list of enhancements features is listed on page 49, something similar could be applied to GI. We recommend that references and information on GI are included and fleshed out within the document.



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Tom"/>	<input type="text"/>
Last Name <input type="text" value="Clarke"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="National Planning Adviser"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Theatres Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	SW13
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
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The Trust is supportive of this policy, and welcomes reference that it applies to cultural facilities within the supporting text.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

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**3c. If this representation represents a petition, please indicate how many people it represents:**

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**3d. If additional documents have been provided to support your representations, please list them below:**

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Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	30/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title <input type="text"/>	Mr <input type="text"/>
First Name <input type="text"/>	Peter <input type="text"/>
Last Name <input type="text"/>	Waldren <input type="text"/>
Job Title (where relevant) <input type="text"/>	Director <input type="text"/>
Organisation (where relevant) <input type="text" value="Marvel Ltd"/>	WYG <input type="text"/>
Address Line 1 <input type="text"/>	<input type="text" value="REDACTED"/>
Line 2 <input type="text"/>	<input type="text" value="REDACTED"/>
Line 3 <input type="text"/>	<input type="text" value="REDACTED"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text"/>	<input type="text" value="REDACTED"/>
Telephone No. <input type="text"/>	<input type="text" value="REDACTED"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>

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**Representor ID Number\* (if relevant)**

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy EcW7 (Tourism, Leisure and Recreation Development) and associated Policy SW4 (Settlement Boundaries)
<b>Page/Paragraph number</b>	6.8.56 and 6.5.32
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

The proposed draft tourism, leisure and recreation Policy EcW7 states:

*"Tourism, leisure and recreation development within settlement boundaries is generally supported, particularly where they aid the revitalisation and regeneration of the Town and Local Centres.*

*Low-impact tourism, leisure and recreation development outside settlement boundaries will be favoured provided the need for a 'countryside location' is fully justified, it minimises environmental impacts and is of an appropriate scale to its surroundings".*

Marvel Ltd object to the policy wording on the following grounds. The use of the terminology 'low-impact tourism, leisure and recreation' fails to appropriately acknowledge the fact that many forms of tourism, leisure and recreation use, which may be classified as having a greater than 'low' environmental impact, could also be acceptable in countryside locations in certain circumstances. Such circumstances include scenarios where proposals result in a significant, positive impact (e.g. on the local economy) but where the type/size/scale of the development makes a town centre or 'in-settlement' location inappropriate.

The policy wording and the definition 'low-impact tourism, leisure and recreation' provided in paragraph 6.8.56 effectively precludes many types of development. Such development may result in some (acceptable) degree of diminution in environmental quality. It may have an international, national or regional focus, with local community benefit being secondary to that. It may not be able to be removed without leaving a permanent trace or have a degree of landscape impact. Due to the inflexibility of the current wording, all such development, and associated investment and spin-off benefits, would effectively be precluded by Policy EcW7 and its supporting text.



Marvel Ltd consider that the requirements of the Wellbeing of Future Generations Act (particularly the goals of achieving “a prosperous Wales”, “a resilient Wales”, “a healthier Wales”, “a more equal Wales”, “a Wales of vibrant culture” and “a globally responsible Wales”) are not recognised by the current wording. Furthermore, the Merthyr Tydfil County Borough Council Destination Management Plan 2015 – 2018 (DMP) makes no reference to or differentiation between ‘low impact’ and other forms of tourism, leisure and recreation. The DMP aspires to Merthyr Tydfil becoming a ‘first class tourism destination’ (page 4), not a ‘low impact only tourism destination’ and Section 6 includes the management / development the tourism infrastructure, broadening the development of activity tourism attractions and outdoor providers to enhance the region’s offer and encourage substantial inward investment into the area. The preclusion of all but ‘low impact’ tourism, leisure and recreation is clearly inconsistent with this existing strategy.

Further to the above, the appropriateness of the term ‘appropriate scale to its surroundings’ (in policy EcW7 and paragraph 6.8.56), is also considered inappropriate. The wording as currently drafted fails to consider new development in the authority area which is unparalleled in type and scale due to specific format requirements.

In view of the above comments, Marvel Ltd object to the current wording of Policy EcW7 and paragraph 6.8.56 (and associated cross reference in Policy SW4 and paragraph 6.5.32). The plan as currently drafted therefore fails to fit with other policies, plans and strategies or to be sufficiently flexible (soundness tests 1 and 3).

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Please find the proposed re-wording of Policy EcW7 below:

*"Tourism, leisure and recreation development within settlement boundaries is generally supported, particularly where they aid the revitalisation and regeneration of the Town and Local Centres.*

~~*Low impact*~~ *Tourism, leisure and recreation development outside settlement boundaries will be favoured provided the need for a 'countryside location' is fully justified, it minimises environmental impacts and is of an appropriate scale to its surroundings".*

Please find the proposed re-wording of the relevant bullet point of Policy SW4 below:

*"is for ~~low impact~~ tourism, recreation or leisure facilities in accordance with Policy EcW7;"*

Paragraphs 6.8.56 and 6.5.32 should be deleted.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a ‘Candidate Site’ earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council’s website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	New policy

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

No reference is made to the role the tourism and leisure industries can play in providing sustainable growth, including economic growth, in the County Borough. Despite the success of Bike Park Wales and Rock UK there is insufficient recognition given to these types of leisure pursuit. This is a serious omission which should be addressed in the emerging LDP (failing soundness test 2).

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).

It is also noted that the Merthyr Tydfil Retail and Commercial Leisure Study focusses on main town centre uses and is quite limited in the scope of its consideration of more novel types of commercial leisure. Theatres, cinemas, ten pin bowling, bingo, health and fitness, restaurants/cafes/pubs/bars and (to a lesser degree) trampoline centres, escape rooms and virtual golf centres are covered. However, hotels and more adventurous forms of leisure are not considered at all, which is a serious omission which should be addressed in the emerging LDP.

While not measurable in the same way as a Sport Wales registered facilities, other facilities can make a valuable contribution to sports provision, activity and wellbeing. Access to facilities such as swimming and skiing or open access walking would all significantly benefit the health and wellbeing of the local population. The failure to address this specifically in the Deposit Plan is significant.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** *(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).*

Allocation of land within Candidate site 28 specifically for leisure development which requires a countryside location.

A Sustainability Appraisal for this candidate site was included at Appendix A of our representations to the Candidate Sites and Sustainability Appraisals Consultation, dated 24 November 2017. This can be resubmitted if required.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy SW1 – Housing
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	To allocate Rhydycar West for housing
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input checked="" type="checkbox"/>	<b>Comment</b> <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input checked="" type="checkbox"/>	<b>Test 2</b> <input checked="" type="checkbox"/>	<b>Test 3</b> <input checked="" type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

The proposed draft housing Policy SW1 identifies the need to ensure that provision is made for 2,825 additional homes over the plan period. In agreement with the HBF's comments made to the preceding Pre-Deposit consultation, Marvel Ltd concur that the Council should look to identify a greater housing figure, in view of the City Deal and Merthyr's role as the regional centre for the Heads of the Valleys. Equally, in respect to the wider approach to housing allocations, Marvel object to the current and substantial reliance on one regeneration site.

Of the 2,850-target housing figure, Table 1 confirms 572 units are proposed to be accommodated on windfall sites. At 20% of the total housing provision, this is considered to be too high and should be reduced in favour of additional specifically identified deliverable housing allocations. As confirmed by the Housing Supply Background Paper (June 2018), the proposed windfall numbers are based upon an average of windfall sites delivered between 2009 and 2018. This clearly highlights the historic deliverability issues of allocated sites to date, resulting in significant pressure for windfall development. Paragraph 9.2.2. of PPW accentuates the importance in ensuring that allocated sites are deliverable, stating; *"The level of housing provision to be proposed over a plan period must be considered in the context of viability and deliverability"* (WYG underlining). It is considered that inadequate justification for the large windfall assumptions in the Deposit Plan have been provided, and a broader range of allocations should be considered.

Furthermore, Marvel Ltd raise specific concern that 629 units of the proposed housing allocations, are currently allocated in the existing 2011 LDP. The vast majority of these sites have not been developed to date and all are classed as 'Category 3' or 'Category 4' in the latest Joint Housing Land Availability Study (2017) (JHLAS). As confirmed by TAN 1, this categorisation means they are agreed not to be financially viable due to market conditions but are otherwise suitable (Category 3) or are unlikely to be developed due to major physical or other constraints (Category 4). The Deposit Plan itself confirms that further studies / investigation is required to inform whether these sites can be developed. In the absence of evidence to

demonstrate that the 2017 JHLAS is incorrect in the categorisation of these sites and that they are, in fact, 'viable and deliverable' (as required by PPW) the proposed allocation of these sites cannot be based on sound and robust evidence.

Finally, the Local Housing Market Assessment finds that the Town, Penydarren and Cyfarthfa wards (all within the Primary Growth Area) are where demand for social housing is greatest. This should be reflected in the spatial distribution of allocations within the Primary Growth Area, with a greater number of units allocated within those wards with the greatest demand (including Marvel Ltd's land within the Cyfarthfa ward).

On the grounds set out above, it is considered there is a clear need to allocate the Rhydycar West site to provide deliverable homes within a sustainable location, in the regional centre of Merthyr Tydfil.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Allocate candidate sites 5 and 11 to increase the number of deliverable housing allocations to meet at least the 2,825-home target without reliance on JHLAS Category 3 or Category 4 sites.

A Sustainability Appraisal for these candidate sites was included at Appendix A of our representations to the Candidate Sites and Sustainability Appraisals Consultation, dated 24 November 2017. This can be resubmitted if required.



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	SW3.4
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	Brondeg, Heolgerrig housing allocation
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

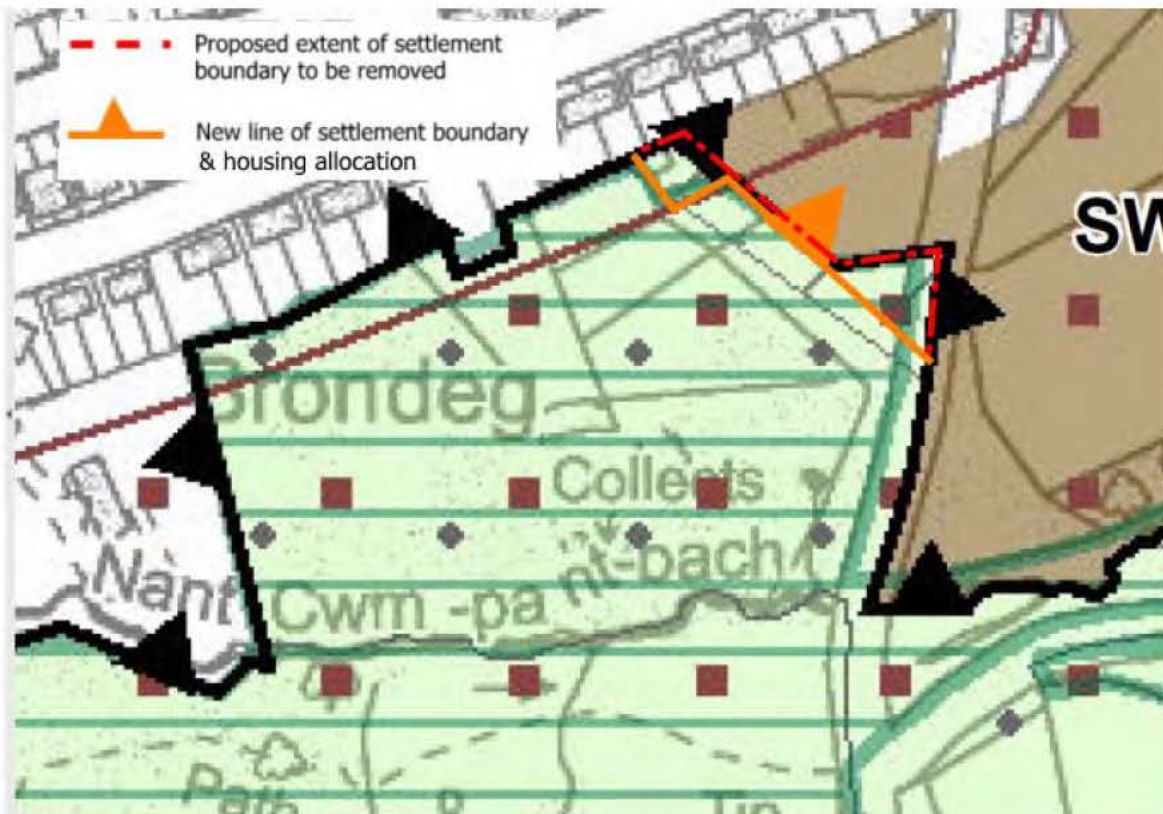
<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input type="checkbox"/>	<b>Comment</b> <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input checked="" type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
<p>Marvel Ltd object to the current configuration of the boundary to the Brondeg, Heolgerrig housing allocation ref: SW3.4 on the basis that it does not reflect the area benefitting from extant outline planning permission (ref: P/06/0061). Specifically, the boundary of SW3.4 would preclude the vehicular link between the east and west parcels of the site granted planning permission.</p> <p>At present, it is evident that the plan does not meet soundness test 2 in that it is not logical, reasonable and does not reflect the relevant evidence (the outline permission).</p>

<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>
<p>Update LDP proposals map as per below showing changes sought to ensure the housing allocation reflects the outline permission (also below) and to amend the settlement boundary to include full (amended) allocation.</p>







**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

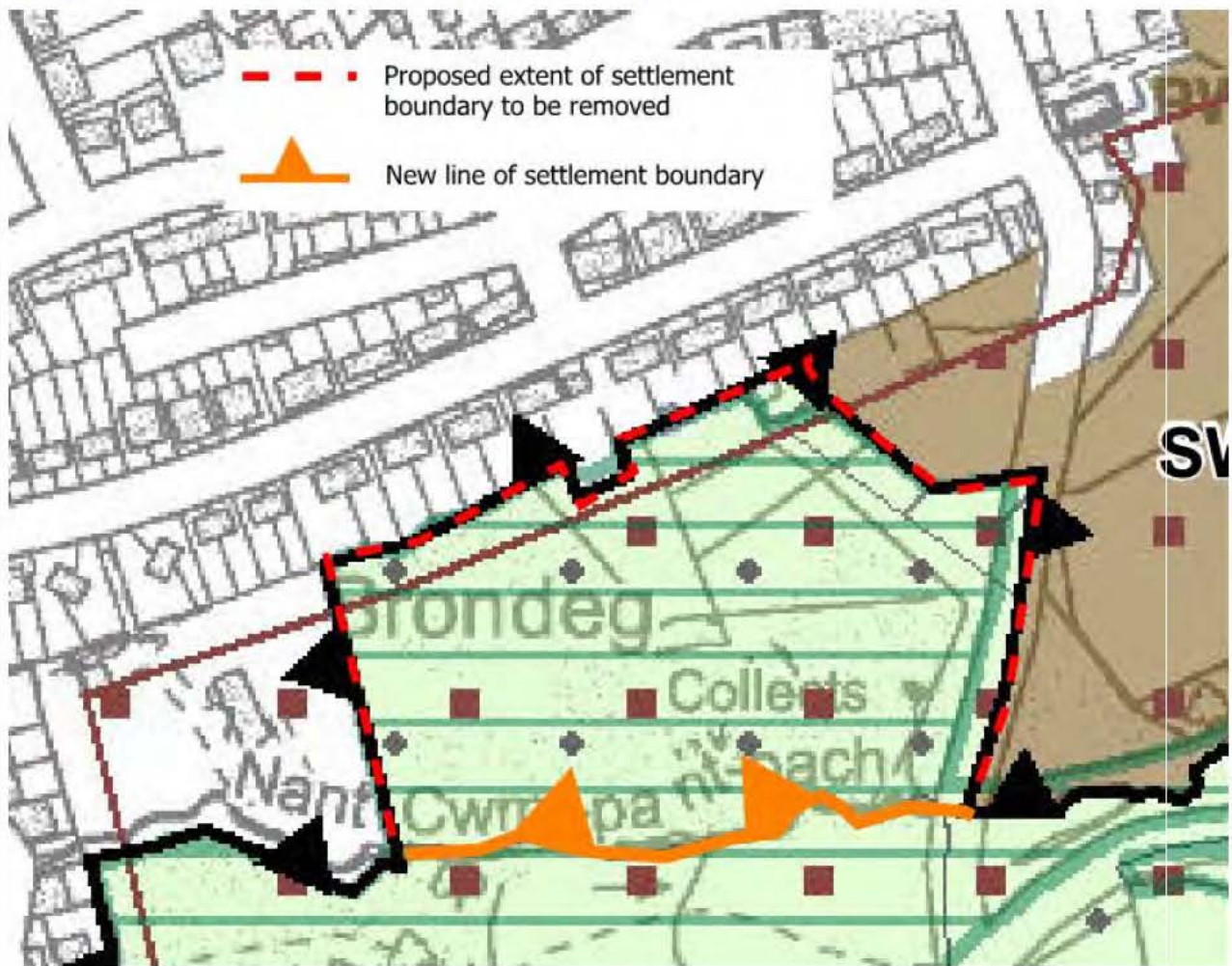
<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy SW3.4 (Brondeg, Heolgerrig)
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	Settlement boundary - Land west of Brondeg, Heolgerrig housing allocation
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input checked="" type="checkbox"/>	<b>Comment</b> <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input checked="" type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
<p>Marvel Ltd object to the exclusion of land west of the Brondeg, Heolgerrig housing site (SW.3.4) from the defined settlement boundary. It is considered that the line of the Nant Cwm-Pant Bach watercourse provides a more logical extent to the settlement boundary and that this area of land (currently within the 2011 LDP settlement boundary) forms an appropriate rounding off opportunity to assist in achieving the Council's windfall housing target.</p> <p>As it stands, the Deposit LDP proposals map is deemed unsound in relation to soundness test 2 as the proposed settlement boundary is not logical.</p>
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>

Update proposed LDP proposal map as per extract below.





**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	Extent of SINC allocation
<b>Constraints Map</b>	Extent of SINC allocation
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input checked="" type="checkbox"/>	<b>Comment</b> <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input checked="" type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

<p><b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i></p> <p>On behalf of Marvel Ltd, which has landholdings covered by SINC numbers 12 (Cwm Glo a Glyndryd) and 36 (Rhydycar West), the following comments are made on the proposed revised delimitation of these two SINC's to ensure that only land meeting the criteria set out in "<i>Criteria for the Selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda CynonTaff (The 'Mid-Valleys Area')</i>" is subject to designation.</p> <p>The revised delimitations of these SINC's are shown on the plans below obtained from Merthyr Council. The first plan relates to SINC 12 and the second to SINC 36. Individual changes proposed either by Merthyr Council or by Marvel Limited are indicated with the annotations 'A', 'B', 'C' etc on these maps. These are referred to in the comments below.</p> <p>12. Cwm Glo a Glyndryd</p> <p>The citation for this SINC reads as follows:</p> <p><i>"This SINC contains the Cwm-Glo a Glyndryd SSSI which is of international significance for grassland fungi. Extensive areas of marshy grassland, species rich neutral grassland and acid grassland alongside woodland and heath supporting an impressive variety of protected, rare and uncommon species including marsh fritillary butterfly (Euphydryas aurinia), Great Crested Newt (Triturus cristatus), big blue pinkgill (Entoloma bloxamii) and olive earthtongue (Microglossum olivaceum)."</i></p> <p>As part of the 2017 review process, amendments have been made to this SINC to rationalise it with the statutory SSSI boundary and to exclude areas that clearly do not meet the criteria for inclusion. These revisions exclude land that has been recently developed (e.g. Parc Cwm Pant Bach housing estate – point D on the attached), and areas of private garden and metalled track (e.g. points A, B and E).</p>
--



Marvel Limited supports the revisions made to exclude non-qualifying land at points A-E and G on the attached plan. Marvel Limited would however like to query the expansion of the SINC at points F and H. The sole reason for these amendments would appear to be to rationalise the SINC boundary with the separate SSSI boundary. However the land in question is heavily invaded by Japanese knotweed, with little residual grassland interest, and therefore we question whether they qualify for inclusion either within the SSSI and (by reference to the Mid Valleys SINC criteria) within the SINC.

Marvel Limited further suggests that the continued inclusion of land between points E and F on the attached Plan (outside the SSSI) and extending east above Collier's Row is questionable. This area is shown shaded in solid blue on the plan below. The woodland here is in part of plantation origin (towards the eastern end) and is not well-related to the rest of the site. By reference to H1 of the Mid valleys SINC criteria, we question whether the inclusion of this land can be justified and would ask for it to be removed from the SINC and/or the basis of its inclusion it to be explained prior to any formalisation of the boundary into the Local Plan.

#### 36. Rhydycar Gorllewin / Rhydycar West

The citation for this SINC reads as follows:

*"Very extensive mosaic of ffridd enclosures supporting complex of semi-upland and lowland habitats, partly contained within conifer plantation. Main components are ancient semi-natural woodland fragments, other semi-natural woodlands, wet heathland, dry heathland, marshy grassland and semi-improved neutral grasslands. Also there are some bracken slopes, scrub, small ponds, streams and sections of dismantled railway. There are areas of semi-improved acid grasslands to the south especially. The habitats intergrade to form a complex mosaic, and may therefore also include some small areas of improved or low diversity semi-improved grassland, but any such areas are a very minor component. Great crested newt occurs in small pools; noctule and pipstrelle bats have both been recorded. Nationally rare and scarce invertebrates are varied and common throughout the area."*

We note that no amendments appear to be proposed to this SINC but that it was due for re-survey in summer 2017. Marvel Limited would request to see the results of that survey insofar as that part of the SINC within their landholding.

Marvel Limit would also propose the following revisions to this SINC, indicated as points I and J on the Plan below.

At point I, we note that the northern (south-facing) slope of the cutting within which the access track connecting (via underpass) to Rhyd-y-car is set is included within the SINC. This does not appear logical given the exclusion of the near-identical south side of this cutting. We have suggested a proposed revision to the SINC boundary here (black dotted line) to correct this anomaly.

At point J there is an area of species-poor grassland on top of a former tip which has a species-poor community by virtue of the addition of higher fertility soils during the construction of the A470, and subsequent more recent disturbance in the process of remedial activities on adjoining land to the north. We contend that this area (defined by black dotted lines) does not logically confirm to any of the Mid-Valleys SINC criteria.

In view of the lack of evidence to justify the extended SINC, the Deposit Plan fails to meet the second test of soundness as the change is not supported by robust, proportionate and credible evidence.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**



Amendment of SINC boundaries in respect of points F, H, I and J, referred to above and shown below.



## Cynllun Datblygu Lleol Merthyr Tudful 2016-2031 Merthyr Tydfil Local Development Plan 2016-2031

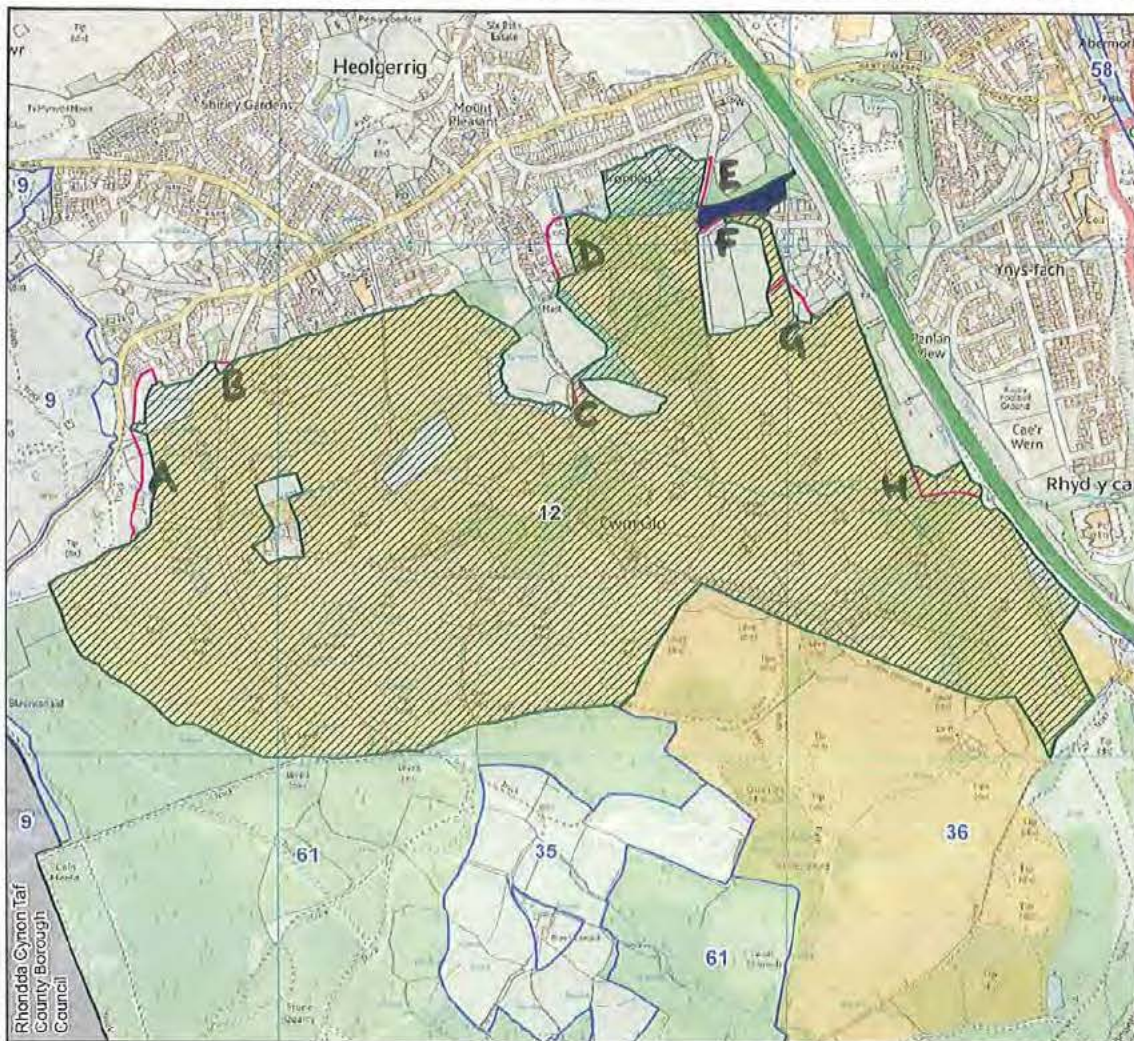
Safle o Bwysigrwydd i Gadwraeth Natur (SBGN) /  
Site of Importance for Nature Conservation (SINC) Number: 12

Enw'r Safle / Site name: Cwm Glo

Ward / Ward: Cyfarthfa / Plymouth

Dwyreiniad / Easting: 303628 Gogleddiad / Northing: 205445

Maint y Safle (Ha) / Site Size (Ha): 127.1



- Ffin SBGN arfaethedig / Revised SINC boundary
- Ffin SBGN presennol / Existing SINC boundary
- Ffin SBGN cyfagos / Neighbouring SINC boundary
- Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) / Sites of Special Scientific Interest (SSSI)
- Ffin Cyngor Bwrdeistref Sirol Merthyr Tudful / Merthyr Tydfil County Borough Council boundary

0 100 200 300 400 500  
Metrau / Metres



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## Cynllun Datblygu Lleol Merthyr Tudful 2016-2031 Merthyr Tydfil Local Development Plan 2016-2031

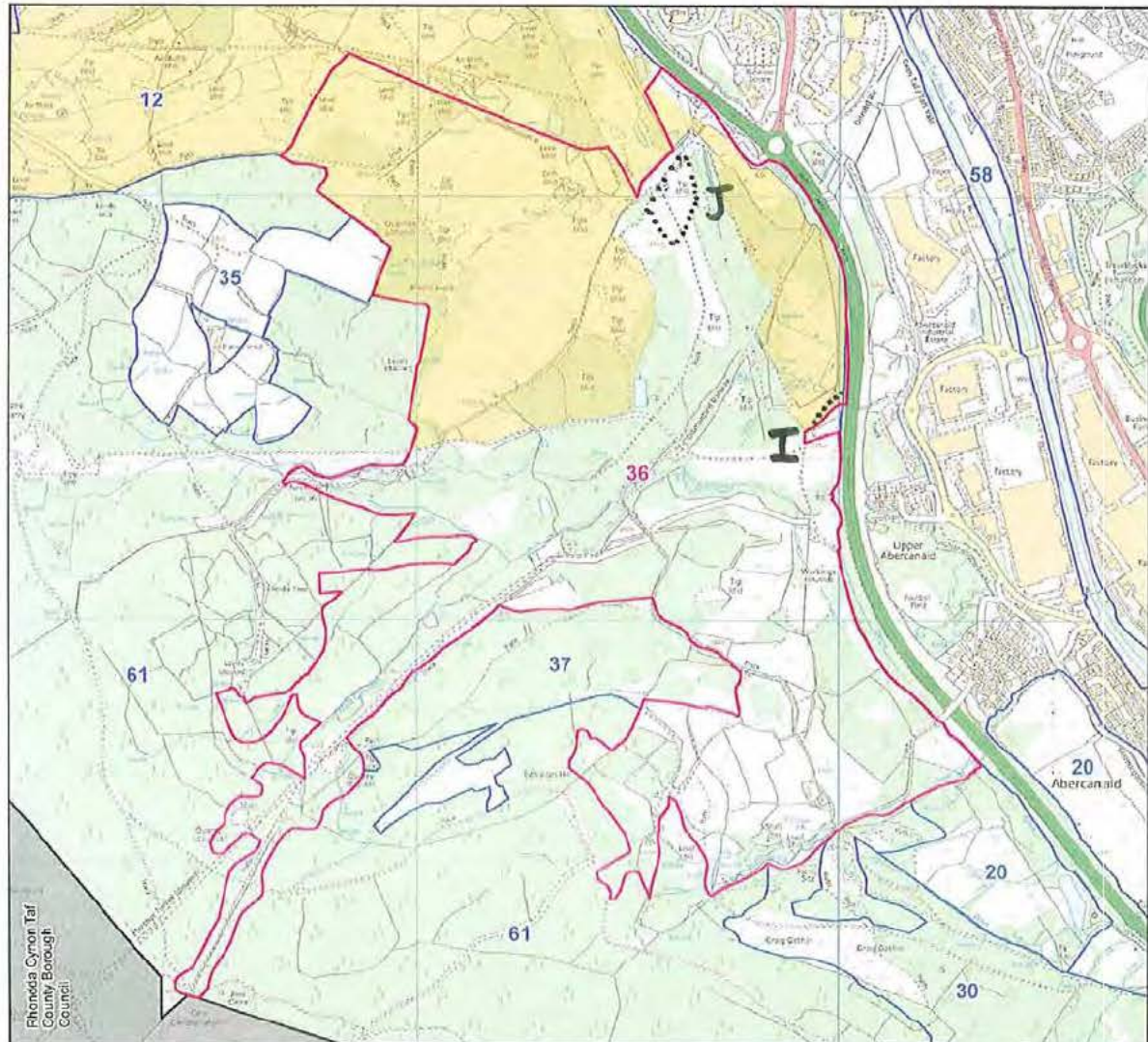
Safle o Bwysigrwydd i Gadwraeth Natur (SBN) /  
Site of Importance for Nature Conservation (SINC) Number: 36

Enw'r Safle / Site name: Rhydycar West

Ward / Ward: Plymouth

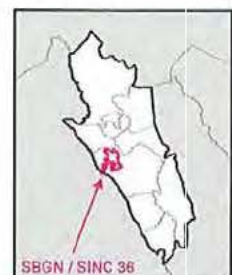
Dwyreiniad / Easting: 304524 Gogleddiad / Northing: 205336

Maint y Safle (Ha) / Site Size (Ha): 177.6



- Ffin SBN presennol /  
Existing SINC boundary
- Ffin SBN cyfagos /  
Neighbouring SINC boundary
- Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) /  
Sites of Special Scientific Interest (SSSI)
- Ffin Cynghor Bwrdeistref Sirol Merthyr Tudful /  
Merthyr Tydfil County Borough Council boundary

0 100 200 300 400 500  
Metrau / Metres



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"Ni chaniateir i chwi gopio, tan-drwyddedu, dosbarthu neu  
werthu y data yma i unrhyw ddyddiad barti mewn unrhyw ffurf"

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy EnW5
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	SLA3
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input checked="" type="checkbox"/>	<b>Comment</b> <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input checked="" type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

Marvel Ltd submitted critical representations in respect of SLA 3 as part of their representations to the Preferred Strategy (dated 5 October 2017). Marvel stand by these representations and consider the SLA Background Paper does not comprise sound evidence on which to base an allocation, contrary to soundness test 2.

From our review of the process of defining the SLAs and the criteria used to identify SLA3 Merthyr West Flank, we conclude:

- 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 rather than focussing on areas of high landscape importance which may be unique, exceptional or distinctive; and
- The description of SLA3 as having a "*a homogenous character of heath, copses, hedgerows individual trees and pasture*", is based on observation "from a distance" and does not recognise the very different character of the landscape in the north of the area, which the SLA Background Paper itself describes as containing "*a complex mosaic of tips, transport features and mine sites intermingled with an upland pasture field pattern*".

The inclusion of the SLA3 area is not justified by the approach adopted and the aspirations set out under Key Policy Issues, Key Management Issues, Contribution to Local well-being goals are not matched by any suggestion for how they may be achieved, given that majority of the area is privately owned and not publicly accessible.

Policy EnW5 does not preclude development within the SLA, only seeking that development must be sensitive to its special characteristics. Development opportunities afforded by the candidate sites 23 and 28 could help deliver many of the policy and management measures set out in the Background Paper, and the potential of the area to contribute to local well-being goals. A management plan for the area's heritage



assets could and would form part of development proposals, as would ecological conservation, enhancement and management.

The designation of SLA3 Merthyr West Flank is not supported by credible evidence, contrary to soundness test 2, and should be deleted.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Deletion of SLA 3 for the Plan.

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	<input checked="" type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

It is considered that the housing, leisure/tourism and environmental matters raised within these representations, particularly matters relating to the potential allocation of the Rhydycar West site to assist with the required housing delivery, calls for our attendance at the examination of the Deposit Plan.

**3c. If this representation represents a petition, please indicate how many people it represents:**

N/A

**3d. If additional documents have been provided to support your representations, please list them below:**

N/A

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	10/09/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Mark	
Last Name	Harris	
Job Title (where relevant)	Planning and Policy Advisor Wales	
Organisation (where relevant)	Home Builders Federation	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone No.		
Email Address		

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

116

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	P.7 Key issues Figure 1
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The list of key issues starts with a very negative point 'A projected population decline from 2024, with the loss of working aged people to elsewhere in the UK.' The HBF would suggest in order to achieve some balance this is followed by wording along the lines of 'The need to provide a sustainable level of housing growth across all types to meet the wider aspirational economic growth plans for the area'.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
Include a further key issue as suggested above.

### Part 3: What happens next?

<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input checked="checked" type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	p.11
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
<p>LDP Growth Strategy</p> <p>The HBF would suggest that that Council should more weight on the impact of City Deal and metro and Merthyr's strong position at the north of the region, in order to support its economic aspirations and proposed housing growth levels.</p>

<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
<p>The HBF suggest that the Council include additional wording to give greater weight to the impact of Cardiff Capital Region City Deal and planned transport investments explaining the link between this and the level of housing proposed.</p>



### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS  
ASSESSMENT**

**RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	SW1: Provision of New Homes
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	Monitoring Framework

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input checked="" type="checkbox"/>	<b>Object</b> <input type="checkbox"/>	<b>Comment</b> <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

<p><b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i></p> <p>The HBF supports the proposed 25% flexibility allowance, both due to the relatively low number of new homes proposed, the reliance on one large regeneration site and the technical difficulties associated with many of the previously developed sites in the Borough.</p>
<p><b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</p>

### Part 3: What happens next?

<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input checked="checked" type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	
<b>Page/Paragraph number</b>	P26 - Table 1
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	Monitoring Framework

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF suggests that it would be clearer if the 25% flexibility was show as a separate figure, as currently it is not clear if it is part of row B – site allocations.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

### Part 3: What happens next?


3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').

3c. If this representation represents a petition, please indicate how many people it represents:	
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3d. If additional documents have been provided to support your representations, please list them below:

Once completed please sign and date your representation form:

Signed:		Dated:	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	6.5.50
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF object to the current wording as we do not consider that it makes it clear that planning obligations will only be required in line with the tests in WG Circular 13/97 which requires them be used to mitigate the impact of the development only. The HBF consider that the current wording suggests all new development will be subject to a S106 agreement.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
Include additional wording as suggested above.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	<input checked="" type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>
The HBF would like the opportunity to discuss the detailed wording of the policy.

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	P 85 General Supporting Information and Assessments
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF suggest that it would be helpful where possible to provide thresholds at which such studies are likely to be required, this will help to provide certainty for developers/ landowners in terms of the potential cost and time associated with bringing sites forward.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>
Provide thresholds for when studies are usually required as suggested above.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	Policy SW7
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF supports the approach taken by the Council with regard to this regeneration site, which is in accordance with recommendations no.6 of the Arcadis report - Longitudinal Viability Study of the Planning Process 2017.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy SW9: Planning Obligations
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
<p>With regard to the first point of this policy which states:</p> <p>1. On site provision of affordable housing on sites of 10 homes or more at an indicative level of:</p> <p>The HBF objects to the word 'indicative' as the word indicative suggest that it could be higher or lower and this does not provide the certainty to developers and landowners required to ensure they are willing to bring land forward.</p>
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>
The HBF requests that the word 'indicative' be changed to 'target', a word agreed in relation to the affordable housing target, as part of a number of recently adopted LDPS.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>
The HBF would like the opportunity to discuss the detailed wording of the policy.

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
---	--

<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy SW11: Sustainable Design and Placemaking
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input checked="" type="checkbox"/>	<b>Comment</b> <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input type="checkbox"/>	<b>Test 3</b> <input checked="" type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF object to the current wording as we consider that it currently suggests that developments are required to meet all of the 10 points listed in the policy. In reality it is unlikely that this will be the case, accordingly the policy should be worded to make it clear that this is not the case.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
The HBF request that the word 'will' should be changed to 'aim'

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
<b>Policy number</b> (including site allocation number if appropriate)	Policy EnW1: Nature Conservation and Ecosystem Resilience
<b>Page/Paragraph number</b>	
<b>Proposals Map</b>	
<b>Constraints Map</b>	
<b>Sustainability Appraisal</b> (please specify page and paragraph)	
<b>Habitats Regulations Assessment</b> (please specify page and paragraph)	
<b>Other</b> (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
<b>Support</b> <input type="checkbox"/>	<b>Object</b> <input type="checkbox"/>	<b>Comment</b> <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
<b>Test 1</b> <input type="checkbox"/>	<b>Test 2</b> <input type="checkbox"/>	<b>Test 3</b> <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF do not consider the use of the term 'Ecosystem Resilience' is clear or well enough explained. This being the case it is difficult to understand and support a policy which requires developments to promote it.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
Consider different wording or provide better explanation.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	87-112 Site details
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF suggests that the site detail constraints included at page 87-112 might be better included in a separate document such as an SPG with just a summary table included in the plan. This would allow the individual site information to become more of a living document which can be kept up to date more easily during the life of the plan. Denbighshire County Council Housing Land Prospectus <a href="#">link to document</a> is an example that the HBF are aware of.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
See comments above.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
---	--

<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Monitoring Framework

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
Ref. no. 5.1 see HBF comments to policy SW11 as currently worded it is unlikely that any development will comply with all 10 points of the policy so monitoring will show a high level of failure. The monitoring requirement would need to be amended if the policy wording is changes as suggested by the HBF.
Ref. no. 6.2 The HBF cannot see any benefit in monitoring this, as it does not relate directly to a policy requirement.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>

### Part 3: What happens next?


3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').

3c. If this representation represents a petition, please indicate how many people it represents:	
--	--

3d. If additional documents have been provided to support your representations, please list them below:

Once completed please sign and date your representation form:

Signed:		Dated:	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Monitoring Framework

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF notes that several the monitoring requirements (1.2,1.3, 1.5, 4.3, 4.4) include breaking the plan period into three phases 2021,2026, 2031. The HBF cannot see any reference to this in any policies or text with the plan document, is there a reason why these have been introduced at monitoring stage.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> <i>(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).</i>
Either remove periods or provide text to explain the periods and what purpose they serve.

### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
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<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Background paper housing land supply and trajectory Para 4.1

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
The HBF suggest cording be added to indicate when the next LHMA is due to be completed and whether or not this will be used to inform the plan. If a new LHMA is due to be completed in the next year then would it not be better to use the most up to date information available.
<b>2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation</b> (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).
Add additional wording to deal with the issue identified above.



### Part 3: What happens next?


<b>3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)</b>	
I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

<b>3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').</b>

<b>3c. If this representation represents a petition, please indicate how many people it represents:</b>	
---	--

<b>3d. If additional documents have been provided to support your representations, please list them below:</b>

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	24/08/2018
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[REDACTED]

Head of Planning and Countryside  
Merthyr Tydfil County Borough Council  
Unit 5, Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

Our Ref: **MTCBC/DLDP/082018**  
Enquiries: Ryan Norman/Rhys Evans

[REDACTED]

31<sup>st</sup> August 2018

Dear Sir / Madam,

**PUBLIC CONSULTATION ON THE REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031**

I refer to your e-mail dated 30<sup>th</sup> July 2018 with regard to the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

We welcome the early engagement taking place between the LPA and Welsh Water. In line with paragraph 6.4.2.17 of the *LDP Manual (Edition 2, August 2015)*, these early discussions have enabled us to advise on the capacity available in our infrastructure where future development growth is proposed.

In line with paragraph 12.1.7 of *Planning Policy Wales (edition 9, November 2016)*, the LPA should develop a strategic and long-term approach to infrastructure provision. Due to the regulatory and financial framework that we operate within, there is the potential for disparity between LDP timeframes and investment in our infrastructure to accommodate growth through our 5 yearly Asset Management Plans (AMP).

Development may therefore need to be phased later in the Plan period to allow the necessary reinforcement works to be delivered through future AMP programmes. Consideration should also be given to the viability of allocations if developers wish to bring forward their site in advance of our capital investment and fund the necessary works themselves.

### **LDP Spatial Strategy**

We note and welcome the Replacement LDP's spatial strategy which focuses on the regeneration of the Hoover Strategic Regeneration Area (HSRA) and the development of other smaller sites across the County Borough.

### **Policy SW1: Provision of New Homes**

In line with the spatial strategy, we support the provision of 2,825 new dwellings over the plan period.

Whilst there may be some water and sewerage constraints that require reinforcement works to our infrastructure, it is unlikely that these will be insurmountable obstacles to the delivery of this level of growth. Detailed comments on the site allocations can be found in Appendix 1.

The whole of the LPA area is served by our Cilfynydd wastewater treatment works (WwTW). There is sufficient headroom at the WwTW presently, though there may come a time towards the latter part of the plan period where reinforcement works are required in order to accommodate the full level of growth proposed.

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 WwTW, an investment scheme will be considered for inclusion within these future AMP programmes.

### **Policy SW3: Sustainably Distributing New Homes**

We are supportive of the distribution of allocations. Whilst there are no significant issues with regard to our infrastructure within the LPA, dependant on the size and scale of allocations we may require developers to undertake hydraulic modelling assessments of our water and/or sewerage networks to determine whether the sites can be delivered and if any improvements are required. Detailed comments in Appendix 1 provides further information.

### **Policy SW4: Settlement Boundaries**

We welcome the inclusion of a settlement boundary policy in order to encourage development in the urban areas. From our perspective, given that our water supply and public sewerage networks are generally more prevalent in urban areas, this means we should be able to support more development as opposed to 'countryside development', though this is not to say we cannot support 'countryside development' – each application will be judged individually.

### **Policy SW6: Hoover Strategic Regeneration Area**

We are supportive of the allocation of this previously developed land as a strategic regeneration area. Given the size of the allocation and the mix of uses proposed, it is likely that hydraulic modelling assessments of both the clean water and sewerage networks will be required to understand whether any reinforcement works/improvements will be required, and to identify potential connection points. Detailed comments can be found in Appendix 1.

**Policy SW7: The Former Ivor Steel Works Regeneration Site**

As with the Hoover Strategic Regeneration Area, given the size of this site, hydraulic modelling assessments of both the clean water and sewerage networks may be required.

**Policy SW9: Planning Obligations**

We understand that the Council's Regulation 123 list includes strategic drainage infrastructure, but welcome the provisions of criteria 4 which will allow for other relevant obligations to be sought.

**Policy SW11: Sustainable Design and Placemaking**

We are pleased to note the inclusion of criteria 4, which requires new development to contribute to sustainable drainage systems where appropriate. Surface water entering the sewerage network can take up a significant amount of capacity, therefore we welcome the requirement of SUDS schemes in new development.

**Policy EcW1: Provision of Employment Land**

We support the provision of employment allocations based in the specific locations. Dependant on the scale and size of the employment proposals, hydraulic modelling of the water supply and/or sewerage networks may be required in order to understand whether any reinforcement works/improvements will be required, and to identify potential connection points.

Dependant on the end user, should any proposal require to discharge trade effluent into the public sewer then the consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the process involved, an element of pre-treatment may also be required.

**Policy EcW8: Renewable Energy**

Whilst we do not have any issue with regard to the specifics of this policy, we would recommend that a criteria is added to ensure that existing services and infrastructure are taken account of in any proposals.

With regard to the sites identified under the **Local Energy Search Area**, where there are any water or sewerage crossings we would seek to ensure that these infrastructure are suitably protected by way of easement widths or diversions.

**Policy EcW11: Minerals Development**

We are pleased to note the inclusion of a criteria ensuring that minerals extraction and associated development will only be allowed where there are no unacceptable impacts on surface water drainage or groundwater resources. We would however welcome the addition of one other criteria in order to ensure that our water and sewerage infrastructure is protected from any development.

**Site Allocation Details - Housing allocations (Policy SW3)**

We note that this section of the Written Statement contains detailed comments from key stakeholders on each of the proposed allocations, received during the Candidate Sites consultation. Whilst we understand this offers the opportunity to give the narrative on any site constraints and

planning application requirements, our preference would be for the Welsh Water infrastructure comments to be amended.

The comments we provide are effectively a snapshot in time and based on the current capabilities of our infrastructure, accordingly there are various factors that can impact on the performance of the infrastructure over time. Given that the LDP plan period extends to 2031, we cannot give assurance that the current capabilities of the infrastructure will remain as set out in Section 8 of the Written Statement.

We are content for general comments to remain, specifically any detail on crossings and the required protection measures, likely requirement for hydraulic modelling and offsite mains/sewers requirements, but would request that any comments relating to the capacity of the networks be removed. Whilst we do not envisage there being any major concerns with regard to the deliverability of the proposed allocations from our perspective, we need to ensure our assets are protected and the information contained within the Written Statement is accurate and up to date.

We would be happy to continue to work with the LPA to produce a statement or specific piece of introductory text regarding Welsh Water infrastructure, and as we have done for other LPAs previously would recommend the production of a Joint Statement of Common Ground for submission when the LPA reaches the Examination stage of the LDP process.

We hope that the above will assist you as you continue to progress the Local Development Plan, and as mentioned above would be happy to continue to work with you as you move forward. If you require any further information then please do not hesitate to contact us on 0800 917 2652 or [forward.plans@dwrcymru.com](mailto:forward.plans@dwrcymru.com).

Yours faithfully,



Ryan Norman  
**Forward Plans Officer**  
**Developer Services**





Ref	Site name	No. of units	Water network	Sewerage network
1	Hoover Strategic Regeneration Area, Plymouth	440	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site works are required to the existing network to accommodate the site.</p> <p>There are numerous water mains crossing the site for which protection measures will be required in the form of easement widths or diversions.</p>	<p>Due to the size of the development a hydraulic modelling assessment will be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate the site.</p> <p>There are numerous sewers crossing the site for which protection measures will be required in the form of easement widths or diversions.</p>
2	Sweetwater Park, Trefechan	10	Site has planning consent	
3	Upper Georgetown Plateau, Cyfartha	50	<p>There are no issues in providing this site with a water supply.</p> <p>The site is traversed by a 600mm trunk water main for which protection measures will be required in the form of an easement width or diversion.</p>	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
4	Brondeg, Heolgerrig	50	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
5	Land at Erw Las, Gellideg, Cyfartha	10	<p>There are no issues in providing this site with a water supply.</p> <p>The site is traversed by a 4" distribution water main for which protection measures will be required in the form of an easement width or diversion.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.</p> <p>The site is traversed by 300mm and 9" combined sewers for which protection measures will be required in the form of easement widths or diversions.</p>

6	Beacons Heights, Cyfartha	20	Site has planning consent.	
7	Winchfawr, Cyfartha	20	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
8	Land south of Castle Park, Twyncarmel	160	There are no issues in providing this site with a water supply.  The site is traversed by an 8" distribution water main for which protection measures will be required in the form of an easement width or diversion.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site, though off-site sewers will be required in order to connect to the existing network
9	Cyfarthfa Mews, Swansea Road	19	Site has planning consent	
10	Trevor Close, Pant, Dowlais	20	There are no issues in providing this site with a water supply.  The site is traversed by a 4" and 160mm distribution water main for which protection measures will be required in the form of easement widths or diversions.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
11	East Street, Dowlais	10	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.  The site is traversed by a 6" foul sewer for which protection measures will be required in the form of an easement width or diversion.
12	St Johns Church, Dowlais	20	Site has planning consent	
13	Victoria House, Dowlais	19	Site has planning consent	

14	Pen-y-Dre, Gurnos	40	<p>There are no issues in providing this site with a water supply, though off-site mains will be required in order to connect to the existing network.</p> <p>The site is traversed by a 450mm trunk water main for which protection measures will be required in the form of an easement width or diversion.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site, though off-site sewers will be required in order to connect to the existing network.</p> <p>The site is traversed by a 225mm combined public sewer for which protection measures will be required in the form of an easement width or diversion.</p>
15	Goetre Primary School, Gurnos	120	<p>There are no issues in providing this site with a water supply.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.</p> <p>The site is traversed by a 225m combined public sewer for which protection measures will be required in the form of an easement width or diversions.</p>
16	Former General Hospital	20	Site has planning consent	
17	Haydn Terrace, Penydarren	40	<p>There are no issues in providing this site with a water supply.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.</p> <p>The site is traversed by a 150mm combined sewer for which protection measures will be required in the form of an easement width or diversion.</p>
18	Former St Peter and Pauk Church, Abercanaid	13	Site has planning consent	
19	Twynyrodyn	150	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site</p>	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site</p>

			<p>works are required to the existing network to accommodate the site.</p> <p>The site is traversed by an 8" distribution main for which protection measures will be required in the form of an easement width or diversion.</p>	<p>works are required to the existing network to accommodate the site.</p> <p>The site is traversed by a 150mm foul sewer, a 150mm foul rising main and the Mountain Hare Sewage Pumping Station (SPS) for which protection measures will be required in the form of easement widths or diversion.</p>
20	Former Mardy Hospital, Twynyrolyn	114	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
21	Bradley Gardens Two, Town	100	There are no issues in providing this site with a water supply.	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site works are required to the existing network to accommodate the site.</p> <p>The site is traversed by a 150mm foul sewer for which protection measures will be required in the form of an easement width or diversion.</p>
22	Former St Tydfils Hospital, Town	50	<p>There are no issues in providing this site with a water supply.</p> <p>The site is traversed by a 5" distribution main for which protection measures will be required in the form of an easement width or diversion.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.</p> <p>The site is traversed by two 150mm combined sewers for which protection measures will be required in the form of easement widths or diversion.</p>
23	Former Miners Hall, Town	12	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.



				The site is traversed by a 225mm combined sewer for which protection measures will be required in the form of easement widths or diversion.
24	Former Ysgol Santes Tydfil, Town	20	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
25	Sandbrook Place	12	Site has planning consent	
26	Project Riverside, Merthyr Vale	153	Site has planning consent	
27	Walters Terrace, Aberfan	23	Site has planning consent	
28	Opposite Kingsley Terrace, Aberfan	12	Site has planning consent	
29	Adjacent to Manor View, Trelewis	248	<p>The site is in an area where there are water supply problems for which there are no improvements planned within our current Capital Investment Programme AMP6 (years 2015 to 2020).</p> <p>The site is traversed by a 24" trunk water main for which protection measures will be required in the form of an easement width or diversion.</p>	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site works are required to the existing network to accommodate the site.</p> <p>The site is traversed by a 6" combined public sewer for which protection measures will be required in the form of an easement width or diversion.</p>
30	Stormtown, Trelewis	80	The site is in an area where there are water supply problems for which there are no improvements planned within our current Capital Investment Programme AMP6 (years 2015 to 2020). In order to establish what would be required to serve the site with an adequate water supply, a hydraulic modelling assessment will be required.	<p>Due to the size of the development a hydraulic modelling assessment may be required in order to determine whether any reinforcement/off-site works are required to the existing network to accommodate the site.</p> <p>The site is traversed by a 225mm combined sewer for which protection measures will be required in the form of an easement width or diversion.</p>

31	Cwmfelin, Bedlinog	50	There are no issues in providing this site with a water supply, though off-site mains will be required in order to connect to the existing network.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site, though off-site sewers will be required in order to connect to the existing network.
32	Commercial Field, Treharris	15	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.
33	Cilhaul, Treharris	30	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site, though off-site sewers will be required in order to connect to the existing network.
34	Oaklands, Treharris	50	<p>There are no issues in providing this site with a water supply.</p> <p>The site is traversed by a 125mm distribution main and a 7" distribution main for which protection measures will be required in the form of easement widths or diversions.</p>	<p>There are no problems envisaged with the public sewerage network for accommodating the domestic foul flows from this site.</p> <p>The site is traversed by a 150mm combined sewer for which protection measures will be required in the form of an easement width or diversion.</p>

10<sup>th</sup> September 2018

Head of Planning and Countryside  
Merthyr Tydfil County Borough Council  
Unit 5  
Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TG

Email: [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk)

Dear Sir/Madam

#### MERTHYR TYDFIL REPLACEMENT LOCAL DEVELOPMENT PLAN 2016-2013

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of 500 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which had annual output valued at £151 billion in 2016. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: [www.mineralproducts.org](http://www.mineralproducts.org).

Further to the consultation on the above document and with reference to our previous representation (August 2017), we have the following comments to make.

Page/Pol/Para	Current Wording	MPA Comment	Required amendment
1.4	Footnote 5	This footnote should be updated to recognize the consultation on PPW V10	Update footnote 5
1.12	Reference is made to PPW and TANs	The plan should also be considered in combination with the Regional Technical Statement (RTS) and MTANs	Include reference to RTS and MTANs.

Page/Pol/Para	Current Wording	MPA Comment	Required amendment
1.13	The Plan identifies the need for a further 2,250 residential properties but seeks provision for 2,825 properties.	No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements.	Consider the implications of additional housing and infrastructure on mineral supply.
2.8	Figure 1 refers to the “protection” of mineral resources	Our previous comments from August 2017 referred to the Sustainable Supply of Minerals. <b>The Council’s Initial</b> Consultation report, acknowledges this approach. The sustainable management of mineral resources, is not solely about protection (minerals safeguarding) of resources but also about the safeguarding of infrastructure and sustainable supply of minerals <b>to meet society’s</b> needs.	Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives (Figure 2).
Page 17 Footnote 27	Footnote 27 refers to a document entitled Merthyr Tydfil: Understanding Urban Character Cadw: 2015	The report referred to, highlights the sources of building stone within the borough. These building stones are important and necessary in order to meet the requirements of Policy CW1: The Historic Environment. These resources are not safeguarded and the provision of such stone not catered for in the minerals policies. It is therefore unclear how the requirements of Policy CW1 can be met.	Amend Policies EcW10 and EcW13 to address the need for the provision and safeguarding of building stone resources and reserves in order to meet the requirements of other policies in the plan.
Policy SW12	Improving the Transport Network	The plan safeguards the route for the dualling of the A465(T) Heads of the Valleys Road and proposes various other transport requirements. However, no assessment is made of the aggregate requirements for the scheme in the plan or in the sustainability report. In order to full consider the implications and requirements of the plan a resources assessment and supply chain considerations should be considered in the plan.	Consider the implications of the proposed transport network improvements on mineral supply.

Policy EcW1	Provision of Employment Land	The development of 36.65ha of employment land will inevitably have a demand on raw materials. No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements	Consider the implications of additional 36.65ha of employment land on mineral supply.
6.8.89	The Role of the Plan	<p>This paragraph sets out four key point in terms of the role of the plan, but does not truly follow the requirements of the current PPW which are outlined in paragraph 14.7.1 of PPW. <b><i>“Development plans should set out the broad strategy for mineral working and related development taking into account the Welsh Government’s policies. They should provide a clear guide to where mineral extraction is likely to be acceptable and include policies which protect sensitive environmental features and provide environmental and resource protection. Policies and proposals should relate to identifiable areas of land unless there is a good reason why this is not possible and should cover mineral resources which are currently used or which may need to be used in the foreseeable future.”</i></b> This should be the recognised role of the plan.</p> <p>Further, and as reflected in the RTS, the planning authority should not rely solely on the annual apportionment, but should consider all factors that may be material to ensuring an adequate supply of aggregates, including</p> <ul style="list-style-type: none"> <li>• <i>The technical capability of one type of aggregate to interchange for another</i></li> <li>• <i>The relative environmental cost of substitution of one type of aggregate by another</i></li> <li>• <i>The relative environmental effects of changing patterns of supply; and</i></li> </ul>	Adapt paragraph 6.8.89 to reflect PPW and reflect the requirements of the RTS and MTAN.



		<ul style="list-style-type: none"> <li>• Whether adequate production capacity can be maintained to meet the required level of supply.</li> </ul> <p>Finally, a review of the RTS is expected to be completed by the end of 2019 and the plan must therefore include flexibility to address any arising supply issues.</p>	
6.8.92	This paragraph states that there is no need for further allocations as the two sites indicated have significant crushed rock reserves	The purpose of this paragraph is not clear. It is the size of an <b>authority's landbank which is</b> relevant in relation to the need for any allocations in its development plan, not the size of the permitted reserve or end date of the mineral permission at any individual site. The paragraph should be re-written to state that the current RTS (2014) did not require any minimum allocation for the Brecon Beacons National Park and Merthyr.	Amend text accordingly
Policy EcW10	Sustainably Supplying Minerals 2 <sup>nd</sup> bullet point states <i>"Maintaining a minimum 10-year landbank of permitted aggregate reserves"</i>	It should be made clear that this bullet point requires the maintenance of a minimum 10-year landbank, throughout the period of the development plan	<i>"Maintaining a minimum 10-year landbank of permitted aggregate reserves throughout the life of the development plan"</i>
Policy EcW10	Sustainably Supplying Minerals	As mentioned above, no reference is made to the supply of building stone to meet the needs of Policy CW1.	Amend Policy accordingly.
6.8.98	This paragraph states that <i>"Merthyr Tydfil has a sufficient landbank to last beyond the plan period"</i>	The requirement in Para. 49 of <b>MTAN 1 is that</b> 'a minimum 10-year landbank of crushed rock shall be required during the entire plan period of each development plan'. The supporting text should reflect that.	Amend text accordingly.
Policy EcW11	This policy states that <b>"Proposals for mineral extraction and associated development will</b>	The is a general acceptance that Local Planning Authorities should plan positively for developments which is echoed in the consultation version of <b>PPW. The word "only"</b>	Delete the word <b>"only"</b> .

	<i>only be allowed:....”</i>	indicates a negative approach to the policy and is unnecessary. Its deletion would infer a positive approach within the policy but would not in fact change the overall policy requirements	
Policy EcW11	The proposed Policy includes a number of Bullet Points referencing Environmental considerations	A strong criticism of many Local Development Plans is that they are often too long and repetitive. A number of <b>the “Environmental Criteria”</b> indicated in the bullet points simply repeat the requirements of other Policies in the plan. The second bullet point repeats the considerations of Policy CW1 (Historic Environment) and EnW1 (Nature Conservation), whilst Bullet Point 3 by EnW5 (landscape). The remaining bullet points are largely addressed through Policy EnW4 (Environmental Protection)	Review the bullet points and delete matters which are more appropriately addressed in the other identified policies in the plan.
6.8.103	This paragraph states that <b>“Mineral</b> extraction can have significant consequences for the environment and <u>on the health and amenity of local communities.</u> (Our underlining)	We are aware that historic research by Newcastle University in to open cast coal extraction, linked airborne emissions, to potential health impacts. We are not aware of any evidence that other forms of mineral extraction (non-energy) are linked to health effects on local communities. The Council should clarify this statement with supporting evidence.	If no evidence linking non-energy extraction to health impacts on local communities can be provided, this paragraph should be amended.
Policy EcW12 :	Mineral Buffer Zones	MTAN 1, para. 70 requires and MPPW make it clear that Buffer Zones are to be established <i>“around permitted and allocated mineral extraction sites”</i> . Policy EcW12 should be amended to accord with that policy requirement.	Amend text accordingly
Policy EcW13	Minerals Safeguarding	The proposed policy seeks only to safeguard aggregate mineral resources and not building stone resources and infrastructure associated with minerals extraction, processing and delivery as referred to in the proposed PPW.	Amend text and proposals map to include minerals infrastructure and building stone.

6.8.113	This paragraph states distances around settlement limits within which minerals development will not be acceptable: - 200 metres in the case of hard rock and 100 metres in the case of sand and gravel.	Stand-off distances for mineral extraction are normally determined through the process of Environmental Impact Assessment. It is unclear whether or not this paragraph seeks to impose a buffer zone around settlements. PPW, supported by subsequent Mineral Plan Inquiries Inspector's reports, is clear in that buffer zones are applicable to mineral extraction operations	Review this paragraph as it is contrary to national policy in PPW.
Page 129	Monitoring Target: -Maintain a 10-year bank of permitted aggregate reserves	This does not accord with MTAN1 which requires a <u>minimum</u> landbank of 10 years during the entire period of the plan.	Amend wording to read <b><i>"Maintain a minimum 10-year landbank of permitted aggregate reserves during the entire period of the development plan"</i></b>
Page 129	Trigger Point: - Less than 10 years.	We are concerned that a trigger point which only comes in to effect once the landbank falls below 10 years will not meet the requirement of PPW, MTAN1 and the RTS. The Mineral Products Association surveys its members annually over the time taken to find, secure and release a mineral reserve. Typically, it takes between 5 and 15 years to convert sites from exploration in to active operational sites, almost three years of which is in the planning process.	The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.

### Proposals Map

The quality of the graphics for the Proposals Map is poor and unclear. It would appear that Vaynor Quarry (limestone) and Gelligaer Quarry (sandstone) are both indicated as coal resources.

The quality of the proposals map needs to be improved.

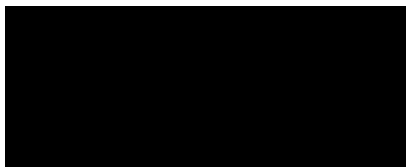
### Summary

Overall, it is disappointing that the comments made in our initial representation from August 2017 have been overlooked by the Council.

There are certain elements in the plan that we do support. We have, however, highlighted specific areas above, where we feel the plan needs further consideration.

We trust the above comments will be given full and proper consideration and would welcome the opportunity to discuss with you, the points raised.

Yours faithfully



Nick Horsley  
Director of Planning



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Michael"/>	<input type="text"/>
Last Name <input type="text" value="Harvey"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Designing out Crime Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="South Wales Police Force"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☒

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	General comments

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick) General Comment</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment x <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
--

As a Designing out Crime Officer working for South Wales Police I am disappointed that no reference is made in the LDP to Designing out Crime, Secured by Design or community safety.

Welsh Government Technical Advice Note (TAN) 12 2016 under paragraph 5.17.2 states:-

"Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.

Paragraph 5.17.3 of TAN 12 states:-

"The Safer Places and Secured by Design Initiative provide recognised standards that have been shown to reduce crime (particularly residential burglary) and the impact of crime upon neighbourhoods. It is desirable for the security of all housing developments, public buildings, and all buildings funded by public bodies, to achieve similar measurable standards."

In addition the Welsh Government produced new guidance in respect of Design and Access Statements in April 2017 highlighting good practice in the production of a DAS.

Under Paragraph v Community Safety in the guidance it states:-

"This section should explain what design measures have been taken to promote safety and security. This may include:

How Secured by Design principles have been considered and details of any consultation undertaken with Designing Out Crime Officers (DOCO)."

In view of the above I would ask that consideration be given for including reference in the LDP to the importance of Designing out Crime and Secured by Design in order to provide safer communities where people want to live, work, socialise etc.

For a development to be sustainable it must be safe and secure. Therefore a paragraph could be included under the heading Sustainable Design and Placemaking on page 37 of the draft Replacement Local Development Plan.

The paragraph could read similar to :-

"For a development to be sustainable it must be safe and secure. The Secured by Design Initiative provides recognised standards that have been shown to reduce crime (particularly residential burglary) and the impact of crime upon neighbourhoods. It is desirable for the security of all housing developments, public buildings, and all buildings funded by public bodies, to achieve similar measurable standards.

A development will only be permitted where it achieves and creates attractive, safe places and public spaces, taking account of Secured by Design principles.”

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** *(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).*

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

--

**3c. If this representation represents a petition, please indicate how many people it represents:**

--

**3d. If additional documents have been provided to support your representations, please list them below:**

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Once completed please sign and date your representation form:

<b>Signed:</b>	Michael Harvey	<b>Dated:</b>	10/09/2018
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The Coal  
Authority

## Replacement Merthyr Tydfil Local Development Plan 2016-2031: Deposit Plan Consultation

### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority



### Date

10 September 2018

### **Background on the Coal Authority**

The Coal Authority is a Non-Departmental Public Body sponsored by the Department for Business, Energy & Industrial Strategy. The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and

ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning

### **Background to Coal Issues in Merthyr Tydfil**

#### Surface Coal Resources

As you will be aware, the Merthyr Tydfil County Borough Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 85% of the Merthyr Tydfil County Borough Council area.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

### Coal Mining Legacy

As you will be aware, the Merthyr Tydfil County Borough Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues.

Within the Merthyr Tydfil County Borough Council area there are approximately 1398 recorded mine entries and around 174 coal mining related hazards have been reported to The Coal Authority. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

### **Comments on the Replacement Merthyr Tydfil Local Development Plan 2016-2031: Deposit Plan**

The comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

### **Representation No.1**

#### **Policy SW4 : Settlement Boundaries**

#### **Test of Soundness**

<b>P1</b>	<b>P2</b>	<b>C1</b>	<b>C2</b>	<b>C3</b>	<b>C4</b>	<b>CE1</b>	<b>CE2</b>	<b>CE3</b>	<b>CE4</b>
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Support** – The Coal Authority is pleased to see that reclamation and/or treatment of unstable land is identified as noted for development proposals within the countryside.

## **Representation No.2**

### **Policy EnW4 : Environmental Protection**

#### **Test of Soundness**

P1	P2	C1	C2	C3	C4	CE1	CE2	CE3	CE4
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Support** – The Coal Authority supports this policy which identifies that development proposals need to demonstrate that land stability issues have been taken into account and that appropriate measures can be taken.

## **Representation No.3**

### **Policy EcW10 : Sustainably Supplying Minerals**

#### **Test of Soundness**

P1	P2	C1	C2	C3	C4	CE1	CE2	CE3	CE4
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Support** – The Coal Authority supports this policy which identifies that mineral resources should be safeguarded from permanent development.

## **Representation No.4**

### **Policy EcW11 : Minerals Development**

#### **Test of Soundness**

P1	P2	C1	C2	C3	C4	CE1	CE2	CE3	CE4
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Support** – The Coal Authority supports the inclusion of this policy which sets out criteria against which proposals for mineral extraction will be considered.

## **Representation No.5**

### **Policy EcW13 : Minerals Safeguarding**

#### **Test of Soundness**

P1	P2	C1	C2	C3	C4	CE1	CE2	CE3	CE4
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**Support** – The Coal Authority supports this policy which identifies that new development in an area of known mineral resource, as identified on the proposals maps, will need to comply with the listed criteria.

## **Representation No.6**

### **Housing Allocations**

#### **Test of Soundness**

<b>P1</b>	<b>P2</b>	<b>C1</b>	<b>C2</b>	<b>C3</b>	<b>C4</b>	<b>CE1</b>	<b>CE2</b>	<b>CE3</b>	<b>CE4</b>
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Comment - The Coal Authority is pleased to see that consideration of these sites has included the risks posed by past coal mining activity and the allocation text for each site identifies if it is in a Development High Risk Area and if so that a Coal Mining Risk Assessment is required.

#### **Conclusion**

The Coal Authority welcomes the opportunity to make these comments. The Coal Authority wishes to continue to be consulted both informally if required and formally on future stages.

Regards



**Melanie Lindsley** *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*  
**Development Team Leader**

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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**PART 1: CONTACT DETAILS**

Personal Details		Agent's Details (if applicable)
Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rhian"/>	<input type="text"/>
Last Name	<input type="text" value="Kvte"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Head of Planning and Regeneration"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Caerphilly County Borough Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No.	<input type="text" value="REDACTED"/>	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i></b>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
--



Please see attached representation (Appendix 1)

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Please see attached representation (Appendix 1)

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

--

**3c. If this representation represents a petition, please indicate how many people it represents:**

--

**3d. If additional documents have been provided to support your representations, please list them below:**

Attached representation (Appendix 1)

Once completed please sign and date your representation form:

<b>Signed:</b>	<i>Rhian Kyte</i>	<b>Dated:</b>	10/9/18
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## **Appendix 1 - Representation on Merthyr Tydfil County Borough Council Deposit Replacement Local Development Plan**

Thank you for providing us with the opportunity to comment on the Merthyr Tydfil Deposit Local Development Plan. As a neighbouring local authority, Caerphilly County Borough Council wishes to make the following comments on the Deposit Replacement LDP.

### **Introduction**

Merthyr Tydfil County Borough Council has commenced work on a First Replacement Local Development Plan (LDP) to cover the plan period 2016 to 2031. It is stated in Paragraph 1.14 that once adopted, this replacement plan will form part of the statutory development plan for the area and will replace the existing LDP (2006-2021), adopted in May 2011.

### **Context (Support)**

Merthyr Tydfil CBC forms part of the Cardiff Capital Region. In January 2018, the Regional Cabinet agreed that work should commence on a Strategic Development Plan (SDP) for the area. The reference to the SDP in paragraph 2.10 is welcomed, as is the commitment from Merthyr Tydfil CBC that they will play a part in regional planning.

### **Level of Population and Dwelling Growth (General Comment)**

The Deposit Replacement LDP identifies a 'Sustainable Population Growth Option' as the preferred option for population and housing growth. This growth option would result in population growth of 8% in the plan period to nearly 64,000 and a requirement of 2,250 new dwellings (150 per annum). This level of growth is slightly higher than historic build rates and would seek to address issues facing the County Borough, including a reduction in the out-migration of working age population.

A range of population and dwelling growth scenarios have been tested and are evidenced in a Background Paper on Population and Housing Requirements, which clearly explains the rationale for the level of growth proposed, and the reasons why it is not appropriate to use the 2014 based population and household projections as the basis for growth, nor to continue the existing high growth strategy, which is unlikely to be delivered.

Caerphilly CBC have no concerns with the level of growth proposed in the Replacement LDP. Furthermore, we welcome the reference to the level of growth within the context of other plans, programmes and strategies including the Cardiff Capital Region City Deal.

### **SW12 Improving the Transport Network (Support/General Comment)**

Caerphilly CBC support the proposals set out in Policy SW 12 to 'Improve the Transport Network' as this will improve connectivity between Merthyr Tydfil and neighbouring areas, including Caerphilly County Borough.

It is noted, however, that the route of the safeguarded route of the Cwm Bargoed rail line and rail head (SW12.6) is not identified on the proposals map.

**Proposed change** – Identify the safeguarded route of the Cwm Bargoed rail line and rail head on the proposals map.

### **Green Wedges (Paragraph 6.5.29) (Object)**

The adopted Merthyr Tydfil Local Development Plan (2011) includes a Green Wedge designated under Policy AS5 between Trelewis and the settlement of Nelson, which is situated within Caerphilly County Borough. This green wedge was not originally designated within the Deposit LDP 2006-2021, but was subsequently included as a Focussed Change following representations made by Caerphilly County Borough Council at Deposit stage. The Inspector supported this proposed change, stating that the designated areas, including at Trelewis/Nelson, are soundly based and that the *“designations have been informed by the approach proposed in neighbouring LDPs.”*

As part of the Preferred Strategy consultation, Caerphilly CBC raised concerns about this issue, which is inconsistent with the approach of neighbouring authorities. However, paragraph 6.5.29 of the Deposit Replacement LDP indicates that the LDP does not include green wedge designations within the Plan, as strong settlement boundaries are considered to be a sufficient mechanism to avoid urban coalescence. This decision is supported by a Background Paper on the Review of Green Wedges (June 2018).

A green wedge is included within the adopted LDP between Trelewis and Nelson. The background paper states that the green wedge was drawn to *“prevent the coalescence, protect the landscape setting and integrity of the communities within the settlements of Trelewis and Nelson.”* It also highlights that *“additional benefits of the designation included maintaining the integrity of this distinctive and rare landscape and helping to protect biodiversity interests, such as the Nant Caeach SINC.”* The Review identifies that there have been no applications for inappropriate development since the LDP was adopted in 2011 and therefore it is considered that the areas is not vulnerable to development pressure and the green wedge designation is not needed.

In assessing the purpose of the green wedge, the Background Paper does not acknowledge that as well as preventing coalescence between Trelewis and Nelson, it also prevents coalescence with and protects the integrity of a grade I listed building, Llancaiach Fawr in Nelson, which is within Caerphilly CBC administrative boundary. The rural setting and wider historic environmental context of the grade I listed building (of which fewer than 2 per cent of buildings listed in Wales qualify) would be irreparably damaged and compromised, should development be allowed in this locality.

The fact that no planning applications for inappropriate development have been submitted since 2011 is not in itself evidence that a green wedge is not needed. Rather, this may be evidence that the green wedge designation has been successful in deterring the submission of planning applications in inappropriate locations. A Candidate Site (Bedlinog Site 6 Land East of Trelewis), has been submitted in the area, and whilst this site has not been allocated for housing, the fact that the site has been submitted as a potential housing site is a sign of development pressure.

Caerphilly CBC therefore continue to resist the de-designation of the green wedge in this locality as it would no longer be in-keeping with the approach to green wedges in the adopted Caerphilly LDP and may result in coalescence between settlements and harm the setting of the urban area, as well as irreparably damaging and compromising the setting and historical integrity of a Grade I listed building.

**Proposed change** – Designate a green wedge between Trelewis and Nelson, as per the adopted Merthyr Tydfil LDP.

### **Special Landscape Areas (Policy ENW20) (Support)**

Caerphilly CBC supports the proposed designation of Special Landscape Areas at Gelligaer and Taf Bargoed and at Nant Morlais and Cwm Taf Fechan. The designations, as detailed in the Special

Landscape Areas Background Paper, are broadly consistent with SLA designations in the Caerphilly County Borough adopted LDP.

**Proposals Map (General Comment)**

The housing allocations on the pdf version of the proposals map are not consistent with the references in the written statement from SW30 onwards.

***Proposed change*** – amend numbering on Deposit map for housing allocations.



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**  
**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT**  
**RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details

Agent's Details (if applicable)

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

132

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (Including site allocation number if appropriate)	SW3 – 3.1 & 3.8
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support X	Object X	Comment X
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**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 <input checked="" type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

I support the "mid Growth Option" (The Preferred Strategy) as it is the most sustainable and deliverable proposal of population growth, new housing build and the allocation of sites for employment/economic regeneration, waste disposal and infrastructure improvements.

**SW3.1 Hoover Factory Site (440)**

The Hoover Factory Site has the potential to bring back into beneficial use a large dormant brownfield site at a gateway location to the main town of Merthyr Tydfil.

I support the development objectives of providing land for 440 homes, employment land and for improvements to the road and rail infrastructure in principle.

However a detailed sustainable development brief is essential to ensure that those objectives will be delivered.

I believe that the iconic built factory entrance and its adjacent sports field must be retained "as is" to ensure those objectives will be delivered.

Until the ownership of the site is acquired by Welsh Government from candy the development will be stalled and places at risk a key component of the LDP.

What is the possibility of a Compulsory Purchase Order?



### **SW3.8 South of Castle Park (160)**

I have serious reservations whether this site is sustainable and deliverable.

1. It is a greenfield site in private ownership currently used as a farm providing grazing for a flock of sheep and/or a herd of cattle.
2. The proposed housing development will adversely affect the setting of the Scheduled Ancient Monument.
3. Development will result in a loss to the biodiversity of the adjacent Winchfawr West SINC and the Winchfawr East SINC & Clwydyfagwr SINC.
4. The site acts as an East/West ecological connective corridor for a meta-population of Great Crested Newts (a European Protected Species).
5. As a Special Landscape Area and an essential element of Merthyr Tydfil's Historic Landscape, it will need an Assessment of the Significance of the Impact of development on the Historic Landscape prior to any built development being possible.

### **SW3 Clywdyfagwr Swansea Road a 1.79Ha site**

This has the potential to provide for 48 housing units.

Why has this site been excluded from the potential housing sites in the Cyfarthfa Ward?

It is in private ownership and has recently been the subject of a Pre-Application Consultation Exercise. A possible windfall site!

### **Policy SW7 The Former Ivor Steel Works Regeneration Site:- The Heartlands Project H23**

It is noted that "appropriate development" on this site will be supported.

In the existing Local Development Plan (2006-2021) outline planning permission for 450 dwellings had been agreed and a site master plan is in place.

What appropriate development will be supported on this site?

Is a limited housing development a feasible option?

#### **Other**

In addition to land/sites allocated for housing, the Deposit Plan identifies land/sites in respect of:-

- Employment
- Retail
- Minerals
- Renewable Energy

- Transport/Infrastructure Improvements
- Gypsy/Traveler Pitches

All of the above sites listed in the Deposit Plan are supported.

Additionally the Deposit Plan includes the following planning/environmental designations:-

- Special landscape Areas
- Urban Character Areas
- Archaeological Sensitive Areas
- Local Nature Reserves
- Sites of Importance for Nature Conservation
- Regionally important Geological Sites
- The Cyfarthfa Heritage Area

These additional designations are welcomed as they will help to preserve and enhance many of Merthyr Tydfil's Natural Environment, Historic Heritage and Cultural Assets.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

It is my view that the following sites should be included in the Replacement LDP (2016-2031) as they are, in my view deliverable within that life of the plan.

**SW3 - Clywdyfagwr Swansea Road a 1.79Ha site on land abutting Swansea Road and Waunbant Court**

A possible windfall site in the current draft Replacement Plan that should be included in the Housing Allocation as a pre-application consultation has taken place to develop 48 properties on the site

**Policy SW7 The Former Ivor Steel Works Regeneration Site:- The Heartlands Project H23**

It is noted that "appropriate development" on this site will be supported so the question is why has this site been excluded from this draft of the LDP

It is my view that the following allocations should be excluded from the Replacement LDO (2016-2031)

**SW3.8 South of Castle Park (160)**

For the reasons given under 2d.

**SW3.1 Part of Hoover Factory Site (440) (see comments on following page)**



That part of the site that includes the current sports ground and the "iconic" Hoovers façade.

The loss of the sports ground cannot be mitigated by providing additional land for general use somewhere else on site as these facilities have taken many years to develop to their current level, in particular the cricket ground which has been used for County Cricket matches in the past.

The façade could easily be built into the design of either a block of flats or a mixed use sports, retail, and/or Leisure building with potential for flats above.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	X

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**


The Housing sites that I specifically commented on under 2d and 2e.

**3c. If this representation represents a petition, please indicate how many people it represents:**

N/A

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	3/9/2018
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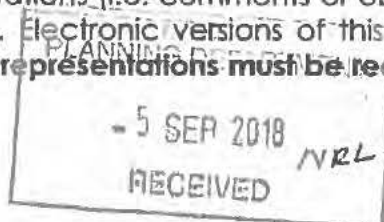
Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

# MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.



#### PART 1: CONTACT DETAILS

##### Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="ALAN"/>
Last Name	<input type="text" value="REES"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text"/>
Telephone No.	<input type="text"/>
Email Address	<input type="text"/>

##### Agent's Details (if applicable)

<input type="text"/>
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<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

134

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	SW6 SW3.1 104
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	109 14
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>
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**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**



9 [REDACTED]

**The L.D.P Team**  
Planning and Countryside  
Merthyr Tydfil County Borough Council

Dear Sir,

Please find enclosed my completed comment response forms which I hope you will find informative and helpful towards you completing the final draft of the MTCBC Deposit Local Development Plan 2016—2031.

I am of the opinion that your Department deserve the highest commendation for the excellent manner in which the vast statistical evidence has been researched, compiled and presented in order for an individual assessment of the comprehensive detail, to be brought to your focused attention.

Thankfully, the entire scope of the outlined plan was available ON LINE and this allowed many hours of scrutiny of the documentation to be done within the stipulated consultation period, aided by welcome home comforts. I also attended the public session held at the Dowlais Library on Aug 20 and was impressed with the courteous knowledgeable answers, which was offered by your colleagues, John Raine and David James, to several pertinent questions.

It is obvious that the combined resource of your Department has brought forth for individual consumption every detail that warrants consideration and a measured response.

The informative documentation, together with the simplistic tables and graphs demonstrates the time and due diligence that has been expended in order to produce a plan, that hopefully will be graciously welcomed by everyone who has a vested interest in the future of the Borough. It remains to be seen if sufficient numbers of the local population will acknowledge your contribution, and return their viewpoint in numbers that will be worthy of your departments dedication and professionalism.

Yours Sincerely,

[REDACTED]

## **Hoover Candidate Site Number 104**

Sustainability Appraisal Report June 2015

Policy SW6 and SW3.1 flood Risk Zone C2, Policy AS7 Tan 21.

Ref Page 109—box 14.

The outlined detail mentions that the East side of the River Taff is unconstrained by flood risk, while the West side will require flood prevention measures. On page 276 box 14 there is a stipulation that an appraisal of the Hoover site results in some uncertainty about the degree of flood risk and a further survey would be considered advisable.

Following my own site surveillance carried out on Friday Aug 31 15, I would respectfully suggest the appraisal details are totally inaccurate and misleading.

I observed that the full length of the former Dragon Park site is protected from any river erosion by a 5 metre high concrete wall with an additional 4 metre stone reinforced embankment above it sloping upwards at 45 degrees to the site level. In complete contrast the opposite Hoover side has only a narrow strip of earthen embankment covered in shrubs, trees and foliage, predominately supporting the main railway line. It is patently obvious that due to the partial canalised flow formation present along this stretch of the river, the surge velocity that would be created during extreme flood conditions would duplicate the same pattern that caused the catastrophic damage and disruption during the severe weather that occurred in Dec 1965. Ref - M. Express enclosures.

Though a potential developer would be minded to investigate all the ramifications normally encountered within a classified flood risk zone, the outlined description of site 104 might not be an acceptable scenario by the examining Inspector, whose main role is to test the Soundness of the Deposit Local Development Plan.

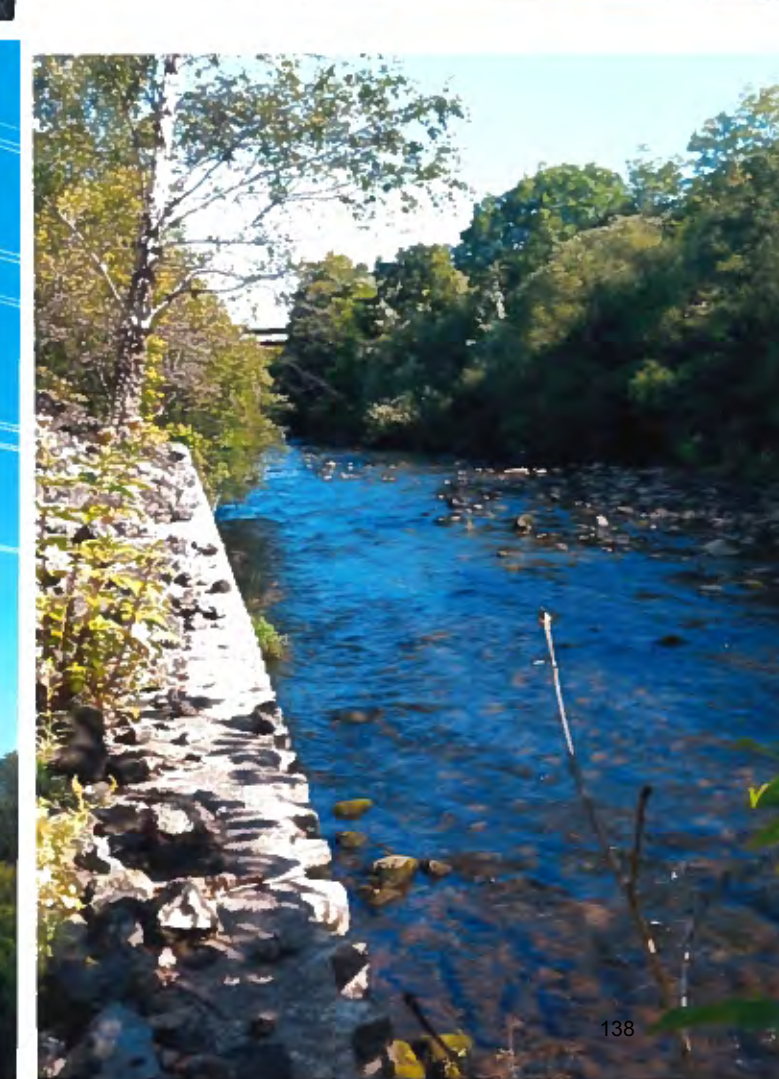
I have enclosed for your detailed scrutiny relevant photographs in support of my comments.

### **Numbered Photo Captions**

- 1 Support bridge for large sewer pipe? and small gas pipe?
- 2 Water storage tank by the side of the railway line supported by narrow earth embankment
- 3 East and West river banks showing comparable ground level height above the Taff.
- 4 Looking upstream towards the Brandy Bridge, showing opposing sides of the river.
- 5 Looking towards the Brandy bridge. Cables overhead of the refurbished National Grid.
- 6 Looking upstream showing sloping embankment above the 5 metre flood barrier wall.
- 7 Overhead view of sewer?and gas? Pipes support bridge.
- 8 looking downstream at the termination point of the Dragon Park flood barrier wall.
- 9 The Hoover electric sub-station cable gantries by the side of the railway line.
- 10 Looking south down the length of the former Dragon Park site.
- 11 View of the comparable ground levels bordering the River Taff Practically equal.
- 12—17 South views from the Brandy Bridge.

Ref Respondent No 134

















are suspended in mid air after week-end rains. cut the bank and washed away ballast.



## IN TWO WEEKS.

The river undercut and buckled more than 100 yards of railway track near Abercanaid and train services were disrupted.

A shuttle service of buses was operated between Merthyr and Abercynon.

By Monday there was a train service as far up the valley as Merthyr Vale.

An emergency meeting of the borough council on Monday morning decided that a Stockport firm, Thomas Storey (Atco), should supply a temporary bridge 150 feet long. An engineer from the firm is to supervise the works and 12 men from the borough engineer's department will help erect the bridge.

A spokesman for the firm told the *Merthyr Express* it was hoped that the temporary

bridge would be completed late on Thursday or Friday (Christmas Eve) morning.

A statement issued by the Town Clerk, Mr. Selwyn Jones, said: "It is essentially a temporary measure. The provision of a bridge to the village is a major problem. The question of finance is under consideration."

The temporary bridge is expected to cost about £12,000 including ancillary works

The Rt. Hon. James Griffiths M.P., Secretary of State for Wales, paid a short visit to the borough on Monday to inspect the flood-damaged Brandy Bridge. He was accompanied by Mr. Harold Finch, Parliamentary Under-Secretary for the Welsh Office, and the Permanent Secretary to the Welsh Office Mr. Goronwy Daniel.

The party inspected the bridge, accompanied by the Mayor of Merthyr, Ald. Ithel Davies, J.P.; Mr. S. O. Davies, M.P. for Merthyr; the Town

**P**RODUCTION at the Abercanaid Dairy of Conway and Sons Ltd. was hit by the collapse of the Brandy Bridge. The firm were told on Tuesday that water supplies would be cut off until Thursday.

The main water pipes to the dairy were damaged when the bridge collapsed. An emergency water supply was laid on but the engineer supervising the erection of a temporary bridge over the Taff said the pipes would have to go when the bridge was put up.

The dairy uses between 10,000 and 15,000 gallons of water a day.

Arrangements were made for an alternative water supply to be connected to the dairy and the other two factories in the village—T.D.S. and Thomas (Merthyr) Ples Ltd.

But a Merthyr Council

## FLOOD DISASTER HIT

official said: "There is no guarantee that there will be sufficient water for the dairy's needs."

Bottling for the dairy has been undertaken by three dairies at Porth, Trecynon and Cardiff. Mr. John Conway said: "We are already losing 35,000 customers on the wholesale side. If we can't keep up supplies to our customers our business is finished."

Clerk, and Supt. Howard Davies, deputy chief constable of Merthyr.

Coffee and sandwiches were provided at the nearby Thomas & Davies Garage.

## No coal for village

Coal merchants were unable to deliver in Abercanaid on Monday, and the refuse could not be collected. Food deliveries were also hit.

Bread, however, was supplied as there are two bakeries in Abercanaid, but shopkeepers found difficulty in getting butter and eggs.



Thursday, December 23, 1965

# Y THAT THE R CA

**FLOODS SWAMPED THE MERTHYR BOROUGH AT THE WEEKEND. ABERCANAID WAS CUT OFF ON SUNDAY WHEN THE RAPIDLY SWELLING RIVER TAFF DESTROYED PART OF THE BRANDY BRIDGE—THE ONLY TRAFFIC ROUTE TO THE VILLAGE—AND HOUSES IN TAFF STREET, MERTHYR VALE, WERE FLOODED FOR THE SECOND TIME IN TWO WEEKS.**



The river undercut and buckled more than 100 yards of railway track near Abercanaid and train services were disrupted.

A shuttle service of buses was operated between Merthyr and Abercynon.

By Monday there was a train service as far up the valley as Merthyr Vale.

An emergency meeting of the borough council on Monday morning decided that a Stockport firm, Thomas Storey (Atco), should supply a temporary bridge 150 feet long. An engineer from the firm is to supervise the works and 12 men from the borough engineer's department will help erect the bridge.

A spokesman for the firm told the *Merthyr Express* it was hoped that the temporary

and temporary supports. It is possible that either the river or the railway track will have to be re-routed.

The Rt. Hon. James Griffiths M.P., Secretary of State for Wales, paid a short visit to the borough on Monday to inspect the flood damage to Brandy Bridge. He was accompanied by Mr. Harold Finch, Parliamentary Under-Secretary for the Welsh Office, and the Permanent Secretary to the Welsh Office Mr. Goronwy Daniel.

The party inspected the bridge, accompanied by the Mayor of Merthyr, Ald. Ithel Davies, J.P.; Mr. S. O. Davies M.P. for Merthyr; the Town

**PRODUCTION** at the Abercanaid Dairies of Conwy and Sons Ltd. was hit by the collapse of the Brandy Bridge. The firm were to open on Tuesday that water supplies would be cut off on Thursday.

The main water pipes to the dairies were damaged when the bridge collapsed. An emergency water supply was laid on but the engine supervising the erection of a temporary bridge over the Taff said the pipes would have to go when the bridge was put up.

The dairies use between 10,000 and 15,000 gallons of water a day.

Arrangements were made for an alternative water supply to be connected to the dairies and the other factories in the village. T.B.S. and Thomas (Merthyr) Plc. Ltd.

But a Merthyr Council

## FLOOD DISASTER HIT



REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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PART 1: CONTACT DETAILS

Personal Details

Agent's Details (if applicable)

Title

MR.

First Name

ALAN

Last Name

JAMES

Job Title  
(where relevant)

DIRECTOR GARTH BAKER

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	X
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>
----------------------------------	---------------------------------	---

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** Further details regarding the soundness tests are provided in the Annex at the end of this form.

Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
---------------------------------	---------------------------------	---------------------------------

**2d. Please set out below your representation on the Deposit Plan (or associated document).** If necessary continue on a separate sheet (which should be clearly labelled and attached).

--



**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.



I want to speak at a public hearing.



**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

STATEMENT TO LDP TEAM. 2 SITE PLANS  
SIGNED STATEMENTS

Once completed please sign and date your representation form:

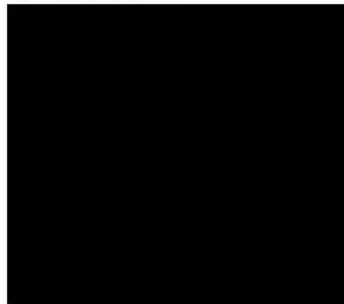
Signed:

Dated:

4/09/2018

THE LDP TEAM,  
PLANNING AND COUNTYSIDE,  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL,  
UNIT 5,  
TRIANGLE BUSINESS PARK,  
PENTREBACH,  
MERTHYR TYDFIL,  
CF48 4TQ.

ALAN JAMES



DATE: 03/09/2018

DEAR SIR/MADAM,

I REFER TO THE DEPOSIT LOCAL DEVELOPEMENT PLAN SECOND COSULTATION.

I HAVE LAND AT THE NORTH OF HEOLGERRIG KNOWN AS MAES MEYRICK, WHICH BORDER'S THE EXISTING DEVELOPEMENT BOUNDARY.

YOU WILL RECALL THERE IS CONSIDERABLE CORRESPONDANCE WITHIN YOUR DEPARTMENT REGARDING APPLICATIONS FOR A SINGLE DWELLING ON MY LAND, RESTING IMMEDIATLEY ON THE PROPOSED BOUNDARY LINE.

MAY I RESPECTFULLY REFER YOU TO THE THE POLICY SW4:SETTLEMENT BOUNDARIES.

TO ENCOURAGE DEVELOPEMENT BWITHIN URBAN AREAS,SUPPORT THE RE-USE OF PREVIOUSLY DEVELOPED LAND AND TO PROTECT AND SUPPORT THE FUNCTIONING OF OUR RURAL ECONOMY.

THERE ARE THE REMAINS OF AN OLD COTTAGE AT MAES MEYRICK,BEILI GLAS FIELD,(ONE PINE END STILL STANDING) THAT WAS LAST LIVED IN IN THE 1960'S BY A GENTLEMAN CALLED LEWIS EMLYN LLOYD.THE LOCAL AUTHORITY HAS INDICATED THAT THE PROPERTY HAD BEEN ABANDONED AND AS SUCH, OVER A PERIOD OF TIME HAD BECOME DIRELECT.

MAY I RESPECTFULLY DRAW YOUR ATTENTION TO A CASE IN THE ENGLAND AND WALES HIGH COURT: CDC2020 plc v Ferreira. Tuesday 5<sup>th</sup> May 2005.  
LORD JUSTICE LLOYD IN HIS JUDGEMENT STATED:

"The dominant owner must manifest an intention to abandon the right and. In order to do So, must make it clear that his intention is that neither he or his successors in title should Thereafter make any use of the right. Abandonment is not to be lightly inferred because The owners of property do not wish to divest themselves of property unless to do so is to Their advantage, even if they have no present use for the property in question."



IN FACT I CAN PROVE THAT MR LLOYD HAD INTENTIONS TO LIVE THERE AND MAKE IMPROVEMENTS TO THE COTTAGE. MR LLOYD WAS TAKEN ILL AND TAKEN TO HOSPITAL FROM THE PROPERTY AS AN EMERGENCY. MR LLOYD NEVER RECOVERED AND PASSED AWAY IN HOSPITAL. HE HAD NO FAMILY AND THE PROPERTY OVER A PERIOD OF YEARS BECAME UNINHABITABLE AND CONSEQUENTLY A STATE OF DISREPAIR.

I HAVE ENCLOSED SIGNED STATEMENTS OF LOCAL RESIDENTS WHO KNEW AND AND VISITED MR LLOYD IN HOSPITAL THAT STATE IT WAS NOT MR LLOYDS INTENTION TO LET THE COTTAGE BECOME ABANDONED. THE STATEMENTS WILL BE MADE AVAILABLE FOR YOUR SCRUTINY.

RECENTLY A SINGLE DWELLING HAS BEEN BUILT IN WHAT USED TO BE THE GARDEN OF A PROPERTY CALLED HYFRYDOL (NORTHERN EDGE OF MY LAND). THE EDGE OF THAT PROPERTY WOULD BE NO MORE THAN FOUR METRES FROM MY BOUNDARY FENCE, WHICH IS ALSO THE SETTLEMENT LINE.

THE SITE OF THE OLD COTTAGE IS NO MORE THAN 20 METRES FROM THE RECENTLY BUILT DWELLING. ADD TO THIS THERE IS AN ESTABLISHED DWELLING 40/50 METRES SOUTH WEST OF MY LAND AND ANOTHER THE SAME DISTANCE SOUTH EAST OF MY LAND. COULD MY REQUEST THEN BE CONSTRUED AS INFILL DEVELOPEMENT.

I WOULD APPRECIATE YOU GIVING CONSIDERATION FOR THE SITE OF THE OLD DWELLING BEING RE-DEVELOPED OR A PLOT THAT WOULD BE NEARER/ON THE EXISTING SETTLEMENT LINE. I HAVE ENCLOSED A SURVEY MAP FOR BETTER UNDERSTANDING.

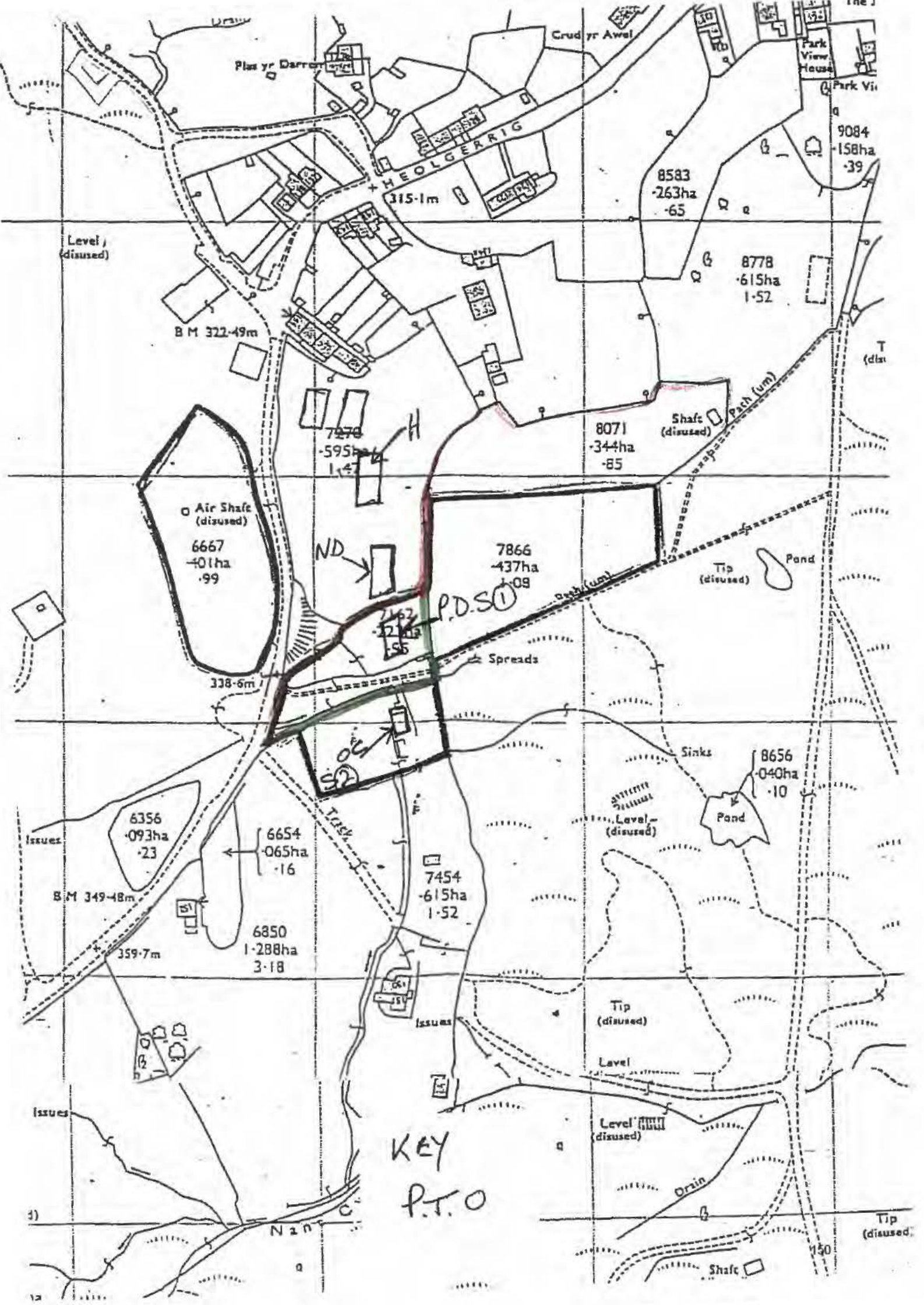
WILL YOU AS PART OF THE CONSULTATION EXERCISE CONSIDER MY REQUEST AND MARGINALLY ALTER THE PROPOSED BOUNDARY LINE TO ENCOMPASS THE LAND REQUIRED TO DEVELOPE A SINGLE DWELLING AND ACCESS.

I HAVE FOR 18 YEARS TRIED THROUGH ALL THE CORRECT CHANNELS AND FOLLOWED ALL THE CORRECT PROCEDURES TO GAIN THIS DEVELOPEMENT. YOUR SYMPATHETIC CONSIDERATION OF THIS APPLICATION WOULD BE GREATLY APPRECIATED.

YOURS SINCERELY,

ALAN JAM








H - HYFRYOL BUNGALOW


ND - NEW DWELLING.


PDS - PROPOSED DWELLING SITE ①

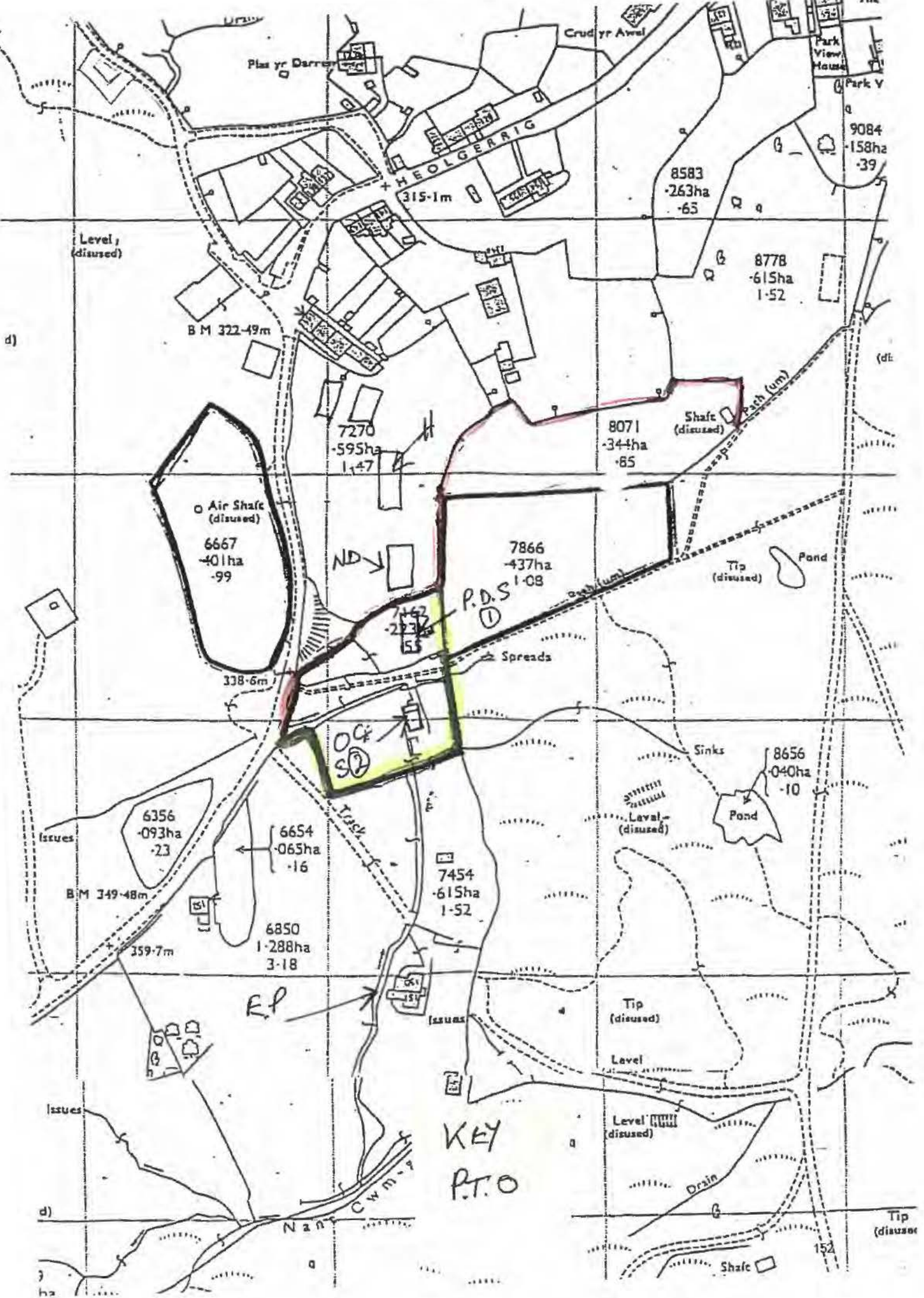
OCS OLD COTTAGE SITE ②

EP ESTABLISHED DWELLING.

 REQUESTED ALTERATION OF BOUNDARY  
LINE FOR SITE ①

 REQUESTED ALTERATION OF BOUNDARY  
LINE FOR SITE ②

 PROPOSED SETTLEMENT LINE




H - HYFRYDOL BUNGALOW


ND - NEW DWELLING


PDS PROPOSED DWELLING SITE ①

OCS OLD COTTAGE SITE ②

E.P. ESTABLISHED DWELLING.

 REQUESTED ALTERATION OF BOUNDARY LINE  
FOR SITE ①

 REQUESTED ALTERATION OF BOUNDARY  
LINE FOR SITE ②

 PROPOSED SETTLEMENT LINE



STATEMENT OF:

BRIAN WILLIAMS.

[REDACTED]

26/10/2016

I AM RETIRED AND RESIDE IN CEFN COED.

MY MOTHER WAS RACHEL ANNIE WILLIAMS. DURING THE 1960'S MY MOTHER CARED FOR A GENTLEMAN CALLED LEWIS EMLYN LLOYD WHO RESIDED AT A COTTAGE AT MAES MEYRICK NOW KNOWN AS BEILI GLAS. SHE CARED FOR HIM FOR A NUMBER OF YEARS. ALTHOUGH LEWIS WAS NOT OF GOOD HEALTH, MY MOTHER SAID HE WAS HAPPY THERE AND WANTED TO STAY THERE. UNFORTUNATELY HE WAS TAKEN ILL AND WAS TAKEN TO HOSPITAL.

MY MOTHER VISITED HIM AT HOSPITAL, HE TOLD HER THAT HE WANTED TO RETURN TO THE COTTAGE. SADLY WHILST IN HOSPITAL LEWIS PASSED AWAY.

BRIAN WILLIAMS

[REDACTED]

WITNESSED BY:

[REDACTED]



STATEMENT OF:-  
MALDWIN GRIFFITHS

OCCUPATION:- RETIRED BUILDER

I am a retired builder and have lived in Hedgerig all my life. A cottage known as Baily Glas was owned and occupied by Lewis Emlyn Lloyd. He lived alone.

People used to visit him from the houses close by and enjoy a sing song with him as he played his piano.

Lewis was not in the best of health but was cared for by a woman known as Rachel Anne, who has now passed away.

He lived in the property in the mid to late sixties. At this time he had no intention of leaving the cottage as I with others wanted to buy the property and the land from him but he declined.

Therefore this property would not have been abandoned.

During the late sixties he was taken ill and went into hospital. I did not see him again.

He must have intended to return to live in the cottage as he did not have any intention of selling

it.

The "Pine" end of the cottage sit  
stands and part of the dividing walls  
for the different rooms can be seen

18/10/16 Signatures





Statement of:-  
Dennis Price

I have lived in Theofgarrig  
all my life.

[redacted] were brought up  
[redacted] which was known  
[redacted] have lived at my  
present address since 1975.

When I was young myself with  
others would visit Thomas Emyr Lloyd  
at his home at "Beili llys".

He was a very private person  
but we used to visit him to listen to  
him play his piano and have a sing  
song with him.

I continued to visit him  
until I was 15 years of age in 1963.  
Lewis would have been in his mid  
thirties.

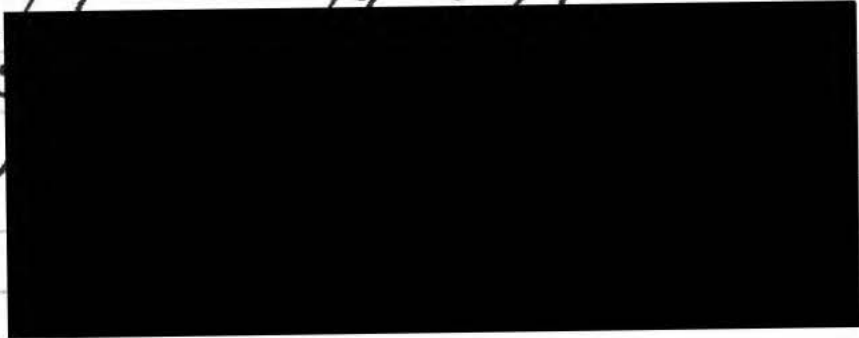
A lady named Rachel  
Lennie used to call to look after him  
and make sure he was alright.

Lewis suffered from epilepsy  
and in the late 60s went into  
hospital.

Before going into hospital he  
was quite happy in the cottage with

STATEMENT OF DENNIS PRICE CONTD.,  
all his friends visiting him and  
listening to him playing his piano  
and having a sing song.

20/10/16 W





STATEMENT OF:

[REDACTED]  
MERTHYR TYDFIL

26/10/2016

I AM RETIRED AND RESIDE AT [REDACTED] MY FAMILY LIVED IN SHIRLEY GARDENS FROM 1962. I LIVED THERE FOR 10 YEARS FROM THE AGE OF 12 TO 22.

MY FRIENDS AND I USED TO CALL TO A COTTAGE AT MAES MEYRICK FIELD. A GENTLEMAN CALLED LEWIS EMLYN LLOYD USED TO LIVE THERE. LEWIS PLAYED THE PIANO AND WE WOULD GO THERE AFTER SCHOOL TO CHAT AND LISTEN TO LEWIS PLAY THE PIANO.

HE LIVED THERE BY HIMSELF BUT A LADY USED TO GO THERE TO CARE FOR HIM, I CAN'T REMEMBER HER NAME. LEWIS WAS HAPPY AT THE COTTAGE, HE NEVER INDICATED TO US THAT HE WANTED TO LEAVE THE PROPERTY. I CAN REMEMBER HE WAS TAKEN ILL, WENT TO HOSPITAL AND NEVER RETURNED TO THE COTTAGE.

MALDWIN DAVIES  
[REDACTED]

WITNESSED BY:

*[Handwritten signature]*

BEILI GAS.

LAST PERSON TO LIVE THERE:-

LEWIS ERLYN LLOYD SINGLE.

SUFFERED FROM FITS

PERSONS WHO CAN VERIFY OCCUPATION.

[REDACTED]

[REDACTED]

[REDACTED]

NO OTHER FAMILY.

TAKEN TO HOSPITAL. DID NOT REVEN.  
BETWEEN 1963-1970.

\* APPROX 40 YEARS OLD \*



Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

#### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

#### PART 1: CONTACT DETAILS

##### Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="James"/>
Last Name	<input type="text" value="Smart"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text"/>
Telephone No.	<input type="text"/>
Email Address	<input type="text"/>

##### Agent's Details (if applicable)

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**  
**Page 23 Para 4.35 Nature Reserves**

Policy number (including site allocation number if appropriate)	SINC Nos 41 & 42
Page/Paragraph number	Page 23 Para 4.35
Proposals Map	Page 3
Constraints Map	All on one Page
Sustainability Appraisal (please specify page and paragraph)	Page 49 Para 7.47
Habitats Regulations Assessment (please specify page and paragraph)	Page 29 SW10
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
----------------------------------	--	----------------------------------

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** *Further details regarding the soundness tests are provided in the Annex at the end of this form.*

<p><b>Test 1 <input checked="" type="checkbox"/></b></p> <ul style="list-style-type: none"> <li>The plan does not have regard to national policy i.e. Access</li> </ul>	<p><b>Test 2 <input checked="" type="checkbox"/></b></p> <ul style="list-style-type: none"> <li>It is not appropriate for the area in the light of the evidence plus it fails in virtually all of the other tests in Test 2.</li> </ul>	<p><b>Test 3 <input checked="" type="checkbox"/></b></p> <ul style="list-style-type: none"> <li>It is unlikely to be effective considering the local objections and the surrounding countryside that is already available to the public. Plus, as in Test 2 it fails in all but one of the other tests in Test 3.</li> </ul>
---	---	--



**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

**My objection is to the Nature Reserve at Nant Llwynog and Coed yr Hendre Bedlinog.**

The first point is that part of the area, where I once had a garage was earmarked for Sheltered Accommodation, one of the reasons that I gave up my garage to the Council in the 1980s. I attach the original plans submitted by MTBC in 1983 for reference.

Secondly my concern on making this area a Nature Reserve is that it will sterilise the area so that the Sheltered Accommodation prospect will be shelved permanently. The reason that this site was earmarked for this housing was that it is the only flat/level area in Bedlinog within walking distance to the local amenities and the space around the site allowed a bus turning area etc.

My third objection to the use of this land as a Nature Reserve is about the management of it and the lack of access that this will bring, there are already disputes over the access to the area, (such as locked gates, use of the playing fields etc.) and placing the area into a Nature Reserve could and probably would mean that local people would be restricted even more from the area., which incidentally goes against the aims of a LNR as specified in the Countryside Act 1949 Section 15 that is referenced in your LDP.

I know that a complex has now been built, and provides a useful asset to the community, in a slightly different area to initially planned, but this does not provide single storey/bungalow accommodation for the disabled or elderly as the design has its drawbacks such as narrow doorways and steep stairs etc...

Lastly I am surprised that MTBC are even contemplating a Nature Reserve in Bedlinog, which is surrounded by beautiful countryside and I would expect the Council to spend any money available on ensuring the public rights of way and footpaths in and around the community were kept usable rather than waste money on a Nature Reserve.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

I would like to see the monies allocated to the Nature Reserve used to ensure footpaths are opened up and brought up to a standard that allows true access to the beautiful countryside around the Bedlinog community and the Merthyr Tydfil Borough as a whole.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.



**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Original plans for the Sheltered Accommodation at the site in Bedlinog

Once completed please return your representation form:

**Signed:**

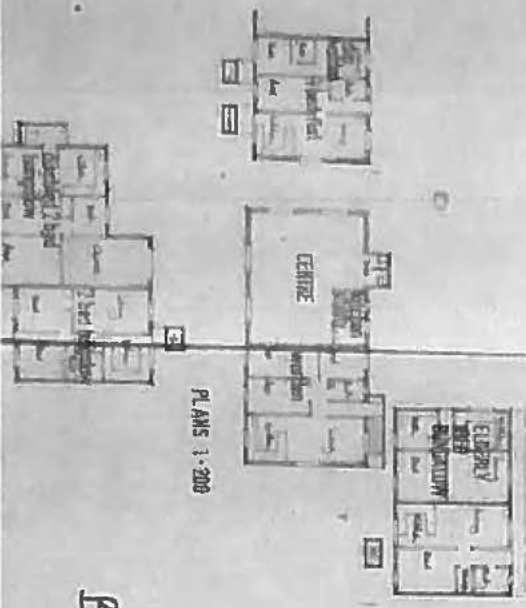
James Smith

**Dated:**

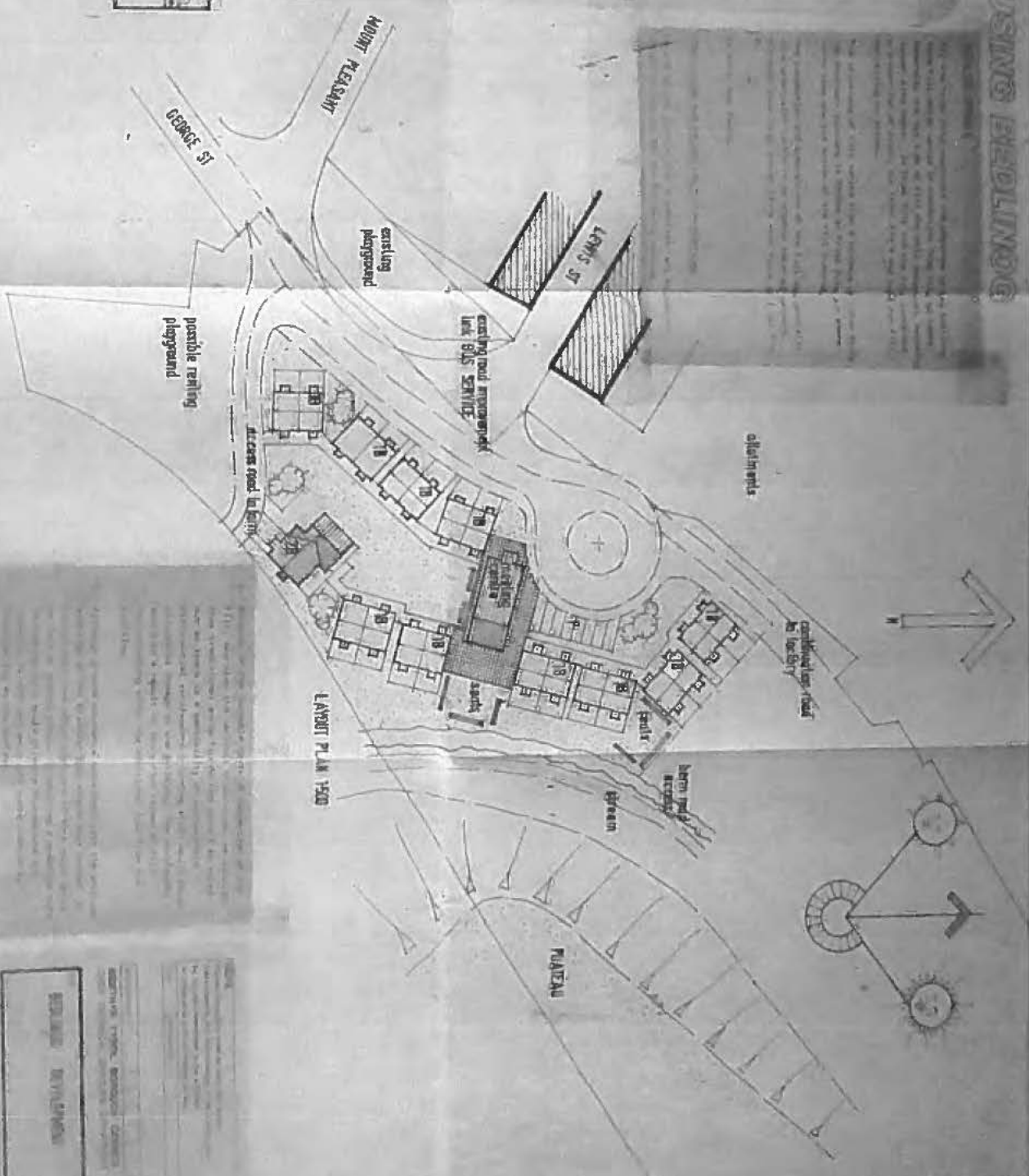
8<sup>th</sup> September 2018



# SHATTERED HOUSING BEDDING

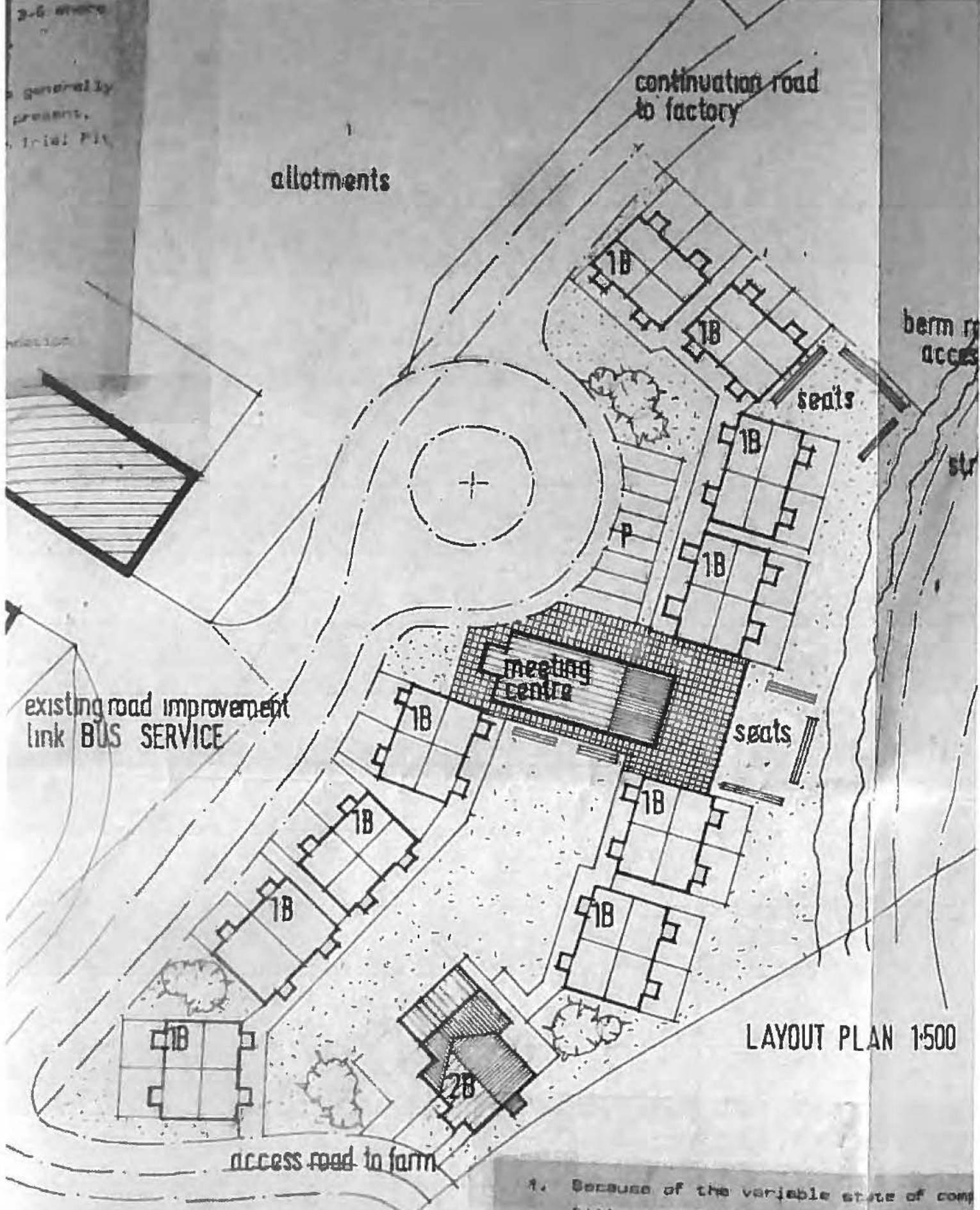


Bedding Sheltered Housing 1-199





2-6 where  
generally  
present,  
trial fix



allotments

continuation road  
to factory

berm rd  
access

seats

existing road improvement  
link BUS SERVICE

meeting  
centre

seats

LAYOUT PLAN 1500

access road to farm

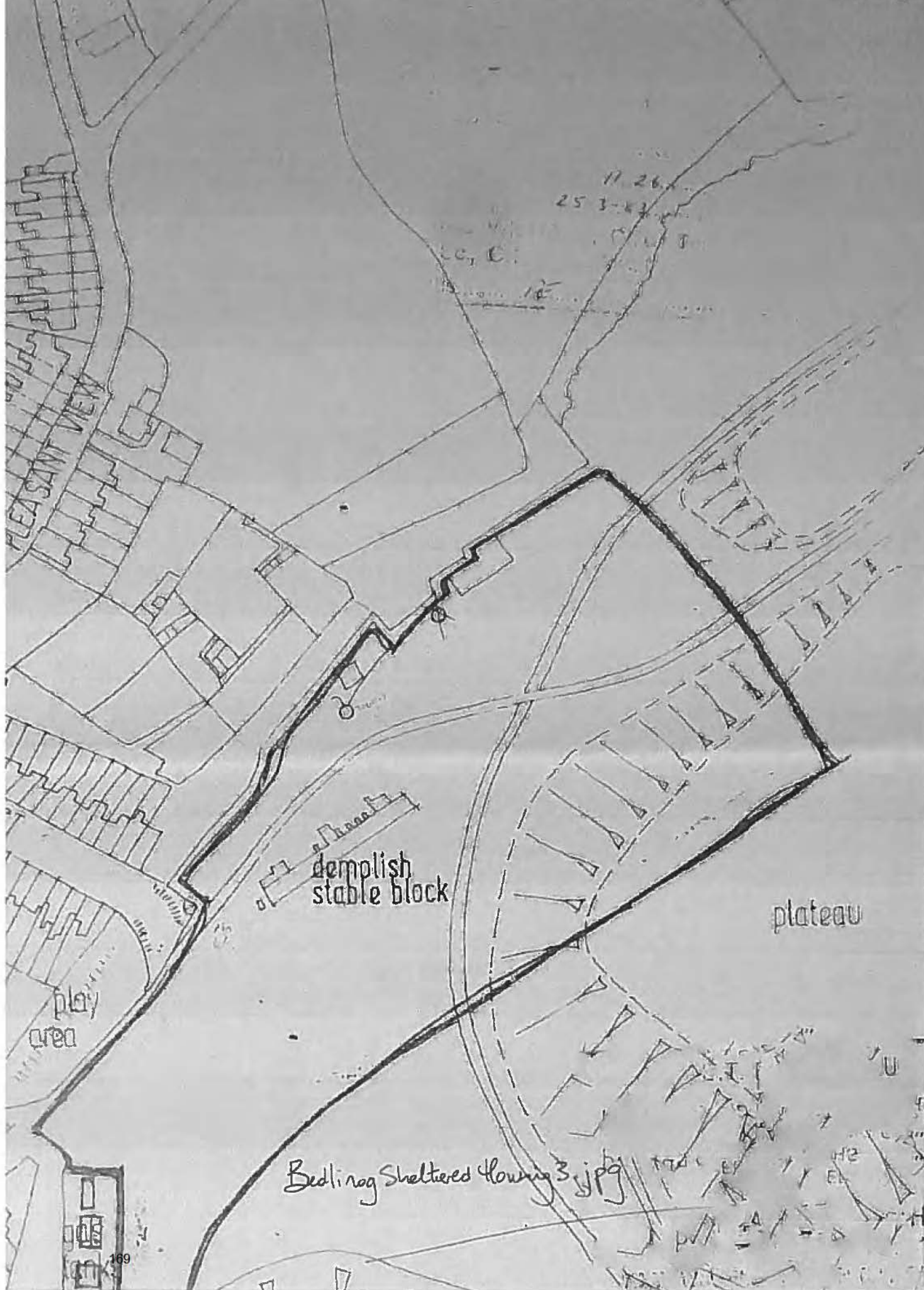
possible resiting  
playground

Bedding Sheltered Housing2.jpg

1. Because of the variable state of comp  
fill, and also the variable thickness  
that traditional strip foundations sh  
out as there is a possibility of unco  
differential settlements occurring wh  
structural damage to the building. T  
would be a result of the s168er layer  
re-compacting under the additional lo



# SHeltered HOUSING (B)



demolish  
stable block

plateau

play  
area

Bedling Sheltered Housing 3.jpg

**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

Personal Details

Agent's Details (if applicable)

Title

Mr.

First Name

Simon

Last Name

Gale

Job Title  
(where relevant)

Service Director of Planning

Organisation  
(where relevant)

Rhondda Cynon Taf CBC

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan (or associated document) are you commenting on?	
Policy number (including site allocation number if appropriate)	Housing Allocations Policy SW3
Page/Paragraph number	p85 and SW3.1 p87/88 and SW3.3 p88
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

2b. Does your representation provide Support, Objection or General Comment? (Please tick)		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>

2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

2d. Please set out below your representation on the Deposit Plan (or associated document). <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
--

The policies/developments contained in the Merthyr Tydfil County Borough Council First Replacement Deposit Draft LDP have no significant impact on RCTCBC Highway infrastructure, and as such there are no policy objection in this regard. There are however a number of observations and comments that we would wish to share with MTCBC in relation to Highways and transportation policies, laid out under section 2e of this representation form.



2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

**Section 8 - Site Allocation Details, page 85. The following additional bullet points could be useful:**

**General**

- **Safe Routes in Communities**
- **Sustainable Drainage and Flood Risk Management.**

**SW3.1**

- **Provision of Residential Travel Plan and Assessment of Safe Routes in Communities to encourage use of sustainable modes of travel.**
- **Satisfactory provision of access, circulation and parking.**
- **No more than 300 dwellings to be served off a single access point.**
- **No more than 5 dwellings to be served off a Private Shared Access.**

**SW3.3**

- **The first bullet point should read - A Transport Statement should be provided... (TAN 18 sets out the thresholds for TA/TS).**
- **Satisfactory provision of access, circulation and parking.**
- **Provision of Residential Travel Plan and Assessment of Safe Routes in Communities to encourage use of sustainable modes of travel.**

**The above generally applies to SW3.4 to SW3.34 .**

**The inclusion of the need for Travel Plan and Assessment of Safe Routes in Communities to encourage sustainable modes of travel and compliance with Active Travel (Wales) Act 2013 should form part of the submission and therefore inclusion in all allocated sites.**

**Other Comments;**

**There does not appear to be reference to strategic bus corridors and proposed works to raise standards and provide bus priority measures eg. safeguarding land for bus lanes or remodelling junctions.**

**The document does not appear to recognise the importance of Prince Charles Hospital and the College as trip attractors for the wider area, including Cynon Valley.**

**LDP Objective 7 – suggest revising this objective to read ‘To support an integrated transport system, promote and *develop* active travel routes and ensure that new developments are accessible by walking and cycling and public transport links.**

**Policy SW6 – suggest the proposed new footbridge also includes provision for cyclists.**

**Policy SW11 – Consider an additional point to read ‘ encourage active travel journeys and reduce the need to travel by private motor vehicles’**

**Consider inclusion of ‘active travel route’s after train routes in paragraph 6.5.73.**

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="checked" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

--

**3c. If this representation represents a petition, please indicate how many people it represents:**

--	--

**3d. If additional documents have been provided to support your representations, please list them below:**

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Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan (or associated document) are you commenting on?	
Policy number (including site allocation number if appropriate)	LDP Objectives 1-8 & Policy SW9
Page/Paragraph number	p12-13 para 4.7 & 4.11/p33 from para 6.5.50
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

2b. Does your representation provide Support, Objection or General Comment? (Please tick)		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

2d. Please set out below your representation on the Deposit Plan (or associated document). <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
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**Paragraph 4.7 (page 12) of the Deposit Plan acknowledges that there will be an increase in school-aged children within the Borough to 2031 and states that there is capacity to accommodate them without the need for any new schools. Further, Merthyr Tydfil proposes to help achieve Welsh Government ambitions of realising 1,000,000 Welsh speakers by 2050. At paragraph 4.11, it states that new housing is to be built within the catchment areas of the two Welsh language primary schools in the County Borough.**

**Accordingly, Rhondda Cynon Taf wishes to raise the question as to how these children will continue to receive a Welsh medium education from the age of eleven? At present, the vast majority of Merthyr Tydfil pupils receiving Welsh Medium Secondary education attend Ysgol Gyfun Rhydywaun, Aberdare – a longstanding arrangement between the two Local Authorities.**

**However, this school is already operating at capacity, and cannot accommodate increased pupil numbers associated with the proposed residential and population growth. Additional housing in Merthyr Tydfil will only increase pressure on an already over-subscribed school.**

**The MTBC Deposit Plan does not propose to build a new Welsh medium secondary school, nor does it include a policy to ensure that financial planning obligations are to be secured from new residential permissions to contribute towards other solutions e.g. extensions of YG Rhydywaun.**

**We note there is general reference to Education Provision in the current Merthyr Tydfil CIL 123 list, however, this would not be sufficient considering the specific need for an extension at YG Rhydywaun. Furthermore, even if the school was specifically listed in the 123 list, again this would not be sufficient considering the significant other projects on the list, the combined associated costs and the subsequent uncertainty over the available funding for the school. This is emphasised by the likely CIL returns from developments at a £25 per sqm rate. Accordingly, there would remain a fundamental objection if CIL payments were to be considered as a solution to this matter.**

**In Rhondda Cynon Taf, all residential development in the Cynon Valley (the shared catchment area for YG Rhydywaun) is CIL liable, whilst planning obligations for education facilities are required where necessary.**

**The Rhondda Cynon Taf LDP includes a policy that identifies education facilities within a list of planning obligation areas we may request. Supplementary Planning Guidance then sets out the detail on how these obligations are calculated. These would apply in principle to all new residential development in the catchment area of YG Rhydywaun. The Council are already having to consider extending Ysgol Gyfun Rhydywaun to increase capacity.**

**RCTCBC would therefore like to see recognition of this matter in the Merthyr Tydfil LDP, and in particular, a policy and other necessary amendments in the Plan. We feel it is necessary to ensure a financial contribution, directly linked to new housing that will be used to provide additional places at Rhydywaun for pupils residing within the County Borough of Merthyr Tydfil.**

**Such a commitment to education should indeed be included within the Planning Obligations Policy SW 9 from page 33 of the Deposit Draft Plan. The issue of Welsh secondary school provision has clearly not been thought through and urgently requires addressing.**

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

**RCTCBC would like to see an amendment to the Planning Obligations Policy SW9 to acknowledge a commitment to funding Welsh secondary school provision for pupils residing in Merthyr Tydfil attending Ysgol Gyfun Rhydywaun.**

**This should be in the form of a new point 4 in Policy SW9 (i.e. with the ‘other relevant obligations’ becoming point 5), specifically relating to Education. E.g.:**

**‘4. Welsh Medium Secondary School Educational facilities, associated with new housing permissions.’**

**Within the associated Policy SW 9 text, there should be further comment along the lines of:**

**‘Further details regarding the thresholds and calculations of Planning Obligations for necessary Welsh Medium Secondary School Education capacity solutions for Merthyr Tydfil, shall be set out in updated Supplementary Planning Guidance, alongside adoption of this LDP. This (shall) aligns with the RCTCBC LDP Planning Obligations Policy and Supplementary Planning Guidance. RCTCBC shares the catchment area for YG Rhydywaun, Aberdare, with Merthyr Tydfil, where the vast majority of Secondary Welsh Medium Education for Merthyr Tydfil County Borough is accommodated. If developments are found to be unviable, then MTCBC as the Local Authority, will provide the necessary funding to support the growth in pupil numbers associated with these housing developments.’**

**Paragraph 4.7 (page 12) of the Deposit Plan also needs to be amended to raise the fact that the growth level cannot be accommodated by the current Welsh Medium Secondary School that currently provides this education for the pupils of Merthyr Tydfil.**

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a ‘Candidate Site’ earlier in the Plan preparation process, please provide the candidate site name and reference number.

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I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	<input checked="" type="checkbox"/>

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Lack of acknowledgement and consideration of the capacity (or significant lack of) for Welsh Medium Secondary Education associated with the proposed housing growth level in this Deposit LDP.

**3c. If this representation represents a petition, please indicate how many people it represents:**

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**3d. If additional documents have been provided to support your representations, please list them below:**

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Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
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Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Volunteer Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
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Please tick if you would prefer correspondence in Welsh ☐

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<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Revised LDP Deposit Plan consultation document

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

<b>TEST 1: DOES THE PLAN FIT?</b>	
Does the plan have regard to national policy?	No
Does the plan have regard to Well-being Goals?	No
Is the Plan consistent with regional plans, strategies and utility programmes?	No
Is the Plan compatible with plans of neighbouring authorities?	No
Is the Plan compatible with other Council strategies and priorities?	No (strategies) Yes (priorities)

Please see comments in attached document below – mldp108a Test1 Fit

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
5. Objectives
6. Revision process and consultation comments
7. Heritage – draft policy proposal and its revision
8. Well-being – objectives and proposals (or lack of)
9. Active Travel, footpaths, cycleways, rights of way, bridleways
10. Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
11. Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail
12. Hoover regeneration strategy – original proposals and revisions
13. Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
14. A465 dualling – comments on Heritage Trust proposals for development of Active Travel network and improvement of National Cycle Route 46 east-west as put forward at A465 public inquiry in 2018
15. Merthyr - Abernant Tunnel – need to secure disused railway line and its historic listed structure (currently in private ownership with public prohibited) from the tunnel entrance to the A470. Need to secure funding for alternative more viable schemes that meet Active Travel standards and suitability (or possibly the re-opening of the Morlais 'Miler' Tunnel on NCR 46)
16. West Merthyr – need to secure landscape, environment, historic assets including listed structures and Scheduled Ancient Monuments, protected areas (including SSSI and woodlands) as well as claimed rights of way and bridleways. Support for a country park (proposed first in 1970s).
17. Ffos-y-fran – need to review proposals for industrial and business use and consider environmentally friendly landscaping in after use as well as potential for leisure including hotel and indoor ski slope.
18. Green open space – potential loss of green open space due to unnecessary development and lack of proposals to improve provision of open space at community level.
19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.



3c. If this representation represents a petition, please indicate how many people it represents:	
--	--

3d. If additional documents have been provided to support your representations, please list them below:
Comments are included in mldp108a Test1 Fit

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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# Merthyr Tydfil Heritage Trust Ltd

## Comments on Draft revised LDP Deposit Plan – soundness Test 1

TEST 1: DOES THE PLAN FIT?		
Does the plan have regard to national policy?	No	A new all-Wales plan is being created. It may well establish a new planning framework.
Does the plan have regard to Well-being Goals?	No	The LDP revision in our view does not align with Well-being Goals where development is proposed. The LDP aims and objectives do not fit well with the 5 well-being objectives outlined for the Cwm Taff well-being strategy
Is the Plan consistent with regional plans, strategies and utility programmes?	No	The City Region plan is still emerging. City Region approval for Merthyr Tydfil CBC to go ahead with LDP revision does not mean the LDP will be consistent with the City Region plan.
Is the Plan compatible with plans of neighbouring authorities?	No	Two immediate local authorities – Caerphilly and Rhondda Cynon Taf have different (LDP) strategies partly because they are larger and cover larger areas that actually neighbour Cardiff. The MT LDP revision is ‘out of step’ in time with its neighbours. Moreover, Blaenau Gwent seems ignored – although it is a near neighbour and like Merthyr Tydfil is wholly within the Heads of the Valleys (proper). It does not fringe Cardiff. There is nothing in the draft LDP to ensure that MT is a fit with BG in terms of population, economic development, housing (private to buy, social or affordable).
Is the Plan compatible with other Council strategies and priorities?	No (strategies) Yes (priorities)	The draft LDP is not compatible with other Merthyr Tydfil CBC strategies such as Well-being, Open Space and Active Travel – the ambition seems to be to avoid conflict. Reference is made to these strategies – but the convoluted scoring system seems just to confuse. Whether the draft revision LDP is neutral for education and social services strategies seems questionable – we can see no evidence as to how services and facilities might change given possible demographic shifts. On the other hand, the draft revision LDP is compatible with other Merthyr

		<p>Tydfil CBC priorities – because its whole thrust is for ‘sustainable growth’ with more housing and more industrial estate growth to produce greater income for MTCBC. (Though these may not result in a larger population.) The local authority has run its own ‘Project Fear’ – forecasting cuts in services with population stability. Officers forecasting the financial benefit to the council at a meeting of the local authority’s internal steering group in 2017.</p>
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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
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<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

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Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

<b>TEST 2:</b>	
<b>IS THE PLAN APPROPRIATE?</b>	NO
Is it appropriate for the area in the light of the evidence?	NO
Is it locally specific?	YES NO
Does it address the key issues?	NO
Is it supported by robust, proportionate and credible evidence?	NO
Can the rationale behind plan policies be demonstrated?	
Does it seek to meet assessed needs and contribute to the achievement of sustainable development?	YES NO
Are the vision and the strategy positive and sufficiently aspirational?	NO
Have the 'real' alternatives been properly considered?	NO
Is it logical, reasonable and balanced?	NO
Is it coherent and consistent?	YES & NO
Is it clear and focused?	?

Comments in full are attached below – mldp108c Test 2 Appropriate.

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8. Well-being – objectives and proposals (or lack of)
9. Active Travel, footpaths, cycleways, rights of way, bridleways
10. Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
11. Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail
12. Hoover regeneration strategy – original proposals and revisions
13. Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
14. A465 dualling – comments on Heritage Trust proposals for development of Active Travel network and improvement of National Cycle Route 46 east-west as put forward at A465 public inquiry in 2018
15. Merthyr - Abernant Tunnel – need to secure disused railway line and its historic listed structure (currently in private ownership with public prohibited) from the tunnel entrance to the A470. Need to secure funding for alternative more viable schemes that meet Active Travel standards and suitability (or possibly the re-opening of the Morlais 'Miler' Tunnel on NCR 46)
16. West Merthyr – need to secure landscape, environment, historic assets including listed structures and Scheduled Ancient Monuments, protected areas (including SSSI and woodlands) as well as claimed rights of way and bridleways. Support for a country park (proposed first in 1970s).
17. Ffos-y-fran – need to review proposals for industrial and business use and consider environmentally friendly landscaping in after use as well as potential for leisure including hotel and indoor ski slope.
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19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.

3c. If this representation represents a petition, please indicate how many people it represents:	
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3d. If additional documents have been provided to support your representations, please list them below:
Comments are provided in mldp108c Test 2 Appropriate

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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## Merthyr Tydfil Heritage Trust Ltd

TEST 2: IS THE PLAN APPROPRIATE?		
Is it appropriate for the area in the light of the evidence?	NO	The evidence put forward by Merthyr Tydfil CBC in the draft revised LDP and the supporting documents does not demonstrate that the growth development proposals are appropriate for the area – i.e. the geographical area of Merthyr Tydfil. Evidence in terms of population projections (overlooked or discounted when Merthyr Tydfil CBC applied to Welsh Government for a revision of the existing local plan), economic and jobs growth (the economic land use study) and of housing is discounted in favour of the local authority's own forecasts. (These, of course, are 'tried and failed' by self-admission as far as the existing LDP is concerned – although the only reason given for the whole LDP revision seems to be failure to build housing.)
Is it locally specific?	YES  NO	The draft revision of the LDP is locally specific because it includes much detail and work on a range of sites at community level.  Not every community is served well by the draft revision. For example, much is made of planning for local communities – yet Abercanaid and Pentrebach are not included in the aspirational plans for improvements for 'down the valley' communities. Instead the draft LDP subsumes both into the town growth area. The proposals suggest they are destined to be surrounded and/or swallowed up by development proposals. Issues have been raised on flooding risks in the town centre and Hoover / Abercanaid area. These are not addressed.
Does it address the key issues?	NO	The draft revision of the LDP does set out a series of key issues for sustainability. Most of these do not appear to be addressed. Instead they are submerged (through a scoring system whose methodology is unclear) The draft makes the comment that little can be done for existing sites/developments/issues in a guide/tool/framework for new development. The well-being issues (as recommended for the Cwm Taf FGA strategy) are not addressed.
Is it supported by robust, proportionate and credible evidence?	NO	Evidence used has been unsatisfactory during the LDP revision process with outdated population growth projections being used at its outset. Evidence for the MTCBC theory that building new houses will grow the local population is dubious. [Traditionally jobs bring in-migration – lack of jobs leads to out-migration.] The housing demand assessment dates from 2014 – it is out of date and surely must be re-visited. The analysis of economic sites provides evidence based on population and economic trends – this is discounted and another measure (historic industrial unit build) is put in place. This evidence is unsatisfactory. Further investigations of the

		<p>local and Heads of the Valleys market is needed. Evidence in the form of inquiries about industrial unit availability is also unsatisfactory.</p> <p>The housing viability assessment – while worthwhile – includes comparisons with other house-building sites that are on the periphery of the M4 and not in the Heads of the Valleys area. More work is needed to survey the housing market.</p> <p>Better site assessments are needed – the housing viability report assumes that site and groundwork problems will be at a low level. This is insufficient – especially when a major housing site at Dowlais (Heartlands) is now being ruled out because of allegedly high site development costs.</p>
Can the rationale behind plan policies be demonstrated?		<p>The rationale behind plan policies can be DETECTED – it is Merthyr Tydfil CBC's quest for funds to prop up services (income from what it described as 'investment').</p> <p>Is there rational behind specific policies within the draft revised LDP? Although there are explanations (excuses some might say) for the changes of direction in proposals (examples include the Hoover Regeneration Area and Goat Mill Road) there seems little sign of clear, long-term planning in such instances.</p>
Does it seek to meet assessed needs and contribute to the achievement of sustainable development?		<p>Although the draft revised LDP claims to meet needs the assessment of those needs is wrong. There is no current assessment of local housing need – i.e. that of people already living in Merthyr Tydfil.</p> <p>The proposals for new industrial sites are not based on assessed need – either of local people or of the local economy. Taken as a whole, the strategy for the northern area (the main town, Hoover zone, Abercarn and Pentrebach) suggests an attempt to achieve substantial development at a cost to the environment and heritage, with the loss of green open space and with disregard to the well-being of local people and local communities.</p>
Are the vision and the strategy positive and sufficiently aspirational?		<p>The vision – as suggested previously by MHT – is bland. The strategy as a whole is negative because:</p> <p>There is a refusal to tackle issues raised (such as flooding, lack of genuine Active Travel provision and proposals, admitted poor open space right across the county borough, town centre retail vacancies, near empty office blocks, health and well-being and admitted heritage and historic buildings 'ticking time-bomb' of neglect and disrepair.</p>
Have the 'real' alternatives been properly considered?	NO	<p>There has not been proper consideration of the only other options put forward for discussion and consultation. Those options were:</p> <ul style="list-style-type: none"> <li>- No population growth (discounted because it would lead to the council cutting services)</li> <li>- More enhanced growth – put forward only to be discounted as unachievable i.e. with the same serious delivery problems as have bogged down development under the current LDP.</li> </ul>

Is it logical, reasonable and balanced?	NO	<p>There are attempts to justify a range of site proposals against sustainability, well-being and other objectives.</p> <p>But there is no consistency of approach. For example, the total numbers of new housing to be delivered does not seem to change under the old and revised LDP. Only the timescale.</p> <p>Where a balance between development aspirations and needs on one hand and well-being, the environment, existing local communities and business is attempted the scale is weighted heavily for developers.</p>
Is it coherent and consistent?	YES & NO	<p>While the strategy is pretty straight-forward – estimate the housing you want (sticking to the total in the current LDP minus completions to date) and work out a population projection and the total sites needed – juggling all the evidence that ends up being discounted makes it complicated and a bit difficult to unravel. The consistency is in keeping to housing development unit totals – regardless of large sites being struck out.</p>
Is it clear and focused?	?	

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

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Last Name <input type="text" value="Thomson"/>	<input type="text"/>
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Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
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Please tick if you would prefer correspondence in Welsh ☐

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Draft revised LDP Deposit Plan Consultation Form

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

TEST 3: WILL THE PLAN DELIVER?	
Is it likely to be effective?	NO
Can it be implemented?	NO
Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?	NO
Will development be viable?	NO
Can the sites allocated be delivered?	NO
Is the plan sufficiently flexible?	NO
Are there appropriate contingency provisions?	NO
Is it monitored effectively?	NO

Please see attached document mldp108c Test 3 Deliverable for full comments on Test 3.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

There needs to be a revision of the preferred strategy in terms of a reduction in the proposed house-building totals to reflect the ruling out – at a late stage in the process – of large key sites.

More studies need to be carried out that better show how house-building sites and industrial unit sites will fit into plans for the Heads of the Valleys – and more detailed assessment of housing viability in Merthyr Tydfil taking into account proposals/potential sites in neighbouring and nearby areas across the Heads of the Valleys and of social/affordable housing need in Merthyr Tydfil.

Flood risk and potential flood mitigation studies are needed.

So also are more detailed site master-planning and site assessments.

Well-being initiatives need to be drawn up and factored in – objectives need to be

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
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mldp108c LDP Test 3 Deliverable

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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## Merthyr Tydfil Heritage Trust Ltd

### Comments on Merthyr Tydfil draft revised LDP – Test 3 Deliverable?

TEST 3: WILL THE PLAN DELIVER?		
Is it likely to be effective?	NO	Population and housing targets won't be met – loss of open space, sustainability and well-being opportunities will nonetheless be at a high level.
Can it be implemented?	NO	The way that strategy targets (population and housing) remain unchanged even when circumstances change or large sites are ruled out suggest the revised LDP will be no more effective than the current LDP. Possibly less so as more problems and issues arise and developers stretch out their tentacles to grab unsuitable sites.
Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?	NO	It is clear that the Welsh Government and Cardiff City Region are not prepared to provide support, backing and funding for infrastructure needs like a new Metro station/hub, mitigation of flood risk to allow desired housing development, mitigation of brown-field sites like Dowlais Heartlands to enable long-promised housing development to go ahead. Only 'low hanging fruit' in sites – that is to say the Hoover Sports Ground have backing.
Will development be viable?	NO	Some key proposals – Hoover West and The Willows, Abercanaid, have already been ruled out for housing on 'viability' grounds. Retention of the historic original Hoover factory façade, gatehouse and office block also – again on viability grounds.
Can the sites allocated be delivered?	NO	We would like to see much more evidence that sites can be delivered at this stage. More studies of major sites are needed. Also of potential problem areas – for example, flood risk.
Is the plan sufficiently flexible?	NO	Clearly, the current LDP has no flexibility. The draft revision of the LDP includes a minimal allocation of sites for the large scale house-building proposed. Several sites have been lost or are likely to be lost even before the draft revised LDP is approved. Any margin for error has been removed.
Are there appropriate contingency provisions?	NO	
Is it monitored effectively?	NO	The current LDP has not been monitored effectively. In particular, the loss of heritage assets and sites have not been recognised (demolition of St Tydfil's Hospital, encroachment on key sites in Cyfarthfa Heritage Area, demolition of Old Labour Exchange (façade only left), loss of Cyfarthfa Cokeworks site – a planned heritage centre site – to DIY retail, decay at Cyfarthfa Ironworks and disuse of a major part of Cyfarthfa Castle with the removal of school classes.

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2a. Which part of the Deposit Plan (or associated document) are you commenting on?	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	Active Travel network map
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

2b. Does your representation provide Support, Objection or General Comment? (Please tick)		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

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<p>2d. Please set out below your representation on the Deposit Plan (or associated document). <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i></p> <p>Merthyr Tydfil Heritage Trust takes a keen interest in Active Travel walking and cycling proposals – because these links are essential to the historic listed buildings, heritage sites, Scheduled Ancient Monuments (SAMs), archaeological sites and historic landscapes that are all around us in the county borough.</p> <p>The Heritage Trust is taking part in the current consultation on the Active Travel network map and future routes being run by Merthyr Tydfil CBC.</p> <p>Unfortunately we have to report that:</p> <p>Active Travel standards and the planning of routes and networks is unsatisfactory in Merthyr Tydfil.</p> <p>A number of paths, pavements and roadways have been presented for approval by the Welsh Government – these clearly fail a basic audit by the Heritage Trust but have been passed by civil servants.</p> <p>Proposals for more routes have been submitted to the Welsh Government – but this future network plan was rejected. It is to be re-submitted soon – hopefully with revisions.</p> <p>The Heritage Trust has put forward a series of proposals for joint local authority and Welsh Government working on the planned A465 Dowlais Top – Hirwaun dualling project to the Inspector at the recent public inquiry.</p> <p>A copy of the Heritage Trust summation is attached.</p> <p>Also a copy of the Heritage Trust's initial submission to Merthyr Tydfil CBC in the present Active Travel consultation.</p> <p>We respectfully suggest amendments to the Active Travel map that is part of the Constraints Map for the draft revised LDP Deposit Plan – there are some inconsistencies. In addition, we would recommend that references to 'extensive Active Travel routes' be amended.</p> <p>There are many issues with paths of less than recommended standards.</p> <p>Even the 'blue riband' route the Taff Trail is sadly deficient for some sections of its length.</p>
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<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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## Merthyr Tydfil Heritage Trust Ltd

### **Check list of Merthyr Tydfil Heritage Trust's 2017 submissions on Active Travel to Merthyr Tydfil CBC and the A465 Public Inquiry**

The Heritage Trust has:

- prepared and presented submissions on Active Travel and other NMU provision to the A465 Sections 5 & 6 Public Inquiry
- drawn up detailed suggestions/recommendations for Active Travel and other NMU provision at A465 crossings and links
- submitted a copy of the interim consultation document to the Public Inquiry Inspector and
- prepared this check-list for easy reference. It is in 2 parts – A465 project links and crossings and National Cycle Route 46 (Rhymney Bridge – Baverstocks)

### **A465 Active Travel and NMU crossings and links**

- 1) Dowlais Top slip roads
  - a) Direct NMU link National Cycle Route 46, A465 slip roads and Asda car park
  - b) Pedestrian controlled lights across slip roads (as at Tredegar)
- 2) Penywern Ponds NMU bridge and links
  - a) Proposed NMU bridge to be to pedestrian and cycling standard
  - b) NMU bridge southern (lower) ramps to connect conveniently with Active Travel cycling and walking standard routes to both Dowlais Top and Penywern
  - c) Design standard of new NMU bridge (noting rusted steel of A465 Section 2 bridges)
  - d) Active Travel link to Lower Row (Tre-Ivor corner)
  - e) Active Travel improvements to Lower Row and Barracks Row
  - f) Active Travel improvements to the 'Bridge 19' footpath – Barracks Row to Victoria Street
  - g) New/restored route from the south west of the upper Penywern reservoir using ramp, gateway and right of way path to The Hafod, Pantyscallog, adjacent to Jones Street Bridge
- 3) Jones Street Bridge, Penywern

- a) Widening Jones Street Bridge to allow footways either side (in the current proposals)
  - b) Re-aligning and straightening footway and ramp on the western side of Jones Street (in the current proposals)
  - c) Providing a footway on the eastern side of The Hafod – to allow access to new route to the upper pond (see above)
  - d) NMU crossing of The Hafod
  - e) Active Travel cycling provision along A465 embankment crossing present Merthyr Motor Auctions extension to Pant Road
  - f) Improvements to Active Travel route MT1 (NCR 46) from northern Penywern pond spill to Pant (including wider corners for turning)
- 4) Pant Road Viaduct
- a) Rebuild Pant Viaduct from Pant Road west
  - b) Provide Active Travel standard access and suitable 'gateway' to Ivor Park / Parc Ifor
  - c) Extend / improve children's playground (incorporating into the new park 'gateway' above)
  - d) Provide amenities 'under the arches' of new viaduct (link to new park 'gateway')
  - e) Provide options for Active Travel in parallel to Victoria Street – using Llewellyn Street to link to improved 'Bridge 19' route
- 5) Ivor Park / Parc Ifor
- a) New access and 'gateway' at Pant Viaduct
  - b) Direct Active Travel route from Pant Viaduct access to Ivor Park / Parc Ifor along A465 route (past new attenuation pond)
- 6) Pant Industrial Estate
- a) NMU improvements in Pant Industrial Estate – mitigation for loss of right of way across A465 to Ivor Park / Parc Ifor
- 7) Rocky Road – Bryniau Road crossing and links
- a) Improved footways and road crossings at top Rocky Road and around the 5-way roundabout (under consideration at A465 public inquiry)
  - b) Active Travel link or route should be planned and developed from the 5-way roundabout to Pantscallog – better provision at the ICI sports ground corner.
- 8) Gurnos Ring Road



- a) Active Travel cycle and walking provision from Galon Uchaf to Goitre Lane (a Merthyr Tydfil CBC aspiration but not part of the A465 project)
- 9) Goitre Lane underpass subways
  - a) Retention and improvement of Gurnos Ring Road and A465 subways – original A465 proposals approved by the Design Council for Wales
  - b) Repair/improvement of historic Goitre Lane route through woodland north of A465
- 10) Taf Fechan
  - a) New footbridge alongside widened Taf Fechan Viaduct (part of A465 proposals)
  - b) New Active Travel route via new footbridge to Penydre and Prince Charles Hospital
  - c) Improvements on new Taff Trail crossing of A465 from Vaynor Road to Cefn Coed High Street
- 11) Cefn Coed High Street
  - a) Active Travel links along High Street – including an NMU crossing – to Cefn Coed Viaduct
  - b) Also across bridge when rebuilt under A465 proposals (commitment at A465 public inquiry)
  - c) Active Travel link from new A465 bridge down past Grawen Cottages to the ‘Lost’ Taff Trail link to Pwll Taf and the Old Navvies Line
  - d) The A465 scheme provides a number of improvements to the Taff Trail (and the ‘Lost’ Taff Trail).
- 12) National Cycling Route 46 - A470 crossing
  - a) Improvements to the ‘loop the loop’ cycling and walking crossing under the A470
  - b) Active Travel provision along Tai Mawr Road to Swansea Road near A470 Trago Mills interchange
- 13) Gellideg Estate
  - a) Improvements to the NCR 46 route through the estate (although ‘authorised’ as an Active Travel Route this section is clearly not up to Active Travel standards)
  - b) Tai Mawr Road and Swansea Road improvements for cycling – potential for addition to National Cycle Route 46
- 14) Swansea Road

- a) Improvements to Swansea Road for cyclists and other NMU to Active Travel standards (although 'authorised' as an Active Travel Route this section is clearly not up to Active Travel standards)
- b) Active Travel standard link from upper Swansea Road to Baverstock (part of A465 proposals)

### **National Cycle Route 46 – Rhymney Bridge to Baverstocks**

- 1. Provide Active Travel standard cycling route along Merthyr Common Road from Gypsy Castle turn-off to Rhymney Bridge interchange
- 2. Direct NMU link to connect National Cycle Route 46, A465 slip roads and Asda car park
- 3. Improvements to Active Travel route MT1 (NCR 46) from northern Penywern pond spill to Pant (including wider corners for turning)
- 4. Active Travel route MT1 improvements and extension to the Morlais (Miler) Tunnel access at the rear of Pantyscallog Primary School
- 5. Re-opening of the Morlais 'Miler' Tunnel – opening up better link to the Taff Trail / National Cycle Route 8 near Pontsarn**
- 6. Improvements to the 'loop the loop' cycling and walking crossing under Cefn Coed Viaduct and the A470
- 7. Active Travel provision along Tai Mawr Road to Swansea Road near A470 Trago Mills interchange
- 8. Improvements to the NCR 46 route through the estate (although 'authorised' as an Active Travel Route this section is clearly not up to Active Travel standards)
- 9. Tai Mawr Road and Swansea Road improvements for cycling – potential for addition to National Cycle Route 46
- 10. Active Travel standard link from upper Swansea Road to Baverstock (part of A465 proposals)

Rob Thomson  
 Volunteer Projects Officer  
 Merthyr Tydfil Heritage Trust  
 17 June 2018

## Merthyr Tydfil Heritage Trust Ltd

### **A465 Sections 5 & 6 Public Inquiry**

#### **Summation - Merthyr Tydfil Heritage Trust**

1. Merthyr Tydfil Heritage Trust has asked questions and presented evidence at the public inquiry on:
  - our historic landscape
  - road safety
  - Active Travel routes for walkers, cyclists and other ‘non-motorised users’
  - National Cycle Routes and
  - the well-being of future generations.

We see the A465 Sections 5 & 6 project as a great opportunity to bring benefits in terms of heritage, health, active travel and well-being to local communities – and to correct some of the problems from the present A465 and A470 Merthyr Tydfil by-pass (north).

But there will also be a cost to communities in Merthyr Tydfil. We have noted the evidence that there will be impacts from noise, pollution, increasing traffic, longer local trips, A465 junction closures and the stopping up of at least five pedestrian routes.

We confirm that we are calling on the Welsh Government to:

- revive and promote the ‘lost’ Taff Trail routes from Cefn Coed to Cwmtaff (and Brecon) and
- provide more effective partnership support Merthyr Tydfil County Borough Council to develop an Active Travel network that is integrated into the A465 scheme and
- continue with the proposed improvements to the east-west National Cycle Route 46 at Merthyr Tydfil – including a feasibility study on re-opening the Morlais ‘Miler’ Tunnel.

Turning to the dual carriageway scheme itself we confirm our calls for the Inspector to recommend:

- design improvements to the A470 crossing
- rebuilding of Pant Viaduct – rejection of an embankment/bridge replacement
- adoption of quality design in structures (perhaps following the bold lead adopted in the A465 Section 2 – which includes a large archway bridge, a suspension bridge and ‘weathered steel’ footbridges)
- retention and improvement of the Goetre Lane underpass
- the commissioning of the Design Council for Wales to carry out further design reviews and
- the delivery of improved NMU provision at crossings and links that can be integrated into future Active Travel routes and networks (details provided to the local authority).

## **2. Road safety**

The Heritage Trust would like the A465 Sections 5 & 6 scheme to go ahead.

A deciding factor for us is road safety. There has been a heavy toll of road crash casualties over many years – although the number has fallen in recent years perhaps after the introduction of average speed cameras on Sections 5 & 6 in 2013.

Our secretary Mr Morgan Chambers separately raised traffic accident concerns in relation to the A470 junction with High Street north of Cefn Coed on behalf of the Vaynor Community Forum.

Assurances have been given that this junction will be re-modelled with safety features for turning vehicles. This is essential given the increase in traffic accessing Cefn Coed.

## **3. The A465 scheme and the Well-being of Future Generations (Wales) Act?**

During the public inquiry, we asked questions to find out if this £400 - £500 million A465 scheme meets Welsh Government requirements under:

- the Active Travel (Wales) Act and
- the Well-being of Future Generations (Wales) Act

Several witnesses for the scheme referred to the aims and principles of the Well-Being of Future Generations (Wales) Act. However, the witness put forward for cross-examination agreed that most of the well-being benefits for local people would come from the improvements to footpaths, cycle ways and Active Travel routes.

The project team has put the investment into non-motorised users (NMU) at £5 million. The Heritage Trust has pointed out that this only amounts to 1% of the cost of the scheme.

#### **4. Active Travel questions**

We also asked some questions about Active Travel. Surely the Welsh Government is obliged to improve Active Travel provision? Would the 13 kilometres of new NMU routes mooted integrate into local authority Active Travel networks?

In evidence there were references to Active Travel standards and witnesses suggested the Welsh Government's obligations were limited in that it was required to take only "reasonable steps" to make improvements.

One witness offered the possibility that the Welsh Government might fulfil its obligation to promote Active Travel through health and activity programmes run by NHS Wales – although the law is clear that the obligation relates to its exercise of highway powers.

The Inspector advised us that he would be unable to make rulings or recommendations on NMU routes outside of the boundaries of the scheme.

We gave an undertaking to write to Merthyr Tydfil County Borough Council with details of our concerns about each and all of the A465 links and crossings and their Active Travel / National Cycle Network connections. We have submitted a copy of this to the Inspector.

#### **5. Historic landscape**

The Heritage Trust realised that the new four-lane Taf Fawr 'fly-over' is likely to have a severe adverse impact on views of the old Cefn Coed railway viaduct – part of the designated historic landscape of Merthyr Tydfil.



We asked questions about the use of Cadw's methodology for measuring the impact of development on historic landscapes.

The evidence suggested to us that Cadw corrected the Welsh Government project team's scoring. The project team maintained that it also assessed the views of the historic viaduct from Cyfarthfa Park and Cyfarthfa Castle off its own bat.

The Cadw methodology has been available for several years. We will write to Cadw suggesting a review to see if it has been effective and if it can be improved.

However, we are in clear disagreement with Cadw over the views of Cefn Coed Viaduct as part of the heritage landscape. To us they form an outstanding view of our industrial past – one of the most significant heritage views in Wales.

## **6. A470 crossing**

The Heritage Trust has raised concerns about the 'blocky mass' of the embankments and bridge carrying the A465 over the A470.

During the inquiry we were made aware that a Design Council for Wales team had looked at the proposals for all the main structures on the scheme. Their June 2016 reports says that an alternative scheme for the A470 crossing was discarded "due to negative environmental impact and cost".

The Heritage Trust was challenged at the inquiry to put forward an alternative to the 'fly-over' crossing. We did so in a letter to the Inspector. Our idea for the A470 to 'fly-over' the A465 was rubbished by the project team – probably rightly so. But we maintain that more discussion and consultation at earlier stages would have been helpful.

## **7. Goitre Lane underpass**

The Design Council for Wales in 2016 commended proposals to widen and improve this important link – the start of the Morlais Heritage Trail.

But the inquiry heard that the underpass would now be stopped up – apparently at the behest of the Merthyr Tydfil County Borough Council. We guess that this is because the local authority – wrongly – sees closure as a solution to fly-tipping and anti-social behaviour problems. This is perhaps the

oldest and most historic travel route in Merthyr Tydfil – with associations going back to the Romans and before. It is very well used by local people.

## **8. Pant Viaduct**

We also raised strong concerns about the proposals to replace Pant Viaduct – a heritage structure in its own right – with embankments and a bridge. The embankments and the loss of landscape views will have a huge negative impact on motorists, the local communities and passers-by.

## **9. Cynon Valley Gateway**

We learned during the inquiry that the Welsh Government has excluded the Cynon Valley Gateway (Aberdare by-pass northern extension) from the A465 scheme.

Evidence from the project team suggested a much more positive business case if the by-pass is constructed in tandem with Sections 5 & 6.

We have no brief for the Cynon Valley. But it seems unsatisfactory that a new A465 junction arrangement (itself the subject of objections) will be created with a link off it waiting for Rhondda Cynon Taf County Borough Council to find capital funding.

## **10. Final conclusion**

We welcome the Inspector's determination to explore the scheme in detail and to examine fairly all the objections and concerns that have been raised – also noting that he may well be limited in his recommendations by his strict remit.

This public inquiry could mark a turning point. The A465 Sections 5 & 6 scheme offers an opportunity for the Welsh Government to set an example in delivering on the well-being of future generations, on active travel as well as on safe-guarding heritage, the historic landscape and the environment.

Rob Thomson  
Volunteer Projects Officer  
Merthyr Tydfil Heritage Trust  
30 May 2018

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Volunteer Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text" value="REDACTED"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Merthyr Tydfil Replacement Local Development Plan 2016- 2031 Deposit Plan: Written Statement Para 2.8 Page 7

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

<p><b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b></p> <p>Merthyr Tydfil Heritage Trust has considered the 'key issues' raised and has made comments on some of them. These comments are included in a table in the separate document below. In the main our comments are directed at our view of how the Revised Draft LDP / Deposit Plan proposals deal with the issues. Heritage Trust concerns raised include:</p> <ol style="list-style-type: none"> <li>1. Population 'targets'</li> <li>2. Public service cuts</li> <li>3. Private house-building not for local need</li> <li>4. Wrong balance in employment land</li> <li>5. Lack of skills and skills training</li> <li>6. Need for a Metro hub</li> <li>7. Flood risk – lack of forward planning on mitigation</li> <li>8. Flood risk – need for urgent study on River Taff west bank</li> <li>9. Changes in population, housing and employment targets (or lack of change)</li> <li>10. Heritage under attack</li> <li>11. Special landscapes – need for protection</li> <li>12. Lack of open space – poor open space</li> <li>13. Active Travel – lack of a network</li> <li>14. Active Travel future proposals 'half-baked'</li> <li>15. Abernant – Merthyr tunnel project – heritage railway line restoration as a cycle route essential.</li> </ol>
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2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Heritage Trust concerns raised include:

1. Downward revision of 'in-migration' population 'targets'
2. 2018 Merthyr Tydfil housing need review/study
3. Support for skills and skills training projects – development of more employer-education partnership schemes
4. Masterplanning for a Metro hub – light rail, bus, car, cycle and pedestrian at Brandy Bridge (instead of just a station and instead of park and ride on Hoover sports ground)
5. Flood risk – an urgent study on River Taff and its tributaries and Welsh Government support for investment in appropriate flood mitigation
6. Revision downward in housing target (to at least take account of sites now ruled out such as Hoover West Bank, Goat Mill Road and Dowlais Heartlands)
7. Clear support for all heritage assets
8. Clear support for special landscapes – to include heritage landscapes such as views of Cefn Coed Viaduct
9. Protect open spaces – allocate sites in wards as suggested by the Open Space Strategy
10. Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map – add in Merthyr Tydfil Heritage Trust A465 dualling proposals
11. Put in place planning protection for the old railway track from the A470 to the Abernant – Merthyr tunnel as a cycle route / footpath / right of way (only) to include protection for public access to its historic assets in terms of bridges and retaining walls en route..



If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
5. Objectives
6. Revision process and consultation comments
7. Heritage – draft policy proposal and its revision
8. Well-being – objectives and proposals (or lack of)
9. Active Travel, footpaths, cycleways, rights of way, bridleways
10. Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
11. Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail
12. Hoover regeneration strategy – original proposals and revisions
13. Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
14. A465 dualling – comments on Heritage Trust proposals for development of Active Travel network and improvement of National Cycle Route 46 east-west as put forward at A465 public inquiry in 2018
15. Merthyr - Abernant Tunnel – need to secure disused railway line and its historic listed structure (currently in private ownership with public prohibited) from the tunnel entrance to the A470. Need to secure funding for alternative more viable schemes that meet Active Travel standards and suitability (or possibly the re-opening of the Morlais 'Miler' Tunnel on NCR 46)
16. West Merthyr – need to secure landscape, environment, historic assets including listed structures and Scheduled Ancient Monuments, protected areas (including SSSI and woodlands) as well as claimed rights of way and bridleways. Support for a country park (proposed first in 1970s).
17. Ffos-y-fran – need to review proposals for industrial and business use and consider environmentally friendly landscaping in after use as well as potential for leisure including hotel and indoor ski slope.
18. Green open space – potential loss of green open space due to unnecessary development and lack of proposals to improve provision of open space at community level.
19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.

3c. If this representation represents a petition, please indicate how many people it represents:	
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3d. If additional documents have been provided to support your representations, please list them below:
Additional information is provided in the Merthyr Tydfil Heritage Trust document mldp108e comments on key issues/aims (attached/below)

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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# Merthyr Tydfil Heritage Trust Ltd

Comments on draft revised Local Development Plan 'key issues'

Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 Deposit Plan: Written Statement

2.8 A wide range of social, cultural, environmental and economic information is expressed in the 'Sustainability Appraisal' which sits alongside the Plan. This information, along with the issues raised through community involvement, have informed the key issues for the LDP. These are summarised in Figure 1:

Figure 1: Summary of key issues for the LDP to address

	Key issues	Merthyr Tydfil Heritage Trust comments
1.	A projected population decline from 2024 with the loss of working aged people to elsewhere in the UK.	Merthyr Tydfil CBC's LDP2006-2021 review report of 2016 said that the LDP had met its "enhanced growth" target of 59,000 population by 2021 by 2011 (unknowingly). Despite past uncertainty over population projects, MTCBC then stated that the population was expected to grow again by 3,300 up to 2031. Merthyr Tydfil Heritage Trust after that raised concerns – pointing out that Welsh Government projections actually forecast that the population would plateau and then decline slightly. Private sector house building is unlikely to arrest the population decline or the emigration of young people. These trends have continued for generations across the Heads of the Valleys. In this instance (the revised LDP/draft deposit plan) the target in terms of homes to be built is unchanged since the draft stage. But key potential sites (Hoover west and Goat Mill Road – a possible 800 dwellings between them) have been ruled out. Dowlais Heartlands (up to 450 houses) has also been cut from the list of potential sites.
2.	Aligning service provision and facilities with demographic changes (such as education, health and leisure).	MTCBC claims a declining population will mean cuts in key services (including education, health and leisure). The draft revised LDP proposals seem likely to add to service reduction as development on amenity and open space will limit opportunities for healthy life-styles and well-being activities. This despite of existing policies intended to protect these.
3.	The impact of development on community identity and characteristics and amenity.	There is likely to be an adverse impact on community amenity with the wholesale development advocated in the draft revised LDP.
4.	Levels of deprivation experienced are higher in the north of the County Borough.	
5.	Access to sufficient quality open space varies but is generally poor	There seem to be little or no proposals to improve the sufficiency or the quality of open space – rated poor across the county borough. There seem to be no proposals to allocate land for allotment

	across the County Borough.	gardens, playgrounds or play areas in local communities. (Suggestions are made in the Open Space strategy report.)
6.	The need for more social, affordable and older persons housing.	Local housing needs – the needs of local people must be addressed. The housing needs assessment produced with the draft revised LDP dates back to 2014. It gave a house building an annual target of 346 units a year to 2019 – a total of 1,730 homes. A further detailed assessment across the county borough is now due. None has appeared. This is in spite of a warning in the LDP review report of 2016 that a previous review in 2010 revealed a housing need in Merthyr Tydfil 10 times higher than previously forecast. The review report highlighted the need for a further review
7.	The quality and energy efficiency of the existing housing.	There seem to be no proposals to address this issue.
8.	Limited employment land development over the past 5 years.	Many of Merthyr Tydfil industrial and trading estates are old and probably sub-standard. Some – in particular EFI Astex and Williamstown which occupy vital heritage sites in or immediately abutting the Cyfarthfa Conservation Area (also now the Cyfarthfa Heritage Area). New and better facilities are needed for most if not all of the businesses on those sites – and probably for many more on other much larger estates. An example of a business in need of relocation is Merthyr Motor Auctions which faces disruption if the present A465 Heads of the Valleys dualling scheme goes ahead. Improving facilities for existing businesses (allowing relocation for some) on industrial should be the priority. Existing sub-standard facilities and those that are already in conflict with local communities should not be protected in the LDP.
9.	General shortage of available industrial and warehouse units across all sizes.	Again, improvement and up-grading of existing estates could be the best way forward. Has the availability of units in near neighbouring areas such as Blaenau Gwent been tested?
10.	Issue with low skills levels, Merthyr Tydfil has a high proportion of its working age population with no qualifications (16 percent).	We agree this should be tackled. Skills training provision is needed. The draft revised LDP/deposit plan does flag up past failure to develop B1 office and light industry uses. But will B1 allocations (even if delivered) be enough to encourage businesses to provide employment for those who have educational qualifications – and to encourage businesses to support more and better skills training ‘in-house’ or through training providers? Will it deter out-migration either of those raised through the schools and college system in Merthyr Tydfil or those who would move to the area if skilled employment opportunities were available? Jobs in B1 or B2 industrial estates may attract people from away. Whether they will move to Merthyr Tydfil to add to the local population is questionable. Plus, Merthyr Tydfil’s 2014 housing assessment raised question marks about whether those even on average local incomes (well below national averages) could afford family housing. This is now a national issue.
11.	Whilst there are extensive walking and cycling routes they are	Merthyr Tydfil Heritage Trust’s view is that walking routes are inadequate and not up to Active Travel standards. This applies to many that are already (incorrectly – in our view) registered for



	not well connected. The number of people who walk or cycle for trips of less than 5km is low. East-west travel is difficult.	<p>Active Travel and those proposed for the Active Travel network map up to 2031.</p> <p>In reality, far too many footways and pavements in Merthyr Tydfil are narrow and many have street light, telephone pole and other obstructions.</p> <p>Cycle routes are virtually non-existent – the first and only cycle segregated from traffic on the main highway is in Penydarren. It extends barely 100 yards. In our view, the investment in it has already proved a boon for pedestrian and traffic safety.</p> <p>Active Travel proposals for the next 10 years are half-baked – the opportunity to work with the Welsh Government and its contractors on the A465 project on Active Travel has been neglected in our view (with the result that some proposals from the two camps are in conflict).</p> <p>Aspirational Active Travel cycleway proposals – set out on the draft revised LDP constraints plan – are flawed (and the map itself appears to have ‘errors’).</p> <p>The Merthyr – Abernant tunnel re-opening proposal needs urgent re-examination by MTCBC and the Welsh Government. The Heritage Trust raised this two years ago. But it is very clear that cycling and walking access to the tunnel must be along the heritage route – that is the continuation of the old Neath to Merthyr Tydfil railway line from the tunnel towards Merthyr Tydfil town centre. This would bring into play heritage structures along the way. The land is in private ownership and the public has been prohibited from going to the eastern tunnel entrance at all for a decade and more. The landowners will have to drop their objections to the claim lodged for a right of way if the tunnel re-opening is to proceed.</p>
12.	A new central bus station is proposed.	MTHT advocates a Metro ‘hub’ – trains, buses, parking and Active Travel routes – at Brandy Bridge on the fringe of the Hoover Regeneration Area near the town centre.
13.	The South Wales Metro project will improve access to Cardiff.	<p>Strictly speaking, the access improvement will amount to no more than two extra trains per hour – additional capacity. The comfort of commuters will be improved – at the moment standards are a disgrace. Problems in accessing stations will continue.</p> <p>Pentrebach Station (formerly known as Pentrebach Halt) is not suitable as a site for a Metro hub. There can be no facility for buses to stop let alone wait for trains and none for cars to drop off and pick up Metro light rail passengers. Extra park and ride capacity – at most 50 additional spaces as 40 existing lay-by parking places along the nearby main road would go – would mean the sacrifice of the Hoover sports ground. The loss of the only sizeable flat grassed sports pitch area (at present in private ownership but to be acquired by the Welsh Government) would be a tragedy for future sports generations and the local community. The loss of the Hoover Sports Ground (and the façade of the original Hoover factory, gatehouse and detached office block) would shout out total surrender to corporate</p>
14.	Home energy use is the	

	primary cause of local GHG emissions. Carbon budgeting is set to drive demand for renewable and low carbon energy.	
15.	Climate change impacts on species, habitats and water resources; transport fuel use is the secondary cause of local greenhouse gas emissions; Twynyrodyn Hill has been declared an Air Quality Management Area (AQMA).	Problems at Twynyrodyn Hill (leading down to the Tesco roundabout) were highlighted in an MTCBC consultation by an Merthyr Tydfil Heritage Trust officer 8 years ago – prior to the building of the costly central link gyratory. Twynyrodyn Hill is an example of how poor highways infrastructure dating back to the 19 <sup>th</sup> century has not been improved or adapted into a road network suitable for modern cars, pedestrians and cyclists.
16.	A wide range of species and habitats are under threat. Greater connectivity is needed between green corridors and green spaces.	MTCBC intends doing away with green wedges – and swathes of green corridor and open space could be re-developed under draft revised LDP proposals.
17.	Improvement is needed to ground, surface and water bodies in particular the Nant Morlais, due to a decline in water quality.	Nothing in the draft revised LDP suggests these serious issues will be tackled.
18.	Parts of the Town Centre are identified as being at risk from flooding.	Nothing in the draft revised LDP suggests the serious issue of increased flooding risk will be tackled – although there is recognition that measures will be required for new schemes (like the new bus station and retail redevelopment of the old bus station) in the town centre (proper). Flooding risk on the west bank of the River Taff from The Willows south to Dragon Parc and Abercanaid has been highlighted by National Resources Wales as an issue for the 2018 Hoover regeneration masterplan. However, the possibility that this might affect regeneration seems to have been overlooked – despite it being made clear in the 2006-2021 LDP that C zone flood risk areas would not be redeveloped for housing.
19.	National and local heritage designations based on past iron and coal industries need sensitive conservation.	This is vital – heritage assets are being left to decay and deteriorate. The draft revised LDP / deposit plan does not recognise the losses of recent years – nor did Merthyr Tydfil CBC's review of the 2006 – 2021 LDP. It found no issues.
20.	Mineral resources located outside of settlements are protected.	
21.	The Ffos-y-fran land reclamation scheme is on-going and some other mineral reserves still have permission. A good	The 2006 – 2021 LDP said that the Goat Mill Road site – or part of it – would be reserved for a waste management facility. It also stated that in future waste management facilities would be developed by a partnership of Merthyr Tydfil CBC and Rhondda Cynon Taf CBC. The employment land review for the draft revised LDP / deposit

	network of waste facilities exists.	plan says that an application is being made / may be made for the development of a waste management facility at Goat Mill Road. It is totally unsatisfactory that such a major project bid / application / site purchase inquiry should be kept under wraps.
22.	At less than 10%, the number of people that can communicate in Welsh is below the Wales average.	
23.	High quality landscape areas, prominent views and traditional field boundaries need proactive management and protection.	Special interest and historic landscapes in Merthyr Tydfil are under huge pressure – more ‘big sheds’ and other intrusions must be resisted. The settlement boundaries in the 2006 – 2021 LDP should be maintained – extra support in terms of the special landscape areas is welcome. Landscape protection must not be watered down.
24.	The need to encourage and promote leisure and tourism.	The importance of good management and investment in the conservation of heritage and the natural environment can’t be underestimated. Well cared for and maintained historic sites and buildings as well as green local open spaces are vital for the well-being of local people. Developing over, around and in the vicinity of heritage and green assets must be resisted – as must poorly considered attempts to improve or enhance them.
25.	Large underused/disused brownfield sites provide regeneration opportunities.	The Hoover west bank area urgently needs redevelopment – it is a massive eye-sore. Yet an adverse flood risk report seems only to have raised the attention of the Welsh Government and Merthyr Tydfil CBC this year. They seem to have abandoned regeneration on the west bank altogether. Yet this is a potential issue that should have been considered years ago – concerns about the problems from river flood risk were identified in the 2006 – 2021 LDP. What’s more the whole of the consultation on the draft revised LDP for over a year was based on Hoover West providing a significant proportion of the new, additional housing sites needed for the new private house building programme. The ‘working groups’ and the Merthyr Tydfil CBC steering group were told this – 25 per cent of the housing allocation. Another pipe dream.
26.	River Taff corridor provides green infrastructure opportunities.	The River Taff corridor – from the confluence south of Cefn Coed downstream – provides tremendous opportunities – but also major challenges. Maintenance, management and repair of river banks is needed – and riverside walks could be developed. This applies southwards – and certainly through the Hoover Regeneration area. We referred above (brown field sites) to the flood risk along the west bank of the River Taff (The Willows to Abercanaid). We would recommend an urgent study of the Taff river banks from the confluence to Abercanaid to assess what is possible and achievable in opening up the river and river banks and linking riverside walks to form a viable Active Travel route which itself should integrate into a wider Active Travel network for the town and riverside communities of Merthyr Tydfil. Much more flood risk work should be undertaken to find out what is needed to mitigate flood risk and so enable the regeneration of

		riverside areas – including The Willows and Upper Abercanaid on the Hoover Regeneration Area west bank (this to link with proposals that should have been forthcoming under the recent Hoover Regeneration Area which has been restricted to the east bank).
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Volunteer Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text" value="REDACTED"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 Deposit Plan: Written Statement Paras 3.5 & 3.6 + figure 2 Pages 9 & 10

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
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Amendments to and commentary on draft revised Local Development Plan Objectives 1-14 is provided on the attached document mldp108ff Comments 5 Objectives.

Merthyr Tydfil Heritage Trust has again considered the objectives for the Revised LDP Deposit Plan.

We have suggested amendments in an attempt to make them clearer. We also reviewed the objectives from the LDP 2006 – 2021 and overall found they covered the same ground and were more appropriate (Of course they would need amendment and references to updated and more recent legislation would need to be added.)

We have also attached comments on the general and particular issues that arise. These include:

The population objective

Downward revision of the housing target to take account of sites no longer under consideration

The need for regeneration to support local communities – not visa versa

Site regeneration is needed for sites like Dowlais Heartlands (contamination) and Hoover West – Willows to Abercanaid (flood risk)

High quality design to be a requirement – this to be reviewed by independent experts such as Design Council for Wales. Support for design is also available in the LDP 2006-2021.

A Metro hub is needed at Brandy Bridge (not just a site for a Metro station)

Heritage must be “protected, conserved and restored” – not “enhanced”

Natural species of importance should be protected [not just species of ‘principle’ (sic) importance as suggested]

Landscape protection – needs beefing up and ‘historic landscapes’ should be referenced as well as ‘special landscapes’

There is a need to support skills training projects

Greater support should be provided for local centres and village centres

Tourism – the notion of ‘all-year round’ tourism should be discarded

Any waste management facility proposals for Goat Mill Road should be made public.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

Proposed amendments to the draft revised Local Development Plan Objectives 1-18 are included in the attached table.

As another option the latest objectives might be better discarded altogether and replaced with updated objectives from the LDP 2006-2021.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
5. Objectives
6. Revision process and consultation comments
7. Heritage – draft policy proposal and its revision
8. Well-being – objectives and proposals (or lack of)
9. Active Travel, footpaths, cycleways, rights of way, bridleways
10. Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
11. Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail
12. Hoover regeneration strategy – original proposals and revisions
13. Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
14. A465 dualling – comments on Heritage Trust proposals for development of Active Travel network and improvement of National Cycle Route 46 east-west as put forward at A465 public inquiry in 2018
15. Merthyr - Abernant Tunnel – need to secure disused railway line and its historic listed structure (currently in private ownership with public prohibited) from the tunnel entrance to the A470. Need to secure funding for alternative more viable schemes that meet Active Travel standards and suitability (or possibly the re-opening of the Morlais 'Miler' Tunnel on NCR 46)
16. West Merthyr – need to secure landscape, environment, historic assets including listed structures and Scheduled Ancient Monuments, protected areas (including SSSI and woodlands) as well as claimed rights of way and bridleways. Support for a country park (proposed first in 1970s).
17. Ffos-y-fran – need to review proposals for industrial and business use and consider environmentally friendly landscaping in after use as well as potential for leisure including hotel and indoor ski slope.
18. Green open space – potential loss of green open space due to unnecessary development and lack of proposals to improve provision of open space at community level.
19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.

3c. If this representation represents a petition, please indicate how many people it represents:	
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3d. If additional documents have been provided to support your representations, please list them below:
Full comments and alternative wording for some objectives are included in the attached document mldp108f Comments 5 Objectives

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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# Merthyr Tydfil Heritage Trust Ltd

## Comments on Replacement LDP Objectives

Merthyr Tydfil Replacement Local Development Plan 2016 – 2031

Deposit Plan: Written Statement

## LDP Objectives

3.5 To realise the vision, support local well-being objectives and address key issues, LDP objectives have been identified having regard to local issues raised through consultation, the evidence base and national policy. The Objectives are set out in Figure 2.

LDP Objective + proposed amendments	Merthyr Tydfil Heritage Trust commentary
LDP Objective 1 Sustainable Population Growth: To encourage a sustainable level and distribution of population growth. Amend to: To encourage a sustainable level and distribution of population and to support sustainable communities.	We have problems with this objective. The idea that the local authority can attract people to live in Merthyr Tydfil simply by allowing private developers to build on unsuitable sites – green space rather than brown sites – is not sound. MTCBC seemed to supply out-dated population statistics suggesting growth of population in its application to the Welsh Government to revise the LDP. The case for more housing was based on the officially forecast rise in population. (This was raised by MTHT in 2016.) But there was a difference of 3,206 in the older and more recent projections at 2034. In fact, the population will plateau and then decline. MTCBC now suggests the building of 2,800 new private houses will attract over 3,000 people to settle in Merthyr Tydfil.
LDP Objective 2 Welsh Language and Culture: To protect and enhance Welsh language and culture. Amend to: To protect, support and develop Welsh language and culture.	Nothing in the development programme will encourage Welsh language and culture – experience shows that neither new build housing or SME B2 use make anything other than token contributions.
LDP Objective 3 Housing Provision: To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.	The much-inflated proposal for 2,800 new homes is not planned to meet local housing needs – only 261 homes (barely 10 per cent) will be social housing or affordable housing. The other 90 per cent of housing land will be for people moving into the area. There is a clear over-provision here. And local housing needs will not be met. The LDP ‘owns up’ to this by proposing that more social housing can be built outside settlement areas. However Objective 3 does not need amendment. It says only that local housing needs should be addressed.
LDP Objective 4 Regeneration: To promote the suitable reuse of previously developed land and the continued regeneration of local communities.	Although an admirable objective it seems that the LDP will accept that there will be no regeneration on most of the original Hoover Regeneration Area – the Welsh Government (and MTCBC’s) withdrawal rather than invest in flood mitigation is unchallenged. The

<p>Amend to:</p> <p>To promote the suitable reuse of previously developed land within settlement boundaries and the continued renewal and regeneration of local communities and local centres.</p>	<p>‘Heartlands’ proposal at the former Ivor Works is also kicked into touch.</p>
<p>LDP Objective 5 Infrastructure: To ensure that community infrastructure and open space supports the regeneration of local communities.</p> <p>Amend to:</p> <p>LDP Objective 5 Infrastructure: To ensure that the regeneration of local communities supports community infrastructure and open space.</p>	<p>This objective suggests that community infrastructure and open space must serve regeneration – and not visa-versa. Regeneration – here meaning development or re-development – should provide community infrastructure and open space. It should benefit community infrastructure – which should not be sacrificed for development. This objective needs to be amended to make this clear.</p>
<p>LDP Objective 6 Sustainable Design: To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change.</p> <p>Amend to:</p> <p>To require design of high quality that ensures development is sustainable, accessible and inclusive – also require that developers commission the Design Council for Wales or equivalent independent professional standard design consultants to critically review proposals at the planning stage.</p> <p>To support measures and promote initiative which mitigate the predicted effects of climate change.</p>	<p>The LDP will not be able to achieve sustainable design of high quality through “promotion”. It should set out a requirement. No testing or measuring of design quality seems to be proposed. The Design Council for Wales could be commissioned project-by-project to provide advice on “high quality” design for all major proposals – and avoidance of DCfW recommendations (in particular, on grounds of cost) should not be allowed.</p>
<p>LDP Objective7 Transport:</p> <p>LDP Objective7 Transport: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.</p> <p>Amend to:</p> <p>To support an integrated transport system with a new Metro hub at Brandy Bridge, to develop and protect Active Travel routes and networks.</p> <p>To ensure new developments are accessible with walking, cycling and public transport links (that meet full Active Travel standard) to local communities, the wider local Active</p>	<p>An integrated local public transport system is essential. MTHT has called for a Merthyr Tydfil Metro that delivers rail, light rail, bus, walking and cycling networks. A Metro ‘hub’ – promised in various SE Wales Metro plans – should be developed at Brandy Bridge as part of the Hoover Regeneration Area project (This proposal has already been suggested by MTHT.) Buses should meet Metro trains there. That is the location for any ‘park and ride’.</p> <p>MTCBC and Welsh Government need to go to the drawing board with Active Travel proposals. Most routes already designated are unsuitable for cycling and less than adequate for walking – they don’t meet the Active Travel standards.</p>

Travel network and public transport.	
<p>LDP Objective 8 Community Facilities: To support existing community facilities and suitable community led development.</p> <p>Amend to:</p> <p>To support and protect existing community facilities and suitable community-led development.</p>	<p>This objective is laudable. But it should be made clear that speculative housing and B2 business development should not be at the expense of existing community facilities and that community-led projects should have priority.</p>
<p>LDP Objective 9 Heritage and Cultural Assets: To protect, enhance and promote all heritage, historic and cultural assets.</p> <p>Amend to:</p> <p>To protect, conserve and restore all heritage, historic and cultural assets and to ensure that Cadw's conservation principles are applied.</p>	<p>This objective should be re-worded. The objective should read "to protect, conserve and restore all heritage, historic and cultural assets".</p> <p>The suggestion that assets (buildings, sites, landscapes, artefacts) can be "enhanced" opens the door to redevelopment. Much more needs to be done if Cadw's conservation principles are to be implemented effectively by MTCBC. The local authority has drafted a new conservation strategy – this must be strongly supported in the LDP as otherwise the recent loss of heritage sites (St Tydfil's Hospital, Cyfarthfa Steelworks Cokeworks, Cyfarthfa Castle schools) for public use will continue.</p>
<p>LDP Objective 10 To improve ecosystem resilience and connectivity which support Biodiversity: habitats and species of principle importance.</p> <p>Amend to:</p> <p>To require improvement of ecosystem resilience and connectivity which supports biodiversity, habitats and species of importance.</p>	<p>This objective should be re-worded so as to be clear that MTCBC through the LDP requires the protection and improvement of ecosystems, habitats and species of importance (not just those of 'principle' importance for biodiversity. [Note: perhaps this should be 'principal' not 'principle'.])</p>
<p>LDP Objective 11 Countryside and Landscape: To protect and enhance the character and appearance of the landscape and the countryside.</p> <p>Amend to:</p> <p>To protect and improve the character, appearance and sustainable management of the landscape (including the designated historic landscapes and special landscape areas) and the countryside.</p>	<p>Again this objective should be re-phrased: "To protect and improve the character, appearance and sustainable management of the landscape (including the designated historic landscapes and special landscape areas) and the countryside".</p> <p>The word 'enhance' should be replaced by 'improve'. [Enhancement might be construed as change ranging from 'cosmetic' or token (and temporary) to substantial development.]</p>
<p>LDP Objective 12 Economic Development: To provide and safeguard appropriate land for economic and skills development.</p> <p>Amend to:</p> <p>To safeguard and allocate appropriate land for sustainable economic development and for skills development.</p>	<p>We are of the view that this objective might be confusing. Is land to be provided and safeguarded for both economic development and for skills development? Is it to be provided for economic development provided there is also skills development? Might there be a distinction drawn between economic development schemes that have a strong training element?</p>

LDP Objective 13 Rural Economy: To strengthen and diversify the rural economy.	
<p>LDP Objective 14 Town and Local Centres: To develop the town and local centres as accessible, attractive, viable and vibrant places.</p> <p>Amend to:</p> <p>To develop the town, local centres and village centres as accessible, attractive, viable, vibrant, safe and healthy places that provide support for local people, their well-being and community activity.</p>	<p>This objective needs clarification as it should include ‘village centres’ as well as ‘local centres’.</p> <p>The draft LDP fails to give recognition to either Pentrebach or Abercanaid. Instead these communities are relegated to be part of the town of Merthyr Tydfil – seemingly consigned to the new ‘urban sprawl’ around the Hoover regeneration area.</p> <p>The objective should reference development for health, safety, well-being and for community use – as it stands it seems to be simply an open invitation for commercial development.</p> <p>So:</p> <p>“To develop the town, local centres and village centres as accessible, attractive, viable, vibrant, safe and healthy places that provide support for local people, their well-being and community activity.”</p>
<p>LDP Objective 15 Leisure, Recreation and Tourism: To support sustainable tourism, leisure and recreation developments and encourage an all-year-round tourism industry.</p> <p>Amend to:</p> <p>To support sustainable and appropriate tourism, leisure and recreation development.</p>	<p>“Support for sustainable tourism, leisure and recreation development” is sufficient. The final section, namely “and encourage an all-year-round tourism industry” is vague and ambiguous at best and would surely be used to undermine other essential safeguards in the draft revised LDP.</p>
LDP Objective 16 Renewable Energy: To promote renewable and low carbon energy.	
LDP Objective 17 Minerals: To ensure a sustainable supply of minerals.	
LDP Objective 18 Sustainable Resources & Waste: To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities.	<p>We note in the LDP 2006 – 2021 that an allocation of land at Goat Mill Road is made for a waste management facility. This possibly to be a Merthyr Tydfil CBC and Rhondda Cynon Taf CBC partnership project.</p> <p>Now there is mention of firm interest in a waste management project at Goat Mill Road. Is there a project? Or an inquiry? Or an application? Offer to buy?</p>

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
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2a. Which part of the Deposit Plan (or associated document) are you commenting on?	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Draft Revised LDP Deposit Plan, Draft Preferred Strategy, LDP Review Report 2016

2b. Does your representation provide Support, Objection or General Comment? (Please tick)		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

<p>2d. Please set out below your representation on the Deposit Plan (or associated document). <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i></p> <p>Merthyr Tydfil Heritage Trust would like to make some comments on the process of revising the Local Development Plan 2006-2021 and drafting the Revised Local Development Plan 2016 – 2031.</p> <p>We appreciate the good work that has gone in to producing detailed strategies and supporting document – such as the Special Landscapes report and the Open Space strategy.</p> <p>We also understand how difficult it is to raise public interest in plans and maps – and in population trends. So efforts that have gone in to public consultation by the planning team deserve recognition.</p> <p>However, there seems to be little corporate weight behind any discussion of the issues at stake. Few or no press notices, little social media activity and a page on the council's website that is groaning under the weight of policy documents – a whole clutch of which were published in June 2018 giving little time for digestion.</p> <p>Plus a consultation period over the annual summer holiday period. And no posting at all on the Cwm Taf Hub – although this is flagged up at Merthyr Tydfil CBC's favoured consultation platform.</p> <p>Going back to 2011, MTCBC seems to taken a rather casual approach to monitoring and reviewing the all-important population, housing and employment data.</p> <p>Local and national government was taken by surprise when the 2011 Census revealed that population projections had been wide of the mark.</p> <p>Merthyr Tydfil CBC was caught on the hop because its Local Development Plan 2006 – 2021 (adopted in 2011) was aimed at halting population decline and encouraging in-migration. It set a target of encouraging population growth to 59,000 by 2020. The</p>
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updated census statistics showed the target had already been reached - over 10 years early.

The 2016 Merthyr Tydfil LDP Review Report said that with an expected national return to economic growth the population of Merthyr Tydfil could be expected to rise again to 62,000 by 2031.

Sometime afterwards Merthyr Tydfil Heritage Trust wrote to the local authority to suggest that its bid to the Welsh Government to revise the LDP was based on out of date projections that projected this scale of population increase - that is to say a rise over 3,000 by 2031.

Minutes of the LDP Steering Group say that councillors were given a presentation with eight projections for population growth. The Lichfields retail needs study of 2017 cites population projections for Merthyr Tydfil that total up numbers to over 63,000 - citing their source as Merthyr Tydfil CBC 'preferred' population projections.

All this matters to the LDP 2006-2021, to the review and to Merthyr Tydfil CBC's preferred strategy for the Revised LDP 2016 - 2031 because house-building targets are linked to population projections.

A target of 3,800 new build houses was set in the 2006 - 2021 for the LDP period.

The draft LDP 2016 - 2031 now agrees with that the local population has plateaued at 59,000 and will remain at about that level and a bit above if the projections (we referenced them on Stats Wales) are to be trusted.

The Preferred Strategy adopted for the 2016 - 2031 LDP is one of "sustainable growth" - with an increase in population attracted by Merthyr Tydfil CBC's proposal to encourage the building of 2,800 or so new dwellings over the plan period. [By contrast the 4,400 population rise and 3,900 new homes targets set in the 2006 - 2021 LDP were "enhanced growth".]

According to the latest 2018 scenario, an in-migration of people of working age will buy new homes from the national house-builders.

We have worked out that as 1,500 properties were said to have been completed by 2011 there was a need for another 2,400 new units if the 2021 target was to be reached.

The number crunching has continued at Merthyr Tydfil CBC and a target of 2,250 new build private houses (with 10 per cent with price discounts so as to rate as 'affordable') is mooted - with 'windfall' sites expected to add nearly 600 more.

This is documented in Policy SW1 on page 22 of the Draft Revised LDP Deposit Plan: Written Statement:

"To sustainably grow our population, 2,250 additional homes are required. To ensure these are delivered, provision is made for 2,825 additional homes."

About the same number of new build houses were needed under the 2016 - 2031 Draft Revised LDP. There would be another decade to build them.

Would the sites already allocated be sufficient for all this new housing? Well, perhaps. But then again.

The draft revised LDP Deposit Plan (June 2018) reveals that three large housing sites have now fallen by the wayside.

Hoover Regeneration Strategy area - only 450 units with a 'loss' of 350 more units

Dowlais Heartlands - 450 units were proposed but site costs including contamination removal have put off all developers

Goat Mill Road - another possible 400 houses is ruled out either because much of this site is to be reserved for a waste management facility or because of firm interest from organisations wanting to commission one there.

In spite of the potential loss of these sites for housing (a national house builder is said to be still interested in part of the overall Goat Mill Road site) the housing target has not been revised.

This means that the available house building land supply may continue to be less than the Welsh Government's five year requirement - with pressure likely to come from developers submitting applications for other unsuitable sites on green open spaces, in the countryside or on heritage sites outside the settlement boundaries.

Finally, employment and economic data does not appear to be analysed and although the Employment Land Study gives an overview of industrial estates we would suggest further research into the employment profile and a robust survey of industrial unit availability in Merthyr Tydfil and the Heads of the Valleys.

A study on skills training would also be of benefit in informing the decision-making process for the revision of Merthyr Tydfil's Local Development Plan.

Flood mitigation studies should be carried out with a view to reviving the Hoover Strategic Regeneration Area project and town centre redevelopment proposals. They should have been carried out much earlier in the process.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** *(e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).*

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

<b>I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.</b>	<input type="checkbox"/>
<b>I want to speak at a public hearing.</b>	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

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19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.



3c. If this representation represents a petition, please indicate how many people it represents:	
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3d. If additional documents have been provided to support your representations, please list them below:

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Volunteer Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
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Line 4 <input type="text" value="REDACTED"/>	<input type="text"/>
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Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

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<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Revised draft LDP Deposit Plan Written Statement Revised draft LDP Initial Consultation Assessment

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/> /tick	Comment <input type="checkbox"/> /tick

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Test 1 <input type="checkbox"/> /tick	Test 2 <input type="checkbox"/> /tick	Test 3 <input type="checkbox"/> /tick

<p><b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i></p> <p>Merthyr Tydfil Heritage Trust remains supportive of the draft Local Development Plan 2016 – 2031 Deposit Plan – as in our previous comments of September 2017 – we have some comments and objections to some proposals.</p> <p>These include:</p> <p>Access to Merthyr – Abernant tunnel: the line of the dismantled railway line north west of the tunnel across the Rhydycar West site should be safeguarded for a heritage cycleway to the A470.</p> <p>Merthyr Leisure Village / northern border of the Hoover Strategic Regeneration Area: the line of the old railway (across the Taff Trail at the listed Brunel designed Glamorganshire Canal bridge) should also be safeguarded for a cycleway to link across the A470.</p> <p>Cyfarthfa Heritage Area</p> <p>EFI Astex Estate</p> <p>– the eastern section of this area should not be protected as an employment area and should be protected to confirm public access to Pontycafnau Bridge and also north along the old tramroad route to Cefn Coed old bridge</p> <p>Cyfarthfa Industrial Estate</p> <p>The corridor of land from Williamstown Bridge along the bank of River Taff to the Cyfarthfa Ironworks site should not be protected as an employment area. This corridor in the Cyfarthfa Heritage Area is within an archaeologically sensitive area and has suffered recent encroachment. It should be safeguarded as a potential cycleway linking sections of the Taff Trail</p> <p>Hoover Strategic Regeneration Area</p> <p>Hoover site 2 – north</p>
---

Additional land south of Brandy Bridge should be safeguarded for a Metro Hub to include a bus interchange. This would be additional to that earmarked for a Metro station.

Original 1948 Hoover factory façade and gatehouse

The Hoover Strategic Regeneration Area Masterplan should be revised to protect the original 1948 Hoover factory entrance corner façade and gatehouse from demolition

Hoover Sports Ground

The main grassed playing area of the Hoover Sports Ground should be safeguarded as a community public open space and (cricket) sports ground.

Pentrebach Station park and ride

The car park and its access should be re-aligned so it does not conflict with the main grassed sports ground

High density housing blocks

This part of the Hoover Strategic Regeneration Area proposals should be deleted as it is in conflict with the sports ground – the only sizeable flat cultivated grassed area (i.e. more than one football pitch) left in the Merthyr Tydfil town area with sports and open space value and potential.

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Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	Draft Revised LDP Deposit Plan: Written Statement Hoover Strategic Regeneration Area Masterplan

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ments on Hoover Strategic Regeneration Area including Hoover Sports Ground, 1948 Factory (façade, gatehouse and office block) and proposed Metro Hub.

Merthyr Tydfil Heritage Trust learned via Merthyr Tydfil CBC's stakeholder working groups that the Hoover Strategic Regeneration Area was expected to provide land for a substantial amount of the new housing required under the draft Preferred Strategy for the LDP revision.

Minutes of the consultation working groups and the Steering Group held early in 2017 show that consultees were told that a large proportion of the new housing required under the draft Preferred Strategy would be at Hoover. It would amount to 25% of the total.

The Welsh Government was again negotiating to buy the Hoover Candy factory complex – including the original 1948 factory, office and gatehouse buildings, the factory extension and the 1970s further extension as well as the Hoover Sports Ground.

Further acquisitions on the River Taff west bank – The Willows, Hoover Dragon Parc site – would allow the development of a strategic site that, according to the 2017 Merthyr Tydfil Retail Study consultants Lichfields, would “deliver approximately 800 dwellings (approx. 1,880 new residents)” and also “accommodate up to 15 ha of land for employment uses that could potentially create 1,500 jobs”.

However, the draft revised LDP Deposit Plan (June 2018) disclosed that the heralded Hoover regeneration scheme would supply only 440 units with a ‘loss’ of 350 more units. The Welsh Government would be concluding the purchase of the main Hoover site – and the present Hoover Candy operation (with possibly 100 or more jobs) would be re-locating elsewhere in the UK.

But the long-awaited Hoover Strategic Regeneration Area masterplan from The Urbanists in June 2018 confirmed what was disclosed in the draft revised LDP Deposit Plan of the same month.

Flood risk had been identified that would limit the regeneration project to a housing grab on the east bank – only 440 houses could be built there (even allowing for a mass of apartment blocks on Hoover Sports Ground – one of the premier cricket fields in the South Wales Valleys and still in use for Wales representative matches and junior school cricket days).

As for the west bank of the River Taff with both employment and housing potential? The Welsh Government was not going to invest.

Merthyr Tydfil Heritage Trust is of the view that is a major setback. It would like to see the promised Metro Hub developed at Brandy Bridge to serve the new housing community being built around and the potential business park to follow on the Triumph site on the River Taff west bank at The Willows.

Merthyr Tydfil Heritage Trust has also advocated that Hoover Sports Ground should be largely retained as one of the premier cricket venues in the South Wales Valleys with potential for a charitable community-led enterprise taking over its management. In fact, the ground is still maintained by volunteers for matches – without any support from the ground owners Hoover Candy.

The sports ground is large enough to provide a cricket ground and a park and ride car park for Pentrebach Station which is on the raised railway embankment on the River Taff's east bank. Some residential development might even be possible on the western site of the site.

The Heritage Trust has previously warned that it will take time and both public and private investment to develop a new Metro hub at Hoover Brandy Bridge to the right design so it can supply a diverse range of housing.

Quick and easy options for Hoover ( which include development of the Hoover old factory façade and sports ground) must be rejected. Quality design, planning & public investment is going to be needed here.

Disappointingly, the Hoover Strategic Regeneration Area masterplan from The Urbanists suggests that higher density housing can be allowed on the sports field on the grounds that it is close to Pentrebach Station. This is not what was put forward as good design in previous studies which talked of high density schemes to form communities around Metro hubs – not a few blocks in isolation sandwiched between a trunk road roundabout, a



main road, railway embankment and car park.

The Urbanists also reject the firm proposal for the Hoover 1948 factory façade – it's distinctive rounded corner at least – along with the round gatehouse building and detached office block / canteen / social club building should be retained.

The sawn-off Hoover project would see housing strung alongside the railway and so detached from the banks of the River Taff – which The Urbanists rightly see as in need of landscaping as a possible east bank green corridor. Again, there is little point in that when the housing estate won't have easy access and the west bank opposite is likely to remain in its derelict state with its best long-term prospect being a view of undistinguished industrial units.

The Metro hub at Brandy Bridge would provide links between buses, cars and Metro light rail not possible at Pentrebach Station.

There would also be better potential for Active Travel walking and cycling links to the town centre and to the Taff Trail.

Because of the rise in the land the Metro hub station could be much closer in level to the rail track – making for good accessibility. Land could be available for park and ride there. The flood risk should have been addressed some years ago. The LDP 2006 – 2021 raised the issue with a warning that inappropriate development would not be allowed in the River Taff flood zone areas.

The Welsh Government and the Cardiff Capital Region should be encouraged in strong terms to support the redevelopment of the whole of their declared strategy area – on both banks of the River Taff. This should be made to happen – whether redevelopment is for light industry or housing, mixed or other beneficial use. The option of flood mitigation and flood defence at Hoover, Upper Pentrebach and Upper Abercanaid/The Willows should be explored as a matter of urgency.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/> / tick

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
5. Objectives
6. Revision process and consultation comments
7. Heritage – draft policy proposal and its revision
8. Well-being – objectives and proposals (or lack of)
9. Active Travel, footpaths, cycleways, rights of way, bridleways
10. Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
11. Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail
12. Hoover regeneration strategy – original proposals and revisions
13. Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
14. A465 dualling – comments on Heritage Trust proposals for development of Active Travel network and improvement of National Cycle Route 46 east-west as put forward at A465 public inquiry in 2018
15. Merthyr - Abernant Tunnel – need to secure disused railway line and its historic listed structure (currently in private ownership with public prohibited) from the tunnel entrance to the A470. Need to secure funding for alternative more viable schemes that meet Active Travel standards and suitability (or possibly the re-opening of the Morlais 'Miler' Tunnel on NCR 46)
16. West Merthyr – need to secure landscape, environment, historic assets including listed structures and Scheduled Ancient Monuments, protected areas (including SSSI and woodlands) as well as claimed rights of way and bridleways. Support for a country park (proposed first in 1970s).
17. Ffos-y-fran – need to review proposals for industrial and business use and consider environmentally friendly landscaping in after use as well as potential for leisure including hotel and indoor ski slope.
18. Green open space – potential loss of green open space due to unnecessary development and lack of proposals to improve provision of open space at community level.
19. Other sites – Merthyr Tydfil Heritage Trust has previously commented on individual sites – comments may need to be updated and discussed again before (if) draft revised LDP go-ahead.

3c. If this representation represents a petition, please indicate how many people it represents:	
--	--

3d. If additional documents have been provided to support your representations, please list them below:

Once completed please sign and date your representation form:

<b>Signed:</b>	Rob Thomson	<b>Dated:</b>	10 September 2018
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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	<b>Policy EnW3, Policy EcW1.1 and Policy SW14</b>
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input checked="" type="checkbox"/> X	Object <input type="checkbox"/> X	Comment <input type="checkbox"/>
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**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

On behalf of our Clients Elan Homes Ltd, we support the inclusion of the land edged red on the attached plan within the proposed Settlement Limits (Policy SW14), as we are currently working on a planning application for its comprehensive development for a residential led scheme with elements of open space. We also offer support for the partially inclusion of part of the land in question as part of the Hoover Strategic Regeneration Area (HSRA) (Policy EcW1.1) in recognition of the close association and contribution the redevelopment of the land in question will make towards the delivery of the Authority's visions for the future of the Town. However, through work currently being undertaken (which once complete will be provided to the Authority), we would ask that the whole of the land edged red form part of the HSRA to ensure a comprehensive strategic approach is taken to the readeration of the whole area is possible. Finally, we would object to the allocation of the land edged red on the accompanying plan as a SINC, as much is currently in the form of semi-improved grassland. Further information will be submitted in due course to support this request.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

See above..

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.

☐

I want to speak at a public hearing.

X

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

The matters raised in 2d.

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

*Site Location Plan*

Once completed please sign and date your representation form:

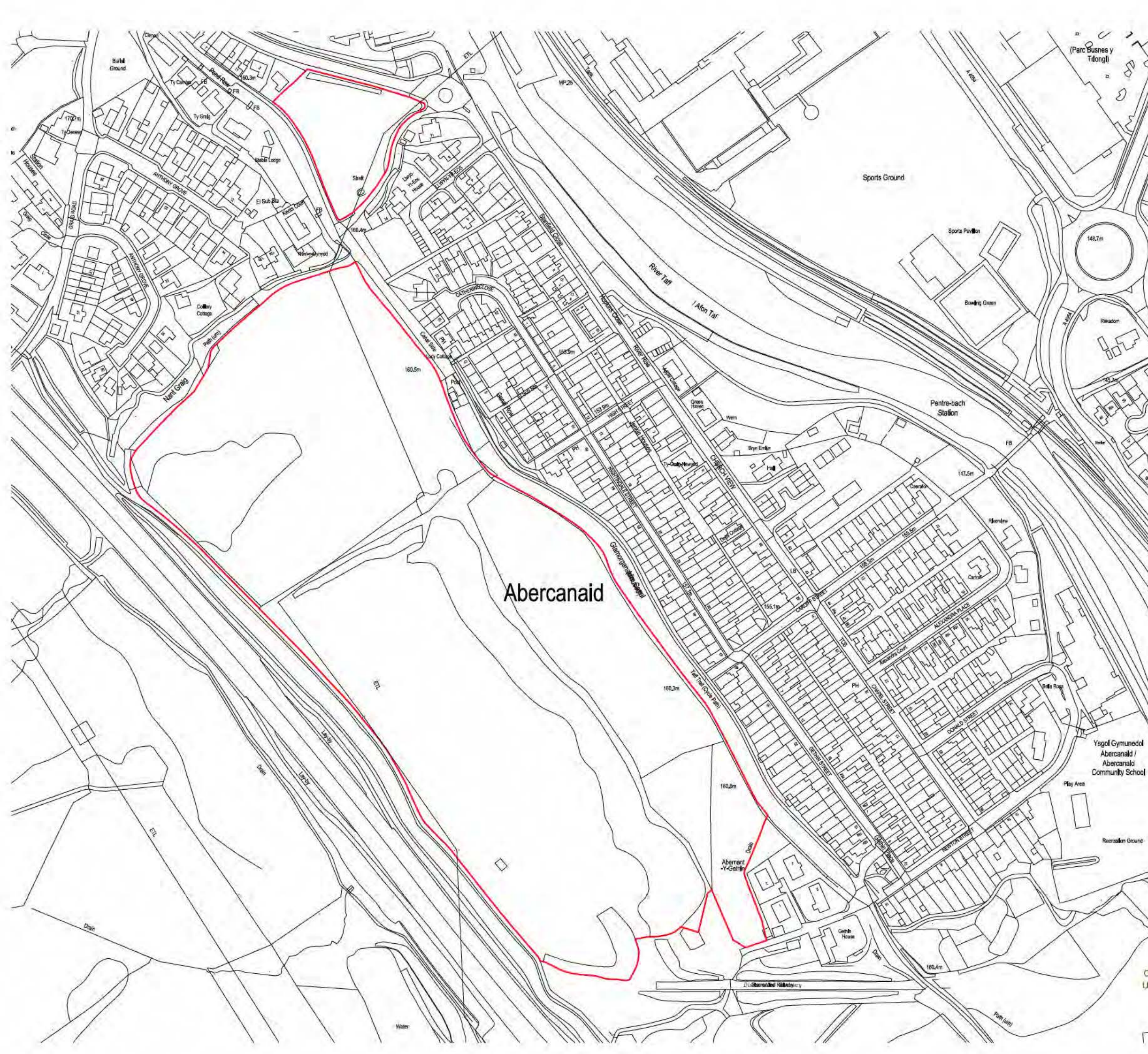
Signed:



Dated:

10/09/18





GRID REF :  
SO 05593 03620

SITE LOCATION PLAN

FORMER LOWER GETHIN TIP,  
ABERCANAID, MERTHYR TYDFIL  
CF48 1DJ

SCALE 1 : 2500 @ A3  
DATE NOV 2016



CHARTERED TOWN PLANNING AND DEVELOPMENT CONSULTANCY  
UNIT 2, CROSS HANDS BUSINESS WORKSHOPS, HEOL PARC MAWR,  
CROSS HANDS, CARMARTHENSHIRE, SA14 6RE  
TEL : 01554 527111



The LDP team  
Planning and Countryside  
Merthyr Tydfil County Borough Council  
Unit 5  
Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

10th September 2018

Dear Sir/Madam,

**Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016-2031) (Deposit Plan)**  
**Representations on behalf of Hammerson PLC**

We write on behalf of our client, Hammerson PLC, to submit representations to the replacement Local Development Plan (2016-2031) consultation (hereafter "*deposit plan*"), in particular focussing upon those policies that affect development at Cyfarthfa Retail Park (Cyfarthfa Park), owned and operated by our client.

Cyfarthfa Park is situated on the edge of the built-up area of Merthyr Tydfil and is situated less than 2 miles from the centre. Cyfarthfa accommodates and supports a number of larger-format retailers and occupiers, including Next, H&M, Debenhams, M&S, Pets at Home, Costa Coffee and McDonald's.

Given its closeness to Merthyr, household surveys in support of planning applications have revealed that Cyfarthfa Park is considered by shoppers to form part of Merthyr's Town Centre, despite being situated out of centre. This fact is supported by the Council's own evidence (including the NEMS survey regarding linked trips – see below), which highlights the close linkages between Cyfarthfa and the wider Merthyr commercial offer.

In recent years, Hammerson has invested further in the Centre to improve its design, attract a broader range of tenants, and strengthen its food and beverage offer.

We previously made representations at the previous round of consultation (i.e. the Preferred Strategy, in September 2017), and these representations reflect the position taken, considered in light of additional evidence produced, and revisions made to draft policies since that consultation.

Our case is that these policies, as currently drafted, fail the tests of Planning Policy Wales (Edition 9, 2016) (PPW) in terms of "*soundness*" as set out at paragraph 2.7.2 on the following bases:

- The Plan does not "*fit*";
- The Plan is not "*appropriate*"; and
- The plan will not "*deliver*"



## Representations

Our representations consider the following policies as relevant to development at Cyfarthfa Retail Park. Our reasons for considering these policies “unsound” in each case are detailed below:

- Draft Policy EcW3: Retail Hierarchy – Supporting Retail Provision;
- Draft Policy EcW4: Retail allocation; and
- Draft Policy SW6: Hoover Strategic Regeneration Area

### Draft Policy EcW3: Retail Hierarchy – Supporting Retail Provision

National Policy, at PPW paragraph 10.2.14 requires that, in terms of the location of new town centre uses:

*“Developers should demonstrate that all potential retail and commercial centre options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered”.*

Specific to plan-making, paragraph 10.2.15 explains that:

*“When preparing development plans local planning authorities should take a positive approach, in partnership with the private sector, in identifying sites which accord with the sequential approach and are in line with a development plan’s retail strategy in terms of the size, scale and format of new developments needed.”*

Accordingly, any development-management policy, in seeking to fit with national policy, should clearly refer to Edge-of-Centre sites as part of a sequential site assessment.

Such treatment is currently omitted from the wording of **EcW3**, which, though it refers to the sequential test, does not explain that, if suitable sites are not available in the Centres, then, Edge-of-Centre sites will be considered. Such an amendment, which was also promoted at Preferred Strategy stage, would ensure that the Draft Policy, and, by extension, the Deposit Plan, was able to “fit” with national policy (i.e. PPW) and could therefore be “sound.”

PPW also notes, at paragraph 10.2.16, that some types of retailing, such as bulky goods, cannot, by virtue of their scale and nature be located in Centres. It explains:

*“Where this is the case such stores should in the first instance be located on the edge of retail and commercial centres, where specific sites are defined in the development plan for such uses. Where such sites are not available or suitable, other sites at the edge of retail and commercial centres, followed by out-of-centre locations may be considered, subject to application of the needs and impact tests.”*

The recognition of the role that Cyfarthfa Park plays in supporting bulky goods retailing in Merthyr (sought at Preferred Strategy Stage and now included at paragraph 6.8.27 of the supporting text), is welcomed. However, a continuing deficiency of **EcW3** is the lack of acknowledgement of these locational requirements faced by bulky goods and showroom type retailers. This omission serves to stymie the effectiveness of the plan in ensuring that there is sufficient, and appropriate, floorspace available for these types of retailing in suitable locations.

Supporting paragraph 6.8.27 should also underline, as submitted at Preferred Strategy stage, the important role that Cyfarthfa Park in particular plays in working alongside the defined town centre in a complementary manner. This would reflect the same point made in the Pre-Deposit Plan at Paragraph 5.32. To reiterate, the NEMS On-Street Survey (Appendix 8 of the Retail and Commercial Leisure Study) that highlights the degree of linked trips between Cyfarthfa Retail Park and the Town Centre.

An amendment to the **EcW3** policy text that explains how the sequential test will be applied to bulky goods and showroom type retailers is therefore required. This would serve to make the Draft Policy, and thus, the Deposit Plan, “fit” with national policy, “deliver”, and thus, “sound”.

In terms of the impact that an application for retail development may have on the vitality and viability of an existing Centre, PPW explains at paragraph 10.4.4, that:

*“All retail applications of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment. For smaller retail planning applications or site allocations, local planning authorities will need to determine whether an assessment is necessary, for example when a smaller proposal may have a significant impact on a centre”.*

In contrast, where it considers retail impact, **EcW3** continues to require that retail developments outside existing Centres can only be permitted where they do not cause any “harm” to local town centre vitality and viability. The policy also does not refer to a floorspace threshold required to trigger a retail impact assessment, contrary to PPW.

As submitted at Preferred Strategy Stage, **EcW3** should therefore refer to “significant harm”. This would not only ensure that the policy, and thus Deposit Plan, was able to “fit” with national policy; it would also ensure it was effective (and thus, deliver) in ensuring that retail and complementary investment in the Borough was not stymied by an overly restrictive policy. The policy should, to fit with national policy, detail that the impact test will only be required for proposals that create 2,500sqm, or more, gross floorspace.

The policy, revised as suggested above, could therefore be considered sound.

#### **Draft Policy EcW4: Retail allocation and Draft Policy SW6: Hoover Strategic Regeneration Area**

PPW, at paragraph 10.3.1, requires that LPAs, “allocate sites for retail and commercial centre uses where there is assessed to be a quantitative or qualitative need and where size and scale are in accord with the retail strategy.”

The Merthyr Tydfil Retail and Commercial Leisure Study identifies a need for 6,281sqm gross floorspace, of which some 3,736sqm is identified for comparison goods, with 2,136sqm food and beverage and 409sqm convenience.

At Preferred Strategy stage, the plan indicated that this need could be accommodated by virtue of the redevelopment of the Merthyr Tydfil Bus Station site. In our representations, we explained that the Council needed to provide further clarity as to the nature of the provision at this site and how it might serve to address the identified need.

The Deposit Plan no longer proposes, within policy to accommodate the identified need at the bus station. The supporting text to **ECw4** (para 6.8.38) reveals that, while “future town centre redevelopment opportunities will exist”, these will be reliant on the bus station having been vacated, and that potential flood risks are mitigated. Accordingly, the bus station site is no longer allocated in the plan.

In lieu of such an allocation, the Deposit Plan (**ECw4**) now seeks to allocate just 409sqm of floorspace, equivalent to the identified need for convenience retail. This is now proposed as part of **SW6**, to be delivered at the Hoover Strategic Regeneration Area.

However the Deposit Plan again fails to explain how this quantum of (convenience) floorspace might be delivered as part of the Hoover Strategic Regeneration Area.

In addition, the plan fails to allocate sufficient sites to meet an identified need for both comparison goods (3,736sqm) and food and beverage (2,136sqm).

Accordingly, on this basis, **EcW4**, and by extension, the Deposit Plan, is not “*sound*” at it does not “*fit*” with the national requirement to allocate sites; “*appropriate*” as the evidence base identifies a need for additional retail floorspace, and consequently, it is will not “*deliver*” – i.e. provide the quantum of comparison and food and beverage floorspace required, and nor is it clear how the convenience floorspace will be provided at Hoover Strategic Regeneration Area.

### Summary

On behalf of our client, Hammerson PLC, we consider that the draft Policies **ECw3 ECw4** and **SW6** are, as written, unsound. These policies do not properly describe the sequential test; the impact test is not specified in accordance with PPW; the role of bulky good retailing is not properly considered, and fails to allocate sufficient floorspace to satisfy requirements for retail needs.

Accordingly, the policies, as written, do not fit, are not appropriate, and will not deliver, and are therefore not in accordance with PPW. These policies could be made sound subject to the changes detailed above.

On behalf of Hammerson PLC, we request attendance at any forthcoming Examination in Public (EiP) by virtue of having made these representations.

Should you require any further information at this stage please do not hesitate make contact with me.

Many thanks.

Yours faithfully,



**Richard Robeson**  
Senior Planner



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

Personal Details	Agent's Details (if applicable)
Title	Mr
First Name	Richard
Last Name	Robeson
Job Title (where relevant)	
Organisation (where relevant)	GL Hearn
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

262

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	EcW3
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object X	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)</b> <i>Further details regarding the soundness tests are provided in the Annex at the end of this form.</i>		
Test 1 X	Test 2 <input type="checkbox"/>	Test 3 X

<b>2d. Please set out below your representation on the Deposit Plan (or associated document).</b> <i>If necessary continue on a separate sheet (which should be clearly labelled and attached).</i>
---

Please see enclosed representations.



**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

**Please see enclosed representations.**

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input type="checkbox"/>
I want to speak at a public hearing.	X

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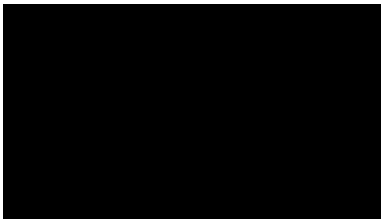
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Please see enclosed representations.

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	10 <sup>th</sup> September 2018
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**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

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Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

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Test 1 X	Test 2 X	Test 3 X

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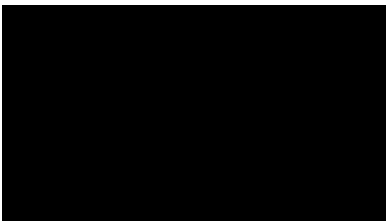
Please see enclosed representations.

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Please see enclosed representations.

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	10 <sup>th</sup> September 2018
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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	
Page/Paragraph number	
Proposals Map	x
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<p><b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b></p> <p>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.</p> <p>From the previous planning history, Council will be aware of the infrastructure and mitigation measures envisaged.</p> <p>The land has been, and is still being, marketed for sale by Cooke &amp; 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.</p>
---

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

We would wish to see the site of the former allotment gardens at the rear of Oakfield Street Aberfan included as an allocated site.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

Please refer to previous correspondence regarding the suggested candidate site.

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a public hearing.	<input type="checkbox"/>

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

--

**3c. If this representation represents a petition, please indicate how many people it represents:**

--

**3d. If additional documents have been provided to support your representations, please list them below:**

--

Once completed please sign and date your representation form:

<b>Signed:</b>		<b>Dated:</b>	09 September 2018
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Cyngor Bwrdeistref Sirol  
**MERTHYR TYDFIL**  
Merthyr Tydfil  
County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

#### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

#### PART 1: CONTACT DETAILS

##### Personal Details

##### Agent's Details (if applicable)

Title

MR

First Name

JAMES NOEL

Last Name

DAVIES

Job Title

RTD

(where relevant)

Organisation

(where relevant)

MTBC BIODIV PTRRS

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)

Page/Paragraph number

Proposals Map

Constraints Map

Sustainability Appraisal (please specify page and paragraph)

Habitats Regulations Assessment (please specify page and paragraph)

Other (please specify)

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support ☐

Object ☒

Comment ☒

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 ☐

Test 2 ☐

Test 3 ☐

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

See attached  
sheets

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.

☐

I want to speak at a public hearing.

☒

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

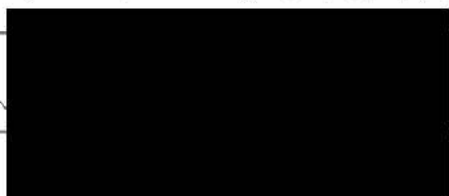
HOUSING ON SINC AT  
CWM FELIN FIELDS

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

10.9.2018



**Comment from Jim Davies on the proposed allocation of housing to the Cwmfelin Slopes SINC site in Bedlinog      Sep 10 2018**

1 As a member of The Merthyr Tydfil Biodiversity Partnership since 2004, and a local resident since 2010, I oppose the development of such a nature rich site.

2 SINC means what it says

**SITE of IMPORTANCE for NATURE CONSERVATION**

All land surfaces contain the ceaselessly active plants, animals, and micro-organisms which sustain our climate, water, and food supply. SINC's have these in greater diversity and numbers, only nominated after an inventory of their component species has been carefully compiled and evaluated.

SINC's have earned their right to permanent conservation and so continue safeguarding our future well being.

3 I visited the Slopes SINC this summer and found the Clements/MTCBC 2007 survey descriptions\*held good with no major habitat damage or change apparent.

The SINC occupies around 12ha, of which only the mid western block of 3ha would be affected by new housing(see attached map).The survey records, and those of the residents, that are mentioned below, refer only to this 3ha.

4 Taking out the 3ha block for housing would generate habitat fragments each incapable of supporting their initial component species complex. Much of the UK farmed countryside is made up of these small, inert, depleted plots, and their formation is always to be avoided.

5 The highlight, most scarce, habitat assemblage of the entire Slopes SINC is the 1ha of undisturbed, Lowland Dry Acid Grassland\*\*(see map Ac Df Fo Fr)an area where at least some housing is suggested.

This anthill covered bank was ancient Oak Woodland until the inter war period, but recolonisation with saplings has not occurred, and the Wavy Hairgrass dominated sward is now favoured Vole hunting ground for the iconic Barn Owl.

6 To its west, this dry acid grassland is contiguous with species rich Marshy Grassland, and water courses, that also prevent it from drying out. Culverting and/or draining this small wetland would be a severe blow to the SINC's viability.

7 The major shortcoming of the 2007 SINC survey(done in September)is the absence of Invertebrate records. The Insects and Spiders all over the site for example, are many and obvious, including under-stone species on the central former building area.

An all- Invertebrate survey is essential before any new building is contemplated: they have a critical role in maintaining the site's biodiversity.

8 No Bird survey was possible either, in September 2007, as most summer migrants had left and none were singing.

In fact, The Residents Group itself has amassed a total of around 50 species and 10 proven breeders. Scarce species include Goshawk, Barn Owl and Lesser Spotted Woodpecker.

This is an exceptional tally, bearing in mind none of the residents is a regular birder.

9 Bats are constantly on the site in summer, of at least 2 species, with a Pipistrelle breeding in one house. A bat detector is being acquired this week for residents' use.

Hedgehogs roam the site.

The garden ponds are sustaining the 3 Common Amphibian species.

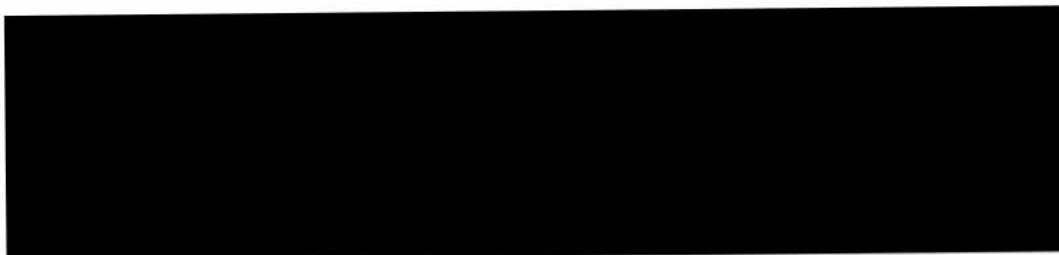
10 The nature richness of this site is partly due to its being left alone, undisturbed by any gross human activity, or by heavy grazing.

In the event of housing NOT going ahead, the acid, thin soils would keep scrub development to a minimal pace. There would be ample time to plan the best conservation procedures for this very special piece of land.

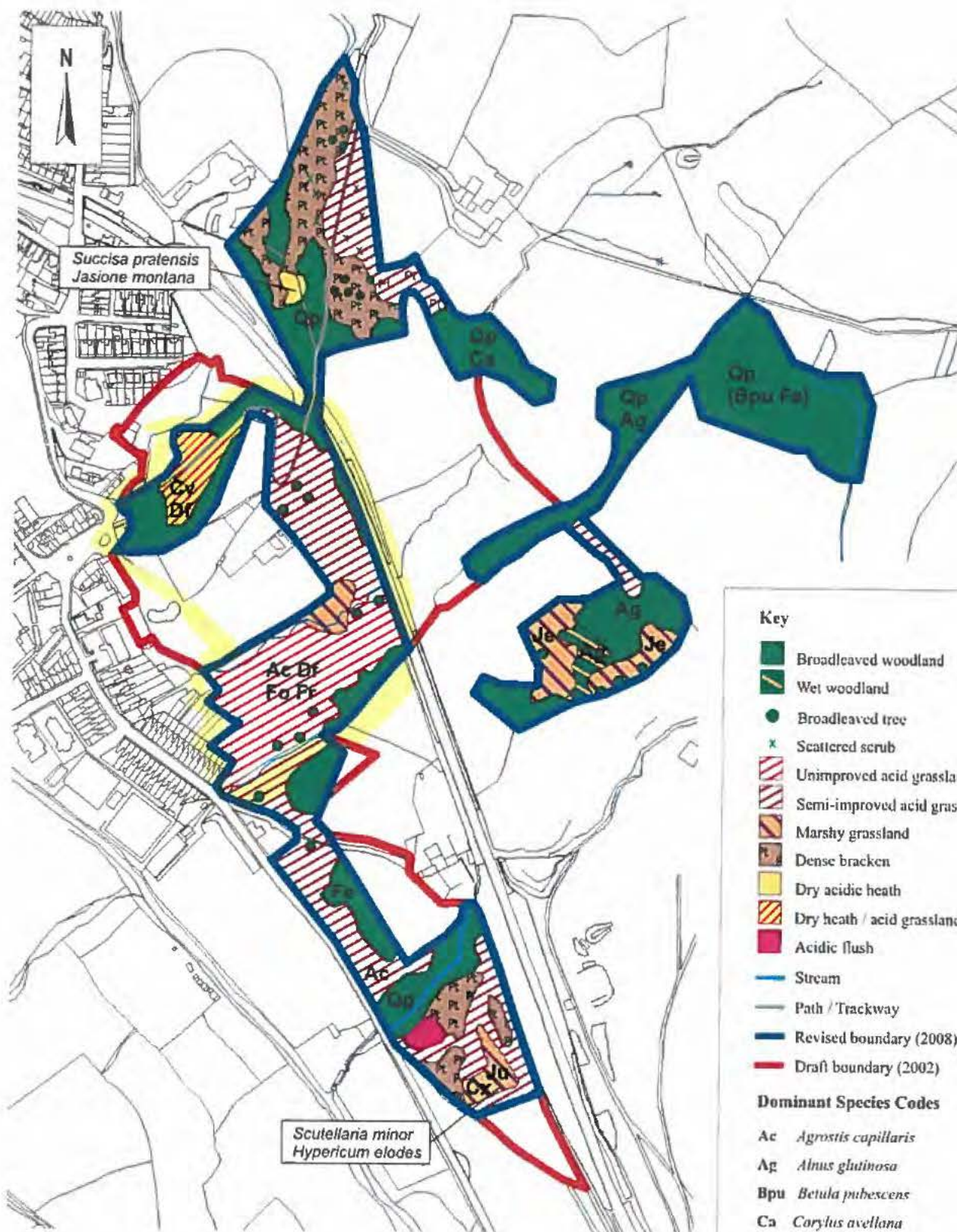
\*David Clements Ecology Ltd. Merthyr Tydfil County Borough. Sites of Importance for Nature Conservation. SO 00SE/15: Cwm Felin Slopes. Survey& Assessment for SINC Designation.

\*\*Merthyr Tydfil County Borough Council and the Merthyr Tydfil Biodiversity Partnership. Guidelines for the Selection of SINC's in Merthyr Tydfil.

Jim Davies, M.Sc.ecol; pg Dip Landscape Architecture; MRSB







#### Key

- Broadleaved woodland
- Wet woodland
- Broadleaved tree
- Scattered scrub
- Unimproved acid grassland
- Semi-improved acid grassland
- Marshy grassland
- Dense bracken
- Dry acidic heath
- Dry heath / acid grassland mosaic
- Acidic flush
- Stream
- Path / Trackway
- Revised boundary (2008)
- Draft boundary (2002)

#### Dominant Species Codes

- Ac** *Agrostis capillaris*
- Ag** *Alnus glutinosa*
- Bpu** *Betula pubescens*
- Ca** *Corylus avellana*
- Cv** *Calluna vulgaris*
- Cx** *Carex* spp
- Df** *Deschampsia flexuosa*
- Fe** *Fraxinus excelsior*
- Fo** *Festuca ovina*
- Fr** *Festuca rubra*
- Je** *Juncus effusus*
- Ju** *Juncus* spp
- Pt** Scattered bracken
- Qp** *Quercus petraea*

### Merthyr Tydfil County Borough SINCs Survey & Assessment for SINC Designation

SO 00SE/15 Cwmfelin Slopes  
Plan 1: Habitats Survey, 2007

DCE 297

NTS

Apr 2008

## **Introduction**

The Friends is pleased to respond to the Replacement Deposit Local Development Plan for the County Borough of Merthyr Tydfil. It welcomes the overall attempt to provide a purposeful and sustainable plan for this period. The need to provide land for development has to be balanced alongside the importance of preserving and making the most of its landscape and heritage.

While the Friends has a limited brief, it is also aware of the importance of considering the needs of the whole borough and of the Welsh Valleys as a whole. Town and county planning plays an essential role in setting out a positive vision for the future and in identifying land and opportunities for enhancement and development. The response to this imperative, and its potential remains to be tested before an inspector for its soundness and integrated approach.

## **Policy SW10**

Recognition of the importance of supporting and promoting nature conservation has to be commended at all levels. Policy SW10 which seeks to provide more nature reserves in the county borough through the forward plan process is supported. Conservation involves restoration and enhancement of nature, not just the declaration of sites.

In relation to the Nant, former colliery site, it is important that the policy is clear and well set out. This is for the benefit of all parties, visitors and local residents alike. It is partly to ensure a good understanding of the aims of the plan, and also to avoid possible conflicts and uncertainties as to the practical application of policy.

The open space site in Bedlinog contains a number of uses. These are long-standing and include children's playgrounds and two sports fields. The Proposals Map for the park and for the new nature reserve covers the whole site. While this may seem acceptable in the context of a multi-purpose site, it may not be were the site to be classed as semi-natural. That classification may at some time be required by Natural Resources Wales in its promotion of further biodiversity gains. The alternative is to confine the designation to the more natural northern parts of the site and leave the sports fields free of any possible fettering. The local community would find this more acceptable and otherwise supports the designation.

Once this is finalised, it should be clear that that the existing playing fields must be respected and keep free of any unnecessary designation, whether statutory or informal, within the plan context. Some sites may well be suitable to be classified as natural or semi-natural, and where biodiversity has the priority use. That is not necessarily the case at Nant Llwynog. The question of ownership and tenure is also important, especially where other uses have been in place for many years and also enjoy public support.

## **Open Space Strategy**

The Open Space Strategy describes aspects in need of improvement. In addition, an Open Spaces report in July 2018 set out a target for improving Priority Open Spaces to achieve the Green Flag or the Green Community Award. We support this aim and will work towards it. The Friends carried out an opinion survey in 2017 and found significant support for a nature reserve on the site. This was heartening. We also took part in the bid to the Rural Development Fund on funding for the Wildlife Trust to work towards preparing a Management Plan for the site.

## **Changes needed**

The changes needed in the plan Policy SW10 include a rewrite to make the submitted points clearer. The Proposals Map will need to be redrawn to remove the playing fields from the proposed nature reserve designation for the Nant Llwynog site. The success of the local plan depends on the ability to integrate these various elements into a meaningful whole. This particularly matters where nature and man come together. The new nature reserves will greatly assist in the understanding of the value of the natural world and its significance for the public. It is essential that the whole community supports the local plan and understands its purpose. We would be pleased to take part in the public examination of the plan to explain these points.



REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

Personal Details

Agent's Details (if applicable)

Title	Mr	
First Name	Paul	
Last Name	Price	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone No.		
Email Address		

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (If relevant)**

289

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	118
Page/Paragraph number	
Proposals Map	SW3-31
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	SINC 33 Page 16
Other (please specify) Mining Report CON 29M / 2016 page 6	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

We do not agree that the proposed development on the Cwmfelin Slope meets the soundness tests in the following areas;

**Test 2**

Evidence demonstrates that it is not an appropriate area for development for a number of key reasons outlined in the attached response.

It is not supported by robust evidence as there are a number of requirements that any developer would have to meet and these cannot be proved possible until an attempt to address them has been made. A previous plan for this site has been given planning permission but has never been followed through, almost certainly because of the extreme technical difficulties and the costs that these would entail to make compliant.

It cannot be considered aspirational as it ignores the importance of the current landscape and the advantages that this already brings to the quality of life in this area. It is also out of keeping with the small village centre which houses the War Memorial.

It is not clear or coherent as the attempt to address the difficulties of an access road to any new site does not take account of safety issues for traffic or pedestrians and has complete disregard for current residents by removing their access road, along with their small community identity and probably their current addresses - and subsuming them to being the back end of an estate. This is a clear breach of one of the council's markers for sustainability.

What would be aspirational would be to offer some larger homes, like those already built in this area. Nearly all the residents here are Bedlinog families, who wanted to move to larger properties without having to leave the area that they were brought up in and love. This would free up smaller homes in the village. All the houses up here have received notes asking for individuals to be notified if we ever wished to sell. One estate agent has also shown interest because of the nature of the village and the desire from people to move into the area, given all the new developments going on in and around Merthyr.



### Test 3

Given the past experience of the very long delay in developers being keen to take up the planning permission that was already laid on this site, why should it be likely that this would be different in the future. With all the known difficulties and safety issues it is doubtful that any large development could take place on this site and be cost effective.

**PLEASE SEE THE ATTACHED DOCUMENTS FOR SUPPORTING ARGUMENTS & EVIDENCE ...**  
(cont..)

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

The Cwmfelin Slopes need to be protected, as does the village centre. Any development on this site should be small enough to keep the SINC protected and maintain the advantages that such a site brings to the area.

Any such development would also have to be guaranteed to protect the safety of the homes and residents in the area and ensure that the current quality of life is maintained. Public safety could be at risk from coal mining issues and certainly from the additional traffic in the tiny village centre.

We note that the Craig y Hendre site has been removed from the LDP even though this would seem to be an ideal site for homes. There is already an access road and an estate built on this land and it would seem a quiet and safe area for children, with a park immediately across the road. It appears that the planners do not deem it to be a large enough site, but as they cannot enlighten us to the actual size for development on the Cwmfelin Slopes we think this is a doubtful argument for not building there. We are told there could be flooding issues, but this is only one of the many problems that will be faced on the Cwmfelin Slopes, which hopefully the attached response will demonstrate.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

The Craig y Hendre site, as outlined above and which was previously included in the plan should be reinstated.



### Part 3: What happens next?

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.

✓

I want to speak at a public hearing.

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

- APP.1. Coal mining Report CON29M
- APP.2 Photographic evidence re the benefits of the SINC
- APP.3 Pipe being used to direct flood water away from a lower property on the slopes.
- APP.4 Site of possible sink hole/shaft and its position in relation to the Nant Wen Shaft.

Once completed please sign and date your representation form:

Signed:

Dated:

5/9/18

**RESPONSE TO THE MERTHYR TYDFIL REPLACEMENT LOCAL DEVELOPMENT PLAN  
2016-2031. DEPOSIT PLAN PUBLIC CONSULTATION.**

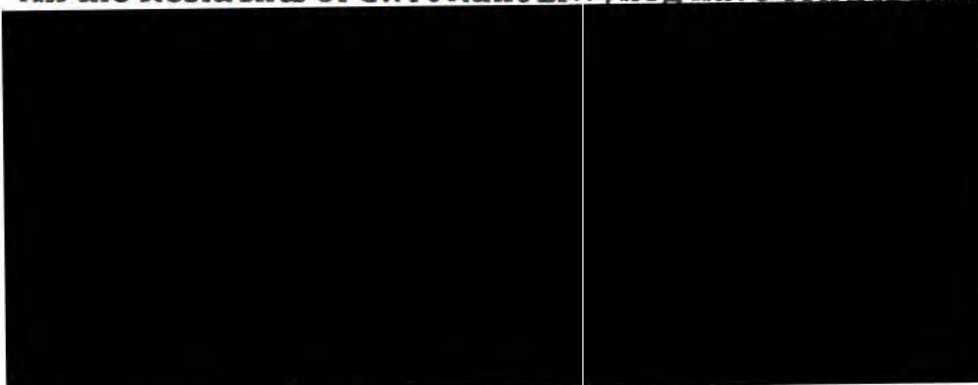
**This response relates to the proposals for The Cwmfelin Slopes in Bedlinog .**

**Site ref: 118. SW3 – 31**

**Incorporating SINC Site 33**

Having been advised at the consultation meeting of the 16/8/18 that a joint response from a group would save time and duplication, especially for the Inspector, the following residents have agreed to submit this combined document. Based on information currently available (including local knowledge) and the fact that the various issues highlighted throughout the document may have more significance for some households than others, all residents are essentially in agreement with the content. We are a small community and would be directly affected by any future development, as the area concerned almost completely surrounds our dwellings.

**All the Residents of Cwrt Nant Llwynog have contributed to this submission ;**



We are not totally against any development in this area, but share genuine concerns about a number of issues, which we feel need to be acknowledged and taken into account in any future building plans that could be presented, following an approval. Outline planning permission has been granted on this site for many years, but we suspect has never been taken up due to the complex and difficult operation it would entail. This site is a very steep slope and formed almost of solid rock. These facts need to be borne in mind when understanding the foundation for our concerns. We also note that the area is said to be 3.57 hectares in size, but that only 1.7 hectares are deemed

to be developable. Given that the total site was thought to be able to provide 50 dwellings, we do not understand how this figure can still be applied to what now seems to be less than half of the original area.

**A. Mining Report CON29M ( attached as App.1. )**

1)This states that in view of the mining circumstances, a developer would need to seek appropriate advice before undertaking any work, due to public safety concerns.

2)The site is in a surface area that could be affected by underground mining at a shallow depth. In order to build on this land a great deal of rock displacement will be necessary to combat the slopes and flatten terraces. The report states that there is the possibility of disturbance leading to the escape of underground gases either during or after development and these must be assessed and properly addressed before any proposals are developed. This would indicate the need to examine these issues before the land is included in the LDP.

3)The LDP does refer to the need to safety check the site in question, but as residents, we would want absolute assurance that this has been done to the required standards and a guarantee that we and our homes will be protected against any damages incurred. Such precautionary work needs to be undertaken by independent and qualified engineers who can give an unbiased view of the condition of the land with regard to public safety.

**B. Ecology.**

1)This site now has SINC status and this is underpinned by the report that has been done, highlighting the significance of the ancient landscape here and its importance in relation to supporting various forms of flora and fauna. Although there are other designated SINC areas, this particular site remains in pristine condition and has not been degraded by invasive non-indigenous plants. It brings a variety of birds and forms of wildlife into the area. Many old anthills also survive here, forming the basis of a very important food chain. The SINC report highlights the differing types of habitat to be found on the slopes.

2)The Slopes also play host to regular walking groups.

### **C. Birds and Wildlife Present in the Local Area.**

1)Many of the species witnessed here are those requiring support and protection and photographic evidence is available for many of them. ( App.2. )

Martins and swallows are regular summer visitors and can be seen most evenings swooping over the grassland to feed. The swallows also return each year to their nesting site and successfully rear their chicks here. Barn Owls are regular visitors to the SINC site and Tawny Owls have also be seen perching on the rooftops of our homes. Due to the large number of moths, bats are nightly visitors. Other birds include Mistle & Song Thrushes, which are the Red List due to destruction of habitat; Green & Greater Spotted Woodpeckers; Bullfinches (Amber List); Red Kites.

Young Goshawks have been seen in the gardens in 2017 and again this year and they, like the Barn Owl, are Protected Species. The Tawny Owl and the House Martin are also placed on the Amber List.

2)Hedgehogs thrive up here, with a group of 8 being seen at one time, suggesting they too are breeding successfully. Foxes are regular visitors.

3)Adders are known to be here, as on 2 separate occasions, (one human, one canine) there have been bites, which were identified when medical/veterinary attention was required.

4)From February onwards, the evidence of amphibians is hard to miss with hundreds of frogs visiting the water courses and using the quiet garden ponds to lay their spawn. Toads can be found up here all year round.

5)Water courses also support water voles, which are again an important food source for many of these special birds.

### **D. Water Courses and Flooding.**

1)This is a real source of concern for residents. Following any heavy rain, water pours down the slopes, bringing with it leaves and debris. Ground stays waterlogged for many weeks. Any new buildings and concrete barriers created on the way down



these slopes will seriously worsen this condition, leaving the water even less room to naturally drain away. One of the houses below seems to be mitigating this by the use of an old gas pipe, presumably to re-direct the water away from the property.

(App.3.) Another resident at the base of the slope has made so many claims for flooding that she can no longer get insurance.

2)The two water courses that flow down the slopes can reach a waterfall status in heavy rains. Where they are situated would be problematic for building development and so a solution would need to be found. This is likely to involve sinking them underground, if a sufficient depth can be created to do this through the rock.

This remains of high concern as to how freely the water could escape through such a channel and where it would eventually be evacuated. The sinking of the water courses would also have a major negative impact on the wildlife environment.

3)The flow down the slopes, which will still continue above the ground, will also cross the likely path of the roadway that would serve any new site, creating a potential hazard, particularly in the cold weather.

#### **E. Stability of the Site.**

1)Due to the rocky nature of this site and the steep decline, which would need to be turned into terraces for building, there is a serious concern for the stability of the properties already here. Major, heavy equipment would be required to make the land suitable for building, which could destabilise an area where there are old, exploratory mining shafts and where there is a large depression, which is likely to have been a substantial sink hole or possibly a mining shaft ?

2)Huge retaining walls would be required at various stages, where terraces are being created, with some current properties being directly affected with the very real prospect of landslip. House No.1 is already perched perilously close above a retaining wall and building beneath this would be a real concern.

3) A map of the adjoining field is shown to contain a mine shaft which is close to the boundary of this proposed site. (App.4).



3) A map of the adjoining field is shown to contain a mine shaft which is close to the boundary of this proposed site. (App.4).

#### **F. Services.**

1) All the services to our homes – water/electric/gas/telephony/sewerage/rain water are buried underground from High Street and routed directly across the area marked for development - specifically, at the point that is highly likely to be a future roadway at the entrance to any new site. Water meters are situated here and so will all have to be moved. A lot of these services are just below the surface of the ground and indeed, some are exposed.

2) Building contractors would presumably have the responsibility to ensure the safe redirection of these amenities, bearing the cost and without interruption to our current supplies. They must remain accessible at all times for maintenance and repair.

#### **G. Water Pressure**

1) Some properties at the height of the slopes already have a lower water pressure than would be desirable. A new development would therefore require new water services as the current supply would not be sufficiently powerful to support it.

#### **H. The Access to a New Housing Development.**

1) It is apparent that the issue of an access road to and from any new housing development is one of the main factors that have deterred building on this site. Following new additions to the old plan and discussions that took place at the consultation meeting, it becomes clear that plans have already been outlined to resolve this issue. It is unacceptable that our current right of way to access our homes, which we have all used since the houses were built, is now to be demolished and abandoned. We must object in the strongest terms to this change in our established use of this road. We maintain this area, keeping verges and vegetation under control and constantly litter-picking to keep it to a good standard.

2) The road is referred to in our contracts when we purchased the homes, so this may

need to be addressed legally. We will particularly object to contributing to any maintenance if developers try to use this road for access in the early stages, so any potential exploring of the site will need to be done via another access point.

3) Work is seemingly now going on behind the scenes in the council to find a solution to the siting of a new road and it is clear that the Rugby Club is being engineered towards a new site and the garage will merely be demolished. The Salem Church is also thrown into the pot now that it has a new owner, although we would hope that the historical importance and the conservation of this building will be sufficient to save it from demolition.

4) The removal of our lane means we will get tagged on to the back end of an estate, completely lose the character of our small community and our identity as such.

We will have to drive through the whole estate each time we wish to enter or leave our properties. Our existing homes are likely to be at the turnaround point for vehicles at the end of the estate, which means headlights will be directly shining into them all evening and during hours of darkness.

5) Any new access road will also have to take account of the number of cars per household. The outline development proposal shows that 50 units are being considered on the new site. Not all properties are likely to have a garage, so the norm of 2 cars per household will result in roadway parking, which will likely impair the free movement of traffic and obstruction to emergency vehicles.

5) Our privacy is also at threat as the height of new properties on the slope could lead to them directly overlooking us and being able to see directly into bedrooms etc.

## **I. Road Safety.**

1) Bedlinog has a narrow road through the village and parking on both sides often reduces it to single track in places. Congestion already occurs at rush hours and on match days and events.

2) With 2 sharp, right angled bends on either side of the proposed new access road, it will be extremely dangerous, as vision is impaired to the left and to the right, with the ability for the traffic situation to change in an instant. Vehicles coming round the

road on their right. At busy periods, this could easily cause an accident.

3) Equally, traffic pulling out of the new access road, onto the main road, will have a brief amount of time to take in the traffic coming in both directions. We could be talking of an additional 100 cars in this small village centre.

4) It would appear that the plan is to build more houses on the corner, once the garage has been demolished and our existing road has been sacrificed. These will be situated at the base of the very steep slope that is High Street. Over the years, there have been two serious accidents here. One a lorry which experienced brake failure and one a coach which slid on the ice. Both of these came to a stop when they hit the obstacles at the bottom, which under the new plan will be people's homes.

Apparently, the coach demolished a safety barrier that was strategically placed there. This has never been replaced, but at some point there must have been a decision taken that such an event could occur, given the steep gradient of the road.

#### **J. The Respect for the Ethos of The Village Centre.**

1) This is a conservation area due to the lovely cottages that have been subject to the regeneration project in the area. The village centre also boasts the well kept War Memorial. The changes proposed and their implications seem disrespectful and out of keeping for this area, which at present is peaceful and quiet. This should remain a culturally sensitive area. Large, heavy, noisy vehicles will impact on all of this for many years, if the village centre is used as the entrance/exit for a new site.

2) Village homes will also have the problems of headlights being directed into their windows.

3) If the plan to extend this vision by building 10 houses per year, goes ahead, then this noise, pollution and disruption will carry on over 5 years, which is totally unacceptable to current residents.

#### **K. The Future Bedlinog.**

1) We would want new people moving into the area to enjoy the quality of life that we

## **K. The Future Bedlinog.**

1) We would want new people moving into the area to enjoy the quality of life that we currently experience here. Sensitive and sympathetic development could maintain that. We want to achieve an outcome that is beneficial to all.

Taking away all the benefits of the SINC sites would be irreversible and none of the effects of this could be satisfactorily mitigated.

We are responsible citizens and we do acknowledge the need for more homes and the pressures upon councils to meet this need. The focus should be on building homes in an area that is safe and enjoyable to live in and enhance quality of life, rather than just ticking boxes.

## **L. Pollution**

1) Bedlinog is at the bottom of a very steep sided valley, which naturally poses problems of air pollution. The work required for a large development of this nature has the potential to greatly increase this, adding dust and vehicle/machinery fumes into the atmosphere. This is an area where many residents have already had the impact of working years in the unhealthy atmosphere of the mines. Add to this the possibility of displaced underground gases and the result could be regrettable.

## **M. Archeological Finds**

1) There have been finds nearby and there is a possibility of a burial site. Grid Ref: 17710 00818. This would require some careful consideration. There could also be a round house, from Bronze Age times. Grid Ref: 09700 00799

2) The area is also likely to contain industrial archaeological finds, which may need exploration.

## **N. The Sustainability Report in relation to Cwmfelin**

This currently shows areas of neutrality, uncertainty and conflict for this site. We would also raise the following areas where we disagree with the assessment of the meeting of objectives.

No.2. This does not maintain and certainly does not enhance,

our community or settlement identity. It completely subsumes it.

No.4. This does not improve health & well – being as it encourages noise, pollution  
And the removal of the pleasures that the slopes and it's wildlife bring to the area.  
Concerns about gases from previous mining activities are a great concern.

No.9. The addition of essential utilities and infrastructure cannot be assumed until  
the difficulties of the site are proven to be able to overcome and the protection for  
current residents is guaranteed.

No.14. We do not see the issue of flooding as being neutral when problems of this  
Type already exist and could be made worse.

No.18. How this can be assessed as uncertain is highly questionable. There is no  
Doubt the destruction of the SINC means that an area that is currently beautiful and  
contributes so much to the local area can in no way be described as 'protection and  
enhancement of the area landscape '.



**Resident signatures to this submission:**

Judith Jones

Clwyd Jones

Anne Powell

Alan Powell

Rob Smart

Karen Smart

Lauren Smart

James Sheen

Steve Bevan

Sian Bevan

Paul Price

Shirley Price

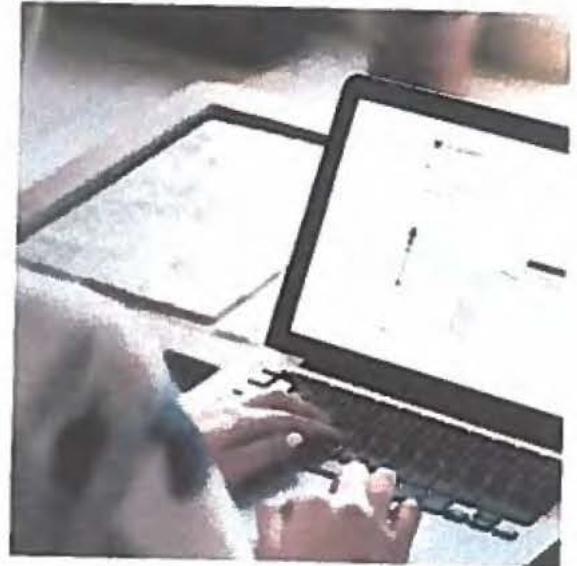
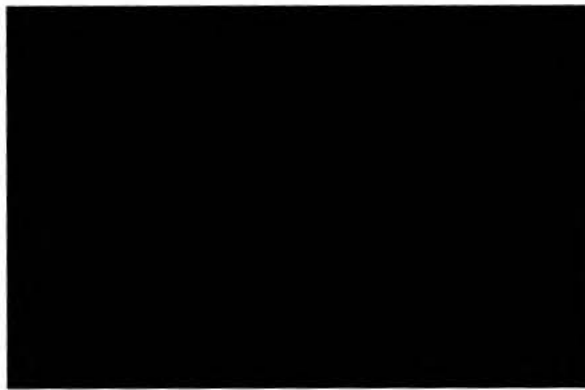
# Appendix 1



The Coal  
Authority

Resolving the **impacts** of mining

## CON29M Residential Mining Report



Date of enquiry: 11 March 2016  
Date enquiry received: 11 March 2016  
Issue date: 11 March 2016

Our reference: 51001120641001  
Your reference: SC/Price

# CON29M Residential Mining Report

This report is based on, and limited to, the records held by the Coal Authority and the Cheshire Brine Subsidence Compensation Board's records, at the time we answer the search.

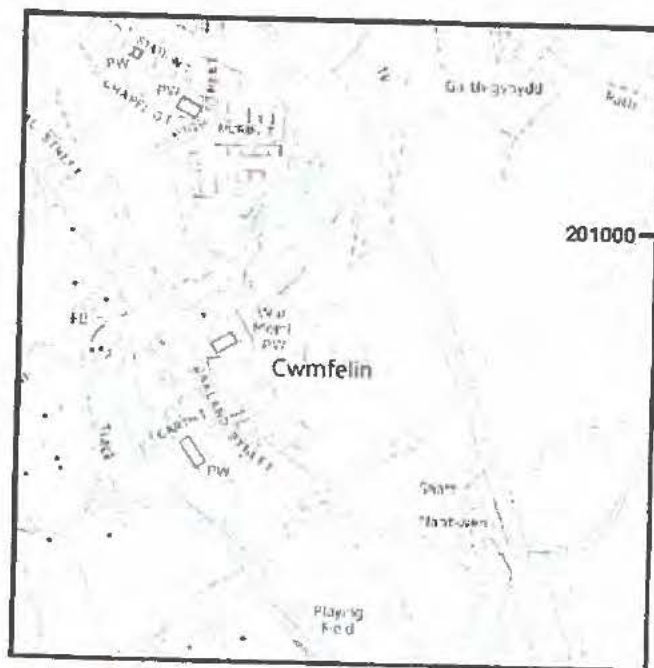
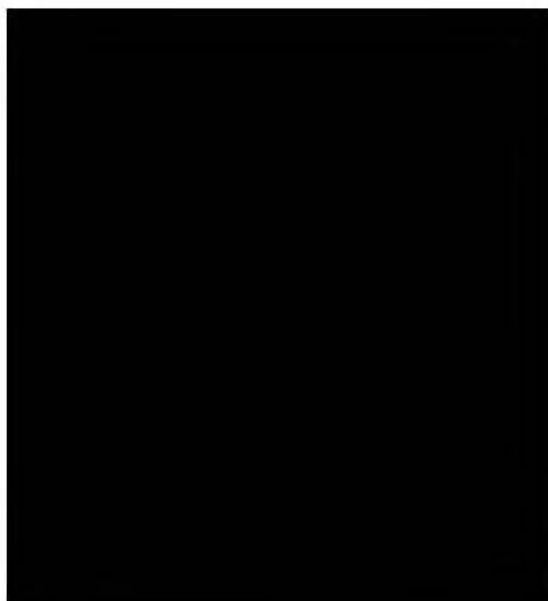
**Client name**

KUNDERT & CO SOLICITORS

## Enquiry address



## How to contact us



Approximate position of property



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# Comments on the Coal Authority information

The Coal Authority own the copyright in this report and the information used is protected by our database right.

In view of the mining circumstances a prudent developer would seek appropriate technical advice before any works are undertaken.

Therefore if development proposals are being considered, technical advice relating to both the investigation of coal and former coal mines and their treatment should be obtained before beginning work on site. All proposals should apply good engineering practice developed for mining areas. No development should be undertaken that intersects, disturbs or interferes with any coal or mines of coal without the permission of the Coal Authority. Developers should be aware that the investigation of coal seams/former mines of coal may have the potential to generate and/or displace underground gases and these risks both under and adjacent to the development should be fully considered in developing any proposals. The need for effective measures to prevent gases entering into public properties either during investigation or after development also needs to be assessed and properly addressed. This is necessary due to the public safety implications of any development in these circumstances.

## Additional remarks

Information provided by the Coal Authority in this report is compiled in response to the Law Society's Con29M Coal Mining and Brine Subsidence Claim enquiries. The said enquiries are protected by copyright owned by the Law Society of 113 Chancery Lane, London WC2A 1PL. Please note that Brine Subsidence Claim enquiries are only relevant for England and Wales. This report is prepared in accordance with the Law Society's Guidance Notes 2006, the User Guide 2006 and the Coal Authority and Cheshire Brine Board's Terms and Conditions applicable at the time the report was produced.



## Appendix 2





## APPENDIX 2.1





## APPENDIX 2.2



## **APPENDIX 2.3**

**Birds seen on and immediately around Cwmfelin Slopes, with varying degrees of regularity. Area outlined on following map.**

### **Common / regularly seen;**

Dunnock	Jackdaw	Crow	Collared Dove
Goldfinch	Heron	Kestrel	Nuthatch
Buzzard	Great Tit	Blue Tit	Coal Tit
Red Kite	Pied Wagtail	Warbler	Gull
Wood Pigeon	Brambling	Starling	Magpie
Chaffinch	Large Bats	Small Bats	Barn Owl
Tawny Owl	Blackcap	Goldcrest	

### **Commonly seen and nesting in the area**

Swallow	Song Thrush	Wren	Greater Spotted Woodpecker
Lesser Spotted Woodpecker		Green Woodpecker	
House Sparrow	Hedge Sparrow	Robin	

### **Seen with Young (nest site not known, but local )**

Sparrow Hawk

### **Annual Migratory Visitors**

Martin	Cuckoo	Redwing	(Swallow above)
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### **Seen Occasionally**

Kingfisher	Tree Creeper	Swift	Jay
Mistle Thrush	Goshawk		

## Appendix 2.4

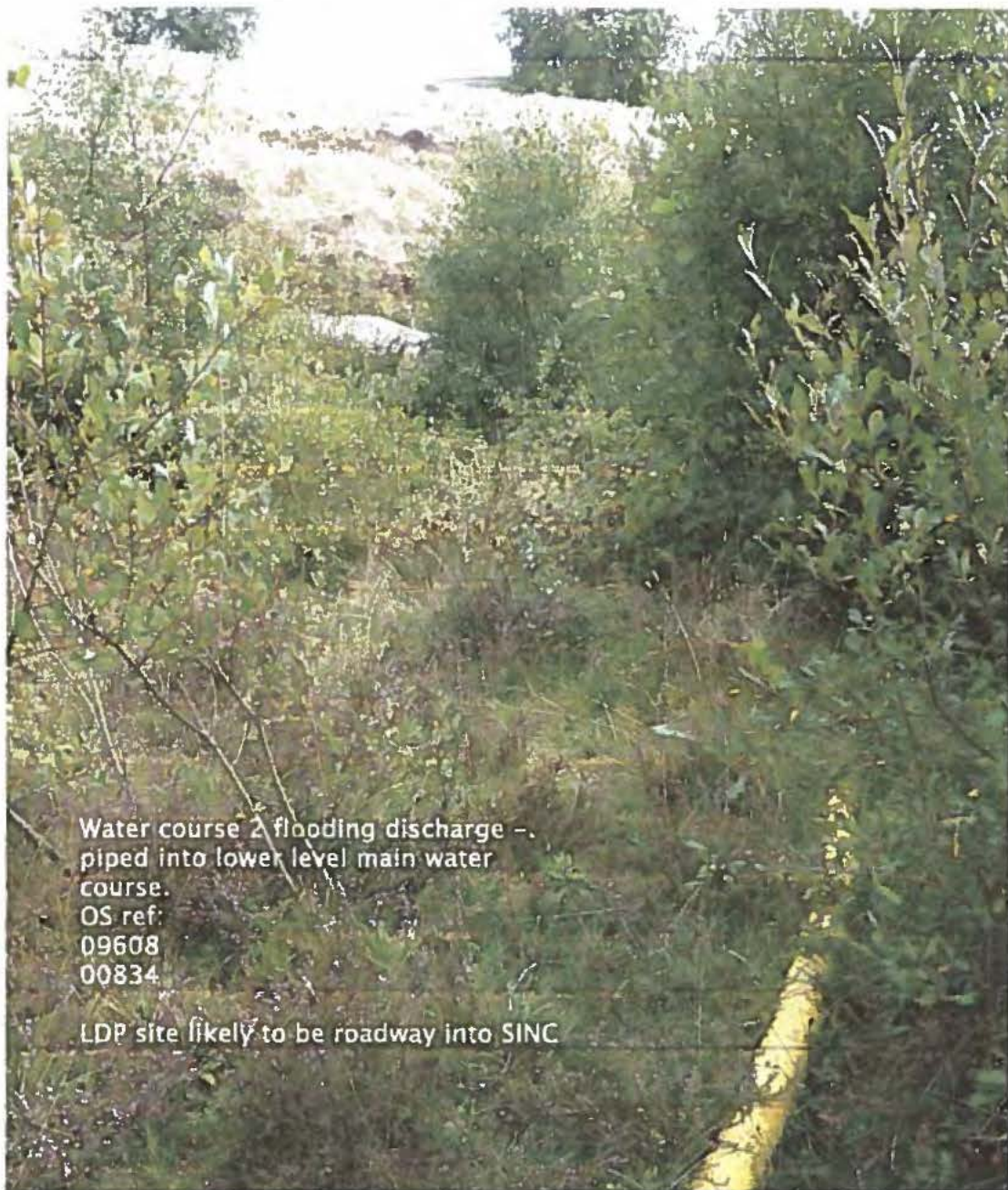




## APPENDIX 3







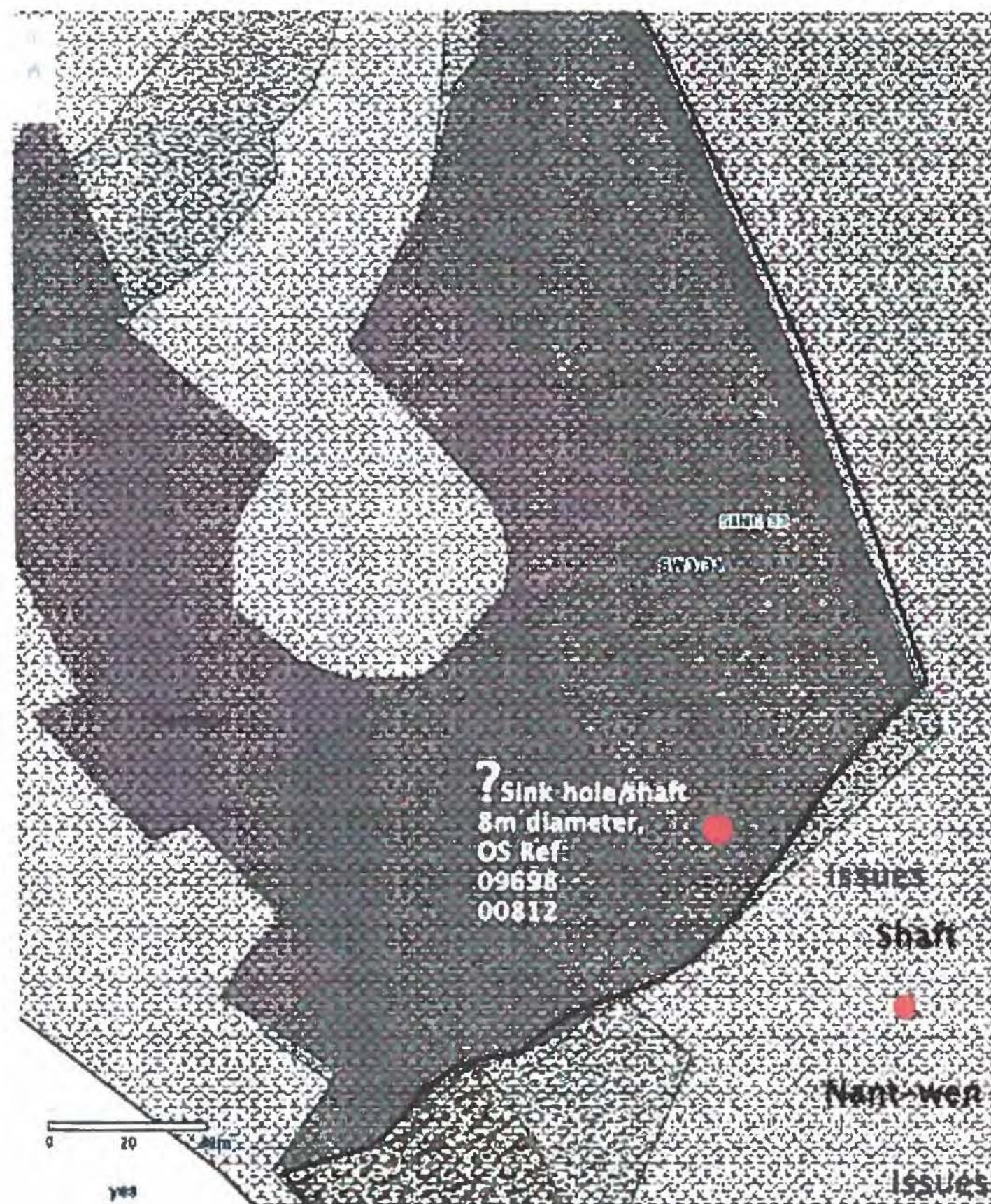
Water course 2 flooding discharge --  
piped into lower level main water  
course.

OS ref:  
09608  
00834

LDP site likely to be roadway into SINC



## Appendix 4



● = mining shaft



REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

PART 1: CONTACT DETAILS

Personal Details

Agent's Details (if applicable)

Title

DR.

First Name

BRENDAN

Last Name

DOUGHERTY

Job Title

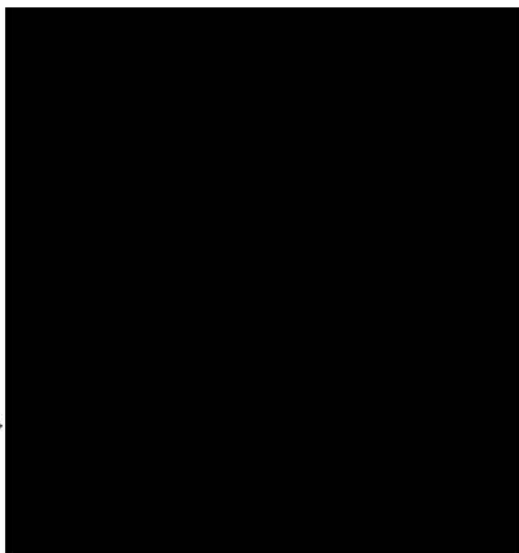
(where relevant)

PROJECT MANAGER

Organisation  
(where relevant)

NEWPORT CITY HOMES

Address Line 1



Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

323

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	SW3 / site 32
Page/Paragraph number	P105 / SW3.32
Proposals Map	—
Constraints Map	—
Sustainability Appraisal (please specify page and paragraph)	—
Habitats Regulations Assessment (please specify page and paragraph)	—
Other (please specify)	—

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

I live in John Street, Trehamis so have a vested interest as a local resident and community member. I also have experience as a project manager based on regeneration and development in Newport, conforming aspiration with the delivery of intended outcomes. The above site is strongly objected to by the local community, in terms of the designated purpose. It is felt that whilst development is needed (to meet safety needs and address structural concerns), limited consultation has taken place prior to putting the site forward for housing developments. There are other sites across the borough that will create better returns in terms of housing development, without removing a community asset that is desperately needed. The shortage of football pitches in Trehamis is critical, with local teams having to use Cyfartha Park, Aberfan and Abercynon given the shortage. The new development in Trehamis is insufficient given competing interests of other communities, and Trehamis Park is not fit for purpose.

2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

My objection is to a specific site allocation, unless suitable local alternative provision is made. The 'Other Growth Area' identified on p.16 emphasises the commuter value of local development (location, transport, regeneration, attracting further investment) alluding to health and wellbeing (objectives 9-12) yet you are proposing the replacement of a historic site previously used by Treharis Athletic Western football club for leisure purposes to be used to develop 15 new homes. The oldest football club in South Wales should be re-developing its stadium, not letting it become a few more houses. As your plan states, there are limited alternative sites in the area of Treharis for this type of provision. Therefore I state my objection to Site 32 Commercial Field, Treharis and the development of 15 dwellings.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)



### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.



I want to speak at a public hearing.



**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

*Petition  
pending,  
as necessary*

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

*22/8/18*

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

PART 1: CONTACT DETAILS

Personal Details

Agent's Details (if applicable)

Title

Mr.

First Name

MICHAEL

Last Name

THOMAS

Job Title

(where relevant)

RETAINED FORMER

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☒

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.

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**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	SW-33
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input type="checkbox"/>
---	---------------------------------	----------------------------------

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** *Further details regarding the soundness tests are provided in the Annex at the end of this form.*

Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
---------------------------------	---------------------------------	---------------------------------

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

--



**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.

☐

I want to speak at a public hearing.

☐

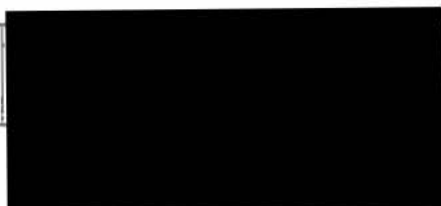
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**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

6-9-2018.



**From:** [REDACTED]  
**To:** [Development Planning](#); [Gibbs, Kevin \(Councillor\)](#); [Davies, Chris \(Councillor\)](#); [Isaac, David \(Councillor\)](#)  
**Subject:** wrong info on page/map  
**Date:** 24 August 2018 17:33:58

---

<https://www.merthyr.gov.uk/media/4090/1-replacement-merthyr-tydfil-local-development-plan-2016-2031-proposals-map.pdf>

page 2 – Gwaunfarren Grove area – the map suggests there is access from between house numbers 8 and 9 in Gwaunfarren Grove to Bishop Hedley.

I can assure you this is definitely not the case – there is no path from Gwaunfarren Grove into BHHS. There is however a path from Alexandra Avenue (immediately alongside Gwaunfarren Primary school) that goes to BHHS – that path runs just south (and parallel to) Gwaunfarren Grove. The path was in use a long time ago, to get to BHHS – but nowadays the path is completely overgrown and there is even a council installed metal fence panel blocking access to the path – it is currently impossible to walk that path.

I would like the plan amended as it is incorrect. I am more than happy to meet with a councillor or a member of the planning team to show where the path actually is, and also to show that there is no way you can get to BHHS from the top of Gwaunfarren Grove.

Thanks

Paul Griffiths

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Development Planning](#)  
**Subject:** Treharris Althlectic  
**Date:** 01 September 2018 13:49:48

---

Sent from [Mail](#) for Windows 10

This email is regarding the plans to build 15-20 dwellings on the Treharris Althlectic football ground I am strongly against this. My son plays for Treharris football club mini and junior and currently they have NO FIELD to play football on we need to keep this ground for the children. The ground it self holds so much of Treharris history that it should be given blue plaque its the oldest football ground in wales. Cardiff played Arsenal in a FA cup match on this ground. These children are future voters and if you take away this away from them from the village then you will be losing future votes. So please do not let these plans go ahead.

Yours sincerely

Mrs S Williams

Spencer Lees

Date: 02/09/2018

LDP Team  
Unit 5  
Triangle Business Park  
Pentrebach  
CF48 4TQ

Subject: Replacement LDP (SW3-5 Erw Las)

Dear Sir/Madam

It has come to my recent attention that the land adjacent to Erw Las has been put forward in the new LDP as a candidate site for the building of 10 dwellings.

This decision is devastating news for our local area and the street of Erw Las as this space is loved by the people who surround it. The building of houses here will destroy this calm and quiet area of Gellideg and we will lose more green space that is much needed in Merthyr Tydfil.

I would like you to accept this letter as formal grievance against these plans and to have this site removed from the new LDP.

We look forward to hearing from you in the near future.

Yours Sincerely

Residence of Erw Las & the surrounding houses



Cynghor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

#### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

#### PART 1: CONTACT DETAILS

##### Personal Details

Title

Mr

First Name

Gareth

Last Name

Hughes

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

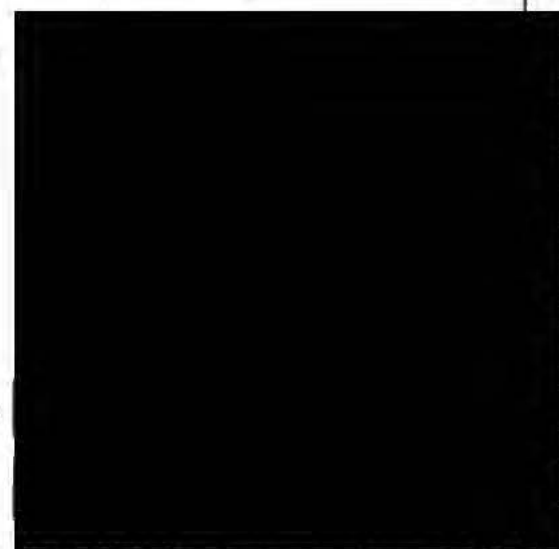
Line 3

Line 4

Post Code

Telephone No.

Email Address



##### Agent's Details (if applicable)

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the

**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	118
Page/Paragraph number	
Proposals Map	SW3-31
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	SINC 33 Page 16
Other (please specify) Mining Report CON 29M / 2016 page 6	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment
----------------------------------	--	---------

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 <input type="checkbox"/>	Test 2 <input checked="" type="checkbox"/>	Test 3 <input checked="" type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

We do not agree that the proposed development on the Cwmfelin Slope meets the soundness tests in the following areas;

**Test 2**

Evidence demonstrates that it is not an appropriate area for development and is not supported by robust evidence. Half the site has already been deemed by the council as not able to be developed, so how can 50 houses still be considered possible.

It cannot be considered aspirational as it ignores the importance of the current landscape to local nature.

It is also out of keeping with the small village centre, which would have to endure 5 years of noise, mess & pollution.

It is not clear or coherent as the attempt to address the difficulties of an access road to any new site does not take account of safety issues for traffic or pedestrians in the village.

**Test 3.**

No developer has felt able to develop on this site before, despite it being available.



**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

The Cwmfelin Slopes are an important resource for the village. The village centre would be completely transformed by a busy roadway and all the additional traffic this would create. We do not think the site is suitable or desirable for housing.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.

☒

I want to speak at a public hearing.

**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:

Dated:

9/9/18

## Resident signatures to this petition

**Signature**

**Date**

**Address**

**Signature**

**Date**

**Address**

**Signature**

**Date**

**Address**

**Signature**

**Date**

**Address**

**Signature**

**Date**

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REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

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PART 1: CONTACT DETAILS

Personal Details

Agent's Details (if applicable)

Title	Mr	
First Name	John	
Last Name	Shankland	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone No.		
Email Address		

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	SW3.30
Page/Paragraph number	
Proposals Map	
Constraints Map	
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/> X	Comment <input type="checkbox"/>
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**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** *Further details regarding the soundness tests are provided in the Annex at the end of this form.*

Test 1 <input type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
---------------------------------	---------------------------------	---------------------------------

**2d. Please set out below your representation on the Deposit Plan (or associated document).** *If necessary continue on a separate sheet (which should be clearly labelled and attached).*

Policy number SW3.30 concerns land at Taf Merthyr Garden Village (Stormtown). My representation is that this land has always been classified as 'Community Amenity Land' and, as recently as 2006, planning permission for housing development has been denied as it was not compliant with the then LDP.

I would be grateful if someone could tell me how and why this designation has been changed.

If it was done deliberately, why weren't the local population informed.

If it was just an oversight (between one LDP and its successor), then when will the new LDP be amended to reflect this.



**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).**

I would wish to see the area outlined in Policy SW3.30 returned to its original classification as 'Community Amenity Land' and removed from the list of sites suitable for housing development

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

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X ☒

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☐

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**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

5.9.18.



Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

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#### PART 1: CONTACT DETAILS

##### Personal Details

Title

Mrs

First Name

Catherine

Last Name

Hagles

Job Title

(where relevant)

Organisation

(where relevant)

Address Line

Line 2

Line 3

Line 4

Post Code

Telephone No

Email Address

##### Agent's Details (if applicable)

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

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Policy number (including site allocation number if appropriate)	118
Page/Paragraph number	
Proposals Map	SW3-31
Constraints Map	
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Other (please specify) Mining Report CON 29M / 2016 page 6	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support ☐

Object ☒

Comment

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 ☐

Test 2 ☒

Test 3 ☒

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

We do not agree that the proposed development on the Cwmfellin Slope meets the soundness tests in the following areas;

**Test 2**

Evidence demonstrates that it is not an appropriate area for development and is not supported by robust evidence. Half the site has already been deemed by the council as not able to be developed, so how can 50 houses still be considered possible.

It cannot be considered aspirational as it ignores the importance of the current landscape to local nature.

It is also out of keeping with the small village centre, which would have to endure 5 years of noise, mess & pollution.

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✓

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**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:

Dated:

9/9/18

## Resident signatures to this petition

**Signature**

**Date**

**Address**

**Signature**

**Date** 9.

**Address**

**Signature**

**Date**

**Address**

**Signature**

**Date**

**Address**

**Signature**

**Date**

**Address**



Cyngor Bwrdeistref Sirol  
**MERTHYR TYDFIL**  
**MERTHYR TYDFIL**  
 County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

#### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

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#### PART 1: CONTACT DETAILS

##### Personal Details

##### Agent's Details (if applicable)

Title

First Name

Last Name

Job Title   
 (where relevant)

Organisation   
 (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No

Email Address

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (Including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

**Please see the example below of objections to the plan. You could use 1 or all of the objections raised below or add your own.**

I object to the proposal to build houses on the site in Treharris outlined in SW3.34 in the Replacement Local Development Plan 2016 – 2031 on the following grounds:

**Policy SW13 – Protecting and Improving Local Community Facilities**

The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).

### Failure of Soundness Test 1

Proposal Sw3.34 fails the Soundness Test 1, as identified in the Annex of the Comment Form, on the following grounds:

- 1) Does the Plan have regard to national policy?
- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

The Plan fails on these 3 counts as the development proposed in SW3.34 does not take into account:

- Merthyr Tydfil Open Spaces Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in area where such amenities are scarce has a direct negative impact on the health and well-being of the local population, social inclusion and erodes local community cohesion.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

I would like to see the removal of SW3.34 as an option for the development of housing, and for alternatives to be sought within the Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" (paragraph 2.8, pg 7) and removing one more compounds the lack of amenities available to members of the local communities and does not comply with the Well-Being of Future Generations Act 2015 as it will negatively impact the health and well-being of the local population.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

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Signed:



Dated:

7/9/18

**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031****DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

## Personal Details

## Agent's Details (if applicable)

Title

Mrs

N/A

First Name

LEANNE

N/A

Last Name

JONES

N/A

Job Title

N/A

(where relevant)

N/A

Organisation

N/A

(where relevant)

N/A

Address Line 1

N/A

Line 2

Line 3

Line 4

Post Code

N/A

Telephone No.

N/A

Email Address

N/A

Please tick if you are Welsh ☐We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

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Sustainability Appraisal (please specify page and paragraph)	
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Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
----------------------------------	--	----------------------------------

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** Further details regarding the soundness tests are provided in the Annex at the end of this form.

Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

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The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).



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- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

The Plan fails on these 3 counts as the development proposed in SW3.34 does not take into account:

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**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

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**3c. If this representation represents a petition, please indicate how many people it represents:**

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**3d. If additional documents have been provided to support your representations, please list them below:**

--

Once completed please sign and date your representation form:

Signed:



Dated:

7/09/2018





Cyngor Bwrdeistref Sirol  
**MERTHYR TYDFIL**  
County Borough Council

**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL**

**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). **Your representations must be received by the Council by 10th September 2018.**

**PART 1: CONTACT DETAILS**

**Personal Details**

Title

First Name

Last Name

Job Title   
(where relevant)

Organisation   
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

**Agent's Details (if applicable)**

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

**Representor ID Number\* (if relevant)**

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Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
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Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

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Development of a recreational space into housing in area where such amenities are scarce has a direct negative impact on the health and well-being of the local population, social inclusion and erodes local community cohesion.

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I want to speak at a public hearing.



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--


**3c. If this representation represents a petition, please indicate how many people it represents:**

--------------

**3d. If additional documents have been provided to support your representations, please list them below:**

--

Once completed please sign and date your representation form:

Signed:		Dated:	7.9.2018
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Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

## MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

### REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

#### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

#### PART 1: CONTACT DETAILS

##### Personal Details

Title	<input type="text" value="MR."/>
First Name	<input type="text" value="Robert Jones"/>
Last Name	<input type="text" value="JONES"/>
Job Title (where relevant)	<input type="text" value="N/A Senior Supervisor"/>
Organisation (where relevant)	<input type="text" value="N/A AMEY"/>
Address Line 1	<div style="background-color: black; width: 100%; height: 100%;"></div>
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	<input type="text"/>
Email Address	<input type="text"/>

##### Agent's Details (if applicable)

<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
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Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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Once completed please sign and date your representation form:

Signed:



Dated:

06.09.18



**REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031**

**DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM**

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**PART 1: CONTACT DETAILS**

**Personal Details**

Title

MRS.

First Name

Sharon.

Last Name

LAWSON

Job Title

(where relevant)

N/A DSW S. Services

Organisation

(where relevant)

N/A MTCBC.

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

**Agent's Details (if applicable)**

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

Please tick if you would prefer correspondence in Welsh ☐

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I want to speak at a public hearing.



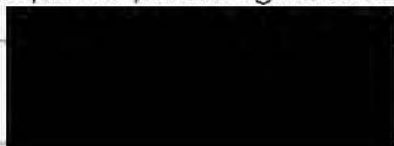
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**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

7/9/18





# MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

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#### PART 1: CONTACT DETAILS

##### Personal Details

##### Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text" value="N/A"/>
First Name	<input type="text" value="Elaine"/>	<input type="text" value="N/A"/>
Last Name	<input type="text" value="Thomas"/>	<input type="text" value="N/A"/>
Job Title (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="N/A"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="N/A"/>
Address Line 1	<div style="background-color: black; width: 100%; height: 100%;"></div>	<input type="text" value="N/A"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text" value="N/A"/>
Telephone No.	<input type="text"/>	<input type="text" value="N/A"/>
Email Address	<input type="text"/>	<input type="text" value="N/A"/>

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

*Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.*

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

**2a. Which part of the Deposit Plan (or associated document) are you commenting on?**

Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
----------------------------------	--	----------------------------------

**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.**

Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

**Please see the example below of objections to the plan. You could use 1 or all of the objections raised below or add your own.**

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**Policy SW13 – Protecting and Improving Local Community Facilities**

The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).

### Failure of Soundness Test 1

Proposal Sw3.34 fails the Soundness Test 1, as identified in the Annex of the Comment Form, on the following grounds:

- 1) Does the Plan have regard to national policy?
- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

The Plan fails on these 3 counts as the development proposed in SW3.34 does not take into account:

- Merthyr Tydfil Open Spaces Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in area where such amenities are scarce has a direct negative impact on the health and well-being of the local population, social inclusion and erodes local community cohesion.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

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**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

7/9/18



Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

344  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT  
RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

PART 1: CONTACT DETAILS

Personal Details

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

Agent's Details (if applicable)

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

<b>2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).</b>
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**Please see the example below of objections to the plan. You could use 1 or all of the objections raised below or add your own.**

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The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).

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- 3) Is the Plan compatible with other Council strategies?

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- Merthyr Tydfil Open Spaces Strategy 2016
- Wellbeing of Future Generations Act 2016

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**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

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**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

05/09/18

# REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

## DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

### PART 1: CONTACT DETAILS

#### Personal Details

#### Agent's Details (if applicable)

Title	<input type="text" value="MR"/>	<input type="text" value="N/A"/>
First Name	<input type="text" value="BRIAN"/>	<input type="text" value="N/A"/>
Last Name	<input type="text" value="CHRISTOPHER"/>	<input type="text" value="N/A"/>
Job Title (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="N/A"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="N/A"/>
Address Line 1	<div style="background-color: black; width: 100%; height: 100%;"></div>	<input type="text" value="N/A"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text" value="N/A"/>
Telephone No.		<input type="text" value="N/A"/>
Email Address	<input type="text"/>	<input type="text" value="N/A"/>

Please tick if you would prefer correspondence in Welsh ☐

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Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
----------------------------------	--	----------------------------------

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Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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Once completed please sign and date your representation form:

Signed:



Dated:

4-9-18



Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

346  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

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#### PART 1: CONTACT DETAILS

##### Personal Details

Title

MR

First Name

DAVID HUGHES

Last Name

KNIGHT

Job Title

(where relevant)

N/A

Organisation

(where relevant)

N/A

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address



##### Agent's Details (if applicable)

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

Please tick if you would prefer correspondence in Welsh ☐

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------------------

Once completed

date your representation form:

Signed:



Dated:

3.9.18





Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

347  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

#### PART 1: CONTACT DETAILS

##### Personal Details

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

##### Agent's Details (if applicable)

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

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**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

**Please see the example below of objections to the plan. You could use 1 or all of the objections raised below or add your own.**

I object to the proposal to build houses on the site in Treharris outlined in SW3.34 in the Replacement Local Development Plan 2016 – 2031 on the following grounds:

**Policy SW13 – Protecting and Improving Local Community Facilities**

The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).

### Failure of Soundness Test 1

Proposal Sw3.34 fails the Soundness Test 1, as identified in the Annex of the Comment Form, on the following grounds:

- 1) Does the Plan have regard to national policy?
- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

The Plan fails on these 3 counts as the development proposed in SW3.34 does not take into account:

- Merthyr Tydfil Open Spaces Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in area where such amenities are scarce has a direct negative impact on the health and well-being of the local population, social inclusion and erodes local community cohesion.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

I would like to see the removal of SW3.34 as an option for the development of housing, and for alternatives to be sought within the Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" (paragraph 2.8, pg 7) and removing one more compounds the lack of amenities available to members of the local communities and does not comply with the Well-Being of Future Generations Act 2015 as it will negatively impact the health and well-being of the local population.

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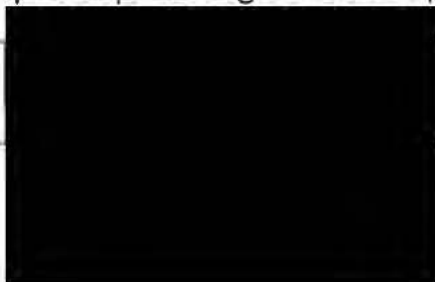
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**3d. If additional documents have been provided to support your representations, please list them below:**

--

Once completed please sign and date your representation form:

Signed:



Dated:

4/9/18





Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

348  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

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Policy number (including site allocation number if appropriate)	SW3.34
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Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

**2b. Does your representation provide Support, Objection or General Comment? (Please tick)**

Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>
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**2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick)** *Further details regarding the soundness tests are provided in the Annex at the end of this form.*

Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>
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**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

I object to the proposal to build houses on the site in Treharris outlined in SW3.34 in the Replacement Local Development Plan 2016 – 2031 on the following grounds:

**Policy SW10 – Protecting and Improving Open Spaces**

The LDP clearly indicates that open spaces should be improved and be afforded some protection from development. The proposed site at Oaklands, Treharris, is an existing community open space in an area where safe green spaces are scarce. The proposal to develop the area into housing directly contravenes the Council's own direction within the Plan that accessible and maintained open spaces make "a significant contribution to our local well-being objective for children and adults to have good physical and mental wellbeing" (paragraph 6.5.59, pg 35). All members of the Community should be provided with amenities to participate in physical activities in an outdoor environment, improving their fitness levels and mental health as they do so.

**Failure of Soundness Test 1**

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account:

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Signed:



Dated:

4/9/18



Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

349  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

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#### PART 1: CONTACT DETAILS

##### Personal Details

Title

MR

First Name

ANDREW

Last Name

THOMAS

Job Title

(where relevant)

N/A

Organisation

(where relevant)

N/A

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone No.

Email Address

##### Agent's Details (if applicable)

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

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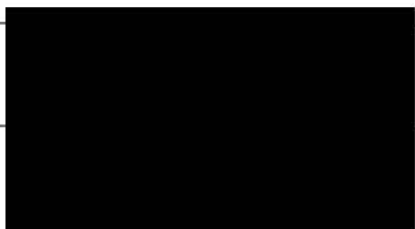
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Signed:



Dated:

3-9-16





Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
County Borough Council

350  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

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#### PART 1: CONTACT DETAILS

##### Personal Details

Title	<input type="text" value="MR"/>
First Name	<input type="text" value="OWAIN"/>
Last Name	<input type="text" value="REPS"/>
Job Title (where relevant)	<input type="text" value="N/A"/>
Organisation (where relevant)	<input type="text" value="N/A"/>
Address Line 1	<div style="background-color: black; width: 100%; height: 100%; min-height: 150px;"></div>
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

##### Agent's Details (if applicable)

<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
<input type="text" value="N/A"/>
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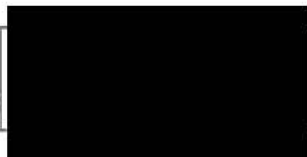
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**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

3/9/19





Cyngor Bwrdeistref Sirol  
MERTHYR TYDFIL  
Merthyr Tydfil  
County Borough Council

351  
MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

### DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM

We would like your views on the Deposit Local Development Plan (LDP) and documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP). Your representations must be received by the Council by 10th September 2018.

#### PART 1: CONTACT DETAILS

##### Personal Details

##### Agent's Details (if applicable)

Title

Mr

N/A

First Name

ALAN FRANCIS

N/A

Last Name

Robins

N/A

Job Title

N/A

(where relevant)

N/A

Organisation

(where relevant)

N/A

N/A

Address Line 1

N/A

Line 2

Line 3

Line 4

Post Code

N/A

Telephone No

N/A

Email Address

N/A

Please tick if you would prefer correspondence in Welsh ☐

We prefer to correspond by e-mail. Please tick if you would prefer future updates by post ☐

Please note all comments will be publically available and cannot be treated as confidential. Your information will be retained on the Council's LDP Database and will only be used in relation to preparation of the Local Development Plan.

Representor ID Number\* (if relevant)

\*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council in identifying you and recording your representation.



**PART 2: Your Comments and Suggested Changes** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan (or associated document) are you commenting on?</b>	
Policy number (including site allocation number if appropriate)	SW3.34
Page/Paragraph number	Page 106/ 107
Proposals Map	Southern Sector East
Constraints Map	Southern Sector East
Sustainability Appraisal (please specify page and paragraph)	
Habitats Regulations Assessment (please specify page and paragraph)	
Other (please specify)	

<b>2b. Does your representation provide Support, Objection or General Comment? (Please tick)</b>		
Support <input type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment <input type="checkbox"/>

<b>2c. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. If you think that the Plan is unsound, which test of soundness do you think it fails? (Please tick) Further details regarding the soundness tests are provided in the Annex at the end of this form.</b>		
Test 1 <input checked="" type="checkbox"/>	Test 2 <input type="checkbox"/>	Test 3 <input type="checkbox"/>

**2d. Please set out below your representation on the Deposit Plan (or associated document). If necessary continue on a separate sheet (which should be clearly labelled and attached).**

**Please see the example below of objections to the plan. You could use 1 or all of the objections raised below or add your own.**

I object to the proposal to build houses on the site in Treharris outlined in SW3.34 in the Replacement Local Development Plan 2016 – 2031 on the following grounds:

**Policy SW13 – Protecting and Improving Local Community Facilities**

The proposed development directly contravenes this policy within the LDP as the development of housing on existing green infrastructure within the community of Treharris is neither protecting nor improving local community facilities. The site has been well used over many years for structured recreational sport, and as such should be protected as an existing space and improved to offer a facility for all members of the community to enjoy informal or formal organised sporting activities. The LDP identifies that developments on such areas will only be approved if the existing provision is "surplus" to the needs of the community. Treharris has a lack of investment in open spaces and certainly does not have a surplus of alternative facilities nearby. Rather, community members have to travel to other villages in the borough, or other borough's, to enjoy well maintained open spaces. With little alternative available to the members of Treharris, it cannot be demonstrated that "there is no longer a viable community use for the facility" (pg 40, LDP).

### Failure of Soundness Test 1

Proposal Sw3.34 fails the Soundness Test 1, as identified in the Annex of the Comment Form, on the following grounds:

- 1) Does the Plan have regard to national policy?
- 2) Does the Plan have regard to Well-being goals?
- 3) Is the Plan compatible with other Council strategies?

The Plan fails on these 3 counts as the development proposed in SW3.34 does not take into account:

- Merthyr Tydfil Open Spaces Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in area where such amenities are scarce has a direct negative impact on the health and well-being of the local population, social inclusion and erodes local community cohesion.

**2e. Please list the changes you wish to see made to the Deposit LDP, if any, as a result of your representation** (e.g. the inclusion of a new or amended policy, site allocation or supporting text that is considered necessary for soundness).

I would like to see the removal of SW3.34 as an option for the development of housing, and for alternatives to be sought within the Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" (paragraph 2.8, pg 7) and removing one more compounds the lack of amenities available to members of the local communities and does not comply with the Well-Being of Future Generations Act 2015 as it will negatively impact the health and well-being of the local population.

If you want to suggest a new site allocation, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. Alternatively, if the site has been submitted as a 'Candidate Site' earlier in the Plan preparation process, please provide the candidate site name and reference number.

You should consider whether it is necessary for your representation to be accompanied by a Sustainability Appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal undertaken on the Replacement Deposit Plan. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site. Further details regarding the Replacement Deposit Plan Sustainability Appraisal and the baseline information can be found on the Council's website: [www.merthyr.gov.uk/ReplacementLDP](http://www.merthyr.gov.uk/ReplacementLDP)

### Part 3: What happens next?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination (which will be held at a later date). You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick)**

I do not want to speak at a public hearing and am happy for my written comments to be considered by the Inspector.



I want to speak at a public hearing.



**3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. 'Housing site at Location X' or 'The overall housing target').**

**3c. If this representation represents a petition, please indicate how many people it represents:**

**3d. If additional documents have been provided to support your representations, please list them below:**

Once completed please sign and date your representation form:

Signed:



Dated:

4-9-18



## Meeting 6<sup>th</sup> August 2018

**Present:** Simon Davies, Neil McNamara, Josh Locke, Delyth Shearing, Michelle Smith, Josh Smith

**Apologies:** Owain Locke, Scooby

### **Matters Arising from last meeting:**

Presentation night went well.

Letter has been sent to Danycraig club thanking them [REDACTED]

Twitter page is up and running.

New coaches are in place for under 6's

### **A.O.B:**

Festival was discussed, entries were low and a decision if it was going ahead was going to be made the following week.

Committee thanked Louise Bennett for the service she had given to the club and flowers were going to be sent to [REDACTED]

Objection letters for the planning of houses on the Athletic were going to be put on Facebook and foams were to be given out for parents to fill in.

The club were officially going to apply to use the Grove pitch in Aberfan this season.

There was not going to be a under 15's girl team because of lack of numbers.

Accreditation had been filled in and sent off.

No decision had been made for tour.

Equipment was ordered.

Details for Boys club of Wales application was needed.

GTBR – forms were going to be kept securely by Michelle and Josh.

Josh Locke was replacing Louise Bennett [REDACTED]  
[REDACTED]

NEXT MEETING 3<sup>rd</sup> September



**From:** [REDACTED]  
**Subject:** Replacement LDP at Treharris Athletic Ground - Thoughts of a local family.  
**Date:** 08 September 2018 14:45:34

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To those it may concern,

I have felt compelled to write to you in regards the plan to build houses on the commercial ground that used to be used by Treharris Athletic.

I am a resident of Treharris (I moved to the area in 2015 as my wife is from Edwardsville) and I can't help but feel building houses on the site would only add to the neglect Treharris and other local villages have suffered over the past years.

Houses are not needed. A quick glance at Rightmove clearly shows there are many houses available to buy or rent in the area. That in itself shows that the area does not need housing. If a decision was made to build houses there then it would only be made with a view of 'lining the coffers' of the council. Please do not sell it to locals as something for them as housing will be 'Affordable'.

The area needs and deserves the investment that Merthyr town has benefitted from. You only have to drive down the valley to see the difference In Quality of signposting the further down the valley you come. I've recently visited Thomastown park and I was astonished - there is nothing like that in the Treharris area. Something like that would be a far better use of this ground that for over a century has been used for recreational activities.

I am 29 years old, as is my wife, and our son is 2 1/2. I have told my wife that she shouldn't take our son to Treharris park anymore as it is no longer safe. Treharris Park has been retaken by nature, left to crumble and fall into disrepair by the council. To now attend a well looked after Park we have to travel to Ystrad Mynach or Pontypridd - this is what the area needs - something for the community like a park area that doesn't get forgotten about. A place the area can be proud of. Those of us who pay our council tax here deserve investment in the area, not just a short term cash injection from selling the land for housing. This short term injection will probably not be reinvested in the area. Surely that isn't right?

Please consider your decision carefully and with empathy. Is it the people who need the housing or the council? The council should aim to serve all its constituents. Treharris' recreational area is being taken away, let us have something the community can use to replace it.

Thank you for your time in reading this.

Kind regards

Rhys, Natalie and Ezra Hughes

[REDACTED]

Sent from my iPhone

**Subject:**

Objection to replacement LDP-Treharris

**Date:**

08 September 2018 15:03:49

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To whom it may concern,

I wish to state my objection to the proposal to build houses on the commercial field, AKA the former Treharris athletic ground.

The ground should be used for the benefit and enjoyment of the community, not for 15 homes.

Living at the bottom of the Merthyr valley, we often find that things are taken from us for the benefit of Merthyr town. A prime example, being the closure of our swimming pool in Edwardsville. Rhydycar was renovated but, we were left with nothing to replace it.

We pay the same council tax but the amenities we have on our door step just doing compare. The council seem so focused on improving the aesthetics of the town centre, with no consideration for the bottom ward. Don't get me wrong, the town looks great. But why isn't the same care and funding afforded to us?

I propose the area of land is used as outdoor space for enjoyment of people at all ages and capabilities. Whether that is a park or sporting facilities, I feel it should be something with the onus of being active and outdoors.

Treharris does not have a nice park. Treharris Park is in need of a major renovation. The paintwork is rusty, the bandstand left to rot. The pool left empty and grubby. The play area for older children completely removed. The younger children are left with a meagre apparatus with nothing for disabled children at all.

We have to travel to Trelewis or Edwardsville to access a playground relatively close to home.

The park in Edwardsville is also due a major overhaul. Again not in the town so doesn't matter.

I remember when the park was last renovated fully, I was a child. I am now approaching 30 and it's becoming rather dilapidated. There are countless, well looked after parks in the town of Merthyr such as Cyfarthfa and Thomastown, both relatively close together. The bottom of the valley deserves the same consideration. We shouldn't have to travel to Pontypridd or Ystrad Mynach for a nice play area for our children. Thousands of children live in the Treharris ward and they, along with the older generations deserve a nice recreational facility.

I ask that you please consider all objections fairly as more houses are not what the Treharris ward need.

Kind regards

Natalie Phillips

## COMMERCIAL FIELD PROPOSAL-TREHARRIS

To Whom it may Concern:

I would like to object to the up coming proposal to build houses on the peace of land known as Treharris Athletic Ground. This place as given the people of Treharris hours of fun, and I fell that it should be made into some short of area were children could go and enjoy them self's. There is no park that you could take your child to play, the park we have is out of the way and over-grown and depleted. The council are always selling off our entertainment (Ex Edwardsville Baths) If this was up in the top of the valley you would spend money on the children of that area.

Kind Regards

Mr P. E. Phillips OStJ

