

**Cynllun Datblygu Lleol Newydd Cyngnor 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

ADRODDIAD YMGYNGHORI CYNLLUN DATBLYGU

DEPOSIT PLAN CONSULTATION REPORT

Rhagfyr 2018 | December 2018

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MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

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Executive Summary

- 0.1 Up-to-date Local Development Plans (LDPs) are an essential part of a planned planning system. As such the Council adopted the Merthyr Tydfil Local Development Plan (LDP) 2006-2021 on 25th May 2011. Since adoption, in accordance with statutory requirements, the Plan has been monitored on an annual basis and the results of findings published in Annual Monitoring Reports. In addition, the Council is required to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. A review of the adopted LDP was therefore commenced in May 2015, the findings of which indicated that a full revision procedure should be followed in preparing a replacement LDP. Consequently, the preparation of a 1st replacement LDP was approved by Merthyr Tydfil County Borough Council (MTCBC) on 20th April 2016.
- 0.2 Following this a Delivery Agreement (DA) for its preparation was agreed by Welsh Government (WG) on 10th August 2017. The DA comprises a timetable for preparing the replacement LDP and a Community Involvement Scheme (CIS) which sets out how and when stakeholders and the community can contribute to the plan preparation process.
- 0.3 The CIS states that details of all involvement and consultation activities should be included in an Initial Consultation Report (ICR) required under LDP Regulation 17(c). An 'Initial Consultation Report' covering the pre-deposit plan preparation stage for the replacement plan was therefore published in June 2018. It identified bodies engaged or consulted at the pre-deposit public consultation stage; the steps taken to publicise plan preparation, how it complied with the CIS contained in the DA, the main issues raised, and how they influenced the preparation of the Deposit LDP.
- 0.4 This document comprises the 'Consultation Report' required under LDP Regulation 22(2). It up-dates the ICR by summarising the representations made at the 'Deposit' Plan stage, the Council's response, how the key issues raised will be addressed, including any changes that are considered necessary for 'soundness', and an explanation of any deviations from the CIS.

1. Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 (section 62) places a duty on all local planning authorities (LPAs) in Wales to prepare a Local Development Plan (LDP) for their area. The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) “the Regulations”, prescribes the form and content of the LDP and makes provision for the procedure to be followed in their preparation.
- 1.2 Accordingly, the Council prepared and subsequently adopted the Merthyr Tydfil LDP on 25th May 2011. The adopted LDP sets out the Council’s priorities for the development and use of land in the County Borough and its policies to implement them over a fifteen-year period, from 2006 and 2021.
- 1.3 Up-to-date LDPs are an essential part of a plan-led planning system, therefore since adoption; the Plan has been monitored on an annual basis. This includes an assessment of the extent to which the LDP’s strategy, policies and development sites are being delivered which has been published in seven Annual Monitoring Reports (AMRs) produced to date.
- 1.4 Section 69 of the 2004 Act requires LPAs to undertake a review of LDPs and report to the Welsh Government (WG) at such times as prescribed. A review of the adopted LDP commenced in May 2015 culminating in the production of a Review Report. That report, which recommended the preparation of a replacement LDP, was approved by Merthyr Tydfil County Borough Council (MTCBC) on 20th April 2016.
- 1.5 A Delivery Agreement (DA) for the preparation of the first replacement Merthyr Tydfil Local Development Plan 2016 -2031 was then approved by Full Council on 13th July 2016 and agreed by the WG on 10th August 2016. The DA comprises a timetable for preparing the replacement LDP and a Community Involvement Scheme (CIS) which sets out how and when stakeholders and the community can contribute to the plan preparation process.
- 1.6 While the Replacement LDP is being prepared, the adopted Merthyr Tydfil Local Development Plan (May 2011) remains extant and will continue to provide the policy framework by which planning applications will be determined. This will remain the case until the point at which the Replacement LDP 2016-2031 is formally adopted by the Council.

- 1.7 This document builds upon an 'Initial Consultation Report' required under LDP Regulation 17(c) covering the pre-deposit plan preparation stage for the first replacement plan. That report identified:
- a) Bodies engaged or consulted at the pre-deposit public consultation stage;
 - b) The steps taken to publicise plan preparation, and how this complies with the CIS contained in the DA and
 - c) The main issues raised, and how they have influenced the preparation of the Deposit LDP.
- 1.8 In accordance with LDP Regulation (22)2, this report comprising the Deposit 'Consultation Report':
- a) Sets out the audit trail and summary of the key issues raised by representors at the Deposit Stage;
 - b) Lists who has been engaged at the Deposit Stage;
 - c) Includes a summary of the main issues and representations made;
 - d) Recommends how the Council considers how each representation should be addressed and
 - e) Sets out an explanation and implication of any deviation from the CIS.
- 1.9 The appendices to this report contain, amongst other information, a synopsis of the consultation methods used for engagement as specified in the CIS, and summaries of the representations made at the Deposit consultation stage together with how the Council has responded to the issues raised.

2. Preferred Strategy Consultation (July and October 2017)

- 2.1 The publication of the Preferred Strategy (PS) for consultation was the first formal publication in the replacement LDP process. It set out the broad direction of travel that the replacement LDP intended to follow to ensure that the County Borough is developed in a sustainable manner over the replacement plan period. It also provided a strategic framework for detailed policies, proposals and land use allocations which were subsequently included in the Deposit Plan.
- 2.2 In line with *Appendix 3* of the DA, a Report was presented to Full Council on 28th June 2017 seeking approval for a 6-week period of public consultation for the PS supported by several pre-deposit proposals documents, background

papers and a Candidate Sites Register. At that meeting the Council resolved that the Preferred Strategy, the Initial Sustainability Appraisal Report and the Habitats Regulations Assessment Screening Report together with supporting documents were approved for a 6 week period of public consultation.

- 2.3 Copies of the Council Report and Minutes of the meeting can be viewed on the Council website at: <http://democracy.merthyr.gov.uk/>
- 2.4 During the Preferred Strategy consultation period held between 14th July – 6th October and additional Candidates Sites consultation held between 13th October - 24th November 2017 a total of 41 individuals and organisations made representations, with a total of 232 individual representations relating specifically to the Preferred Strategy and background papers. Of these 84 (36%) provided support, 29 (13%) objected and 119 (51%) provided general comment. Appendix 40 of the ICR, June 2018, contains a summary of the responses received as a result of the PS Consultation, the main issues raised, the Council's responses to those issues and how they influenced the preparation of the Deposit LDP. A breakdown of representations by policy or theme can be found in the Initial Consultation Report (June 2018) which provides further details of this stage.

3. Replacement Deposit LDP Public Consultation (July – September 2018)

- 3.1 As part of the preparation process for the Replacement LDP, the Council is required to publish and consult on a Deposit Plan (LDP Regulation 17 and 18). As outlined in Appendix 3 of the *DA Potential Involvement Methods and Decisions at Key Stages in Plan preparation* a Statutory 6-week 'Deposit' consultation took place from Monday 30th July 2018 until Monday 10th September 2018. This was agreed by Full Council on 25th July 2018 who resolved that:
- The issues raised during the pre-deposit Preferred Strategy public consultation in 2017 and recommended responses be noted.
 - The Replacement Deposit Local Development Plan 2016 - 2031 and associated documents be approved for a statutory six week period of public consultation commencing in July 2018.

Copies of the report and minutes can be viewed at:

<http://democracy.merthyr.gov.uk/ieListDocuments.aspx?CId=159&MId=3021&Ver=4&LLL=0>.

3.2 Following this, in accordance with Appendix 2 *External Consultees* of the DA, the Council made specific, environmental consultation and general consultation bodies, other consultees and the general public aware of the Public Consultation Exercise stating the provisions made in the plan, outlining the Plan process, where and how documents can be accessed and how to make representations through the following methods as outlined in Appendix 3 *Potential Involvement Methods and decisions at Key Stages in Plan Preparation*, of the DA as follows:

- Published a bilingual Statutory Public Notice, attached at Appendix 1;
- Directly contacted statutory consultees and contacts on the Council's database by email in Welsh and English, attached at Appendix 2;
- Directly contacted statutory consultees and contacts on the database by letter where requested in Welsh and English, attached at Appendix 3 and 4;
- Issued a press release in both Welsh and English, attached at Appendices 5 and 6;
- Distributed a poster throughout the County Borough in both Welsh and English, attached at Appendices 7 and 8;
- Produced an Easy Read Document in both Welsh and English, see Appendices 9 and 10;
- Inserted a Banner and eye catcher on the County Borough Council website signposting to the Replacement LDP web page, see Appendix 11;
- Alerted the public on the Council's twitter Account, see Appendix 12;
- Prepared comment forms in both Welsh and English, attached at Appendices 13 and 14; and
- Deposited hard copies of all documents at the following locations:
 - Civic Centre, Castle Street;
 - Unit 5, Triangle Business Park, Pentrebach;
 - Rhydycar Library Hub, Merthyr Tydfil Leisure Centre;
 - Treharris Library, Perrott Street, Treharris;
 - Dowlais Library, Church Street, Dowlais; and
 - Aberfan Community Library, Pantglas Road, Aberfan.

- 3.3 Documents deposited at the above locations and up-loaded to the Replacement LDP website (www.merthyr.gov.uk/ReplacementLDP) comprised:

New Core documents:

- Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP)(2016 – 2031) Deposit Plan - Written Statement June 2018;
- Merthyr Tydfil County Borough Council Replacement LDP (2016 – 2031) Proposals Map July '18;
- Merthyr Tydfil County Borough Council Replacement LDP (2016 – 2031) Constraints Map July '18;
- Initial Consultation Report June 2018;
- Deposit Plan Sustainability Appraisal (SA) Report June 2018;
- Deposit Plan Sustainability Appraisal (SA) – Non Technical Summary June 2018 and
- Deposit Plan Habitats Regulations Assessment Screening Report June 2018.

New supporting documents:

- Deposit Plan – Easy Read Version July 2018;
- Replacement Deposit Plan – Comment Forms;
- Site Assessment Background Paper June 2018;
- Viability Assessment: Local Development Plan / Community Infrastructure Levy June 2018;
- Housing Land Supply and Trajectory background paper June 2018;
- Affordable Housing background paper June 2018;
- Hoover Strategic Regeneration Area - Framework Masterplan June 2018;
- Merthyr Tydfil Strategic Flood Consequence Assessment (SFCA) June 2018;
- Merthyr Tydfil Employment Land Review June 2018;
- Waste Planning background paper June 2018;
- Minerals planning background paper June 2018; and
- South Wales Regional Aggregates Working Party - Annual Report 2016 published March 2018.

Up-dated background papers:

- Gypsy and Traveller Accommodation Assessment 2018 Update – June 2018;

- Special Landscape Areas background paper June 2018;
- Review of Green Wedges background paper June 2018;
- Sites of Importance for Nature Conservation background paper June 2018; and
- Merthyr Tydfil Renewable Energy Assessment Report 2017 and June 2018 Addendum.

Other background documents:

- Merthyr Tydfil County Borough Council Replacement LDP (2016 – 2031) Preferred Strategy June 2017;
- Replacement LDP (Pre Deposit) Initial Sustainability Appraisal Report June 2017;
- Replacement LDP (Pre Deposit) Habitats Regulations Assessment Screening Report June 2017;
- Population and Housing Requirements background paper June 2017;
- Merthyr Tydfil Retail Study and Commercial Leisure Study June 2017;
- Merthyr Tydfil Archaeology and Archaeologically Sensitive Areas background paper July 2017;
- Merthyr Tydfil County Borough Council Replacement LDP Delivery Agreement August 2016;
- Merthyr Tydfil Open Space Strategy June 2016
- Merthyr Tydfil Open Space Strategy Action Plans June 2016;
- Merthyr Tydfil Gypsy and Traveller Accommodation Assessment Approved 2016;
- Merthyr Tydfil Proposed New Bus Station Flood Consequence Assessment May 2016;
- Merthyr Tydfil County Borough Council LDP (2006 – 2021) Review Report April 2016;
- South East Wales Valleys Local Transport Plan January 2015;
- Landscape Sensitivity and Capacity Study April 2015;
- Merthyr Tydfil: Understanding Urban Character 2015;
- Heads of the Valley Smaller Scale Wind Turbine Development 2015;
- Merthyr Tydfil Local Housing Market Assessment 2014;
- South Wales Regional Aggregates Working Party - Regional Technical Statement 1st Review including Appendix B August 2014;
- South Wales Regionally Important Geological Sites (RIGS) Audit March 2012; and
- Merthyr Tydfil Local Development Plan (2006 – 2021) Written Statement, adopted May 2011.

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- 3.4 A number of public consultation drop-in events were also held during the consultation period where planning officers were available to answer any queries, as follows:
- Monday 13th August 2018 - Library, Aberfan Community Centre: 1pm - 6pm
 - Tuesday 14th August 2018 - St Tydfil's Shopping Centre (near Costa): 12pm - 5pm
 - Thursday 16th August 2018 - Bedlinog Inn, Bedlinog: 3pm – 7pm
 - Saturday 18th August 2018 - St Tydfil's Shopping Centre (near Costa): 10am - 3pm
 - Monday 20th August 2018 - Dowlais Library, Dowlais: 1pm - 6pm
 - Tuesday 21st August 2018 - The Bothy Heritage Centre, Cyfarthfa Park: 1pm - 6pm
 - Wednesday 22nd August 2018 - Treharris Library, Treharris: 1pm - 6pm
- 3.5 The only departure from the DA (see paragraph 3.2) was the use of the Cwm Taf Engagement Hub website, given that the Council stopped utilising it due to low response rates, and publication of the Deposit Plan in the Contact magazine as the publication timescales did not align. A statement of Compliance with the Community Involvement Scheme (CIS) is given in section 8 of this Consultation Report.
- 3.6 At the end of the consultation period the responses were collated and analysed. A total of 48 individuals and organisations made representations during the LDP Deposit Plan consultation, with a total of 234 individual representations relating to the Deposit Plan and background papers. Of these 18 (8%) provided support, 120 (51%) objected and 96(41%) provided general comments. The following table illustrates the breakdown of representations by policy or topic and whether support, objection or comment was received:

TABLE 1: Deposit Plan Consultation – Breakdown of Representations by Policy/Section				
Deposit Plan Section/Policy	Support	Object	Comment	Total Representations
Deposit Plan (General)	1	0	3	4
Introduction	0	0	4	4
Context & Key Issues	0	23	4	27
LDP Vision & Objectives	0	19	2	21
LDP Strategy	1	3	3	7
Policy SW1	1	3	1	5
Policy SW2	0	0	2	2
Policy SW3	1	26	10	37

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Policy SW4	2	1	2	5
Policy SW5	0	0	0	0
Policy SW6	1	3	3	7
Policy SW7	1	0	2	3
Policy SW8	0	0	1	1
Policy SW9	0	2	1	3
Policy SW10	1	1	2	4
Policy SW11	0	1	5	6
Policy SW12	1	3	5	9
Policy SW13	1	0	0	1
Policy CW1	0	1	3	4
Policy CW2	0	0	0	0
Policy EnW1	0	0	2	2
Policy EnW2	0	1	1	2
Policy EnW3	0	19	1	20
Policy EnW4	1	2	1	4
Policy EnW5	1	1	0	2
Policy EcW1	1	3	3	7
Policy EcW2	0	0	1	1
Policy EcW3	0	1	0	1
Policy EcW4	0	1	0	1
Policy EcW5	0	0	0	0
Policy EcW6	0	0	0	0
Policy EcW7	0	3	0	3
Policy EcW8	0	1	2	3
Policy EcW9	0	0	0	0
Policy EcW10	1	0	5	6
Policy EcW11	1	0	4	5
Policy EcW12	0	0	2	2
Policy EcW13	1	0	3	4
Policy EcW14	0	0	0	0
Site Allocation Details	0	0	6	6
Monitoring Framework	0	1	6	7
Plan Preparation	1	1	1	3
Proposals Map	0	0	3	3
Constraints Map	0	0	0	0
Background papers	0	0	2	2
Total	18	120	96	234

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TABLE 2: Deposit Plan Consultation Breakdown of Representations by Issue					
Policy Topic / Theme	Support	Object	Comment	Total	Indicated to speak at hearing
Affordable Housing	0	0	2	2	
Alternative Sites	0	1	2	3	Marvel (White Young Green), Merthyr Initiative Group
Community Facilities	1	0	0	1	
Economy & Employment	0	5	1	6	Merthyr Tydfil Heritage Trust
General Comments	1	1	3	5	Merthyr Tydfil Heritage Trust
Gypsy & Travellers	0	0	1	1	
Historic Environment	0	1	2	3	Merthyr Tydfil Heritage Trust
Hoover Strategic Regeneration Area	2	4	4	10	Merthyr Tydfil Heritage Trust, Elan Homes
Housing Allocation SW3.1	0	0	1	1	Merthyr Initiative Group
Housing Allocation SW3.5	0	1	0	1	
Housing Allocation SW3.8	0	0	1	1	Merthyr Initiative Group
Housing Allocation SW3.30	0	1	0	1	
Housing Allocation SW3.31	0	22	0	22	Mr Jim Davies
Housing Allocation SW3.32	0	19	0	19	
Housing Allocation SW3.33	1	0	0	1	
Housing Requirement	0	2	1	3	Merthyr Tydfil Heritage Trust
Housing Supply	1	2	10	13	Marvel (White Young Green), HBF, Rhondda Cynon Taff CBC, Merthyr Tydfil Heritage Trust
Infrastructure & Delivery	0	4	3	7	Marvel (White Young Green), Merthyr Tydfil Heritage Trust
Landscape & SLAs	1	2	0	3	
Minerals	3	0	19	22	
Miscellaneous Policy Matters	2	3	7	12	Merthyr Initiative Group, Merthyr Tydfil Heritage Trust
Monitoring Framework	0	1	6	7	Merthyr Tydfil Heritage Trust
Natural Environment	0	8	7	15	Marvel (White Young Green), Merthyr Tydfil Heritage Trust, Elan Homes
Open Spaces	1	3	2	6	Merthyr Tydfil Heritage Trust, Friends of Nant Llwynog Park
Plan Preparation	1	1	3	5	Merthyr Tydfil Heritage Trust, Friends of Nant Llwynog Park
Renewable Energy	0	1	2	3	
Retail	0	2	0	2	Hammerson
Settlement Boundaries & Rural Dev.	2	1	2	5	Elan Homes
Tourism, Leisure & Recreation Dev.	0	4	0	4	Marvel (White Young Green), Merthyr Tydfil Heritage Trust
Transport	1	6	8	15	Merthyr Tydfil Heritage Trust
Vision Issues Strategy & Objectives	1	24	9	34	Merthyr Initiative Group, Merthyr Tydfil Heritage Trust
Waste	0	1	0	1	Merthyr Tydfil Heritage Trust
Totals	18	120	96	234	

4. Deposit LDP Consultation – Schedule of Main Issues

- 4.1 This section summarises the main issues raised in representations on the Deposit Plan and the Council's response to them under LDP issue headings (see sections 4.1 to 4.24). Detailed responses to each representation are provided at Appendix 15.
- 4.2 Where an individual policy or site allocation is subject to one representation, this is shown in a distinct main issue table. Where multiple deposit representations are made on one policy or site allocation, these are grouped under one main issue. Where representations relate to one distinct issue these have also been grouped together where appropriate.
- 4.3 Where deposit representations have been made which do not clearly fall within a 'main issue' for a policy topic, these are listed under the 'miscellaneous policy matters' issue.
- 4.4 Each main issue box lists the applicable representation numbers and representor names. Where representors have indicated they wish to speak at a public hearing session the relevant representation numbers and main issue text appears as **bold** text.
- 4.5 In addition to the main issues tables under sections 4.1 to 4.24, a summary of key issues and focused changes that have been proposed to the Deposit Plan are provided in the paragraphs below. The Consultation Report and schedule of main issues should be read alongside the 'Schedule of Focused Changes to the Replacement Deposit Plan' (December 2018) which provides a comprehensive list of all Focused Changes that are considered necessary for 'soundness'. The document cross references the relevant representation numbers for each focused change. These are representation number which can also be found under the schedule of main issues and Appendix 15 of this Consultation Report.
- 4.6 A number of representations were received regarding the Hoover Strategic Regeneration Area (HSRA) and the housing and employment allocations at the strategic site. Whilst there was general support for focusing new development here to regenerate the area, a number of concerns were raised regarding flood risk and the nature and scale of development. For example, concern was raised regarding the need for a comprehensive development (including land west of the River Taf), provision of a new Metro hub near Brandy Bridge, loss of open space/cricket ground and the importance of reflecting the sites industrial heritage.

- 4.7 In response the Council has clarified the contribution the site makes to delivering the Replacement Plan strategy and the consideration of flood risk constraints when proposing new site allocations. With regards to flood risks at the Willows Industrial Estate, the allocation of employment land located partly in flood zone C2 is proposed to be removed from the Plan as the specific impacts of development proposals on flood risk would require further consideration at planning application stage. The Council is satisfied that there is sufficient alternative employment land supply identified in the Plan and development proposals in this part of the HSRA could come forward in the future where they satisfy national policy requirements in relation to flood risk.
- 4.8 Many of the issues raised regarding the HSRA are addressed in the Framework Masterplan that has been prepared to inform future development proposals on the site and amendments to Policy SW6 (The Hoover Strategic Regeneration Area) have been proposed in order to more clearly incorporate the sustainable placemaking principles contained in the master plan.
- 4.9 Objections were also received regarding other specific residential site allocations. This included, sites SW3.5 (Erw Las, Gellideg), site SW3.30 (Stormtown, Trelewis), Site SW3.31 (Cwmfelin, Bedlinog) and SW3.32 (Commercial Fields, Treharris). Where these have resulted in changes to residential allocations a summary is provided in the following paragraphs which set out the key issues relating to each change. Notwithstanding this, a number of the concerns raised related to detailed design matters that need be addressed at the planning application stage once development proposals are available to consider. In this respect, the Council is satisfied the proposed level of growth in the Replacement LDP can be delivered on the sites identified.
- 4.10 With regards to site SW3.31 (Cwmfelin, Bedlinog), objections were received regarding the allocation of the site and the scale of development at the site given the potential impacts on the Site of Importance for Nature Conservation (SINC) that lies partly within the allocation. Following consultation with the Council's Countryside officer and consideration of previous layouts for the site it is proposed to amend the allocated number of dwellings from 50 to 30 to provide for a more realistic and deliverable scale of development at the site. In order to ensure sufficient housing provision is made in the Replacement LDP an additional residential site allocation is proposed at Clwydyfagwr, Swansea Road for 40 dwellings. This site is identified in the current adopted LDP and the Council has recently received an outline planning application for residential development on the site.

- 4.11 With regards to site SW3.32 (Commercial Fields, Treharris), concerns were raised regarding the loss of the sports pitch and impact on the provision of open space. Whilst the site was put forward as a candidate site for potential redevelopment, it has come to light that the existing sports pitch use will continue. If the site does become available in the future, the acceptability of redevelopment proposals could be considered as part of a planning application that would be assessed against the Plan policies. Consequently, the allocation for 15 dwellings is proposed to be removed and alternative provision has been made through the inclusion of the new residential site allocation at Clwydyfagwr, Swansea Road.
- 4.12 Objections were received regarding the proposed Local Nature Reserve (LNR) at the Old Colliery site Coed yr Hendre and Nant Llwynog, Bedlinog. These identified that the multi-functional green space used to inform the proposed designations included existing sport pitches which could lead to conflicting uses and priorities. Consequently, it is proposed to amend the proposed LNR designations to remove the sports pitch at the Old Colliery Coed yr Hendre and Nant Llwynog, Bedlinog LNR. For the same reason, this has also resulted in boundary changes at the Lfor Tip, Dowlais and Goitre Lane, Penydarren proposed LNRs.
- 4.13 Following the preparation of further evidence regarding landscape sensitivity, the Merthyr Road Local Search Area for Solar Energy is proposed to be removed from the Replacement LDP due to the high sensitivity identified.
- 4.14 Objections or requests for further justification or clarification were also received on the Plan regarding a number of other policy areas and these are detailed in sections 4.1 to 4.24 below. These include for example, providing clarifications and amendments to the Plan's environmental policies and regarding the Council's consideration of the Well-being of Future Generations Act 2015. Other mapping amendments were also identified in response to representations and these can be found in the Schedule of Focused Changes to the Replacement Deposit Plan (December 2018).
- 4.15 Representations on the Deposit Plan Sustainability Appraisal (SA) Report were received regarding the assessment of the Cwmfelin, Bedlinog residential site allocation and regarding the impact of the Plan's growth on minerals supply generally. In the case of site allocation assessment these were considered to have been undertaken consistently and whilst an amended assessment has been prepared to reflect the reduced level of growth on the site, no implications on the SA of the Deposit Plan were identified. In the case of the assessment of the impacts on the minerals supply, references to minerals requirements in the SA Report and the consideration of potential impacts

were clarified in the written response to the representation. However, no implications for the Deposit Plan SA were identified.

- 4.16 Finally, with regards to the Habitats Regulations Assessment (HRA) Screening Report, NRW agreed with the conclusion of no likely significant effects on protected European designated sites based on the Replacement LDP. Following the Deposit Plan consultation the HRA Screening Report has been updated to incorporate the requirements of HRA Appropriate Assessment and other minor factual corrections.

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4.1 Plan Preparation

Plan Preparation	
LDP section references:	Written Statement, page 5, para 2.10
Representation number:	Representor name:
119.D1	Dwr Cymru Welsh Water
129.D1	Caerphilly County Borough Council
134.D2	Mr Alan Rees
207.D49	Merthyr Tydfil Heritage Trust
288.D1	Friends of Nant Llwynog Park
Main Issues:	Council Response:
<p>Dwr Cymru Welsh Water:</p> <p>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.</p>	Comments noted. The Council has had early engagement with Dwr Cymru Welsh Water which has informed development of the Plan's strategy and any site specific comments have been incorporated into the site allocation details where appropriate.
<p>Caerphilly County Borough Council:</p> <p>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.</p>	Comments noted and support welcomed.
<p>Mr Alan Rees:</p> <p>General support for the plan and consultation process, including praise for the comprehensive and informative evidence base, its on-line accessibility and courteous manner of officers staffing drop-in sessions.</p>	Comments noted and supported welcomed.
<p>Merthyr Tydfil Heritage Trust:</p> <p>Appreciate the good work that has gone into producing detailed strategies and supporting documents and acknowledge the effort gone into the public consultation exercise. However object to the seemingly lack of corporate support, short consultation period held over the summer holidays and non-use of the</p>	Comments noted and support welcomed. The consultation process for the Deposit Replacement LDP comprised a multi-faceted approach in line with the Delivery Agreement agreed with Welsh Government at the start of the plan preparation process. Unfortunately, the Council no longer subscribes/supports to the Cwm Taf Hub website. Alternative engagement and

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<p>Cwm Taf Hub.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Revision process and consultation comments.</p>	<p>public consultation methods were employed and this has been noted in the Deposit Plan Consultation Report (December 2018). For example, direct contact was made with all representors included on the LDP database either through email or letter. A pop-up banner and eye-catcher was included on the front page of the Council's Website and the process was 'Tweeted' on the Council's twitter account. Posters were distributed and a number of drop in sessions were held throughout the County Borough area during the consultation period. Planning officers were also available during normal office hours to answer any queries relating to the replacement LDP and the public consultation. There is no longer a legal requirement to publish public notices in local papers, however, an article on the consultation process appeared on the front page of the Merthyr Express during the consultation period which carried over onto the inside pages.</p>
<p>Friends of Nant Llwynog Park:</p> <p>The Friends is pleased to respond to the whole County borough over this period and recognises the role Town planning has to play in balancing the need for development alongside the preservation, enhancement and promotion of local landscape and heritage assets.</p> <p>The Friends of Nant Llwynog Park has requested to speak on the role of the plan in designating new nature reserves it will greatly assist in the understanding of the value of the natural world and its significance for the public.</p>	<p>Comments noted and support welcomed.</p>

4.2 Vision, Issues, Strategy and Objectives

Introduction & Key Issues	
LDP section references:	Introduction, page 1 & 3, para 1.4, 1.12 & 1.13 Key Issues, page 7, para 2.8
Representation number:	Representor name:
116.D1	Home Builders Federation
122.D1 – D3	Mineral Products Association Wales
207.D10	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Home Builders Federation:</p> <p>The list of key issues starts with a very negative point and should be balanced by additional wording e.g. 'The need to provide a sustainable level of housing growth across all types to meet the wider aspirational economic growth plans for the area'.</p>	<p>The summaries of key issues listed for the replacement plan comprise issues that were identified in the SA Baseline Scoping Report, dated January 2017, and through early public consultation and stakeholder engagement. One of the issues identified is that the latest 'population projections show a declining population from 2024 onwards' and a 'trend of losing working age people to elsewhere in the UK' (see page 23 of the Baseline Scoping Report). Further details are also provided in the Initial Consultation Report as well as the Deposit Plan Consultation Report. Although it is agreed that without any policy intervention, there is likely to be a less coordinated approach to the delivery of new housing and other development, it is considered the Plan contains appropriate policies that respond to the key issues identified and that issue raised has been address though the Replacement LDP. Therefore, it is not necessary to amend the key issues as suggested.</p>
<p>Mineral Products Association Wales:</p> <p>Update footnote 5 to recognize the consultation on PPW V10.</p>	<p>Given that the final version of PPW 10 has now been published it is agreed that the reference to national policy should be updated including the footnote on page 36.</p> <p>Change proposed - all reference to PPW9 should be up-dated to reflect PPW10.</p>
Mineral Products Association Wales:	It is not considered necessary to include

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<p>Include reference to RTS and MTANs.</p>	<p>reference to all Plan, Policies and Programmes that have been considered as part of Plan preparation. However, it is acknowledged that reference should be made to Mineral Technical Advice Notes (MTANs) consistent with reference to other national guidance referred to in paragraph 1.12 of the Deposit Plan. A focused change to paragraph 1.12 has been proposed accordingly.</p>
<p>Mineral Products Association Wales:</p> <p>Consider the implications of additional housing and infrastructure on mineral supply and note that no assessment is made in the SA Report of the implications on mineral supply chain and raw material requirements.</p>	<p>Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that <i>'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction'</i> and that <i>'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'</i>.</p> <p>The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.</p>

<p>Merthyr Tydfil Heritage Trust:</p> <p>Comment in relation to Key Issue 1. Private sector house building is unlikely to arrest the population decline or the out migration of young people and key housing sites such as private sector house building is unlikely to arrest the population decline or the emigration of young people have been ruled out.</p> <p>Heritage Trust concerns raised include amongst other things:</p> <ul style="list-style-type: none"> • Downward revision of 'in-migration' population 'targets' • 2018 Merthyr Tydfil housing need review/study • 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). 	<p>The 2016 Review Report does not state that the enhanced growth target of the current adopted had been met. The Report states that the population had indeed reached 59,000, but this was from a much higher base level population in 2006 than was initially thought. Essentially, the long term issue of population decline in the County Borough had started to reverse earlier than the data available at the time was indicating.</p> <p>At the time of the Review Report, the most recent WG projections (2011-based) were indeed projecting the population to grow to over 62,000 by 2031. However, when the 2014-based projections were published, they indicated a much slower level of population growth in the County Borough, with some population decline actually forecast towards the end of the new LDP period. Whilst these two sets of projections resulted in different housing requirements (91 dwellings per annum for the 2011 projections, dropping to 22 dwellings per annum for the 2014 projections), the strategy of building 150 dwellings a year was considered appropriate by Council as it remained far enough above the trend scenario to be regarded as ambitious (more so under the 2014 figures), but also a dwelling requirement that is also deemed deliverable when looking at what can realistically be achieved in Merthyr Tydfil County Borough.</p> <p>The Council agrees that simply building houses alone will not automatically increase the population. However, coupled with the significant regeneration works that have taken place over the past ten years; the increased attractiveness of Merthyr as a place to live, work and spend leisure time; and the accessibility of Merthyr</p>
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	<p>Tydfil (which will be enhanced further through the Metro proposals and the final phase of A65 dualling), the Council consider that the level of housing growth proposed in the Replacement LDP is appropriate and will contribute to a sustainable level of population growth in the County Borough, enabling the vision of the LDP to be fulfilled.</p> <p>The Council is still able to make an overall housing provision of 2820 dwellings (25% above the housing requirement of 2250 dwellings), despite being unable to allocate certain sites for housing, as stated in this representation. Whilst the sites in question have not been allocated for housing, they remain within settlement limits and could come forward for development should the site specific constraints be overcome. This again highlights the flexibility of the LDPs housing strategy which will help to ensure delivery of the Replacement LDP Strategy.</p>
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Vision and Objectives	
LDP section references:	Vision, page 8, para 3.1-3.4 Objective 7, page 9, para 3.6, figure 2 LDP Objectives, page 9-10, para 3.5-3.6
Representation number:	Representor name:
154.D7	Rhondda Cynon Taf CBC
207.D2 – D8, D12, D32 – D47	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Rhondda Cynon Taf County Borough Council:</p> <p>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’.</p>	<p>Objective 7 in the Deposit LDP reads ‘To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links’. It is considered that the Objective as currently worded is sufficient to support and promote the development of active travel routes and therefore no changes to the objective are considered necessary.</p>
Merthyr Tydfil Heritage Trust:	The Replacement LDP’s vision, strategy and objectives have been informed by

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The representation considers that the LDP revision does not align with Well-being Goals where development is proposed and considers the LDP aims and objectives do not fit well with the 5 well-being objectives outlined for the Cwm Taff well-being strategy.

The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the LDP Objectives and how these relate to wellbeing goals.

the Council's wellbeing aims set out in the Merthyr Tydfil Wellbeing Statement 2017-2022 and early review work to inform the Cwm Taf Wellbeing Strategy 2018-2023 that was published later in 2018 following the Merthyr Tydfil Wellbeing Statement.

This includes the wellbeing assessment review commissioned by the Cwm Taf Public Services Board and prepared by Netherwood Sustainable Futures and PwC. The workshops undertaken for this review were designed to inform the Replacement LDP and informed the LDP Objectives. Further details can be found in: *Cwm Taf: Understanding our Communities – Wellbeing Assessment Consultation Brief Analysis Report December 2016*. Development of the Replacement LDP strategy and objectives were also subject to early stakeholder engagement through the establishment of stakeholder working groups. This included working groups for the themes (1) Population and Community facilities, (2) Heritage, Leisure and Countryside (3) Housing Viability (4) Economic Development and Tourism, as well as public consultation on the LDP Preferred Strategy. The stakeholder engagement and consultation outlined has been undertaken in accordance with the Community Involvement Scheme contained within the Delivery Agreement. Further details can be found in the LDP Initial Consultation Report at Sections 7 and 8. The Council has also reviewed the Cwm Taf Wellbeing Strategy 2018-2023 and considers the Replacement LDP is in accordance with the Strategy's wellbeing aims.

The Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that

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	the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act. No changes to the Deposit Plan in this respect are therefore considered necessary.
<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on the Strategy of the Deposit Plan in relation to Soundness Test 1 (Does the Plan Fit?). MT LDP revision is 'out of step' in time with its neighbours Caerphilly and Rhondda Cynon Taf LDPs and ignores Blaenau Gwent CBC.</p> <p>It is incompatible with other MTCBC strategies such as Well-being, Open Space and Active Travel although it is acknowledged that it is compatible with other MTCBC priorities.</p>	<p>All neighbouring authorities including Caerphilly, Rhondda Cynon Taf, Blaenau Gwent County Borough Councils, Brecon Beacons National Park and Powys County Council were consulted early in the process as Statutory Consultees and have not raised objections to the Deposit Plan's Growth and Spatial Strategies. The Council has also considered other local and regional Plans Policies and Programmes as part of the Sustainability Appraisal and the plan making process as required by SA guidance and in accordance with the tests of soundness. The Council considers the Replacement LDP Strategy is realistic and deliverable and there are no conflicts with proposals in adjoining local authority areas.</p> <p>Up-to-date LDPs are an essential part of a plan-led system and in line with national policy the Council is required to undertake a full review of the adopted LDP at intervals no longer than every 4 years from the date of adoption. The review report completed in April 2016 also considered the possibility of preparing Joint Plans (see page 27 of the Review Report). However, given that the evidence gathered and consideration of the monitoring data the Review supported a full revision of the Merthyr Tydfil LDP and due to the uncertainty of the timescales of preparing a replacement Plan with neighbouring authorities it was concluded that the Council should follow a full revision procedure. This approach was agreed by the Welsh Government in August 2016 in a Delivery Agreement comprising a</p>

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	<p>timetable and Community Involvement Scheme committing the Council to producing its replacement LDP in accordance with the stated timescales and consultation processes.</p> <p>As part of the Cardiff Capital Region Merthyr Tydfil CBC is committed to the preparation of a Strategic Development Plan (regional plan) and whilst work and yet to formally commence, discussions are on-going with regional partners regarding governance arrangements.</p> <p>Finally, with regards to consideration of wellbeing objectives, the Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on the Strategy of the LDP Deposit Plan in relation to Soundness Test 2 (Is the Plan Appropriate?).</p> <p>The LDP and supporting documents do not demonstrate that the growth development proposals are appropriate for the area, not every community is served well e.g. Abercanaid and Pentrebach, the evidence used for population growth projections is out-dated and evidence based on population and economic trends is discounted. More work is needed to survey the local housing market and better site assessments are needed. New industrial sites are proposed at a cost to the environment, heritage and loss of green open space. There has not been proper consideration of the other options put forward for discussion and</p>	<p>The Replacement LDP is not a continuation of the current LDP strategy, with the timescale for implementation extended. When work commenced on the Replacement LDP in 2016, all relevant issues and evidence were revisited, and a number of scenarios in terms of the level of growth and the spatial distribution of any growth were considered. At the time of producing the Review Report in 2016, the 2011-based Welsh Government population projections were available.</p> <p>In order to generate the various scenarios in terms of the County Borough's population, the Council has, in line with national guidance, used the most recent Welsh Government population projections as a starting point. At the time of producing the Review Report in 2016, the 2011-based Welsh Government projections were the</p>

consultation.

The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the LDP Strategy and Objectives and how these comply with the tests of soundness.

most recent figures in the public domain. The 2014-based projections were released in early 2017 and these remain the most up-to-date projections at the present time. The scenarios examined are clearly set out in the LDP background paper: *Population and Housing Requirements*. This paper clearly sets out the differences for Merthyr Tydfil shown in the last 4 sets of WG population projections.

The Council has not simply chosen a number of houses that it thinks is appropriate to build in the County Borough, but has considered a variety of issues in coming to the decision that the proposed strategy of the Replacement LDP is the most appropriate strategy for the County Borough. The consideration of the various strategic options was carried out as part of work undertaken in preparing the Preferred Strategy, with engagement taking place with a variety of stakeholders.

The most recent Local Housing Market Assessment (LHMA) has been produced in accordance with Welsh Government guidance and outlines the level and location of affordable housing need in the County Borough. Work on an updated LHMA will be carried out in early 2019 as the Council has recently moved to a Common Housing Register that requires a period of time to bed in and generate robust data. Pending the findings of the updated assessment, any appropriate updates to the LDP or any background papers will be highlighted as necessary as part of the LDP Examination.

The Viability Assessment produced to accompany the Deposit Replacement LDP does not assume low levels of development costs, but contains robust information on development costs

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	<p>based on previous experience of developments in the area, and where survey work such as ground investigations have taken place, this has also been considered.</p> <p>The employment sites contained in the Replacement LDP are either existing employment sites, or new allocations that have been subject to the site assessment process, and have then been determined as being appropriate to allocate for employment use.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>The representation comments on the Key Issues of the Deposit LDP in relation to Soundness Test 2 (Is the Plan appropriate?).</p> <p>Although the LDP sets out a series of key issues for sustainability most of these do not appear to be addressed including wellbeing issues (as recommended in the Cwm Taf FGA strategy).</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Test 2.</p>	<p>The key issues were initially identified through the baseline scoping work and evidence gathering exercise, the results of which were published in the <i>Sustainability Baseline Scoping Report</i>, dated January 2017. <i>The Initial Sustainability Appraisal (ISA) Report</i> dated June 2017, up-dated and built upon that work. Given that Sustainability Appraisal (SA) is an iterative process the ISA was further up-dated to consider the Deposit Plan. The consideration of these issues is discussed at paragraphs 5.2 - 5.17 of the Deposit Plan SA report.</p> <p>In addition, an integrated approach was taken for the community to raise issues related to wellbeing and Replacement LDP. The opportunity was afforded through the Cwm Taf: Understanding Our Communities Stakeholder Workshops, held in response to the Future Generation and Well-being Act (FGA). In particular, the Cultural, Economic and Social Well-being workshops were designed to inform the Replacement LDP, with the Environmental well-being workshop, being specifically run to focus on key issues for the LDP. Further details can be found in: <i>Cwm Taf: Understanding our Communities – Wellbeing Assessment Consultation Brief Analysis Report December 2016</i> and <i>The LDP Initial Consultation Report</i> at Sections 7 and 8.</p>

	<p>It should also be noted that the stakeholder engagement undertaken is in accordance with the Community Involvement Scheme contained within the Delivery Agreement approved by Welsh Government.</p> <p>Figure 1 of the Deposit LDP is a summary of many of those issues raised through the SA process together with those raised through community involvement, which has informed the LDP. It is considered that the summary of the key issues reflects those identified in the Cwm Taf Wellbeing Strategy. It is however recognised that the LDP cannot deliver all the well-being outcomes as the Plan is reliant on appropriate development proposals coming forward and some issues extend beyond the direct influence of the 'land-use planning system'.</p> <p>The Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>The representation comments on the Vision of the Deposit Plan in relation to Soundness Test 2 (Is the Plan appropriate?).</p> <p>The vision is bland and the strategy as a whole is negative due to the refusal to tackle issues raised e.g. lack of open space and Active Travel provision and empty town centre retail and office units.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of</p>	<p>The Replacement LDP vision and strategy are considered appropriate for the County Borough and have been developed through extensive public consultation and engagement which is set out in the Initial Consultation Report and Deposit Plan Consultation Report. A number of issues are raised in the representation and whilst the Plan contains a number of policies to address specific issues, such as the provision and protection of open space though the planning system, there will be some wellbeing issues that the LDP cannot directly influence. Whilst the plan seeks</p>

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<p>issues including Aims and Objectives.</p>	<p>to facilitate the management of such matters as flood risk, town/district centre regeneration, the historic environment and support and promote the development of Active Travel Routes it is appropriate development schemes from coming forward. Notwithstanding this, it is considered that Policies SW10, SW12, CW1, CW2, EnW4 and EcW3 – 5 address these issues in line with national policy.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>The representation comments on the Strategy of the Deposit Plan in relation to Soundness Test 3 (Will the Plan deliver?).</p> <p>The Plan will not deliver because housing targets won't be met, there will be a loss of open space with lack of support from WG and the City Region for infrastructure improvements and mitigation measures required to bring sites forward such as Heartlands. The Plan has no flexibility and includes a minimal allocation of sites for the large scale house-building.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Council considers that the housing requirement contained in the Replacement LDP is deliverable when considered against the fact that the level of housebuilding proposed (150 units per annum) is in line with a rate of housebuilding that has been achieved in Merthyr Tydfil for a significant period of time. Also, the range of sites allocated in the Plan, coupled with the other components of supply, maximises the likelihood of the Strategy being delivered. This significant level of flexibility contained in the overall housing provision (25% above the housing requirement) again will assist with the delivery of the Strategy.</p> <p>The Council is still able to make this level of overall housing provision, despite being unable to allocate certain sites for housing, as stated in this representation. Whilst these sites have not been allocated for housing, they remain within settlement limits and could come forward for development should the site specific constraints be overcome. This again highlights the flexibility of the LDPs housing strategy which will help to ensure delivery of the Replacement LDP Strategy.</p> <p>With regard to the point made by the representor that, <i>“Welsh Government and Cardiff City Region are not prepared to provide support, backing and funding for infrastructure needs like</i></p>

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<p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Revision process.</p>	<p><i>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”, the Council considers this statement to be incorrect.</i></p> <p>The improved station/Metro Hub at Pentrebach remains a project included in the first phase of Metro improvements, and coupled with Welsh Government purchasing the Hoover Factory site, this gives a firm indication that there is support from Welsh Government and the Cardiff City Region to deliver the LDP strategy in Merthyr Tydfil County Borough. There is also likely to be funding available through the City Deal’s Stalled Sites Fund which aims to bring forward housing on sites that have proven difficult to develop due to high development costs.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Representations also relate to the wording of the Plan’s Objectives (1-18) and how these have been addressed in the Replacement LDP.</p>	<p>The Plan’s 18 Objectives are overarching objectives that supplement the Strategy. The Council’s response advises that the LDP contains more detailed policies that address the strategic issues raised by the objectives and that the Plan should be read as a whole. Having considered the issues raised it is not considered necessary for soundness to amend the wording of the objectives as suggested.</p>

LDP Strategy	
LDP section references:	Growth Strategy, page 11 & 13
Representation number:	Representor name:
116.D10	Home Builders Federation
119.D3	Dwr Cymru Welsh Water
129.D2	Caerphilly County Borough Council
132.D1	Merthyr Initiative Group
Main Issues:	Council Response:
Home Builders Federation:	Comments noted. It is considered that
The HBF would suggest that the Council	Paragraph 2.4 of the Deposit Plan adequately emphasises the County

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<p>should put more weight on the impact of City Deal and metro and Merthyr's strong position at the north of the region.</p> <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>	<p>Borough's position as being '<i>strategically located at the centre of the heads of the Valleys geographic and economic region to the north of the 'Cardiff Capital Region'.</i> In addition, paragraph 2.10 states that '<i>the South East Wales 'Cardiff Capital Region' is committed to the preparation of a Strategic Plan as part of the City Deal. The County Borough is committed to playing its part in regional planning and discussions are on-going with regional partners regarding the future arrangements for an SDP'.</i> This has also been demonstrated though the Plan's policies and allocations. No changes further in this respect are considered to be required.</p>
<p>Dwr Cymru Welsh Water:</p> <p>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.</p>	<p>Comments noted and support welcomed.</p>
<p>Caerphilly County Borough Council:</p> <p>Caerphilly CBC has no concerns with the level of growth proposed in the Replacement LDP and welcome the reference to the level of growth within the context of other plans, programmes and strategies including the Cardiff Capital Region City Deal.</p>	<p>Comments noted and welcomed.</p>
<p>Merthyr Initiative Group:</p> <p>Support for the mid-Growth option 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.</p> <p>The Merthyr Village Initiative Group which to speak in relation to housing sites SW3.1</p>	<p>Comments noted and support welcomed.</p>

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Part of the Hoover Factory Site, SW3.8
 South of Castle Park, SW3 Swansea Road
 and SW7 The Former Ivor Steel works.

Sustainability Appraisal

LDP section
 references:

Sustainability Appraisal, Figure 7.1

Representation number:

Representor name:

122.D4

Mineral Products Association Wales

Main Issues:

Council Response:

Mineral Products Association Wales:

Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognised in the LDP objectives (Figure 2).

The summaries of key issues listed in Figure 1, comprise issues that were identified in the Baseline Scoping Report, dated January 2017 and evidence gathered from community involvement as part of the Plan preparation process. Furthermore, the key issue also recognises approved reserves in the County Borough as well as the need to protect/safeguard mineral resources. In addition, the Plan contains appropriate policies to address both safeguarding and supply. Consequently is not is considered necessary to amend the key issue in Figure 1.

The SA Objectives are outlined in Appendix 3: Strategic Framework attached to the Sustainability Appraisal Report which is based on Strategic Environmental Assessment (SEA) Topics as required by the relevant legislation. These objectives are used to appraise the 'sustainability' of the plan. As illustrated on page 87-88 a number of decision aiding questions were used to assess the Plan's growth and spatial options and these included a questions in relation to both the safeguarding of mineral resources and providing sustainable levels of extraction in the Plan area.

The need to ensure the supply of minerals is recognised in LDP Objective 18 and at paragraph 4.42, Policy SW4:

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	Settlement Boundaries, and at paragraph 6.8.89, Policy EcW10: The Sustainable Supply of Minerals. In addition, Policy SW12 safeguards the Cwm Bargoed rail line and rail head including future extension of the line to Dowlais Top. It is therefore concluded that the Plan has had regard to the safeguarding of infrastructure and sustainable supply of minerals as well as the protection of minerals resources.
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4.3 Housing Requirement

Policy SW1 Provision of New Homes and Local Housing Market Assessment (LHMA)	
LDP section references:	Policy SW1 Provision of New Homes, page 22 Policy SW1 Provision of New Homes, page 22, para 6.5.7
Representation number:	Representor name:
119.D4	Dwr Cymru Welsh Water
207.D14 and D56	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Dwr Cymru Welsh Water:</p> <p>Support for the overall strategy and level of growth proposed. Some water and sewerage constraints may require works to Welsh Water infrastructure, but it is unlikely that they will be insurmountable. Any improvements needed at the wastewater treatment works could be factored in to later Capital Investment Programmes.</p>	Comments are noted and welcomed.
<p>Merthyr Tydfil Heritage Trust:</p> <p>A new/revised housing needs assessment should be carried out in order to ensure that the housing needs of local people are met.</p>	<p>The current Local Housing Market Assessment (LHMA) has been produced in accordance with Welsh Government guidance and identifies the level and type of affordable housing need across the County Borough. The LHMA covers the time period of 2014-2019, however the Council's Housing Strategy Department has not yet produced a new assessment. The Social Housing waiting lists in the County Borough have undergone significant change over the last year with the amalgamation of a number of waiting lists into a single</p>

<p>Comments on plan revision and preparation. Desired changes include:</p> <ul style="list-style-type: none"> • Downward revision of 'in-migration' population 'targets'. • 2018 Merthyr Tydfil housing need review/study. • 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). 	<p>Common Housing Register. In order to use the most up-to-date data and establish an accurate level of need, the Council intends to wait until at least April next year to update the LHMA. This will give the new Common Housing Register time to bed in and enable the WG methodology to be followed to assess the level of housing need.</p> <p>The policies and allocations included the Replacement Deposit LDP will enable a range of types of housing need to be met across all parts of the County Borough. Further details regarding how the LDP addresses local housing needs is provided in the Housing Supply and Affordable Housing background papers.</p> <p>Welsh Government population projections are a starting point for projecting population growth for the Replacement Development Plan, and for Local Development Plans in general. Using these as a starting point, the Council generated a number of options and following consultation on the Preferred Strategy the level of growth proposed in the Replacement Deposit Plan is considered appropriate.</p> <p>The figure quoted from the 2016 Review Report (indicating that the trend was for the population to increase to approximately 62,000 by 2031), was based on the 2011-based population projections, and was the most up to date data available at the time.</p> <p>During early 2017, 2014-based population projections were released by Welsh Government. These figures indicated that the projected population growth for Merthyr Tydfil County Borough had slowed considerably, with a population high of approximately 59,300 reached in 2024, with the population</p>
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	<p>then slowly decreasing to 59,011 by 2031. This population change during 2016-2031 would have resulted in a need for 330 dwellings (22 per annum).</p> <p>As part of work undertaken prior to publication of a Preferred Strategy for the Replacement LDP, a range of options were looked at by the Council in regard to proposing a strategy for the Replacement LDP that delivered an appropriate level of population and housing growth.</p> <p>The options examined were: Scenario A: Principal projection Scenario B: 10 year average migration projection Scenario C: Zero migration projection Scenario D: Dwelling led projection – 150 per annum (15 year ave. build rate) Scenario E: Dwelling led projection - 253 per annum (continuation of 2006 LDP Strategy) Scenario F: Jobs – led projection Scenario G: Zero UK migration projection Scenario H: Positive UK migration projection.</p> <p>When all of these options were considered (including engagement with internal and external stakeholders through the LDP Steering and Working Groups), it was agreed that a dwelling led scenario, in line with past build rates (circa 150 dwellings a year) would be the appropriate level of growth to take forward in the Replacement LDP.</p> <p>The number of dwellings proposed is considered both aspirational (as it is significantly higher than the WG principal projection) and deliverable, as the amount of dwellings required is in line with the amount of housing development that has taken place in Merthyr Tydfil County Borough over the past 20 -30 years.</p>
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	<p>Whilst the number of units allocated at the Hoover Strategic Regeneration (HSRA) is now 440 dwellings (opposed to the 'upto 1000' mentioned in the Preferred Strategy), this still represents a significant amount of the overall housing requirement (20% of the 2250 dwelling requirement), and the site remains the largest housing site in the County Borough.</p> <p>Whilst the former Ivor Steelworks Site (Project Heartland), has been included as a regeneration site in the Deposit Replacement LDP, the site was never considered to directly contribute to the housing provision of the Replacement LDP due to known constraints on the site, and associated high development costs.</p> <p>Goatmill Road was assessed as a candidate site and it was considered that it is appropriate to allocate the entire site as employment land. The Council is confident that the housing sites allocated in Policy SW3, in combination with the windfall allowance outlined in the Plan, provide enough appropriate land to deliver the housing requirement by 2031.</p> <p>Information relating to housing land supply can be found in the Housing Supply background paper update (December 2018) and in Appendix 2 of the Replacement LDP Written Statement (as amended by the Focused Changes). The data indicates that the Council will have a land supply of over 6 years upon adoption, with this figure increasing to over 10 years later in the Plan period as more housing is delivered in accordance with the LDP housing requirement.</p>
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4.4 Housing Supply

Policy SW2 Provision of Affordable Housing	
LDP section references:	Policy SW2 Provision of Affordable Housing LHMA
Representation number:	Representor name:
116.D2	Home Builders Federation
Main Issues:	Council Response:
<p>Home Builders Federation:</p> <p>The HBF suggest wording 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.</p>	<p>Work on an updated LHMA will be carried out in early 2019 as the Council has recently moved to a Common Housing Register that requires a period of time to bed in and generate robust data. Where necessary, any appropriate updates to the Replacement LDP will be carried out as part of the LDP Examination.</p> <p>It is proposed that LDP paragraph 6.5.13 be amended to make reference to using the most up to date LHMA data in securing affordable housing on residential development.</p>

Policy SW3 Sustainably Distributing New Homes	
LDP section references:	Policy SW3 Sustainably Distributing New Homes, page 24 Policy SW3 Sustainably Distributing New Homes, page 26, table 1
Representation number:	Representor name:
101.D4 and D5	Welsh Government
115.D4 and D5	Marvel (WYG)
116.D9, D11, D12, D14	Home Builders Federation
119.D5, D14, D15	Dwr Cymru Welsh Water
Main Issues:	Council Response:
<p>Welsh Government:</p> <p>The Housing Trajectory and Housing Land Supply Table should be included as appendices in the LDP Written Statement. 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</p>	<p>In order to ensure effective implementation and monitoring of the plan's housing delivery the Housing Trajectory and Housing Land Supply table will be included as an Appendix of the LDP written statement as part of a Focused Change. The indicative phasing / delivery timescales of housing allocations as outlined in Table C of the</p>

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<p>Policy SW3.</p> <p>Table 1 in the Deposit Plan should be updated to reflect Table 1 in the Preferred Strategy and to clarify that there is no double counting.</p>	<p>'Housing Land Supply and Trajectory' background paper will be included as an additional column in the allocations list in Policy SW3.</p> <p>In order to provide clarity with regard to the components of housing supply, Table 1 has been updated in accordance with Welsh Governments comments.</p>
<p>Marvel (WYG):</p> <p>Marvel Ltd object to the current configuration of the boundary of the Brondeg housing allocation (SW3.4) as it does not reflect an existing outline planning permission.</p> <p>Update LDP proposals map showing changes sought to ensure the housing allocation reflects the outline permission and to amend the settlement boundary to include full (amended) allocation.</p> <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>The settlement boundary should be amended to include land currently in the settlement boundary in the adopted LDP, between existing housing at Brondeg and the Nant Cwm-Pant Bach watercourse.</p>	<p>The boundary of the housing allocation and the settlement boundary will be amended to include two parcels of land at the West of the site, in order to reflect the previous planning permission referred to by the representor.</p> <p>Housing allocation SW3.4, and the settlement boundary, to be extended on the Proposals Map to include two parcels of land at the West of site to reflect the previous planning permission. As a result of this change, small sections of a Special Landscape Area and a Safeguarded Coal Resource will be removed from the Proposals Map.</p> <p>The Council amended the settlement boundary in the Replacement LDP at this location in order to provide a more logical settlement boundary. It is considered that the existing curtilage of the 'Greenacres' property to the East; the curtilages of the properties at Brondeg to the North; and the extent of the housing allocation would provide a more logical settlement boundary in this area.</p> <p>There have been previous pre-application discussions surrounding the land in question, and given the constraints included in this area (the area includes SINC and TPO designations), and the fact that no firm proposals were subsequently submitted to the Council, it is considered that tightening the settlement boundary in</p>

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	<p>this location provides clarity regarding this area of land. However, in line with above representation, there will be some minor amendments to the settlement boundary on the Western section of the housing allocation to reflect a previous planning permission.</p>
<p>Home Builders Federation:</p> <p>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.</p> <p>The HBF suggest that it would be helpful where possible to provide thresholds at which such studies are likely to be required.</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>The HBF suggests that it would be clearer if the 25% flexibility was show as a separate figure In Table 1, as currently it is not clear if it is part of row B – site</p>	<p>Comments noted. The Council considers that it is appropriate to include this information as an appendix to the LDP Written Statement to assist with the usability of the document and provide as much information as possible on the housing allocations included in the Plan. Including this information as part of the written statement provides clarity to developers/landowners regarding the level of work/potential costs associated with these sites.</p> <p>The Site Allocation Details section in the Deposit Plan Written Statement will move from Section 8 to Appendix 1 as part of a proposed change.</p> <p>The Site Allocation Details section of the Deposit LDP (now included as Appendix 1) outlines the relevant studies required for each housing and employment allocation, and provides clarity for developers/landowners as to the level of work and potential cost required to bring each site forward.</p> <p>Comments are noted and welcomed.</p> <p>The Components and Distribution of Housing Supply Table included under Policy SW3 has been amended to clarify</p>

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allocations.	the components of supply as part of a focused change. This table is now numbered Table 2.
<p>Dwr Cymru Welsh Water:</p> <p>DCWW support the spatial distribution of housing allocations across the County Borough. Some modelling work may be required dependant on the size and timing of sites coming forward.</p> <p>DCWW request that reference to the capacity of networks be removed from individual site details in Section 8 of the LDP written statement. A piece of introductory text at the start of the site details section would be a more appropriate way forward.</p> <p>General comments regarding current capacity; incorporating development proposals into future Capital Investment Programmes; assets being laid over private land; easements or diversions of existing assets; proximity of development to Waste Water Treatment Works or Sewage Pumping Stations; and a caveat that these issues can change over the period of an LDP.</p>	<p>Comments are noted and welcomed. Comments from DCWW on specific sites have also been incorporated into the Site Allocation Details appendix of the LDP Written Statement. Water supply has been raised as an issue on two sites in Trelewis and additional text is proposed to be added to the site detail for these allocations.</p> <p>The Council agrees with the changes suggested by DCWW and changes to the site allocation details have been proposed to address this. The Council and Welsh Water have worked collaboratively throughout the LDP process. It is understood that there are no insurmountable infrastructure constraints that would affect the anticipated site deliverability and delivery of the Plan's overall growth strategy. Some of the allocations will require off-site works in order to connect to the existing networks, however this is a standard pre-requisite of development, and as such should not hinder site deliverability.</p> <p>Your comments are noted and welcomed. These issues have been incorporated into the site assessment process and the site allocation details section of the LDP. No further changes to the LDP are considered necessary.</p>

4.5 Hoover Strategic Regeneration Area (HSRA)

Policy SW6 Hoover Strategic Regeneration Area (HSRA)	
LDP section references:	Policy SW6 Hoover Strategic Regeneration Area (HSRA), page 30
Representation number:	Representor name:
101.D2, D3	Welsh Government
119.D7	Dwr Cymru Welsh Water
134.D1	Mr Alan Rees
154.D8	Rhondda Cynon Taf CBC
207.D30, D48, D58, D55	Merthyr Tydfil Heritage Trust
258.D2	Elan Homes Ltd
Main Issues:	Council Response:
<p>Welsh Government:</p> <p>The authority should repeat the key principles from the Framework/Masterplan into Policy SW6.</p> <p>Parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15.</p>	<p>Comments noted. The Council has proposed changes to SW6 to incorporate the key design requirements set out in the Framework masterplan.</p> <p>Policy EcW2 states development will be permitted at the existing employment sites if It is an “appropriate” waste management facility. Paragraph 6.8.20 expands on this issue and states that such development proposals for waste management facilities would also need to satisfy the LDPs other design and environmental protection policies.</p> <p>Policy EnW4: <i>Environmental Protection</i> states that new development will be expected to avoid flood risk and meet the requirements of TAN 15. The Council considers that this combination of policies clarifies the situation in regard to waste management facilities and flooding.</p> <p>In addition to this, Policy EcW14: <i>Waste Facilities</i> identifies five existing employment sites as preferred areas of search for waste management facilities, and the employment land within the HSRA is not identified as one of these</p>

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	preferred areas and separate changes proposed to the Deposit Plan have removed the employment land allocation at the Willows Industrial Estate.
<p>Dwr Cymru Welsh Water:</p> <p>The representation is supportive of the regeneration of previously developed land at the Strategic Regeneration Area. It also notes that hydraulic modelling assessments of both the clean water and sewerage networks will be required to understand whether any reinforcement works/improvements would be required.</p>	<p>The Council welcomes the support for the designation of Hoover Strategic Regeneration Area. Specific land uses have been allocated within the regeneration area and the site allocation details for the Hoover Factory Site allocated for residential development includes the need for a hydraulic modelling assessment. The DCWW infrastructure plans show these are located to the edges of the Hoover Factory site and do not appear to present a significant constraint to the residential allocation. However, the site allocation details will be amended to clarify the assessment should extend to the sewerage network and changes to the site allocation details have been proposed. Elsewhere, a range of development proposals in the wider Hoover Strategic Regeneration Area are likely to come forward and development will be informed by refinements to the HSRA framework masterplan and ongoing flood modelling and assessment work. Development proposals will be assessed against the Plan's development management policies, including for example, Policy SW11: Sustainable Design and Placemaking, and separate changes have been proposed to clarify that development proposals will need to protect and provide relevant utility services and infrastructure. Therefore, no further changes are considered necessary to SW11.</p>
<p>Mr Alan Rees:</p> <p>Representation comments on flooding issues at the Hoover Strategic</p>	<p>A Strategic Flood Consequence Assessment (SFCA) has been prepared to inform the Deposit Plan. It identifies</p>

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<p>Regeneration Area and raises concerns regarding the associated site allocation details.</p>	<p>flood risks on the western banks of the River Taff where no allocation for highly vulnerable development has been made. The eastern banks comprising the existing Hoover Factory site are defined as Flood Zone B where there is a lower risk of fluvial flooding. Natural Resources Wales have been consulted regarding the housing allocation and not raised objections to the principle of residential development here. In addition, TAN 15: Development and Flood Risk permits the allocation of residential development in such areas. Should any localised issues be identified the Replacement LDP contains policies to require further assessments to be considered at planning application stage where these may be necessary (as required by Policy En4: Environmental Protection.</p>
<p>Rhondda Cynon Taf County Borough Council:</p> <p>Suggest the proposed new footbridge indicated in Policy SW6 also includes provision for cyclists.</p>	<p>The framework masterplan prepared for the Hoover Strategic Regeneration Area dated June 1018, identifies the footbridge to establish links across the river together with the creation of a network of pedestrian and cycle routes, way-finding within the development to connect to existing strategic recreational routes (Taff and Trevithick Trail) and prioritising pedestrian and cycle movement through shared spaces. This is indicative only but it is recognised that there is the opportunity to ensure that a bridge would be for dual use and changes have been proposed to the policy wording and reasoned justification of the policy to clarify this.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>The Merthyr Tydfil Heritage Trust has raised a number of issues they wish to speak on at the examination including the redevelopment of the Hoover Strategic Regeneration Area. These are</p>	<p>The Council has responded to the issues raised as summarised in the following headings:</p> <p><u>Comprehensive redevelopment:</u> The Council agrees with the representor that the land to the West of the River Taff should form part of the redevelopment</p>

summarised below.

Comprehensive redevelopment / West bank area:

It is considered that the west bank area should be included in the redevelopment as this area was initially relied upon to contribute a significant amount of housing in the Replacement LDP.

Assistance should be sought from Welsh Government and the Cardiff Capital Region to encourage comprehensive redevelopment of the area.

Transport:

Additional land should be safeguarded for public transport infrastructure. The Heritage Trust requests that the Master Planning includes a new Metro hub for light rail, bus, car, cycle and pedestrians at Brandy Bridge (instead of just a station and a park and ride on the Hoover sports ground).

A new Metro Hub at Brandy Bridge could 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.

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.

There would also be better potential for Active Travel walking and cycling links to the town centre and to the Taff Trail.

Flood risk:

The representation requests further

of the Hoover site. Accordingly, the land is included within the boundary of the Hoover Strategic Regeneration Area (HSRA).

However, as the flooding issues on this area of land are, at this point in time, unresolved, the Council did not consider that it would be appropriate to allocate the land for a specific use in the Deposit Replacement LDP. As it is important for a LDP to be able to demonstrate compliance with national policy, and that its strategy is deliverable, relying on a significant number of house on this land would not be a sound approach to take forward. The 440 dwellings allocated on the Hoover Factory site still accounts for a significant proportion of the housing requirement at 20%.

The Council considered it to be more appropriate to allocate other suitable sites within the Primary Growth Area in order to ensure that the Replacement LDP makes appropriate provision in relation to the housing requirement. The land to the west of the River Taff remains within the settlement boundary, is situated in the HSRA, and subject to flooding issues being resolved (alongside other material planning considerations), development proposals on site could come forward within the timeframe of the Replacement LDP.

Flood Risk:

The Replacement LDP follows a precautionary approach to flooding, and has generally directed development away from areas at risk of flooding. No highly vulnerable development has been allocated in Development Advice Map (DAM) zone C2, and Policy EnW4 states that any new development proposals will be expected to meet the requirements of national policy in regards to flooding.

investigation of flood risk from the River Taff and its tributaries and investment in appropriate flood mitigation.

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.

Welsh Government support for / investment in appropriate flood mitigation should be considered.

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.

The Replacement LDP does not identify how the increased flooding risk will be tackled. Further work on River Taff and its tributaries needs to be carried out.

Cricket ground / open space:

Merthyr Tydfil Heritage Trust has 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

Land to the West of the River Taff at Pentrebach has been included within the Hoover Strategic Regeneration Area (HSRA), but does not carry a specific land use allocation, as the flooding issues at this location are unresolved at this point in time.

With regard to the Town Centre flooding issues, the new bus station site has been granted planning permission and flood risk was resolved as part of that process. Further assessment work is currently being undertaken to consider the issue of flooding at the current bus station site, other areas of the Town Centre, and land within the HSRA. This piece of work will identify the true extent of flood risk in the area and identify potential flood defence measures that would remove as much of the flood risk as possible.

Cricket ground / open space and factory façade:

The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open space will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with *Policy SW9: Planning Obligations* and *Policy SW10: Protecting and Improving Open Spaces* of the Replacement LDP.

Similarly, with regard to the façade of the main entrance, the indicative masterplan shows that the building is unlikely to be retained in its current form. However, there will be scope to include some form of built development that has regard to the industrial heritage of the site, for example through the main

<p>for matches – without any support from the ground owners Hoover Candy.</p> <p>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.</p> <p>The playing field should be retained as open space.</p> <p><u>Development quality and factory façade:</u></p> <p>The Merthyr 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.</p> <p>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.</p> <p>The factory façade and gatehouse should be retained as part of the development.</p>	<p>entrance building as part of the redevelopment. This will also help to ensure that the development of the site is carried out in accordance with <i>Policy CW1: The Historic Environment</i> of the Replacement LDP.</p>
<p>Elan Homes Ltd:</p> <p>The representation supports the partial inclusion of the Lowes and land West of Gethin Street in the Hoover Strategic Regeneration Area (HSRA) boundary (Policy SW6) however requests that additional land West of Gethin Street</p>	<p>Support for inclusion of the Gethin the Hoover Strategic Regeneration Area (HSRA) is welcomed. The representation seeks the inclusion of additional land to the West of Gethin Street (submitted as candidate site 68) in the HSRA boundary (i.e. to extend the HSRA boundary to the south east). This area has been</p>

(submitted as candidate site 68) is in the HSRA boundary (i.e. to extend the HSRA boundary to the south east) to provide a strategic approach to the regeneration of the area. Reference to additional work being undertaken is also made.

designated as a Site of Importance for Nature Conservation (SINC) in the LDP under Policy EnW3 as it contains SINC criteria quality neutral grassland, marshy grassland, standing open water, mosaic habitats, heath and grass heath communities; four of which are UK & Wales BAP Habitats and Section 7 Habitat of Principal Importance for the Conservation of Biological Diversity in Wales under the Environment Wales Act 2016. Further details reading the designation can be found in the SINC Review background paper (June 2018).

The land to the south east of the proposed HSRA boundary and provides opportunities for offsite mitigation and enhancement features. In addition, redevelopment of this land would require significant regrading of the Gethin Tip and would impact on the SINC designation along the former Glamorganshire Canal. Consequently, no changes to the Hoover Strategic Regeneration Area boundary at this location are considered to be appropriate.

Land at the Lowes and adjoining Gethin Tip to the north of the candidate site is included in the HSRA boundary. Whilst this land is not allocated for a specific use in the Replacement LDP it is considered that these areas represent the most realistic parcels of developable land (i.e. where there are fewer physical and nature conservation constraints to the redevelopment of the site). This part of the land West of Gethin Street would be accessed through land at the Lowes which is partly located in flood zone C2 as indicated on the NRW Development Advice Maps. Therefore, whilst this area is located in the HSRA, access and flooding issues would be the main constraint in bringing forward development proposals. If the site can

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	be removed from flood zone C2 or proposals made acceptable though flood mitigation and the application of the TAN15 acceptability criteria, the site could contribute towards the wider redevelopment of the HSRA.
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4.6 Infrastructure and Delivery

Policy SW9 Planning Obligations & Key Issue 17	
LDP section references:	Policy SW9 Planning Obligations, page 33 Policy SW9 Planning Obligations, page 33, para 6.5.50 Policy SW9 Planning Obligations, page 12, para 4.7 Key Issue 17, page 7, para 2.8
Representation number:	Representor name:
116.D5 and D7	Home Builders Federation
119.D2	Dwr Cymru Welsh Water
154.D1, D3 and D4	Rhondda Cynon Taf County Borough Council
207.D25	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Home Builders Federation:</p> <p>A form of wording should be included in the LDP Written Statement to make it clear that planning obligations will only be secured in line with the tests in WG Circular 13/97.</p> <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</p>	<p>Paragraph 6.5.50 of the LDP advises that national planning policy explains the 'appropriate use of planning obligations'. Policy SW9 itself states that planning obligations will be sought 'where appropriate' and criterion 4 of the policy includes the wording 'other relevant obligations' not on the Council's Regulation 123 List of Infrastructure. Paragraph 6.5.53 of the LDP also states that planning obligations sought must satisfy the test included in Regulation 122 of the CIL Regulations 2010 (as amended). Consequently, the Council considers that the current wording of Policy SW9 and associated text makes it clear that planning obligations will only be sought in accordance with national policy and legislation.</p> <p>The Council considers that the current wording of the policy is appropriate as it gives sufficient flexibility to the Council to negotiate appropriate levels of planning obligations. Changing the word 'indicative' to 'target' may give the impression that the levels of affordable housing sought in Policy SW9 would be</p>

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<p>not provide the certainty to developers and landowners required to ensure they are willing to bring land forward.</p> <p>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.</p>	<p>the maximum levels to be sought. Whilst the Plan seeks to provide developers with as much certainty as possible, there still has to be the flexibility in the policy to enable levels of affordable housing to be sought, both higher and lower than the levels stated in the policy, when development viability has been taken into consideration. Therefore, no change in this respect is proposed.</p>
<p>Dwr Cymru Welsh Water:</p> <p>The Council should aim to ensure that the phasing of development in the LDP coordinates with DCWW AMPs where possible. If development comes forward prior to DCWW investment plans, the developer will need to fund any necessary work for themselves.</p>	<p>The Council has engaged with DCWW since the initial stages of preparing the Replacement LDP, in order to establish as much certainty as possible in regard to water infrastructure over the LDP period.</p> <p>Comments received from DCWW throughout this period have indicated that they do not envisage any significant issues with the overall level of growth proposed, and the spatial distribution of that growth.</p> <p>However, as outlined in this representation, there is potential for issues to arise depending on how sites are phased, and how this coordinates with DCWWs investment plans. The overall provision included in the LDP Housing Trajectory has been phased in such a manner that there is a steady rate of development, rather than any significant peaks and troughs. This steady rate of housing development, combined with the 25% flexibility allowance, should enable the LDP strategy to be fulfilled without significant disparity from DCWWs AMPs.</p>
<p>Rhondda Cynon Taf County Borough Council:</p> <p>The representation seeks a change to Policy SW9 Planning Obligations to add a specific infrastructure item covering Welsh Medium education to</p>	<p>The Council considers that the current situation in terms of which planning obligations are sought through S106 agreements, and which are covered by Community Infrastructure Levy (CIL), is the most appropriate arrangement for Merthyr Tydfil County Borough.</p>

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<p>acknowledge a commitment from the Council to fund additional demand for Welsh Medium education school places.</p> <p>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.</p>	<p>Education provision is an item included on the Council's CIL 123 list and this covers all mediums of education provision. Accordingly, contributions towards education provision cannot be secured via section 106 agreements in Merthyr Tydfil unless it is a site specific requirement. If this changed, the policy contains a final statement which covers all other relevant obligations not included on the regulation 123 list. Therefore, no change in this respect is considered to be required.</p>
<p>Rhondda Cynon Taf County Borough Council:</p> <p>Additional information relating to transport and highways issues should be added to the Site Allocation Details section.</p>	<p>The Council considers that the Site Allocation Details section contains an appropriate amount of detail on each individual site, and clearly sets out the Council's expectations in regard to a number of issues, such as highways and transport, on the housing and employment allocations contained in the Replacement LDP. Furthermore, the Plan contains policies to ensure these issues can be fully considered once detailed development proposals are available. Therefore, no changes to the Plan are proposed.</p>
<p>Rhondda Cynon Taf County Borough Council:</p> <p>Additional information should be related to the Site Allocation Details Section, specifically relating to the Hoover Factory Site.</p>	<p>The Council considers that the Site Allocation Details section contains an appropriate amount of detail on each individual site, and clearly sets out the Council's expectations in regard to a number of issues, such as highways and transport, on the housing and employment allocations contained in the Replacement LDP.</p> <p>In addition to the Site Allocation Details section, a framework masterplan has been prepared for the Hoover Strategic Regeneration Area, and the principles outlined in this document have been incorporated into Policy SW6.</p>
<p>Merthyr Tydfil Heritage Trust:</p>	<p>The Replacement LDP follows a precautionary approach to flooding, and has directed development away</p>

<p>The Replacement LDP does not identify how the increased flooding risk will be tackled.</p>	<p>from areas at risk of flooding. No highly vulnerable development has been allocated in Development Advice Map (DAM) zone C2, and Policy EnW4 states that any new development proposals will be expected to meet the requirements of national policy in regards to flooding.</p> <p>Land to the West of the River Taff at Pentrebach has been included within the Hoover Strategic Regeneration Area (HSRA), but does not carry a specific land use allocation, as the flooding issues at this location are unresolved at this point in time.</p> <p>With regard to the Town Centre flooding issues, the new bus station site has been granted planning permission and flood risk was resolved as part of that process. Further assessment work is currently being undertaken to consider the issue of flooding at the current bus station site and other areas of the Town Centre. This piece of work will identify the extent of flood risk in the area and identify potential flood defence measures that would remove as much of the flood risk as possible.</p>
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4.7 Affordable Housing

Policy SW2 – Provision of Affordable Housing	
LDP section references:	Policy SW2 – Provision of Affordable Housing, page 23
Representation number:	Representor name:
101.D6 and D10	Welsh Government
Main Issues:	Council Response:
<p>Welsh Government:</p> <p>The level of affordable housing need should be set out in the justification text of Policy SW2.</p> <p>The affordable housing need of 5,505</p>	<p>The level of affordable housing need is now set out in paragraph 6.5.12 of the LDP Written Statement as part of a focused change. The overall level of need has also been corrected from 5505 to 5490 in line with the LHMA annual</p>

units over the plan period should be set out in the reasoned justification to Policy SW2.	need figure.
The affordable housing target contained in Policy SW2 needs to be clarified. It should be based on the housing requirement, not the overall housing provision.	The affordable housing target has been amended to 251 units to reflect the fact that the target should be based on the housing requirement, not the provision as suggested. Additional clarifications to the policy wording and reasoned justification have also been proposed to clarify that the figure represents a target to be achieved from development proposals over the plan period and to clarify the components of affordable housing target.

4.8 Economy and Employment

Policy EcW1: Provision of Employment Land	
LDP section references:	Policy EcW1: Provision of Employment Land, page 58, para. 6.8.9-6.8.14
Representation number:	Representor name:
103.D3	Natural Resources Wales
119.D11	Dwr Cymru Welsh Water
207.D16 – D18 and D57	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>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).</p> <p>Merthyr Tydfil CBC has undertaken a Strategic Flood Risk Assessment (SFCA) dated June 2018, in which the above site has been considered. The information</p>	<p>Comments noted. The Strategic Flood Risk Assessment (SFCA) prepared for the Deposit Plan identified the potential suitability of this area for commercial development (less vulnerable development) however development proposals would be required to demonstrate that they would satisfy the justification and acceptability tests set out in TAN15. A review of the model data currently available in this area indicated that this may be possible, as velocities are largely less than 0.3m/s.</p>

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

We also suggest the LPA give further consideration to the viability of Brandy Bridge as the access / egress route to serve the proposed development.

Depths are relatively variable and are lowest to the east and south, below 0.6m (figure 8 of the SFCA). Where depths are above this, ground raising could be considered, providing that there are no third-party impacts on flood risk. NRW have advised that further assessment in the form of a Flood Consequence Assessment for the site would be required to demonstrate that the site could satisfy the requirements of TAN15 in order to justify allocating the land located in zone C2.

There are no detailed development proposals for the site in order to base an assessment on and the land is in various private ownerships. The site was identified as under used / undeveloped land following the Employment Land Review and master planning process at the Hoover Strategic Regeneration Area with a view that future regeneration proposals would expand northwards to include the Willows Industrial Estate with the potential of landownerships changing. However, at present there is no new developer identified for the land and parts of the land allocated are in or have since come forward for various B2/B8 storage and distribution uses. Consequently, it is proposed to remove the allocation from the Deposit Plan and amend the existing employment site boundary accordingly in order to comply with the flood risk requirements contained in national policy and to more accurately reflect existing uses and proposals for the site. With the removal of the employment land, the Replacement LDP would continue to contain sufficient employment land supply with the identified employment

	<p>land requirement over the Plan period being 14.46 hectares and the Plan containing 30.65 hectares allocated over a range of sites.</p> <p>It should be noted that the Council's Regeneration department has commissioned further hydrologic modelling and flood mitigation assessments to consider potential future mitigation options for the Nant Morlais – River Taf convergence that results in areas of flood zone C2 in Merthyr Tydfil Town Centre and this work will also consider potential options to help bring forward development sites further downstream at the Willows Industrial Estate. It is hoped that the assessment will inform potential future funding bids to bring forward new development. Whilst this work will inform the consideration of potential flood mitigation options it is not anticipated that this would provide the detailed site level FCA required for a site allocation as this would require consideration of detailed development proposals that are currently unavailable and an assessment of third party impacts (in addition to other requirements identified at paragraph 4.2.11 of the SFCA).</p> <p>Consequently, the allocation of employment land partly in flood zone C2 is proposed to be removed from the Plan as the specific impacts of development proposals will require further consideration once detailed development proposals are confirmed. The Council is satisfied that there is sufficient alternative employment land supply identified in the Plan and if new development proposals in this part of the</p>
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	<p>HSRA come forward in the future they would not be prevented by the Plan's policies provided they can satisfy national policy requirements in relation to flood risk.</p>
<p>DCWW:</p> <p>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.</p> <p>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.</p>	<p>Comments noted and support welcomed. A paragraph detailing the potential requirements dependent on the scale and size of the proposal will be added to the general supporting information for employment site allocations on page 108 of the Deposit Plan Written Statement. A paragraph is already included which details the potential requirements dependent on the end user as appropriate for each allocated site.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Many of Merthyr Tydfil industrial and trading estates are old and probably sub-standard. New and better facilities are needed for most if not all of the businesses.</p> <p>Improving facilities for existing businesses (allowing relocation for some) on industrial sites 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.</p> <p>There is a general shortage of available industrial and warehouse units across all</p>	<p>The Council has protected employment sites in line with national policy and following a review of employment sites and premises undertaken in accordance with Welsh Government guidance. Further details can be found the Merthyr Tydfil Employment Land Review (June 2018). No changes to the Deposit Plan in this respect are necessary.</p> <p>The Deposit LDP has been informed by a review of employment sites and premises undertaken in accordance with Welsh Government guidance. Existing employment sites have been identified and protected and sufficient land has been allocated for new employment</p>

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<p>sizes. Has the availability of units in near neighbouring areas such as Blaenau Gwent been tested?</p> <p>There is an issue with low skills levels in the County Borough. , 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.</p> <p>Support for skills and skills training projects is needed, along with development of more employer-education partnership schemes.</p> <p>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.</p> <p>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.</p>	<p>development in line with national policy. The employment land review also included a review of economic development in neighbouring authority areas and the supply/provision of sites.</p> <p>The Merthyr Tydfil Employment Land Review provides a comprehensive review of the employment needs of the area. It includes an employment land and premises review and considers future growth needs based on labour/employment trends by sector and past employment land uptake trends. This has been prepared in line with Welsh Government guidance and provides a robust evidence base for the Plan's employment policies. A range of existing industrial units and land for development is available and the Plan provides for sufficient employment land and contains policies to protect existing sites and premises. Whilst the Plan can protect existing sites and make sufficient provision for new employment land, it cannot directly impact skills and training decisions and support for skills training projects and the development of employer – education partnership schemes is outside the remit of the LDP. No changes to the Plan are therefore considered necessary.</p>
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4.9 Housing Allocations

Policy SW3 Sustainably Distributing New Homes – Allocation SW3.1	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.1, page 24 & 87
Representation number:	Representor name:
132.D2	Merthyr Initiative Group
Main Issues:	Council Response:
<p>Merthyr Initiative Group:</p> <p>Residential development is supported at the Hoover Factory site, but the façade at the main entrance, and the cricket field should be retained as part of any development.</p> <p>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.</p> <p>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.</p>	<p>The current proposed boundary of the housing allocation at the Hoover Factory site consists of the entire parcel of land between the A4054 and the railway line, and includes the sports field and the façade at the main entrance. In order to give an appropriate level of flexibility as to how the site is actually developed, the Council consider the current allocation boundary to be appropriate.</p> <p>The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open space will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with <i>Policy SW9: Planning Obligations</i> and <i>Policy SW10: Protecting and Improving Open Spaces</i> of the Replacement LDP.</p> <p>Similarly, with regard to the façade of the main entrance, the indicative masterplan shows that the building is unlikely to be retained in its current form. However, there will be scope to include some form of built development that has regard to the industrial heritage of the site, for example through the main entrance building as part of the redevelopment. This will also help to ensure that the development of the site is carried out in accordance with <i>Policy CW1: The Historic Environment</i> of the</p>

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	Replacement LDP.
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Policy SW3 Sustainably Distributing New Homes – Allocation SW3.5	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.1, page 24 & 89
Representation number:	Representor name:
333.D1	Mr Spencer Lees
Main Issues:	Council Response:
<p>Mr Spencer Lees:</p> <p>The housing allocation at Erw Las should be deleted as the land currently provides a valuable area of green space.</p>	<p>Whilst the site is currently amenity green space, the area is not defined as open space in the Council's adopted Open Space Strategy and has been deemed surplus to requirements by the Council's Estates department.</p> <p>Further assessments of the site have indicated that the site is suitable for residential development. It is accessible from an adopted highway and adjoins an existing settlement. Development of the site would provide a logical small scale extension of the settlement and would contribute to local housing land supply. Whilst some constraints have been identified these are not considered to be untypical for the area or insurmountable. Therefore, no change to the Deposit Plan is proposed.</p>

Policy SW3 Sustainably Distributing New Homes – Allocation SW3.8	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.1, page 24 & 91
Representation number:	Representor name:
132.D3	Merthyr Initiative Group
Main Issues:	Council Response:
<p>Merthyr Initiative Group:</p> <p>Housing allocation SW3.8 should be deleted from the LDP due to issues relating to biodiversity and the historic environment:</p>	<p>The site is currently used as agricultural land, but was submitted as a candidate site by a local developer and the landowner is aware of its submission. The site consists of low value agricultural land, and the loss of this class of land is not deemed to be unacceptable,</p>

<ul style="list-style-type: none"> • 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. • The proposed housing development will adversely affect the setting of the Scheduled Ancient Monument. • Development will result in a loss to the biodiversity of the adjacent Winchfawr West SINC and the Winchfawr East SINC & Clwydyfagwr SINC. • The site acts as an East/West ecological connective corridor for a meta-population of Great Crested Newts (a European Protected Species). • 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. 	<p>particularly as there is a significant amount of similar quality agricultural land in the County Borough.</p> <p>As the site is situated within the Merthyr Tydfil Landscape of Outstanding Historic Interest, and lies adjacent to both a Scheduled Ancient Monument (SAM) and a Special Landscape Area (SLA), it has been identified that an Assessment of the Significance of the Impacts of Development on the Historic Landscape (ASIDOHL) will be required as part of any planning application on the site.</p> <p>The site itself has does not have any significant nature conservation value, but does lie adjacent to a Site of Importance for Nature Conservation (SINC) and does provide a corridor for Great Crested Newt migration in the area. It has been suggested that these issues can be addressed by providing an appropriate ecological buffer zone along the extent of the site that borders the SINC, and providing a connective corridor that links the site to the Clwydyfagwr SINC to the East. This corridor may also be able to provide an appropriate linear SUDs solution for the development.</p> <p>Taking all this information into consideration, the Site Assessment process identified that site is appropriate to allocate for residential development and is anticapted to deliver 160 dwellings in the latter part of the Plan period.</p>
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Policy SW3 Sustainably Distributing New Homes – Allocation SW3.30	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.1, page 25 & 103
Representation number:	Representor name:
336.D1	Mr John Shankland
Main Issues:	Council Response:
<p>Mr John Shankland:</p> <p>Housing allocation SW3.30 should be deleted and the land should be designated as 'Community Amenity Land'.</p>	<p>The site proposed as SW3.30 in the Replacement LDP was designated as land for informal recreation in the Merthyr Tydfil Borough Local Plan 1996-2006. This Plan would have been the primary document to inform planning decisions until the current Local Development Plan (2006-2021) was adopted in May 2011. Accordingly, any planning applications for residential development on this site would have been regarded as not being in accordance with the Local Plan adopted at that time.</p> <p>The current LDP (adopted May 2011) does not carry any specific land use allocation/designation on the site in question. This change from an informal recreation designation to no designation was full consulted on as part of preparation of the 2006-2021 LDP, with the consultations taking place in accordance with a Delivery Agreement agreed with Welsh Government.</p> <p>In 2016, following a statutory review of the LDP, work commenced on preparing a Replacement LDP that will cover the period 2016-2031. One of the initial pieces of work carried out was a Call for Candidate Sites, where the Council invited stakeholders to suggest sites for inclusion in the replacement LDP (suggestions could be for both development and protection of land). The land at Stormtown was proposed by the Council's Estates Department as a site for residential development. Furthermore, the Council's Open Space</p>

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	<p>Strategy does not identify this site as an open space site with alternative functional green spaces identified in the area (shown on the LDP Constraints Map).</p> <p>Following the Site Assessment process it was considered that there are not any insurmountable constraints and development of the site is considered to be realistic and deliverable within the Replacement LDP plan period. Consequently, no changes to the Deposit Plan in this respect are proposed.</p>
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Policy SW3 Sustainably Distributing New Homes – Allocation SW3.31	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.1, page 25 & 104 SINCs Background Paper
Representation number:	Representor name:
287.D1	Mr Jim Davies
289.D1 to 289.D17	Mr Paul Price
335.D1 and 335.D2	Mr Gareth Hughes
337.D1 and 337.D2	Mrs Catherine Hughes
Main Issues:	Council Response:
<p>Mr Jim Davies:</p> <p>The housing allocation (SW3.31 – Cwmfelin, Bedlinog) should be removed and the site should not be developed as the site has a high level of nature conservation value.</p>	<p>The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.</p> <p>By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).</p> <p>However, given comments received as part of the consultation on the</p>

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	<p>Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SNC, and facilitated the principle of an appropriate access and layout which took account of the sites topography.</p>
<p>Mr Paul Price:</p> <p>The proposed allocation does not meet soundness tests as the difficulty of developing the site has not been fully considered. More aspirational proposals would be to offer larger homes, in line with the detached dwellings recently built in the surrounding area.</p> <p>Land at Craig y Hendre should be allocated instead.</p> <p>The Cwmmfelin Slopes need to be protected as does the village centre. Any development on this site should be small enough to keep the SNC 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.</p> <p>We note that the Craig y Hendre site has been removed from the LDP even though this would seem ideal site for homes. There is already an access road and an estate built on this land and it</p>	<p>The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site.</p> <p>By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).</p> <p>However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SNC, and facilitated the principle of an appropriate access and layout, taking</p>

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<p>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 the 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.</p> <p>Consideration should be given to reducing the number of dwellings proposed on the site, given the known constraints in the area.</p>	<p>account of the sites topography.</p> <p>The land at Craig y Hendre has not been allocated as the Council considers that it is unlikely that the site is capable of accommodating more than 10 dwellings (10 dwellings in the threshold that the Council has used in allocated residential sites). The site does however remain within the settlement boundary where the principle of residential development is acceptable subject to any proposals satisfying relevant planning policies and other material planning considerations.</p>
<p>Consideration should be given to reducing the number of dwellings proposed on the site, given the known constraints in the area e.g. nature conservation constraints.</p> <p>Ecological issues will need to be closely considered as part of any development on this site.</p> <p>There are a significant number of species of birds and other types of wildlife that will need to be closely considered as part of any development on the site.</p>	<p>By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).</p> <p>However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SNC, wildlife and which facilitated the principle of an appropriate access and layout, taking account of the sites topography.</p>
Issues of land stability and the coal	Comments noted. Detailed

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<p>mining history of the site need to be fully considered.</p> <p>Issues relating to drainage and flood risk will need to be closely considered as part of any development on the site.</p>	<p>consideration will also be given to issues such as land stability and flood and drainage requirements as part of any planning applications on the site, and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.</p>
<p>The services of existing dwellings will need to be closely considered when detailed development proposals are put forward.</p>	<p>Comments noted. Protection of existing services is an issue that will be fully considered at planning application stage and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.</p>
<p>There is an issue of low water pressure in the vicinity of the site.</p>	<p>DCWW have not raised any issues in regard to water supply in the area. Comments from DCWW on the previous planning application have stated that a connection to water supply can be made at the site, however a contribution from the developer may be required towards the provision of water infrastructure.</p>
<p>Road safety and access issues will need to be closely considered as part of any development proposals on this site.</p>	<p>Comments noted. Access and road safety are issues that will be fully considered at planning application stage and this issue is not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.</p> <p>The previous outline permission contained an access that satisfied the Council's Highways Department, and delivery of the site has been phased later on in the Plan period in order to allow sufficient time for issues such as access arrangements and ownership to be resolved.</p>
<p>The character of the village of Bedlinog needs to be closely considered when development proposals are put forward for the site.</p> <p>Any development of the site should not</p>	<p>Comments noted. This matter can be addressed at planning application stage once detailed development proposals are available. However, the amended allocation for 30 dwellings more closely reflects a layout approved as part of the most recent outline permission, and</p>

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be to the detriment of the attractiveness of the Bedlinog as an area to live	enables greater scope to ensure that the development reflects the character of the existing settlement and provides the opportunity to increase the attractiveness of the village for new and existing residents.
<p>The issue of potential air pollution will need to be closely monitored as part of any development proposals at this site.</p> <p>Archaeological issues will need to be closely considered as part of any development proposals on the site.</p>	Detailed consideration would be given to issues such as archaeology as part of the planning application process and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.
The representors disagree with certain scores under the Site Sustainability Appraisal.	The Council considers the score attributed against each objective in the appraisal of the site in question to be consistent with the methodology contained within the Sustainability Appraisal Framework, and consistent with the assessments of other candidate sites that were considered. However, as the number of units allocated on the site has reduced from 50 to 30, the score relating to the SA Housing Objective has been reduced to '+' from '++'.
<p>Mr Gareth Hughes and Mrs Catherine Hughes:</p> <p>The Cwmfelin Slopes are an important resource for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.</p>	<p>The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.</p> <p>By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at</p>

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	<p>an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).</p> <p>However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SNC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.</p>
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Policy SW3 Sustainably Distributing New Homes – Allocation SW3.32	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.32, page 25 & 105
Representation number:	Representor name:
323.D1	Mr Brendan D'Cruz
332.D1	Mrs S Williams
338.D1	Mrs Leanne Jones
339.D1	Mrs Leanne Jones
340.D1	Ms Nia Davies
341.D1	Mr Robert Jones
342.D1	Mrs Sharon Lawson
343.D1	Mrs Elaine Thomas
344.D1	Mr Keiron Jones
345.D1	Mr Brian Christopher
346.D1	Mr Rowan Knight
347.D1	Mrs Bernadette Wathen
348.D1	Mr Justin Clarkson
349.D1	Mr Andrew Thomas
350.D1	Mr Owain Rees
351.D1	Mr Alun Robins
352.D1	Mr Rhys Hughes
353.D1	Ms Natalie Phillips
354.D1	Mr Patrick Phillips
Main Issues:	Council Response:

<p>Summary of all representations:</p> <p>The housing allocation at Commercial Field, Treharris (3.32) should be removed as the pitch has historical significance, and the loss of the facility would exacerbate an already critical shortage of football pitches, open space, play & leisure facilities in the area.</p> <p>Local youth teams have no pitch to play on, and the field also has historical significance.</p> <p>The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP. The allocation also does not take into account the MTCBC Open Space Strategy, and the Wellbeing of Future Generations Act. The site is well used and its use as a playing field should be protected.</p> <p>SW3.34 should be removed as an option for the development of housing, and for alternatives sought within the [County] 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.</p>	<p>The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.</p> <p>Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.</p> <p>The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.</p>
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Policy SW3 Sustainably Distributing New Homes – Allocation SW3.33	
LDP section references:	Policy SW3 Sustainably Distributing New Homes – Allocation 3.33, page 25 & 106
Representation number:	Representor name:
324.D1	Mr Michael Thomas
Main Issues:	Council Response:
Mr Michael Thomas:	Support welcomed.
Support for housing allocation 3.33.	

4.10 Gypsy and Traveller Accommodation

Policy SW8 – Gypsy, Traveller, and Showpeople Accommodation	
LDP section references:	Policy SW8 – Gypsy, Traveller, and Showpeople Accommodation, page 32, para 6.5.46 - 6.5.49
Representation number:	Representor name:
101.D7	Welsh Government
Main Issues:	Council Response:
Welsh Government:	
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.	The Welsh Ministers have now approved the updated Gypsy Traveller Accommodation Needs Assessment (2018). The study identifies there is no need for new site allocations during the Plan period as the identified needs can be met at existing sites. Consequently, no changes to the Deposit Plan are required.

4.11 Transportation

Policy SW12: Improving the Transport Network	
LDP section references:	Policy SW12: Improving the Transport Network, page 38, para 6.5.74-6.5.80 Proposals Map, Northwest & Northeast
Representation number:	Representor name:
122.D8	Mineral Products Association Wales
129.D3	Caerphilly County Borough Council
154.D5 and D6	Rhondda Cynon Taf CBC

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207.D19 – D21 and D50 – D54	Merthyr Tydfil Heritage Trust
331.D1	Mr Paul Griffiths
Main Issues:	Council Response:
<p>Mineral Products Association Wales :</p> <p>The representation request that the Replacement LDP considers the implications of the proposed transport network improvements (e.g. the Heads of The Valleys Road improvements) on aggregate supply/requirements. It is considered to fully consider the implications and requirements of the Plan a resources assessment and supply chain considerations should be included in the Plan. This is also not considered in the SA Report.</p>	<p>Planning Policy Wales requires development plans to take account of and be consistent with strategies and policies contained in Local Transport Plans (paragraphs 5.3.6). Paragraph 5.3.12 further states that “<i>Development plans should include all proposals for new roads and major improvements to the primary road network over the plan period, and set out the broad policy on priorities for minor improvements.</i>” the inclusion of the heads of the Valleys Road improvement scheme, a Welsh Government proposal, and the range of other local transport schemes is therefore in line with national policy. With the exception of new access and estate roads to be provided as part of development sites that are allocated, there are no other proposals new road building. Consequently, no changes to the policy are considered necessary.</p> <p>Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that ‘no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction’ and that ‘there is no apportionment for sand and gravel in South East Wales, due to the region’s reliance on marine-dredged</p>

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	<p>aggregates from the Bristol Channel and the Severn Estuary’.</p> <p>Paragraph 3.15.8 of the Sustainability Appraisal Baseline Scoping Report also notes the recommendations of the RTS 1st Review to encourage <i>“the use of construction, demolition and excavation waste as an alternative to primary land-won aggregates; safeguarding resources of both crushed rock aggregates and land-based sand and gravel; and safeguarding existing railheads in order to provide a full range of sustainable transport options”</i>.</p> <p>Whilst specific reference to the impact on the level of employment development on the minerals supply has not been made, it is considered that the level of growth would not have a significant impact on the supply of minerals. The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves. It is therefore concluded that implications and requirements of the plan with regard to resource assessment and supply chain requirements have been fully considered during Plan preparation.</p>
Caerphilly County Borough Council:	Comments noted and support welcomed. There are no confirmed

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<p>The representation supports 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.</p> <p>Requested change – Identify the safeguarded route of the Cwm Bargoed rail line and rail head on the proposals map.</p>	<p>proposals for the Cwm Bargoed rail line however it is agreed the whole of the Cwm Bargoed rail line should be protected for future use. This has been included as part of a focused change to the Deposit Plan.</p>
<p>Rhondda Cynon Taf County Borough Council:</p> <p>There does not appear to be reference to strategic bus corridors and proposed works to raise standards and provide bus priority measures such as bus lanes or remodelling junctions.</p> <p>The document does not appear to recognise the importance of Prince Charles Hospital and the College as trip attractors for the wider area.</p>	<p>The Deposit Plan has been prepared in line with the South East Wales Local Transport Plan; the major schemes relating to the County Borough have been included in the Replacement Deposit LDP comprising the development of a new bus station. Whilst other smaller bus improvements, relating to bus stop enhancements, are not specifically mentioned in the Plan, Policy SW12 as written supports a modal shift towards sustainable transport including enhancement of bus facilities. It is therefore considered that the policy is in accordance with the Local Transport Plan and the requirements of national policy. No changes to the policy in this respect are proposed.</p> <p>Comments noted. There are daily buses to Prince Charles Hospital and the dualling of the A465 Heads of the Valleys Road should alleviate longer terms issues arising from trips generated to and from the wider area, Cynon Valley and the</p>

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	<p>hospital. The college is situated directly opposite the bus station and within walking distance of the train station. Whilst trip generation to both sites is recognised, it is not considered any changes to the Plan or policy SWS12 in this respect are necessary.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on Key Issue 11 in relation to revising the Active Travel network routes currently shown on the Proposals Map to include Merthyr Tydfil Heritage Trust proposal to improve National Cycle Route 46 east-west as part of the.</p> <p>A465 dualling proposals and secure access from the Abernant to Merthyr Tunnel to the A470 and the possible opening of the Morlais 'Miler' Tunnel on NCR 46). Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map - add in Merthyr Tydfil Heritage Trust A465 dualling proposals.</p> <p>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.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Active Travel, footpaths, cycleways, rights of way, bridleways, 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,</p>	<p>The Active Travel Integrated Network Map route proposals do not necessarily include recognised / established recreational routes for walking and cycling, but rather are identified local 'commuter' routes for improvement. These are typical local routes for making key short journeys by physically active means, like walking or cycling to the shops, town centre, school, places of work or for further commuting such as train or bus stations. The Replacement Deposit Plan proposals map included draft consultation routes that were proposed by the public and as such their accuracy had not been verified. These routes were awaiting verification and approval by Welsh Government.</p> <p>Following the County Borough's successful application for funding, a total of £365,000 has been awarded from the Welsh Government's Local Transport Fund towards upgrading Active Travel Routes in Merthyr Vale and the development of plans for access to the South East Wales Metro stations. The Council's Active Travel Integrated Network Plan has now been verified and agreed by the Welsh Government. Consequently, the Proposals Map will be up-dated to reflect the existing and approved Active Travel Integrated Network Map routes.</p> <p>With regards to the Merthyr-Abernant</p>

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<p>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).</p>	<p>Tunnel, a grant of £125,000 has been awarded to Rhondda Cynon Taf County Borough Council to continue its partnership work with the County Borough in investigate re-opening of the tunnel to provide a direct, traffic-free route from Merthyr Tydfil to Aberdare. This is also proposed as part of the Integrated Network Map and highlighted in paragraph 6.5.75.</p>
<p>Representation comments on Key Issue 12 in relation to the new bus station and advocates a new metro 'hub' at Brandy Bridge on the fringe of the Hoover Regeneration Area near the town centre</p>	<p>Proposals for a new Metro station have been included in the Hoover Regeneration Area – Framework Masterplan, June 2018 to the south of Brandy Bridge and land is safeguarded under Policy SW12: Improving the Transport Network (see scheme 4). The scheme does not form part of the first phase of the Transport for Wales's metro proposals but it is anticipated the proposal could come forward in the next rail franchise period. It is considered this issue is sufficiently addressed in the Replacement Deposit Plan and no further changes are considered necessary.</p>
<p>Representation Comments on Key Issue 13 in relation to the South Wales Metro, Merthyr Tydfil Heritage Trust object to the loss of the Hoover Sports grounds (and the loss of the façade of the original Hoover factory, gatehouse and detached office block) due to the need to provide extra park and ride capacity. Concerns also raised regarding bus access.</p>	<p>Improvements to Pentrebach Station are part of the South Wales Metro project which is due to receive EU structural funding to undertake improvement works on the Merthyr, Treherbert, Aberdare and Rhymney lines by 2023/24. This will include £21.1m for doubling part of track on the Merthyr line, new platforms and an improved interchange at Merthyr Tydfil station and a new platform, access improvements and increased parking facilities at Pentrebach Station, which do not constitute a hub. Policy SW12: Improving the Transport Network –includes</p>

	<p>reference to Pentrebach Park and Ride, as shown on the Proposals Map.</p> <p>The new Metro hub near brandy bridge included in the Hoover Regeneration Area – Framework Masterplan, June 2018 has been strategically placed to serve both the proposed new development and within close proximity to the proposed Metro network. This has been safeguarded under policy SW12 and it is anticipated the proposal could come forward in the next rail franchise period. It is considered this issue is sufficiently addressed in the Replacement Deposit Plan and no further changes in this respect are considered necessary.</p> <p>Although the existing sports facilities will be lost, compensation in the form of new open space will be required and provided within the scheme. Whilst the front facade of the Hoover factory building is not listed or formally protected, it is hoped that the industrial heritage of the site can be reflected in development proposals for the site and this has been reflected in policy SW6 relating to the Hoover Strategic Regeneration Area. However, retaining specific buildings is unlikely to be possible as this this would be difficult to achieve this given the layout requirements and viability of the scheme. New development will be designed in such a way as to reflect the existing facade at the entrance. The framework master plan provides illustrations as to how this might be achieved (see page 7 of the master plan). Development proposals will also need to satisfy the design policies of the Plan, such as Policy SW11, and issues such as highway and access</p>
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	<p>arrangements and detailed design requirements can be considered further as part of the pre application and planning application process.</p>
<p>Comments on Key issue 11: Whilst there are extensive walking and cycling routes they are not well connected and Active Travel routes. It is considered that Active Travel standards and the planning of routes and networks are unsatisfactory in Merthyr Tydfil and fail a basic audit by the Heritage Trust and the Heritage Trust have put forward a number of proposals relating to the planned A465 dualling Dowlais Top – Hirwaun.</p>	<p>Active Travel Routes are shown on the Proposals Map. Strategic footpaths and cycleway routes are shown on the Constraints Map and it is agreed that there some inconsistencies when compared with recognised recreational routes such as the Taff Trail, Trevithick trail, Celtic Trail, Heads of the Valleys route. Changes have been proposed to show corrected recreational routes on the Constraints Map.</p> <p>Key issue 11 relates to existing 'extensive walking and cycling routes' which can relate to both Active Travel Routes and recreational routes such as Public Rights of Way and other recognised recreational routes such as The Taff and Trevithick Trail. It does not specifically refer to the quality of the routes. No further changes are considered to be necessary in this respect.</p>
<p>The Abernant tunnel should be safeguarded for a heritage cycleway to the A470 together with the old railway track from the A470 leading to the tunnel.</p>	<p>Support welcomed. Policy SW12: Improving the Transport Network seeks to support the development of the Active Travel Integrated Network routes. These have now been agreed with Welsh Government. Paragraph 6.5.75 states that "Significant socio-economic benefits would be brought by re-connecting Merthyr Tydfil and Aberdare through the disused Merthyr to Abernant railway tunnel, and as such is included on the Integrated Active Travel Network Map". This route would be developed as part of the Active Travel programme of works. A grant of £125,000 has been awarded to Rhondda Cynon Taf County</p>

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	Borough Council to continue its partnership work with the County Borough to investigate re-opening the tunnel to provide a direct, traffic-free route from Merthyr Tydfil to Aberdare. No changes to the Deposit Plan are considered to be required in this respect.
The line of the old railway (across the Taff Trail at the listed Brunel designed Glamorganshire Canal bridge) should be safeguarded for a cycleway to link across the A470.	Part of the Taff Trail/Active Travel Route MT17 (Rhydycar to Aberfan Cemetery) runs under the dismantled railway at Rhydycar Skew Bridge (Grade II listed). The route proposed along the bridge crossing over the line of the former Glamorganshire Canal meets a dead end at the A470. Therefore an alternative route has been proposed as part of the Active Travel Integrated Network. This comprises a new route (MT46) leading from MT7 linking to another proposed route (WS32) utilising existing paths which lead to an existing footbridge/cycleway that crosses the A470 near the Orbit Centre. These links would provide alternative provision to the proposed route. The Active Travel Routes are proposed as part of policy SW12 and no further changes to the Plan are considered necessary.
Cyfarthfa Heritage Area, EFI Astex Estate – parts of this area should not be protected as an employment area and should be protected to confirm public access through the site along the existing roadway/footpath/cycleway.	The industrial site has been identified as a long standing existing employment site and as such has been given appropriate status under policy EcW2 in order to protect the employment function of the County Borough. Further details are provided in the in the Council's Employment Land Review background paper (June 2018). Future development proposals here would need to satisfy the Plan's other policies including those to conserve and enhance the historic environment. No changes for soundness

<p>The corridor of land from Williamstown Bridge to the Cyfarthfa Ironworks site should not be included in the protected employment area but instead be safeguarded as a potential cycleway</p>	<p>in this respect are considered to be necessary.</p> <p>With regards to the protection of public access routes, the Taff Trail/Active Travel Route MT6 run along the south of the site adjacent to the Pontycfnau (grade II* listed building)/ Pont y Cafnau Tramroad Bridge (Scheduled Ancient Monument) which links onto Active Travel Route MT8 and leads onto MT7 to the Cefn Railway Viaduct (grade II* Listed building). The route is also protected as part of the Taff Trail a national cycle route.</p> <p>A footpath/cycleway currently runs from the south of the site at Pontycfnau Tramroad Bridge leading through the western edge of the industrial site, also used as a private roadway, onto the limekilns south of Cefn Bridge (grade II* listed building) where it joins Active Travel Route MT7 to the Mormon Church. This is not a Public Right of Way (PRoW) and therefore has no legal designation. However, a parallel route to the west of this route, outside of the Industrial Estate, was considered as part of the Integrated Network Map of Active Travel Route links which could provide access from Pontycfnau Bridge and serve as a link to route MT7. The confirmed Integrated Network Map routes will be shown on the Replacement LDP Proposals Map and are recognised under policy SW12. No further changes in this respect are considered to be required.</p> <p>As part of the Active Travel Integrated Network Plan, route WS33 has been proposed from Brecon Road past the EFL Industrial Estate along Pandy Close to Cyfarthfa Industrial Estate linking with</p>
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linking sections of the Taff Trail.	Active Travel Route MT7 (Pontycnafau Bridge to Mormon Church) and will comprise a shared cycling and walking route leading onto proposed route MT46 which will link to the Taff Trail. This route will provide the link desired and will be shown as a proposed active travel route alongside all other approved Active Travel Integrated Network Plan routes on the LDP Proposals Map.
<p>Mr Paul Griffiths:</p> <p>Proposed Active Travel route (39) is shown going through 2 private dwellings (Gwaunfarren Grove), where there is no path and should therefore be deleted.</p>	<p>Comments noted. This route was proposed during the Active Travel Integrated Route Map public consultation and as such it was not agreed or confirmed on the ground. The Council's Active Travel Integrated Network Plan has now been approved by Welsh Government and the confirmed active travel routes will be amended on the Replacement LDP Proposals Map as part of a focused change to show all approved routes. This would mean that the route in question would be redirected to avoid any conflict with private dwellings.</p>

Hoover Strategic Regeneration Area – footbridge	
LDP section references:	Policy SW6 – Hoover Strategic Regeneration Area, page 30, para 6.5.40-6.5.44
Representation number:	Representor name:
154.D8	Rhondda Cynon Taf County Borough Council
Main Issues:	Council Response:
<p>Rhondda Cynon Taf County Borough Council:</p> <p>Suggest the proposed new footbridge indicated in Policy SW6 also includes provision for cyclists.</p>	<p>The framework Masterplan document dated June 1018, identifies the footbridge to establish links across the river together with the creation of a network of pedestrian and cycle routes and way-finding within the development to connect to the existing strategic recreational routes (Taff and Trevithick Trail) and prioritising pedestrian and cycle movement through shared</p>

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	spaces. This is indicative but it is recognised that there is the opportunity to ensure that a bridge would be for dual use. It is proposed to include additional design requirements to Policy SW6 and supporting text which will include making the reference to the footbridge dual purpose for cycle use.
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Sustainable Design and Placemaking – reference to active travel in Policy SW11	
LDP section references:	Policy: SW11: Sustainable Design and Placemaking, page 37, para 6.5.66-6.5.73
Representation number:	Representor name:
154.D9	Rhondda Cynon Taf County Borough Council
Main Issues:	Council Response:
Rhondda Cynon Taf County Borough Council: Consider inclusion of 'active travel routes' after train routes in paragraph 6.5.73. Consider an additional point to read ' <i>encourage active travel journeys and reduce the need to travel by private motor vehicles</i> ' in Policy SW11.	Comments noted. For consistency and clarity it is agreed that reference should be made to Active Travel Routes in paragraph 6.5.73 and a focused change has been proposed accordingly.

Written Statement Context and Issues – Transport and Air Quality	
LDP section references:	Written Statement Context & Issues, Key Issue 14, page 7, para 2.8
Representation number:	Representor name:
207.D22	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
Merthyr Tydfil Heritage Trust: Comments on Key Issue 14 in relation to Twynrodyn AQMA. Given that the Merthyr Tydfil Heritage Trust officer highlighted problems at Twynrodyn Hill 8 years and is an example how old highways infrastructure has not been improved or adapted into a road network suitable for modern cars, pedestrians and cyclists.	The representation comments on air quality and transportation with particular reference to the Twynrodyn AQMA. In March 2018 the Council agreed to consult on traffic management and engineering changes to a Twynrodyn Hill, comprising three options, as part of an action plan to reduce nitrogen oxide levels in the area. Following the 12-week consultation period feedback was

	considered and a finalised plan sent to Welsh Government regarding the AQMA. The Council has put forward traffic management proposals to alleviate congestion and these are currently being considered by Welsh Government. No changes to the Deposit Plan in this respect are considered to be required.
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4.12 Historic Environment

Policy CW1 Historic Environment	
LDP section references:	Key Issue 18, page 7, para 2.8 Policy CW1 Historic Environment, page 42-46, para 6.6.5-6.6.17
Representation number:	Representor name:
103.D10 and D18	Natural Resources Wales
207.D26	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>We advise that 'landscape character assessments' should be added to the features listed in paragraph 6.6.10.</p> <p>We advise that Parks and Gardens and Historic Landscapes of local interest should be added to the features listed in paragraph 6.6.15.</p>	<p>Comments noted. It is agreed that reference to historic, cultural and landscape character assessments could be added to the paragraph. The Council's Landscape Character Assessments were prepared as part of the Merthyr Tydfil LANDMAP landscape Assessment undertaken in 2002 by White Consultants and assessments such as these could be referred to be developers.</p> <p>Paragraph 6.6.15 specifically refers to the built environment and is therefore not the appropriate paragraph to refer to locally important Parks and Gardens and Historic Landscapes. However, it is considered appropriate to refer to them elsewhere in the supporting text i.e. paragraph 6.6.12.</p>

<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on Key Issue 18 in relation to heritage asset being left to decay and deteriorate which has not been recognised in the Deposit Plan.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Heritage – draft policy proposal and its revision.</p>	<p>Key issue 18 – “<i>National and local heritage designations based on past iron and coal industries need sensitive conservation</i>”, was identified in the Sustainability Appraisal Baseline Scoping Report, dated January 2017 as an SA Topic Area – “<i>Cultural Heritage (incl. Welsh language) and Historic Environment</i>”, which includes a section on ‘<i>Buildings at Risk</i>’ which names buildings at most risk of decay (see pages 63 – 65). LDP Objective 9 <i>Heritage and Cultural Assets: To support, enhance and promote all heritage, historic and cultural assets</i> and Policy CW1: <i>The Historic Environment</i> seek to address this issue. Therefore, no change is considered to be required.</p>
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4.13 Natural Environment

Deposit Plan Habitat Regulations Assessment	
LDP section references:	Habitat Regulations Assessment, Table 2
Representation number:	Representor name:
103.D2	Natural Resources Wales
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>Reference should be made to the Conservation of Habitats and Species Regulations 2017 as a more recent version of the 2010 regulations.</p> <p>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</p>	<p>Comments noted. The Council has prepared a Deposit Plan Addendum - Habitats Regulations Assessment Revised Screening Report incorporating Appropriate Assessment based on the previous Deposit Plan Habitats Regulations Assessment Screening Report (June 2018) in response to developments in HRA case law. As part of this revision to the Habitats Regulations Assessment references to</p>

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to as the 'Aberbargoed Grasslands Metapopulation' rather than supporting the 'Hirwaun meta-population'.	legislation has been updated and references to the 'Hirwaun meta-population' have been amended to 'Aberbargoed Grasslands Metapopulation' where necessary.
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Policy EnW1 – Nature Conservation and Ecosystem Resilience	
LDP section references:	Policy EnW1 – Nature Conservation and Ecosystem Resilience, page 48, para 6.7.6-6.7.11
Representation number:	Representor name:
103.D11	Natural Resources Wales
116.D6	Home Builders Federation
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>We suggest further detail is provided in the explanatory text for this policy on what is meant by 'ecosystem resilience'.</p> <p>Various changes suggested to supporting paragraphs under policy EnW1 – Nature Conservation and Ecosystem Resilience including:</p> <p>Section 6.7.6 - More detail should be included here to specify how the 'biodiversity value' of a site is established.</p> <p>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.</p> <p>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</p>	<p>The Environment (Wales) Act 2016 places a duty on public bodies to maintain and enhance biodiversity and to promote the resilience of ecosystems and updated references to ecosystem resilience have been incorporated into draft Planning Policy Wales (Edition 10). Therefore, whilst no specific changes to the wording of policy EnW1 are considered to be necessary, it is accepted that an additional introductory paragraph to policy EnW1 would assist in explaining the term and the overall aim of the policy – i.e. to maintain and enhance biodiversity interest as a whole by promoting ecosystem resilience including considering the extent, diversity, connectivity and condition of biodiversity (species and habitats) as set out in the Environment (Wales) Act.</p> <p>Opportunities to integrate with existing Green Infrastructure and to provide new features will help meet these biodiversity objectives. However, it is acknowledged that Green Infrastructure as a whole will require consideration early in the</p>

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 – textual amendments suggested to more clearly describe compensation measures. It would also be helpful to define what is meant by ‘like-for-like’ compensation.

Section 6.7.10 – clarify wording of this paragraph as there could be confusion between mitigation and enhancement requirements. 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’.

planning and design stages of development proposals and not just where there are specific biodiversity impacts. Consequently, references to green infrastructure and examples have been included in the updated supporting text to policy EnW1 and new text has been added under policy SW11: Sustainable Design and Placemaking.

With regard to paragraph 6.7.6, further detail of how the biodiversity value of a site can be established is provided in the Council’s Nature and Development Supplementary Planning Guidance referenced in paragraph 6.7.11. The SPG includes detailed guidance and includes reference using suitably qualified ecologists, CIEEM guidelines and British Standard Guidance. To clarify this approach to establishing biodiversity value, changes are proposed to paragraph 6.7.6 to advise that this will typically be achieved through a biodiversity survey and ecological impact assessment that is proportionate in nature to the development proposals. This would involve biodiversity desktop and field studies and would result in comprehensive ecological impact assessments where required.

With regard to paragraph 6.7.7, it is agreed that the supporting text could benefit from reference to a site in supporting a particular species or assemblage and amended text has been proposed. The term ‘stepping stone’ is included in national policy under paragraph 5.4.3 of PPW and is a commonly used term within government, academic research, and Chartered Institute for Ecology and Environmental

	<p>Management (CIEEM) reports and documents. These are sites that assist habitat connectivity for species migration, dispersal or genetic exchange. Other sites may provide continuous or direct habitat connectivity for the same purpose. For clarity amended supporting text to policy EnW1 has been proposed.</p> <p>With regard to paragraph 6.7.8, it is accepted that most sites will contain some biodiversity value with the exception of rare instances. Amendments are proposed to clarify the supporting text. With regards to the requirement to establish the biodiversity value of a site, this is included in the earlier paragraph 6.7.6 and changes are proposed to clarify that this would typically be established through biodiversity site surveys and ecological impact assessments. In addition, 'Biodiversity' as a term will also be included in the Plan's glossary.</p> <p>With regard to paragraph 6.7.9, it is agreed that the suggested amendments to the supporting text improve clarity and consistency with the Environment (Wales) Act and these have been incorporated into the proposed changes. With regards to the consideration of 'like for like' compensation, it is accepted that this should not relate to a literal interpretation and should relate to overall biodiversity interest with the aim to maintain and enhance biodiversity. It is considered the proposed changes clarify this requirement and aims of the policy.</p>
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	<p>With regard to paragraph 6.7.10, this paragraph is included to ensure development proposals can be considered in accordance with the Environment (Wales) Act duty to maintain and enhance biodiversity and ensure this can be implemented without placing disproportionate or onerous restrictions where new development can be justified in accordance with national planning policy. Changes are proposed to ensure consistency with Environment (Wales) Act and consistency of the terms used. The changes include reference to considering opportunities for greater enhancement wherever possible in order to address the concerns raised. The list of enhancement features provides examples and is not exhaustive. Further guidance is provided in the Council's Nature and Development Supplementary Planning Guidance.</p>
<p>Home Builders Federation:</p> <p>The HBF do not consider the use of the term 'Ecosystem Resilience' is clear or well enough explained.</p> <p>Consider different wording or provide better explanation.</p>	<p>The term 'ecosystem resilience' is a commonly used term within nature conservation and planning guidance (such as PPW Edition 10) and is included in the Environment (Wales) Act 2016 Section 6. Changes to the supporting text under policy EnW1: Nature Conservation and Ecosystem Resilience and Policy SW11: Sustainable Design and Placemaking: have been proposed in response to representations from Natural Resources Wales. The changes make reference to the legislative duty on public bodies to maintain and enhance biodiversity including promoting the resilience of ecosystems (see representation 103D.11/EnW1). The changes also provide examples of how development can maintain and enhance biodiversity and in so doing promote ecosystem resilience. This</p>

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	includes, for example, considering the use of green infrastructure as part of development proposals.
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Policy EnW2 – Nationally Protected Sites and Species	
LDP section references:	Policy EnW2 – Nationally Protected Sites and Species, page 50, para 6.7.12-6.7.15
Representation number:	Representor name:
103.D5 and D12	Natural Resources Wales
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>Representation raises concern that there is no mention of European Protected Species, as listed in Schedules 2 and 4 of Conservation of Habitats and Species Regulations 2017 and seeks changes to policy EnW2 wording and supporting text.</p> <p>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.</p> <p>The representation seeks various changes to paragraphs 6.7.12 to 6.7.14 to clarify references to SSSI designations, the consideration of protected species. In particular:</p> <p>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.</p> <p>Section 6.7.13 – the authority has a duty to address nature conservation and this is</p>	<p>Comments noted. The changes suggested would ensure Policy EnW2 is in accordance and consistent with protected species legislation. It is therefore proposed to incorporate changes into Policy EnW2 and supporting paragraph 6.7.12.</p> <p>Comments relating to paragraph 6.7.12 and the references to SSSI designations and descriptions are noted and changes have been proposed to address these.</p> <p>Comments relating to paragraph 6.7.13 and the Council's legal duty to have due regard to the conservation of protected species whether or not advice is provided by NRW are noted. Changes have been proposed to clarify this.</p> <p>Comments relating to paragraph 6.7.14</p>

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<p>not dependent on whether NRW provides comment. Reword paragraph to clarify.</p> <p>Section 6.7.14 – clarify paragraph as it implies that the conservation value of a site or species could be preserved / enhanced following the consideration of a development proposal where there is an overriding justification and no suitable alternative.</p>	<p>and the implications of development on protected sites or species are noted. To be justified under the policy development proposals must clearly outweigh the impacts on the protected sites and species and there must be no suitable alternatives in accordance with legislation and national policy. The policy also requires that the proposal contributes to the protection, enhancement and positive management of the site, or in the case of protected species where there are appropriate avoidance, mitigation and compensation measures. As each case will need to be assessed on its own merits it is considered appropriate to elaborate on this requirement, however, it is accepted there maybe cases where this is not possible. Therefore, changes have been proposed to the paragraph clarify this element of the policy.</p>
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Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation and Priority Habitats and Species	
LDP section references:	Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation and Priority Habitats and Species
Representation number:	Representor name:
103.D13	Natural Resources Wales
115.D6	Marvel (WYG)
258.D3	Elan Homes
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>The representation seeks to include reference to geodiversity into the criteria and support text of policy EnW3.</p>	<p>Comments noted. Policy EnW3 applies to geodiversity and Regionally Important Geological Sites (RIGS). The consistent reference to geodiversity is therefore considered to be appropriate and changes to the policy wording (criterion 4) have been proposed. In addition, changes to paragraph 6.7.19 has also</p>

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	<p>been made as a consequential change inline earlier amendments regarding the promotion of biodiversity on development sites and to include reference to geodiversity.</p>
<p>Marvel (WYG):</p> <p>The representation relates to the proposed Sites of Importance for Nature Conservation (SINC) boundaries some of which overlap with the Cwm Glo a Glyndyrus SSSI. Amendments to exclude points A-E and G which lie outside the SSSI are supported and the inclusion of points F, H, and I as part of the proposed SINC (and within the SSSI designation) are contested with some minor boundary changes proposed. Point J located within the previous and current proposed SINC is also contested.</p> <p>The representation also seeks amendments of SINC boundaries (points F, H, I and J referred to in the submission).</p> <p>As part of the 2017 SINC 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> <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</p>	<p>The Council's approach to the SINC review is provided in the Sites of Importance for Nature Conservation background paper (June 2018). In relation to this designation, access to the land has historically not been permitted. For practical reasons, where access is permitted, SINC surveys across the County Borough have focussed on known boundary issues and known or likely changes since the previous Local Development Plan. Landowners, landowner attitudes and permissions often change. Amendments to SINC are based on the best available known evidence at the time. The boundary changes at points F, H and I marked on the representation map are based on the Cwm Glo a Glyndyrus SSSI boundary changes confirmed since the previous LDP.</p> <p>Sites of Special Scientific Interest (SSSI) were originally notified under the National Parks and Access to the Countryside Act 1949, SSSIs were then re-notified under the Wildlife and Countryside Act 1981. Improved provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way Act 2000. Landowners have an obligation, under legislation, to manage a SSSI in a way which helps conserve its special features with NRW providing the landowner with details of legislation affecting the site, management practices, activities likely to cause</p>

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 outside the SSSI (shown on the Plan attached to their submission) 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.

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

damage, activities requiring permission on site and those activities that are exempt. NRW are the statutory body with the powers to enforce SSSI issues.

Cwm Glo SSSI was first notified on 23rd January 2003. The Cwm Glo a Glyndyrus SSSI notification of enlargement was made on 17th July 2008 with a site area of 203.1ha. Following evidence, representations and objections by the landowner to NRW through the process of notifying SSSI amendment to the site boundaries were made with the current Cwm Glo a Glyndyrus SSSI being confirmed on 8th April 2009 with a reduced area of 181.3ha. MTCBC is confident that the Countryside Council for Wales (now NRW), as statutory nature conservation body for Wales, had sufficient rigorous and evidence based systems and process to confirm the final SSSI boundary as it currently exists and has no evidence to the contrary.

A SSSI is a statutory designation for nationally important sites with detailed "Guidelines for the Selection of Biological SSSI" (Part 2: Detailed Guidelines for Habitats and Species Groups).whereas SINC designation is based on regionally important criteria (Mid-Valleys SINC Criteria). When comparing the (SSSI) "Part 2: Detailed Guidelines for Habitat and Species Groups" with the (Mid-Valleys SINC Criteria) "Part 2: Detailed Criteria for Selection" the former always meet the latter criteria for the habitats present within Cwm Glo a Glyndyrus SSSI.

The area marked J lies outside Cwm Glo a Glyndyrus SSSI and within Rhydyrcar

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<p>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.</p> <p>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.</p>	<p>West SINC. The site was originally designated after being surveyed by David Clements Ecology Ltd (as detailed in the Rhydyccar West Survey and Assessment for SINC designation Report dated May 2006). The alleged impact (upon the SINC) from “the addition of higher fertility soils during the construction of the A470” occurred in 1996/1997, a significant duration prior to the SINC surveys and designation. The National Terrestrial Phase 1 Habitat Survey (Countryside Council for Wales), undertaken prior to the construction of this portion of the A470, also shows this area as semi-natural habitat within area J evidencing a continuation of this habitat over a reasonable period of time.</p> <p>Access to the land in question has historically not been permitted and no new evidence has been submitted, or changes observed, to justify amendments the SINC designation in this area (for example an ecology survey of site J). Therefore, in the absence of this evidence changes to the SINC designation are not considered to be appropriate. No changes to the Deposit Plan SINC designation are therefore proposed.</p>
<p>Elan Homes:</p> <p>Representation objects to the Gethin Tip section of Maes Abercanaid/ Abercanaid Fields (east of the A470) being allocated as a SINC.</p>	<p>The representation relates to SINC 20 which was originally designated in the adopted LDP 2011 and was resurveyed in July 2016. This confirmed that the site continues to meet Mid Valleys SINC Criteria. Further details can be found in the Sites of Importance for Nature Conservation background paper (June 2018). No supporting evidence has been received to support the claim that it does not meet the criteria as suggested.</p>

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	Consequently, no changes to the SIN designation in the Deposit Plan are proposed.
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Policy EnW4 – Environmental Protection	
LDP section references:	Policy EnW4 – Environmental Protection, page 52, para 6.7.21-6.7.24
Representation number:	Representor name:
103.D6, D7 and D14	Natural Resources Wales
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>Representation raises concerns that the policy contains no provision to improve water quality and suggests changes to address this given the role the planning system can play in meeting the objectives of the Water Framework Directive.</p> <p>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</p>	<p>Issues regarding water quality are understood to arise from a number of factors, including for example, overflows from abandoned mine workings and the risk of sewerage misconnections. However, the Council acknowledges the role the planning system can play in improving water quality through new development. Consequently, changes have been proposed to Policy EnW4 to include reference to improving water quality.</p>

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.

Representation raises concern that policy EnW4 as currently worded is contrary to Technical Advice Note 15 (TAN15): Development and Flood Risk, July 2004 as it implies that an increase in flood risks could be acceptable whereas TAN15 requires that there should be no flooding elsewhere. Amendments to the wording of the supporting text are suggested.

Policy EnW4 would be relevant to all forms of development, including less vulnerable development and development within flood zones B, C1. Whilst it is accepted that the acceptability criteria for flooding consequences (under paragraph A1.12 of TAN 15) requires that there is 'no flooding elsewhere' (i.e. downstream or elsewhere on third party land) however it is possible that less vulnerable development could be permitted in zone C2 which has some level of acceptable flood risk (i.e. in accordance with the justification and acceptability criteria in TAN15).

Furthermore, it may be possible to locate development outside of zone C2 as part of a development proposal. In this respect, TAN 15 paragraph 6.2 states that: "New development should be directed away from zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue. In zone C the tests outlined in sections 6 and 7 will be applied, recognising, however, that highly vulnerable development and Emergency Services in zone C2 should not be permitted". Consequently, it is considered appropriate for policy EnW4 to include a statement that summaries the aim of the policy i.e. to avoid areas of flood risk. It is however accepted that

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<p>Representation requests additional explanatory text to explicitly mention SuDS, as this would encourage the long-term reduction of diffuse pollution which is one of the biggest factors impacting water quality in the River Taff.</p>	<p>the support text to policy EnW4 at paragraph 6.7.24 could be clarified to better reflect TAN15 in respect of increasing flood risk elsewhere and changes have been proposed.</p> <p>Comments noted. Changes have been proposed to policies EnW4: Environmental Protection and SW11: Sustainable Design and Placemaking to incorporate consideration of water quality improvement. This has included adding reference to sustainable drainage systems and improving water quality which addresses the issue raised.</p>
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Consideration of Green Infrastructure	
LDP section references:	Policy SW11 – Sustainable Design and Placemaking, page 37
Representation number:	Representor name:
103.D16	Natural Resources Wales
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>The representation highlights some of the benefits of Green Infrastructure improvements and requests that more detail is added regarding the consideration of Green Infrastructure in the design of new development under policy SW11 Sustainable Design and Placemaking. This includes for example, 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.</p>	<p>Comments noted. The Council has proposed changes to policy SW11 following a separate representation (103.D11//EnW1) from Natural Resources Wales which provide further information regarding the incorporation of green infrastructure into new development.</p>

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Natural Environment – Key issue 15, 16 & 25	
LDP section references:	Key issue 15, page 7, figure 1 Key issue 16, page 7, figure 1 Key issue 25, page 8, figure 1
Representation number:	Representor name:
207.D23, D24 and D31	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on Key Issue 15 in relation to green wedges, green corridors. The representation states: MTCBC intends doing away with green wedges – and swathes of green corridor and open space could be re-developed under draft revised LDP proposals.</p>	<p>The issues raised under Key issue 15 (A wide range of species and habitats are under threat. Greater connectivity is needed between green corridors and green spaces) are addressed by the Replacement LDP through its policy framework. This includes designating areas Sites of Importance for Nature Conservation and including development management policies that require consideration of green infrastructure and the promotion of ecosystem resilience through maintaining and enhancing biodiversity.</p> <p>Green wedges are not a mechanism created for the purpose of ecological connectivity, though they may, to some extent, perform that function they are to prevent the physical coalescence of settlements. It is considered that the best method for the maintenance and enhancement of ecological connectivity is through prioritising the protection and improvement of the best quality habitats in the County Borough. In this regard the geographical distribution and protection afforded by SINC (Sites of Importance for Nature Conservation), SSSI (Sites of Special Scientific Interest) and Open Spaces/Local Nature Reserves are deemed to be far more likely to maintain and enhance ecological connectivity at</p>

<p>Comments on Key Issue 16 in relation to water quality. In particular the representation states: "Nothing in the draft revised LDP suggests these serious issues will be tackled".</p>	<p>all scales rather than the more limited areas afforded by Green Wedge designation.</p> <p>Comments noted. Whilst water quality in the area has improved in recent years the River Taff remains at 'moderate' status and water quality has been identified as one of the key issues within the LDP. Policy wording changes (to policies EnW4: Environmental Protection and SW11: Sustainable Design and Placemaking) have been proposed in response to representations made by NRW (see representation 103.D14//EnW4) which address the need to consider water quality improvement in new development proposals.</p>
<p>Comments on Key Issue 25 in relation to the River Taff corridor. Representation does not specify a change to the Plan but highlights the opportunities and constraints provided in the River Taff corridor and considers that further flood assessment work should be undertaken.</p>	<p>A Strategic Flood Consequence Assessment (SFCA) has been prepared to inform the Deposit Plan. It identifies flood risks on the western banks of the River Taff where no allocation for highly vulnerable development has been made. The eastern banks comprising the existing Hoover Factory site are defined as Flood Zone B where there is a lower risk of fluvial flooding. Natural Resources Wales have been consulted regarding the housing allocation and not raised objections to the principle of residential development here and TAN 15: Development and Flood Risk permits the allocation of residential development in such areas. Should any localised issues be identified the Replacement LDP contains policies to require further assessments where these may be necessary (for example, Policy En4: Environmental Protection).</p>

	<p>The Council's Regeneration department have commissioned further hydraulic modelling work and flood mitigation assessments to consider potential future flood mitigation options for the Nant Morlais – River Taf convergence that results in areas of flood zone C2 in Merthyr Tydfil Town Centre. This assessment work will also consider potential development sites at The Willows / Abercanaid. Whilst this work will inform the consideration of potential flood mitigation options it is not anticipated that this would provide the detailed site level FCA required for plan allocations. With regards to the Dragon Parc site at Abercanaid, the landowner is preparing further hydraulic modelling work and flood mitigation assessments to further consider opportunities for residential and employment development at the site.</p> <p>With regards to the opportunities to incorporate green infrastructure and active travel along the river corridor, these features are highlighted in the Hoover Strategic Regeneration Area Framework Masterplan (June 2018). This document sets out key urban design principles which will inform development proposals at the strategic site. Reference to these has been incorporated into the wording Policy SW6: Hoover Strategic Regeneration Area as part of a focused change to the Deposit Plan. This includes adding further details to the supporting text regarding the importance of the river corridor, green infrastructure and active travel.</p>
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4.14 Open Spaces

Policy SW 10 Protecting and Improving Open Spaces	
LDP section references:	Key Issue 5, page 7, para 2.8 Policy SW 10 Protecting and Improving Open Spaces, page 35, para 6.5.59-6.5.65 Open Space Strategy and Action Plans – page 35
Representation number:	Representor name:
103.D8	Natural Resources Wales
143.D1	Mr James Smart
207.D11 and D13	Merthyr Tydfil Heritage Trust
288.D2 and D3	Friends of Nant Llwynog Park
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>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.</p>	<p>Comments noted. The requirement for improvements to Open Spaces has been made through the Deposit LDP Policy SW9: Planning Obligations and further reference is made in paragraph 6.5.68 under policy SW11. However, it is agreed that this should be included in Policy SW10 given the overall aim of the policy is to protect and improve open spaces and for consistency and clarity. Changes to Policy SW10 have been proposed to include reference to improving open spaces.</p>
<p>Mr James Smart:</p> <p>Objection to the proposed Nature Reserve at Nant Llwynog & Coed yr Hendre, Bedlinog. In particular the representation makes the following points:</p> <p>Part of the area, where I once had a garage, was earmarked for Sheltered Accommodation and was 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.</p> <p>Secondly, my concern on making this area a Nature Reserve is that it will</p>	<p>Comments noted. The attached plans are 35 years old, and given the time that has passed and the fact that the site has not been developed in that time, it is clear that plans for sheltered accommodation on this site have been long abandoned and are highly unlikely to come forward within the plan period. As stated there has been other sheltered accommodation developed in the area and other housing sites allocated in the area could be used for such accommodation to address identified needs.</p> <p>The purpose of Local Nature Reserves</p>

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<p>sterilise the area so that the Sheltered Accommodation prospect will be shelved permanently.</p> <p>My third objection to the use of this land as a Nature Reserve is about the management of it and 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.</p> <p>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.</p>	<p>(LNRs) is to see local sites protected to conserve and enhance biodiversity and improve access to nature for education purposes and to provide areas where people can derive pleasure from nature. During the consultation process held for the Open Space Strategy local residents of all ages identified a desire to see more 'wildlife' in open spaces above any other factors and LNR designation is in response to this. Furthermore, the use of LNRs would comply with Section 6 of the Environment (Wales) Act 2016, which recognises the need to improve awareness and participation in the natural world and with the Council's Well-being Objectives which seek to encourage people to spend more time outdoors in good quality accessible green space and to help wildlife flourish. Finally, the Council's Active Travel Integrated Network Plan, currently being considered by the Welsh Government, includes proposals to up-grade footpaths and cycleways in the vicinity of the proposed LNR. Consequently, the proposed LNR designation is considered to be justified. Further details can be found in the Local Nature Reserves background paper (December 2018).</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Representation comments on key Issue 2 regarding service provision, as it is considered that development on open space will lead to a reduction in service provision and limit opportunities for healthy life-styles and well-being activities.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including green open space – potential loss of green open space due to unnecessary development.</p>	<p>The plan proposes a sustainable level of population growth which seeks to facilitate an increase in the County Borough's population. Aligning service provision with demographic changes will need to be considered by service providers alongside plan growth identified in the LDP.</p> <p>The only development proposed on existing open space in the Replacement LDP is for housing on site 32: Commercial Fields, Treharris. However, given a change in circumstances on this site this is proposed to be removed though a</p>

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<p>Comment on Key Issue 5 regarding Open Spaces as there seems to be no proposals to improve the sufficiency or the quality of open space or to allocate land for additional allotment gardens, playgrounds or play areas.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including lack of proposals to improve provision of open space at community level.</p>	<p>focused change to the Plan. Identified open spaces are shown on the LDP Constraints Map.</p> <p>With regards to the protection and provision of open space, the Plan would require new developments to contribute to open space provision through policies SW9 and SW10. Policy SW10 also seeks to prevent the unjustified loss of existing Open Space.</p> <p>Policy SW10 proposes a number of Local Nature Reserves throughout the County Borough for protection and use by local people. In line with the Council's Open Space Strategy the Plan's focus is on improving existing open spaces identified in the Open Space Strategy. These are identified on the LDP Constraints Map. Furthermore, Policy SW9 Planning Obligations (page 33) requires contributions for the provision of new open space and improvement of existing open space on sites of 10 homes or more. However, in order to support improvements open spaces provision it is proposed to add text to Policy SW10 to include reference to improving the quality, quantity and access to open spaces (see response to representation 103.D8/SW10).</p>
<p>Friends of Nant Llwynog Park:</p> <p>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. However it is requested that policy SW10 is amended to clarify the aim of the policy and to ensure that semi-natural areas have biodiversity as the priority use.</p> <p>The boundary of the proposed Local Nature Reserve at Old Colliery site Coed</p>	<p>Comments noted and support welcomed. To ensure greater land management clarity and reduce confusion it is agreed that the policy should make reference to conserving biodiversity and the boundary for Old Colliery Site Coed-y-Hendre and Nant Llwynog proposed Local Nature Reserve (LNR) should be amended to exclude the existing sports pitches. For consistency the sports pitches, amenity greenspace and play areas are also proposed to be removed from the Goitre Lane and Ifor Tip proposed LNRs</p>

yr Hendre and Nant Llwynog should also be amended to remove the existing playing fields.

An Open Spaces monitoring 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 of Nant Llwynog Park has requested to speak on the role of the plan in designating new nature reserves it will greatly assist in the understanding of the value of the natural world and its significance for the public.

as part of focused changes.

It is considered that the wording of policy SW10 could be clarified regarding the role of Local Nature Reserves and changes have been proposed to address this. A background paper has been prepared which provides further justification and details can be found in the Local Nature Reserves background paper (December 2018). Other changes to the policy regarding the improvement of open space have also been proposed in response to comments made by Natural Resource Wales (see response to representation 103.D8/SW10).

4.15 Landscape and Special Landscape Areas

Policy EnW5 Landscape Protection	
LDP section references:	Policy EnW5 Landscape Protection, page 54, para 6.7.25 – 6.7.30
Representation number:	Representor name:
115.D7	Marvel (White Young Green)
207.D28	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Marvel (White Young Green):</p> <p>The SLA Background Paper does not comprise sound evidence on which to base an allocation.</p> <p>From our review of the process of defining the SLAs and the criteria used to identify SLA3 Merthyr West Flank, we conclude:</p> <p>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 homogenous character of heath, copse, 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".</p> <p>The inclusion of the SLA3 area is not</p>	<p>The Special Landscape Areas (SLAs) have been identified using methodology as recommended by national policy (PPW Edition 10, paragraphs 6.3.11 and 6.3.12). Full details are provided in the Merthyr Tydfil Special Landscape Areas Background Paper (June 2018). Section 7 sets out the methodology for the approach and section 8 provides the evaluation of the proposals SLAs against the identified strategic criteria. The Council considers that the approach is in accordance with national policy and LANDMAP guidance notes.</p> <p>Responses at the Preferred Strategy stage explained that the use of moderate LANDMAP evaluation scores (referred to at Table 1 and paragraph 7.5 of the background paper) were incorporated to reflect local landscapes with a unique significance to the County Borough Area. This is considered to be justified when considering SLAs which are local level non-statutory designations and has been applied consistently to potential SLA designations.</p> <p>Consequently the methodology utilised to identify the SLAs is considered to be robust and in line with national policy. The Council stands by its assessment and</p>

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<p>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.</p> <p>The designation of SLA3 Merthyr West Flank is not supported by credible evidence, contrary to soundness test 2, and should be deleted.</p>	<p>recommendations for SLA3: Merthyr West Flank (page 43-46) and no changes to the Deposit Plan are considered necessary.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>High quality landscape areas, prominent views and traditional field boundaries need proactive management and protection.</p> <p>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 maintained – extra support in terms of the special landscape areas is welcome. Landscape protection must not be watered down.</p> <p>Clear support for special landscapes is required – to include heritage landscapes such as views of Cefn Coed Viaduct.</p>	<p>The Replacement LDP contains a number of mechanisms which protect the landscape (including the historic landscape) of the County Borough. These comprise Policy SW4 – Settlement Boundaries, Policy SW11 – Sustainable Design and Placemaking, Policy CW1 – Historic Environment and Policy Enw5 – Landscape Protection. These have been produced in accordance with national policy and are considered to be appropriate in order to manage landscape impacts and protect the high quality and historic landscapes. Therefore, no changes to the Deposit Plan are considered necessary.</p>

3.16 Settlement Boundaries and Rural Development

Policy SW4 Settlement Boundaries	
LDP section references:	Policy SW4 Settlement Boundaries, page 27, para 6.5.28 – 6.5.34
Representation number:	Representor name:
119.D6	Dwr Cymru Welsh Water
124.D1	The Coal Authority
129.D4	Caerphilly County Borough Council
136.D1	Mr Alan James
258.D1	Elan Homes Ltd (c/o JCR Planning Ltd)
115.D9	Marvel (WYG)
Main Issues:	Council Response:
<p>Dwr Cymru Welsh Water:</p> <p>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.</p>	Comments noted and support welcomed.
<p>The Coal Authority:</p> <p>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.</p>	Comments noted and support welcomed.
<p>Caerphilly County Borough Council:</p> <p>Caerphilly CBC resists the de-designation of the green wedge in the locality of Llancaiach Fawr.</p> <p>In assessing the purpose of the green</p>	Comments noted. The Council has considered the need for green wedges in the County Borough against national policy and the policy provisions of the LDP. The justification for this approach is contained in the Review of Green Wedges background paper (June 2018).

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.

It was concluded that there is no need for green wedge designations in the County Borough as the Plan's settlement boundary and development in the countryside polices are sufficient to prevent coalescence and to control inappropriate development (see background paper sections 8 and 9). The Council stands by this assessment and considers green wedge designations in the County Borough are not necessary.

With regards to development pressure in the area referred to at Trelewis the background paper states:

"Development of candidate site 6: Land to the East of Trelewis would extend the settlement of Trelewis further eastwards along Gelligaer Road towards the listed Llancaiach Fawr Manor, although the site would be separated by the Nant Caeach and mature trees and vegetation that run along the County Borough boundary. To the east of Llancaiach Fawr there is no further development for some distance (approximately 1.5km). The built up areas of Trelewis and Nelson are closely related with development extending along the B4255 Shingrig Road (consisting of existing residential development and stable buildings) and are separated by the Cwm Bargoed railway line that runs north-south. Development of the site would extend the built up area of Trelewis further south of Gelligaer Road but would maintain approximately 300 metres distance between the edge of the development and Shingrig Road to the south west. Therefore, development of the site would not lead to the coalescence of

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	Trelewis with Nelson. If the site were to be developed it is considered that the replacement LDPs settlement boundary policy would be sufficient to control inappropriate development in the countryside here”.
<p>Mr Alan James:</p> <p>There are the remains of an old cottage at Maes Meyrick, Beili Glas Field, (one pine end still standing) that was last lived in the 1960s by a gentlemen 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 derelict.</p> <p>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.</p> <p>Will you as part of the consultation exercise consider my request and marginally alter the proposed boundary line to encompass the land required to develop a single dwelling and access.</p> <p>Alter settlement boundary to include land at Maes Meyrick, Heolgerrig.</p>	<p>The cottage referred to in your representation has been unoccupied for approximately 50-60 years, and little to none of it remains, with the land having more of a relationship with the open countryside than with the built development and settlement of Heolgerrig. As such, the extension of the Settlement Boundary at this location is not considered appropriate or justified. However, if an application for a replacement dwelling were to come forward at this location, this could be assessed against Policy SW4 which permits the re-use, adaption, or replacement of rural buildings and dwellings.</p>
<p>Elan Homes Ltd:</p> <p>Support for the inclusion of Gethin Tip within Settlement Limits.</p>	<p>Comments noted and support welcomed. The inclusion of the site within the settlement boundary will enable the consideration of to appropriate development proposals as windfall development. The Council looks forward to receiving a formal application in due course.</p>
<p>Marvel:</p> <p>Marvel Ltd objects to the current wording of Policy EcW7 and paragraph 6.8.56 (and associated cross reference in Policy</p>	<p>The wording of Policy SW4 and Policy EcW7, is considered appropriate to protect the county borough's 'countryside locations' from inappropriate development and to</p>

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).

It is requested that “low impact tourism” is deleted from policy SW4 and that paragraph 6.5.32 should be deleted.

support appropriate tourism, leisure and recreation development that minimises environmental impacts in these locations.

In this regard, Planning Policy Wales (Edition 10) paragraphs 5.5.2 and 5.5.3 state:

“5.5.2 The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism. In addition to supporting the continued success of existing tourist areas, appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.

5.5.3 In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment”.

In particular, PPW references that “... appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.” Policies SW4 and EcW7

	<p>therefore set out what is considered to be appropriate tourism-related development in the County Borough are considered to be in accordance with national policy.</p> <p>This approach is also considered to be in line with PPW paragraph 3.56 Development in the Countryside which states that “new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design” and paragraph 5.5.3 which further states that “In rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy. Here development should be sympathetic in nature and scale to the local environment”.</p> <p>Majority of the land outside settlement limits in the County Borough are upland areas or steeply sloping valley sides where new development is likely to have significant landscape and visual impacts. In addition, there are a number of historic landscape and nature conservation designations located outside settlement boundaries such as Sites of Importance for Nature Conservation, Sites of Special Scientific Interest and Landscapes Historic Interest (the Merthyr Tydfil Landscape of Outstanding Historic Interest and the and Gelli-gaer Common Landscape of Special Historic Interest) as well as upland areas in close proximity to the</p>
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	<p>Brecon Beacons National Park where large scale or developments with more significant impacts would not be appropriate.</p> <p>Therefore, the policy approach to ensure new tourism, recreation or leisure developments are low impact in nature is considered appropriate in the context of the County Borough. Where exceptional development is proposed, for example where there is an overriding need for development of regional or national importance, this could be considered on its own merits. Welsh Government guidance contained in Local Development Plans Manual, Edition 2, (paragraph 2.3.4) advises that LDPs should not include policies to cover every eventuality. Policies SW4 and EcW7 are considered to provide sufficient detail and are local policies that are appropriate to consider new tourism, recreation or leisure development proposals in the area. Consequently, no change for soundness is considered to be required.</p>
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3.17 Retailing and Town and Local Centres

Policy EcW3 Retail Hierarchy – Supporting Retailing Provision	
LDP section references:	Policy EcW3 Retail Hierarchy – Supporting Retailing Provision, page 62, para 6.8.24 – 6.8.33
Representation number:	Representor name:
262.D2	Hammerson (Merthyr) Ltd (c/o GL Hearn)
Main Issues:	Council Response:
<p>Hammerson (Merthyr) Ltd:</p> <p>The representation objects to the sequential approach advocated by policy EcW3 and considers the status of</p>	<p>Policy EcW3 requires an assessment of need and the application of the sequential test. Out-of-centre development will be permitted where justified. As such, it is not considered that</p>

Cyfarthfa Retail Park and requirements of out of town retailing should be reflected in the policy wording and supporting text.

Amendments to EcW3 are suggested:

The policy should refer to Edge-of-Centre sites as part of a sequential site assessment to “fit” with national policy and be “sound.”

The policy does not acknowledge the locational requirements faced by bulky goods and showroom type retailers.

Supporting paragraph 6.8.27 should underline the important role that Cyfarthfa Park in particular plays in working alongside the defined town centre in a complementary manner.

The policy should be amended to explain how the sequential test will be applied to bulky goods and showroom type retailers.

The policy does not refer to a floorspace threshold required to trigger a retail impact assessment, contrary to PPW.

The policy requires 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 should refer to “significant harm”. This would ensure that retail and complementary investment in the Borough was not stymied by an overly restrictive policy.

the wording of the policy is unnecessarily restrictive. The policy is considered to be in accordance with the ‘town centre first’ approach and requirements of contained in national policy. The policy is also supported by policies EcW5 and EcW6 which also address the issues raised.

Changes to the reasoned justification text are proposed to clarify the application of the policies and location/status of Cyfarthfa Retail Park.

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Policy EcW4 Retail Allocation	
LDP section references:	Policy EcW4 Retail Allocation, page 64, para 6.8.34 – 6.8.39
Representation number:	Representor name:
262.D3	Hammerson (Merthyr) Ltd (c/o GL Hearn)
Main Issues:	Council Response:
<p>Hammerson (Merthyr) Ltd:</p> <p>The representation requests further justification and explanation regarding the provision for projected comparison goods (3,736sqm) and food and beverage (2,136sqm) floorspace headroom. The following points regarding Policy EcW4 are made:</p> <p>The policy does not include sufficient retail allocations to meet the need identified in the Merthyr Tydfil Retail and Commercial Leisure Study.</p> <p>The Deposit Plan (ECw4) allocates 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.</p> <p>The Deposit Plan fails to explain how the identified floorspace headroom might be delivered as part of the Hoover Strategic Regeneration Area.</p> <p>Accordingly, on this basis, EcW4, and by extension, the Deposit Plan, is not "sound".</p>	<p>The Council is confident that sufficient provision for retailing needs has been made in the Plan and that there is sufficient enough scope within Merthyr Tydfil town centre to accommodate future growth requirements. The Merthyr Tydfil Retail and Commercial Leisure Study identified 5,360sqm of vacant floorspace in the town centre and, whilst it is not allocated, the existing bus station site could be developed, dependent on adequate flood defence measures. In addition, vacant floor space within existing centres could also address future needs. As such, it is not considered necessary to provide additional retail allocations to meet the identified needs set out in the Retail and Commercial Leisure Study.</p>

4.18 Community Facilities

Policy SW13 Protecting and Improving Local Community Facilities	
LDP section references:	Policy SW13 Protecting and Improving Local Community Facilities, page 40, para. 6.5.81-6.5.85
Representation number:	Representor name:
107.D1	The Theatres Trust
Main Issues:	Council Response:
The Theatres Trust: The Trust is supportive of this policy, and welcomes reference that it applies to cultural facilities within the supporting text.	Comments noted and support welcomed.

4.19 Tourism, Leisure and Recreation

Policy EcW7: Tourism, Leisure and Recreation Development	
LDP section references:	Policy EcW7: Tourism, Leisure and Recreation Development - page 68-69 Key Issue 23: The need to encourage and promote leisure and tourism – page 7
Representation number:	Representor name:
115.D1	WYG (on behalf of Marvel)
207.D29	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
WYG (on behalf of Marvel): Marvel Ltd object to the use of terminology of 'low-impact tourism, leisure and recreation, ' referred to in Policy EcW7, and definition referred to in paragraphs 6.8.56 and 6.5.32 and the use of the term 'appropriate scale to its surroundings' as stated in Policy EcW7, and paragraph 6.8.56. Marvel Ltd object to the policy wording on the following grounds:	Policy EcW7 sets out the instances where the Council would favour new tourism, leisure and recreation development. The wording of Policy SW4 and Policy EcW7, is considered appropriate to protect the county borough's countryside locations from inappropriate development and to support appropriate tourism, leisure and recreation development in these locations. The Council considers that Planning Policy Wales (Edition 10) paragraphs 5.5.2 and 5.5.3 support the policy.

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.

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

In particular, PPW references that "... appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors." Policies SW4 and EcW7 therefore set out what is considered to be appropriate tourism-related development in the County Borough are considered to be in accordance with national policy.

This approach is also considered to be in line with PPW paragraph 3.56 Development in the Countryside which states that "new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design" and paragraph 5.5.3 which further states that "In rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy. Here development should be sympathetic in nature and scale to the local environment".

Majority of the land outside settlement limits in the County Borough are upland areas or steeply sloping valley sides where new development is likely to have significant landscape and visual impacts. In addition, there are a number of historic landscape and nature conservation designations located outside settlement boundaries such as

<p>specific format requirements.</p>	<p>Sites of Importance for Nature Conservation, Sites of Special Scientific Interest and Landscapes Historic Interest (the Merthyr Tydfil Landscape of Outstanding Historic Interest and the and Gelli-gaer Common Landscape of Special Historic Interest) as well as upland areas in close proximity to the Brecon Beacons National Park where large scale or developments with more significant impacts would not be appropriate.</p> <p>Therefore, the policy approach to ensure new tourism, recreation or leisure developments are low impact in nature is considered appropriate in the context of the County Borough. Where exceptional development is proposed, for example where there is an overriding need for development of regional or national importance, this could be considered on its own merits. Welsh Government guidance contained in Local Development Plans Manual, Edition 2, (paragraph 2.3.4) advises that LDPs should not include policies to cover every eventuality. Policies SW4 and EcW7 are considered to provide sufficient detail and are local policies that are appropriate to consider new tourism, recreation or leisure development proposals in the area.</p> <p>Furthermore, all new development in the countryside would need to comply with the Plan's other design, landscape, environment and nature conservation policies and the requirement to minimises environmental impacts and for proposals to be of an appropriate scale to its surroundings is consistent with the requirements of requirements of these</p>
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	<p>policies. Consequently, no change for soundness is considered to be required.</p> <p>Deposit LDP Paragraph 6.8.56 gives examples of low-impact tourism but the list is not exhaustive and alternative development proposals where justified could be given favourable consideration. Although this includes tourism capable of being removed without leaving a trace it does preclude other types of appropriate development or restrict development to this type only. It is therefore not considered that this is too onerous, but would ensure development is both sympathetic in nature and scale to the local environment whilst helping to avoid damage to the environment, consistent with the Plans other policies.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>Comments on Key Issue 23 in relation to leisure and tourism and the need to resist the developing over, around and in the vicinity of heritage and green assets as well as poorly considered attempts to improve or enhance them.</p>	<p>The Replacement LDP recognises the importance of the County Borough's built heritage and natural environment and will seek to conserve and enhance these through the Plan's policies. In particular, this is reflected in Policy SW11: Sustainable Design and Placemaking which makes specific reference for new development to integrate effectively with the 'historic environment.' Furthermore, policy CW1: The Historic Environment states that, "The integrity of our historic environment assets will be conserved and enhanced".</p> <p>In relation Borough's natural environment Policy SW10: Protecting and Improving Open Spaces makes specific reference to protecting open spaces with 'significant nature or historic conservation importance' and to</p>

	<p>enabling 'access to nature' whilst contributing to 'our local well-being objective for children and adults to have good physical and mental wellbeing'.</p> <p>Finally, whilst Policy CW2 seeks to support the development of the Cyfarthfa Heritage Area as a visitor attraction it is considered that adequate protection against poorly considered attempts to improve or enhance the area and its surroundings is provided by the Plan policies and designations in line with national policy. It is therefore considered that adequate provision has been made to protect, conserve and enhance the County Borough's heritage assets and important open spaces/green assets.</p>
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4.20 Renewable Energy

Policy EcW8 Renewable Energy	
LDP section references:	Policy EcW8 Renewable Energy, page 71, para. 6.8.57-6.8.83
Representation number:	Representor name:
101.D8	Welsh Government
103.D4	Natural Resources Wales
119.D12	Dwr Cymru Welsh Water
Main Issues:	Council Response:
<p>Welsh Government :</p> <p>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</p>	<p>Comments noted. The constraints that were applied in the Renewable Energy Assessment (REA) have been clarified in an addendum to the study dated December 2018. This includes additional justification provided by Regen, the specialist consultants who prepared to the REA, where required and updated recommendations following the preparation of a Landscape Sensitivity Study (December 2018) to support the identification of the local search areas for solar energy.</p>

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.

With regards to the grid connection distances, the solar resource assessment in the REA uses a 2km grid connectivity buffer as proximity to the grid reduces connection costs. In Regen's experience, grid connection costs over 2km are typically higher which can impact on the economic viability of ground-mounted solar energy projects. This buffer distance is considered appropriate as Regen's analysis shows that nearly all solar farms developed to date fall within this distance (or closer) to the 33kV or higher voltage electricity network. Regen have provided a ground mounted resource assessment mapped against existing and proposed solar farms for the whole of the south Wales Western Power Distribution licence area. This level of correlation stands for every region assessed to date by Regen using this methodology, which in addition to south Wales includes, in England, the West Midlands, East Midlands, East of England, South East, Southern and South West licence areas.

The 2km grid connectivity distance was not applied for the large scale (2MW) wind assessment as this scale of wind energy projects are more financially viable and lengthier connection distances to the grid are more realistic. Consequently, no grid connection restriction was applied to the large scale wind energy assessment (2MW). With regards to the smaller scale wind assessments (500kW), areas that were more than 2km from a 33kV or higher power line were removed due to the impact of longer connection distances on the viability of schemes for this scale of turbine.

Finally, as suggested by Welsh Government the summary tables for

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	renewable heat and electricity set out in the addendum to the REA (Figures 12 and 13) will be inserted as a focused change to the reasoned justification to Policy EcW8 and included in the monitoring framework.
<p>Natural Resources Wales:</p> <p>We have concerns regarding the Local Search Areas for ground-mounted solar energy.</p> <p>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.</p> <p>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.</p>	<p>Comments noted. The Council has prepared a Landscape Sensitivity Study (December 2018) which provides further supporting evidence for the local search areas. This provides a strategic landscape assessment which assesses the landscape value and susceptibility to solar energy development in order to identify the sensitivity of the search areas identified. Further details are provided in the background paper and the Renewable Energy Assessment (REA) Addendum dated December 2018. As a result of this exercise, one of the solar search areas (Merthyr Road), has been discounted as a Local Search Areas for solar development due to its very high landscape sensitivity. The remaining three local search areas are considered to be appropriate to be identified as search areas. The explanatory text, within Policy EcW9, for the remaining Local Search Areas has been amended to take into account the results of the Landscape Sensitivity Study, as have the resource summary tables where necessary which are set out in the REA Addendum dated December 2018.</p>
<p>Dwr Cymru Welsh Water:</p> <p>Whilst we do not have any issue with</p>	<p>Comments noted. Changes are proposed to Policy SW11, Sustainable design and Placemaking, to ensure that</p>

<p>regard to the specifics of this policy, we would recommend that a criterion is added to ensure that existing services and infrastructure are taken account of in any proposals.</p> <p>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.</p> <p>We would recommend that a criterion is added to ensure that existing services and infrastructure are taken account of in any proposals.</p>	<p>development proposals take account of existing infrastructure and any necessary protection measures.</p>
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4.21 Minerals and Waste

EcW10 Sustainably Supplying Minerals	
LDP section references:	EcW10 Sustainably Supplying Minerals, page 77, para 6.8.95-6.8.102
122.D5 and D10 – D13	Mineral Products Association Wales
124.D3	The Coal Authority
Main Issues:	Council Response:
<p>Mineral Products Association Wales, 122.D5:</p> <p>The representation refers to a Cadw topic paper “Merthyr Tydfil: Understanding Urban Character” which highlights the importance of local building stone when considering new development in urban character areas. The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.</p>	<p>The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy.</p>

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	Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.
<p>Mineral Products Association Wales, 122.D10:</p> <p>The representation comments on LDP paragraph 6.8.89 and considers that this does not fully reflect national policy. It also notes that a new RTS is being prepared.</p>	<p>Paragraph 6.8.89 of the LDP seeks to summarise the main roles of the Plan with regards to minerals planning. The points listed in the written statement cover the issues raised with regards to the adequate and sustainable supply of minerals and to minimise environmental costs. The paragraph is one of a number of introductory paragraphs before policies EcW10 to EcW13 and the reasoned justification that deal with more specific points. Welsh Government guidance advises that the Plan should not unnecessarily repeat national policy and in this case it is considered that it is not necessary to include reference to all points. Therefore, no change is considered necessary for soundness.</p> <p>With regards to the Regional Technical Statement, the 2nd review has been commissioned however this is not anticipated to be finalised until the end of 2019. However, there is no indication that the existing pattern of supply needs to change significantly over the Plan period or that there will be a deficit of any particular type of aggregate.</p>
<p>Mineral Products Association Wales, 122.D11:</p> <p>The representation comments on para 6.8.92 & considers that amendments should be made so that the paragraph clarifies the land bank position in relation to national policy requirements rather than commenting on the crushed rock reserves of two quarries.</p>	<p>Comments noted. Permitted reserves at Vaynor and Gelligaer quarries comprise the aggregates landbank which is sufficient to provide a minimum 10-year supply throughout the plan period in accordance with the requirement of MTAN 1: Aggregates. It is considered that the paragraph could be amended to clarify that no new allocations have been made as there is a sufficient</p>

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	landbank of permitted reserves as required by MTAN1.
<p>Mineral Products Association Wales, 122.D12:</p> <p>Representation comments on the second bullet point of Policy EcW10 Sustainably Supplying Minerals and considers that it should be clarified that this applies throughout the plan period.</p>	<p>The second bullet point of Policy EcW10 states that the Plan will contribute towards meeting society's need for a continuous and secure supply of minerals by maintaining a minimum 10-year landbank of permitted aggregate reserves. This would apply throughout the plan period as well as at the beginning. Therefore, it is considered that the change specified is not necessary. Changes are however proposed to paragraph 6.8.92 of the supporting text to explain the requirement of MTAN 1 to provide a minimum 10-years supply throughout the plan period.</p>
<p>Mineral Products Association Wales, 122.D13:</p> <p>Representation comments on paragraph 6.8.98 under policy EcW10 and considers that the requirement for a minimum 10-year landbank of crushed rock during the entire plan period should be clarified.</p>	<p>Paragraph 6.8.98 advises that the crushed rock landbank for Merthyr Tydfil indicated in the 2015 Swrawp annual report was more than 50 years. This is again the case in the 2016 Swrawp Annual Report. Consequently there is a sufficient landbank to satisfy the requirements of MTAN 1. The sentence referred to could be clarified by adding reference to the likelihood of their being more than 10 years landbank of reserves at the end of the Plan period.</p>
<p>The Coal Authority, 124.D3:</p> <p>The Coal Authority supports the inclusion of policy EcW10.</p>	Support welcomed.

EcW11 Minerals Development	
LDP section references:	Policy EcW11 Minerals Development, page 78, para 6.8.103-6.8.108
119.D13	Dwr Cymru Welsh Water
122.D14 – D16	Mineral Products Association Wales
124.D4	The Coal Authority
Main Issues:	Council Response:

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<p>Dwr Cymru Welsh Water, 119.D13:</p> <p>Representation supports 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. However, DCWW requests that an additional policy criteria be added in order to ensure that water and sewerage infrastructure is protected from any development.</p>	<p>Comments noted. Policy EcW11 makes specific reference to surface water drainage and ground water resources at criterion 5. A number of the criteria in the policy are also addressed in topic based development management policies. This includes policy SW11 which requires consideration of utilities infrastructure provision and Policy EnW4: Environmental Protection which requires consideration of surface and ground water impacts. Changes have been proposed to Policy EcW11 to remove duplication (under criterion points 2 to 7) when compared with the Plan's topic based development management policies. Notwithstanding this, to ensure the protection of water and sewerage infrastructure is covered in the Plan, policy SW11: Sustainable Design and Placemaking has been amended include reference to proving and protecting relevant utility services and infrastructure (at criterion 8).</p>
<p>Mineral Products Association Wales, 122.D14:</p> <p>Representation objects to the use of the wording "development will only be allowed where..." in policy EcW11.</p>	<p>Comments noted. It is considered that the list of criteria would apply whether or not the word 'only' is included. However, other changes are proposed in order to simplify the policy and reduce duplication in accordance with advice in the LDP Manual (see representation 122.D15) and this change has also been incorporated. The proposed change would be consistent with the wording of the Plan's other criteria based policies.</p>
<p>Mineral Products Association Wales, 122.D15:</p> <p>A number of the "Environmental Criteria" indicated in the bullet points simply repeat the requirements of other Policies in the plan.</p>	<p>Comments noted. Whilst the criteria included are specific to the likely impacts and considerations for assessing minerals development it is acknowledged that the Plan's other topic based development management policies also sufficiently cover the</p>

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	required consideration of these issues. This includes Policies SW11, SW12, CW1 and EnW1 to EnW5. Changes are therefore proposed to focus the policy and avoid duplication in accordance with Welsh Government guidance contained in the LDP Manual, Edition 2 (paragraphs 2.2.1 and 2.3.4). An amendment to policy EnW4: Environmental Protection is also proposed to ensure the potential impacts of dust arising from minerals development are included in the policy.
Mineral Products Association Wales, 122.D16: Representation questions the evidence behind the assertion in paragraph 6.8.103 that mineral extraction can have significant consequences for the environment, health and amenity of local communities.	The Plan's policies as a whole would be used to assess all mineral developments including those related to coal extraction where there can be a range of impacts. Furthermore, paragraph 75 of MTAN1 states that the potential impact on health must always be considered in relation to proposals for aggregate extraction. Therefore, reference to potential health and amenity impacts is considered to be relevant and justified. No change to the Deposit Plan is considered necessary.
The Coal Authority, 124.D4: The Coal Authority supports the inclusion of policy EcW11.	Support welcomed.

EcW12 Mineral Buffer Zones	
LDP section references:	Policy EcW12 Mineral Buffer Zones, page 80-81, para 6.8.109-6.8.111
101.D9	Welsh Government
122.D17	Mineral Products Association Wales
Main Issues:	Council Response:
Welsh Government, 101.D9: The representation advises the LPA that only primary coal resources require safeguarding in draft PPW Edition 10 and	Comments noted. The Deposit Plan currently safeguards primary and secondary coal resources (excluding settlements and designations of national environmental and cultural importance)

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if published before or during the examination this should be incorporated into the Plan.	in accordance with MTAN2: Coal. Secondary coal resources will be excluded from the proposals map as part of a Focused Change resulting to the change of policy contained in Edition 10 of PPW.
Mineral Products Association Wales, 122.D17: Representation considers policy EcW12: Minerals Buffer Zones is not sufficiently clear regarding the description of buffer zones.	Policy EcW12 establishes buffer zones around permitted and active/inactive mineral sites in accordance with MTAN 1. These are identified clearly on the Proposals Map. To clarify the wording of the policy the below minor amendments have been proposed.

EcW13 Minerals Safeguarding	
LDP section references:	Policy EcW13 Minerals Safeguarding, page 81, para 6.8.112-6.8.119
122.D6, D18 and D19	Mineral Products Association Wales
124.D5	The Coal Authority
Main Issues:	Council Response:
Mineral Products Association Wales, 122.D6: The representation refers to a Cadw topic paper "Merthyr Tydfil: Understanding Urban Character" which highlights the importance of local building stone when considering new development in urban character areas. The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.	The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy. Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.

<p>Mineral Products Association Wales, 122.D18:</p> <p>Representation considers that Policy EcW13: Minerals Safeguarding should include reference to minerals infrastructure and building stone.</p>	<p>Policy EcW13 sets out the criteria for considering development proposals within the areas of known minerals resources. The mineral resources safeguarded on the Deposit LDP Proposals Map have been identified in accordance with the BGS Aggregates Safeguarding Map for South East Wales and the Mineral Resource Map for South East Wales (with regards to Primary and Secondary Shallow Coal resources) as required by national policy. There is no requirement to provide specific sites or safeguarding for building stone and it is considered that there is adequate provision and safeguards within the Plan to ensure a sufficient supply of aggregates. The Plan also safeguards infrastructure under relevant policies such as EcW10: Sustainability Supplying Minerals and SW12: Improving the Transport Network. Therefore, no change to the policy is considered necessary.</p>
<p>Mineral Products Association Wales, 122.D19:</p> <p>The representation comments on paragraph 6.8.113 under policy EcW13: Minerals Safeguarding and questions the inclusion of the 'stand-off' buffer distances that would typically be applied to prior extraction developments.</p>	<p>The paragraph provides supporting text regarding the consideration of prior extraction when assessing development proposals in accordance with Policy EcW13: Minerals Safeguarding. In particular, when considering the appropriateness of prior extraction it states that the environmental and amenity impacts of extraction will need to be considered (in accordance with criterion 2 of the policy). Reference is made to distances for hard rock, sand and gravel and coal where extraction would not generally be acceptable. This relates to the minimum distances indicated in MTAN 1 and MTAN 2 to protect sensitive land uses from mineral extraction operations. The supporting text advises these are distances where mineral working would generally not be</p>

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	acceptable. Whether mineral extraction closer to sensitive uses would be acceptable or not would need to be considered on a case by case basis.
The Coal Authority, 124.D5: The Coal Authority supports the inclusion of policy EcW13.	Support welcomed.

Other Minerals Planning matters relating to:

CW1 Historic Environment, EcW1 Provision of Employment Land, Site Allocation Details, Monitoring Framework and the Proposals Map

LDP section references:	Policy CW1 Historic Environment, page 42, para 6.6.5-6.6.17 Policy EcW1 Provision of Employment Land, page 58, para 6.8.9-6.8.14 Site Allocation Details, page 85 Monitoring Framework, page 129 Proposals Map
122.D7, D9, D21 and D22	Mineral Products Association Wales
124.D6	The Coal Authority
Main Issues:	Council Response:
Mineral Products Association Wales, 122.D7: The representation refers to a Cadw topic paper "Merthyr Tydfil: Understanding Urban Character" which highlights the importance of local building stone when considering new development in urban character areas. The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.	The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy. Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.

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<p>Mineral Products Association Wales, 122.D9:</p> <p>The representation considers the Sustainability Appraisal has not considered the implications on the mineral supply chain and raw material requirements that might arise from planned employment growth.</p>	<p>Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that <i>'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction'</i> and that <i>'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'</i>.</p> <p>Whilst specific reference to the impact on the level of employment development on the minerals supply has not been made, it is considered that the level of growth would not have a significant impact on the supply of minerals. The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.</p>
<p>Mineral Products Association Wales, 122.D21:</p>	<p>The requirement to provide a minimum 10 year landbank is set in national policy</p>

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Representation considers the proposed monitoring trigger point is too short and should be extended.	in MTAN1: Aggregates. Consequently, the identified trigger point is considered to be appropriate and no change is considered necessary. LDP Annual Monitoring Reports will be informed by the Swrawp Annual Reports which will indicate any emerging landbank or capacity issues. The County Borough has two hard rock quarries and permitted reserves at these sites currently provide a landbank in excess of 50 years. Therefore, there is not anticipated to be a need to consider new allocations during the plan period.
Mineral Products Association Wales, 122.D22: Representation considers the symbols used to denote permitted reserves are unclear on the Proposals Map.	The proposals map identifies all permitted mineral reserves and this includes Vaynor and Gelligaer Quarries, Ffos-y-fran and two inoperative mines north of Bedlinog (Ffynonau Duon 3 and 4). There are a large number of symbols that need to be shown on the proposals map and grouping permitted reserves in this way has been necessary to clearly show all other relevant designations. The proposals map legend clearly labels the symbol as the permitted mineral reserves identified under Policy EcW12. No changes for soundness are therefore considered to be required.
The Coal Authority, 124.D6: Representation notes the consideration of these sites has included the risks posed by past coal mining activity and that the Plan identifies where a site is in a Development High Risk Area where a Coal Mining Risk Assessment would be required.	Comments noted.

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Key Issue 21 - Waste	
LDP section references:	Key Issue 20, page 8, para 2.8
207.D1	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Merthyr Tydfil Heritage Trust:</p> <p>The representations provides comment on Key Issue 21 in relation to Waste and raises concerns that details of waste management proposals are yet to be made public.</p>	<p>The Goatmill Road site is allocated for B1/B2/B8 uses under policy EcW1: Provision of Employment Land. It is also identified as an area of search for Waste Management facilities under policy EcW14: Waste Facilities. The Council is aware of recent market interest in the site for B2/B8 waste management uses as noted in the Employment Land Review however following this there has been no request for pre application advice and no planning application has been made. Whilst a good network of waste management facilities in terms of residual waste processing exists the Council is required to support the development of a sustainable network of waste management facilities in line with Welsh Government Policies and programmes. Consequently, Policy EcW14 identifies a number of 'areas of search' for such facilities that could accommodate new facilities. Further details are provided in the Council's Waste Planning background paper (June 2018).</p>

4.22 General Comments / Miscellaneous Policy Matters

Deposit Plan Written Statement	
LDP section references:	Written Statement general comments
Representation number:	Representor name:
101.D1	Welsh Government
103.D1	Natural Resources Wales
122.D23	Mineral Products Association Wales
207.D1	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Welsh Government:</p> <p>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.</p> <p>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.</p>	Comments noted and support welcomed.
<p>Mineral Products Association Wales:</p> <p>Overall, it is disappointing that the comments made in our initial representation from August 2017 have been overlooked by the Council.</p> <p>There are certain elements in the plan</p>	Comments noted. All representations received as part of LDP consultations are given full consideration and where considered necessary for soundness changes have been proposed as part of the focused changes to the Deposit Plan.

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<p>that we do support. We have, however, highlighted specific areas above, where we feel the plan needs further consideration.</p> <p>We trust the above comments will be given full and proper consideration and would welcome the opportunity to discuss with you, the points raised.</p>	
<p>Merthyr Tydfil Heritage Trust:</p> <p>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.</p> <p>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.</p>	<p>The Deposit Plan has been produced in line with, and having regard to, national policy and emerging regional and national plans, policies and programmes. This includes consideration of the City Deal, which the Council is signed up to along with all other City Deal partners. Work on a Strategic Development Plan for South East Wales has yet to commence. However, the Plan's strategy is for higher growth than principle population and household projects indicate and this demonstrates the County Borough's contribution to the wider City Deal growth aspirations. Furthermore, the Replacement LDP Strategy locates development at the Hoover Strategic Regeneration Area and Primary Growth Area which will benefit from the South East Wales Metro improvements.</p> <p>Welsh Government are preparing a National Development Framework (NDF) which once adopted will form part of the statutory development plans system in Wales. This is in the early stages of preparation and a draft NDF is anticipated to be published in Summer 2019. Reference to these Plans is contained within the context section of the LDP Written Statement (paragraphs 2.2 to 2.10). The Replacement LDP has also been produced in consultation with</p>

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	Welsh Government, other Local Authorities, and other -statutory consultees (including utility providers). Consequently, it is considered that the Plan meets the tests of soundness in this regard.
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Deposit Plan Written Statement Policies	
LDP section references:	Deposit Plan Written Statement Policies, page 22-83
Representation number:	Representor name:
132.D6	Merthyr Initiative Group
207.D6 and D15	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Merthyr Initiative Group:</p> <p>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/Traveller Pitches. All of these sites listed in the Deposit Plan are supported.</p> <p>The Deposit Plan also 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 and The Cyfarthfa Heritage Area. These additional designations are welcome as they will help to preserve and enhance many of Merthyr Tydfil's Natural Environment, Historic Heritage and Cultural Assets.</p>	Comments noted and support welcomed.
<p>Merthyr Tydfil Heritage Trust:</p> <p>Can the rationale behind plan policies be demonstrated? The rationale behind plan policies can be DETECTED – it is Merthyr Tydfil CBC's quest for funds to</p>	Comments noted. The policies within the Replacement LDP have been produced in line with national policy and are supported by an up-to-date evidence base. The Council is satisfied that the Replacement LDP makes sufficient

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<p>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> <p>There seem to be no proposals to address the issue of the quality and energy efficiency of the existing housing.</p>	<p>provision to deliver the strategy and reasoned justification has been provided for the site allocations at the Hoover Strategic Regeneration Area and Goat Mill Road in the Written Statement. Specifically, these allocations have been informed by site assessments, the Employment Land Review, a Strategic Flood Consequence Assessment, the Hoover Strategic Regeneration Area framework master plan and other technical studies prepared for the LDP.</p> <p>This quality and energy efficiency of the existing housing is not something that the LDP has the ability to directly influence as it is controlled under the Building Regulations and is typically only considered when there are physical alterations to a building. However, where new development requires planning permission Policy SW11 Sustainable Design and Placemaking addresses this issue (bullet points 6 and 7). Furthermore, policies EcW8 and EcW9 support renewable energy developments where appropriate.</p>
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Deposit Plan Proposals Map	
LDP section references:	Proposals Map, Housing Allocation numbering
Representation number:	Representor name:
129.D6	Caerphilly County Borough Council
Main Issues:	Council Response:
Caerphilly County Borough Council: The housing allocations on the pdf version of the proposals map are not consistent with the references in the written statement from SW30 onwards.	Comments noted. The reference numbers from SW3.30 onwards, on the proposals map, were incorrect as stated. The online interactive maps contained the correct site referencing (consistent with the Replacement LDP Written Statement) and whilst changes to the

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	online PDF maps have since been made to correct this, incorrect labelling is shown on printed Deposit Plan proposals maps. This will be identified in the list of Focused Changes and the final proposals map will contain corrected labelling consistent with the reference numbers in the written statement.
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Policy SW7 The Former Ivor Steel Works Regeneration Site	
LDP section references:	Policy SW7 The Former Ivor Steel Works Regeneration Site, page 31, para. 6.5.45
Representation number:	Representor name:
116.D13	Home Builders Federation
119.D8	Dwr Cymru Welsh Water
132.D5	Merthyr Initiative Group
Main Issues:	Council Response:
Home Builders Federation: 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.	Comments noted and support welcomed.
Dwr Cymru Welsh Water: 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.	Comments noted. The requirement for the hydraulic modelling assessments referenced has been included in the site allocation details for this site. Notwithstanding this, any developments which come forward on the site will be assessed against the Plan's policies, which include SW11, which as amended by proposed focused changes, includes the requirement to protect and provide sufficient utilities infrastructure.
Merthyr Initiative Group: It is noted that "appropriate development" on this site will be supported.	Comments noted. The site is allocated in the Replacement LDP for a range of appropriate regeneration proposals to come forward. There known land contamination and other constraints on the site from historic industrial activity.

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<p>In the existing LDP (2006-2021) outline planning permission for 450 dwellings had been agreed and a site master plan is in place.</p> <p>What appropriate development will be supported on this site?</p> <p>Is a limited housing development a feasible option?</p> <p>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.</p>	<p>The Council has concluded that it would not be appropriate to rely on the site to form part of the Plan’s housing land supply under policy SW3 due to the sites significant viability and deliverability constraints. However, this does not mean residential development could not come forward on the site. For example, the site could come forward under the policies of the plan if funding is made available to regenerate or remediate the site to make it more attractive for public / private sector developers.</p> <p>The omission of this site from the Proposals Map was an error, and will be included as a mapping change in the focused changes schedule as an allocation for regeneration, in accordance with Policy SW7.</p>
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Policy SW9 Planning Obligations	
LDP section references:	Policy SW9 Planning Obligations, page 33, para. 6.5.50-6.5.58
Representation number:	Representor name:
119.D9	Dwr Cymru Welsh Water
Main Issues:	Council Response:
<p>Dwr Cymru Welsh Water:</p> <p>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.</p>	<p>Comments noted and support welcomed.</p>

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Policy SW11 Sustainable Design and Placemaking	
LDP section references:	Policy SW11 Sustainable Design and Placemaking, page 37, para. 6.5.66-6.5.73
Representation number:	Representor name:
103.D9	Natural Resources Wales
116.D8	Home Builders Federation
119.D10	Dwr Cymru Welsh Water
123.D1	South Wales Police
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>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.</p>	<p>Noted however it is considered that the addition of 'colour' to the requirements of Policy SW11 is unnecessary. If this issue was particularly important in relation to a specific development, it could be controlled via the 'elevational treatment' and/or 'materials and detailing' criteria of Policy SW11. Therefore, this change is not considered appropriate.</p>
<p>Home Builders Federation:</p> <p>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.</p> <p>The HBF request that the word 'will' should be changed to 'aim'.</p>	<p>The wording of the policy seeks to achieve a high standard of design in line with the National Sustainable Placemaking Outcomes set out in national planning policy. The individual criteria are considered to provide sufficient flexibility when determining planning applications and if a criterion is not relevant or appropriate to the development this would not prevent the consideration and determination of the proposal. As such, no change to the policy wording is considered necessary.</p>
<p>Dwr Cymru Welsh Water:</p> <p>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</p>	<p>Comments noted and support welcomed.</p>

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significant amount of capacity; therefore we welcome the requirement of SUDS schemes in new development.	
<p>South Wales Police:</p> <p>No reference is made in the LDP to Designing out Crime, Secured by Design or community safety.</p> <p>Consideration should be given to 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.</p>	<p>Thank you for your comments, which are noted. Policy SW11 includes reference to "reducing the opportunity for crime and antisocial behaviour" (final bullet point) ensuring this issue will have consideration in the development management process. The issues raised are also addressed in national policy (TAN 12). Therefore no changes to the plan are considered necessary.</p>

Policy EnW4 Environmental Protection	
LDP section references:	Policy EnW4 Environmental Protection, page 52, para. 6.7.21-6.7.24
Representation number:	Representor name:
124.D2	The Coal Authority
Main Issues:	Council Response:
<p>The Coal Authority:</p> <p>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.</p>	<p>Your comments are noted. Your support is welcomed.</p>

4.23 New/Alternative Sites

Policy SW1 Provision of New Homes	
LDP section references:	Policy SW1 Provision of New Homes
Representation number:	Representor name:
115.D8	Marvel (WYG)
Main Issues:	Council Response:
<p>Marvel (WYG):</p> <p>Land at Rhydycar West should be allocated for housing to assist in meeting the overall housing target due to the uncertainty regarding the deliverability of a number of proposed allocations.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The overall level of housing provision included in the LDP has been made in order to deliver the housing requirement of the sustainable growth strategy proposed by the Council. The housing requirement for the LDP strategy is 2250 dwellings, with an overall provision made for 2820 dwellings, in order to provide flexibility and to assist in the delivery of the strategy. The requirement of 2250 dwellings, whilst based on past build rates, is also an ambitious figure as the most recent trend-based Welsh Government population projections would only require 330 dwellings to be built over than Plan period. The level of growth proposed in the LDP therefore does tie in with Merthyr's position as a regional centre for the Heads of the Valleys, within the Cardiff Capital Region.</p> <p>The LDP allocates land for 2195 dwellings, which equates to 97.6% of the housing requirement. The Council consider that this is an appropriate amount of land to allocate when coupled with an assumption of a windfall allowance that is based of historic trends (amounting to 572 units over a 15 year period). The components of supply identified in Policy SW3 combine to provide the overall housing provision of 2820 dwellings. This amounts to a flexibility allowance of 25.3% over the actual housing requirement of the LDP strategy. The Council consider this relatively high level of flexibility to be</p>

<p>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.</p>	<p>appropriate given the focus of the strategy on using previously developed land. The level of flexibility has also been considered appropriate by Welsh Government, the Home Builders Federation and infrastructure providers such as Welsh Water.</p> <p>The Council accepts that there are a large number of housing allocations carried forward from the existing LDP. However, the fact that these sites have not been delivered as part of the previous plan can be attributed to the strategy of the existing Plan being over-ambitious (250 dwellings per annum, nearly double historic build rates) rather than the sites being completely unviable. The strategy of the Replacement LDP is in line with past build rates and allows sites to come forward at a more appropriate pace. Whilst a number of these units are included in Categories 3 and 4 of the JHLAS, this does not mean that they will not come forward during the Plan period. These categories mean that they are unlikely to come forward within the next 5 years.</p> <p>The spatial distribution of allocations does broadly correspond with the areas of highest housing need. Cyfarthfa and Town are two of the top three areas of need, and are also two of the top three areas in terms of number of houses allocated. This issue is covered in Section 4 of the 'Housing Land Supply and Trajectory' Background Paper.</p> <p>With regard to the two sites suggested by this representation, the Council stands by the assessments already carried out on these proposals. Site 11 (Candidate site ref: 62) is included within the settlement boundary, and as such, the principle of development at this site is acceptable subject to proposals satisfying relevant planning policies and</p>
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	<p>other material planning considerations.</p> <p>Site 5 (Candidate site ref: 23) is a much larger proposal with the majority of the proposed site situated outside the settlement boundary, and a significant portion of the site being classified as a Site of Special Scientific Interest (SSSI). Accordingly, the Council considers the allocation of this site inappropriate and not in accordance with the Strategy of the LDP.</p>
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Policy SW3 Sustainably Distributing New Homes	
LDP section references:	Policy SW3 Sustainably Distributing New Homes, page 24, para 6.5.19-6.5.27
Representation number:	Representor name:
281.D1	Mr David Davies
132.D4	Merthyr Initiative Group
Main Issues:	Council Response:
<p>Mr David Davies:</p> <p>Amend Settlement boundary and allocate land to the ear of Oakfield Street, Aberfan (candidate site 103) for residential development.</p>	<p>The Council has assessed all candidate sites and full details are available to view in the Site Assessment background paper (June 2018). Part of Candidate site 103 (southern half of the site adjoining Oakfield Street) is allocated in the existing Local Development Plan 2006-2021 (residential site allocation H38) however development proposals have not been forthcoming. Highway access has been identified as a constraint in bring the site forward during the Replacement LDP plan period due the presence of a ransom strip. The remainder of the candidate site to the north would require access through the land adjoining Oakfield street and would represent a further extension of the settlement into the countryside which forms part of the Glamorganshire Canal Site of Importance for Nature</p>

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	<p>Conservation (SINC). Therefore, it is not considered appropriate to amend the settlement boundary at this location or to allocate the site due to the identified deliverability constraints. Therefore, no change to the LDP is therefore considered necessary.</p>
<p>Merthyr Initiative Group:</p> <p>The site at Clwydyfagwr, Swansea Road (H6 in the current adopted LDP) should be included as a housing allocation as it is deliverable in the lifetime of the Plan.</p>	<p>The land at Swansea Road is currently allocated the Adopted LDP as site 'H6 – Clwydyfagwr' and is included in the Council's annual Joint Housing Land Availability Study (JHLAS). The site was not however submitted as a Candidate Site as part of preparation of the Replacement LDP. Given that there had been little progress with the site since adoption in 2011, coupled with the reduction in the level of housing growth proposed in the Replacement LDP, it was considered that it was not necessary to allocate the site in the Deposit Plan, and it could potentially come forward as a windfall site.</p> <p>Since publication of the Deposit LDP, the landowner has progressed through a pre-application process on the site with an application for outline permission submitted in October 2018 for 40 dwellings. Given the progress on the site, and discussions with the landowner, the Council now considers that it is appropriate to allocate the site for 40 dwellings, with completions anticipated between 2022 and 2024. The allocation at this location further emphasises the importance of the Primary Growth Area in the housing strategy of LDP, and increases the range of sites for the market to develop.</p> <p>A site assessment, including a Sustainability Appraisal, has also been prepared and included in updates of the relevant documentation.</p>

4.24 Monitoring Framework

Monitoring Framework	
LDP section references:	Monitoring Framework, Indicators 1.2, 1.3, 1.5, 4.3 & 4.4 Monitoring Framework, Indicator 5.1 Monitoring Framework, Indicator 5.3, page 119 Monitoring Framework, Indicator 6.2 Monitoring Framework, Indicators 9.1 -9.3 page 123 Monitoring Framework, Indicator 16.1
Representation number:	Representor name:
103.D15 and D17	Natural Resources Wales
116.D3, D4 and D15	Home Builders Federation
122.D20	Mineral Products Association Wales
207.D9	Merthyr Tydfil Heritage Trust
Main Issues:	Council Response:
<p>Natural Resources Wales:</p> <p>Recommend that the Indicator, Target and Trigger Point text for 5.3 remove references to meeting TAN15 tests.</p> <p>Recommend that Indicators 9.1-9.3 be amended as it is unclear how it will be possible to determine if the objective to 'improve' is being met.</p>	<p>Comments noted. In order to comply with TAN 15 it is agreed that indicator 5.3 should be amended to exclude reference to meeting TAN 15 tests.</p> <p>These indicators have been included to measure the success of policies EnW2 and EnW3 which are included to provide protection for important habitats and species. Therefore, no amendments to these are considered necessary. However it is acknowledged that an additional indicator would be appropriate in order to measure the success of Policy EnW1 in promoting the resilience of ecosystems and requiring development proposals to maintain and enhance biodiversity interests.</p>
<p>Home Builders Federation:</p> <p>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 changed as suggested by the HBF (see HBF comments to policy SW11 which requested changing the first statement of</p>	<p>It is considered that Policy SW11 is in line with the sustainable design principles set out in national policy and that there is sufficient flexibility within the individual criterion set out in the policy. Consequently, no changes are proposed to the wording of the policy. Notwithstanding this, the wording of the monitoring indicator is considered to be</p>

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<p>the policy to require development to 'aim' to achieve the list of criterion).</p> <p>It is considered too onerous to meet all the requirements of Policy SW11: Sustainable Design and Placemaking and thereby the monitoring requirements of indicator 5.1.</p> <p>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?</p> <p>Either remove periods or provide text to explain the periods and what purpose they serve.</p> <p>There is no benefit in monitoring the number of major applications accompanied by a travel plan as it is not specifically required by Policy SW12. Delete indicator 6.2</p>	<p>appropriate whether the suggested change is made or not as it is monitoring the implementation of the policy. Therefore, no changes to the working of the monitoring indicator are proposed.</p> <p>It is a requirement of Welsh Government to include Housing completion dates as core monitoring indicators (identified the in LDP Manual Edition 2 and draft Development Plans Manual Edition 3). These figures relate to the housing requirement figure and it is useful to include key milestones in order to better measure the plans effectiveness, therefore no changes to these inclinators have been proposed. Separate changes are proposed to include the Housing Trajectory and Land Supply Information in the appendices of the plan and under policy SW3 as requested by Welsh Government (see representation 101.D4/SW3).</p> <p>Ensuring that the development plan is consistent with "minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport" is a requirement of PPW (Edition 10) paragraph 3.38 and - Chapter 4 Active and Social Places. TAN 18 states that Travel Plans demonstrate the benefits of sustainable transport and can help to reduce road traffic and promote walking, cycling and public transport. In this sense a Travel Plan can help demonstrate how a development can "encourage modal shift towards sustainable transport" as required under in Policy SW12.</p> <p>Page 19, paragraph 3.11, of Draft Development Plans Manual Edition 3, states that LDPs should not repeat national policy. Transport Assessments</p>
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	and Travel Plans are therefore not specifically mentioned in Policy SW12. However, in Section 8: Site Allocation Details of the Deposit LDP under the title "General Supporting Information and Assessments" Travel Plans are listed. It is therefore considered that Indicator 6.2 is an appropriate local indicator to measure the effectiveness of Policy SW12 and no changes in this respect are proposed.
<p>Mineral Products Association Wales:</p> <p>In order to accord with MTAN1 amend wording of indicator 16.1 to read "Maintain a minimum 10-year landbank of permitted aggregate Reserves during the entire period of the development plan."</p>	<p>Comments noted. For clarity, it is agreed that the core indicator should be amended to align with the wording of the MTAN requirements. A focused change is proposed to amend indicator 16.1 accordingly.</p>
<p>Merthyr Tydfil Heritage Trust:</p> <p>It is not considered that the existing LDP has been monitored affectively in relation to the loss of heritage assets which raises questions with regard to the soundness of the Monitoring Framework of the Deposit Plan in relation to Soundness Test 3.</p> <p>The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including soundness Test 3 Delivery.</p>	<p>The sites referred to have all been the subject of detailed planning applications and or applications for Listed Building Consent which have been processed in accordance with relevant Planning Legislation and Guidance. The Council considers that there are sufficient monitoring proposals in the Replacement LDP and no changes in the respect are proposed.</p>

5. Deposit Plan Sustainability Appraisal (SA)

- 5.1 The Deposit Plan has been informed by a Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA). The SA process has been undertaken in an integrated assessment manner and includes impact assessments for equalities, health and wellbeing, and welsh language. In addition, consideration of the LDP at full Council has been subject to individual Equalities Impact Assessment (EqIA) at each stage. The Deposit Plan Sustainability Appraisal Report (June 2018) contains full detail of the assessment and is supplemented by a Non-Technical Summary.
- 5.2 With regards to the representations on the Deposit Plan Sustainability Appraisal (SA) Report, representations were received regarding the assessment of the Cwmfelin, Bedlinog residential site allocation and regarding the impact of the Plan's growth on minerals supply generally. In the case of site allocation assessment these were considered to have been undertaken consistently and whilst an amended assessment has been prepared to reflect the reduced level of growth on the site there, no implications on the overall SA of the Deposit Plan were identified. In the case of the assessment of the impacts on the minerals supply, references to minerals requirements in the SA Report and the consideration of potential impacts were clarified in the written response to the representation. However, no implications for the Deposit Plan SA were identified.
- 5.3 Following consultation on the Deposit Plan, an SA Addendum (December 2018) has been prepared to consider the proposed Focused Changes and any implications for the SA of the Deposit Plan.
- 5.4 The SA Addendum has screened all Focused Change to consider whether any of the proposed changes require reassessment. The addendum contains new assessments for the additional site allocation at Clwydyfagwr, Swansea Road, an amended assessment for the Cwmfelin, Bedlinog site allocation, and amended assessments for Policies SW10, SW11, EnW2, EnW4, EcW8 and EcW11. Following consideration of the updated appraisals no implications on the overall SA of the Deposit Plan were identified, although there were some minor improvements to the performance of the policies against some Sustainability Objectives.
- 5.6 In order to clearly demonstrate compliance with the Wellbeing of Future Generations Act 2015 the SA Addendum also includes an assessment of compliance with the Act in preparing the Replacement LDP.

6. Habitats Regulation Assessment (HRA)

6.1 A Habitats Regulations Assessment (HRA) was re-run for the Deposit Plan focussing on:

1. All development allocations in the Deposit Plan must avoid the loss and or have the potential to affect the loss and or degradation of marsh fritillary habitat (of relevance to the Aberbargoed Grasslands SAC and Blaen Cynon SAC).
2. Emissions from new industrial development on protected and allocated industrial sites in the Deposit Plan must not directly contribute to the degradation of the environmental conditions of the Brecon Beacons SAC, Coedydd Nedd a Mellte SAC, Cwm Cadlan SAC, and Llangorse Lake/Llyn Syfaddan SAC.

6.2 All other matters were screened out at the Preferred Strategy stage. The Deposit Plan Screening Report concluded that the LDP is not likely to significantly adversely affect the integrity of any Natura 2000/European Sites either alone, and given the absence of direct affects, or 'in-combination' with other plans, projects and programmes considered in the light of all available evidence.

6.3 The only responses made in relation to this document were received from Natural Resources Wales (NRW) as follows:

- Reference should be made to the Conservation of Habitats and Species Regulations 2017 as a more recent version of the 2010 regulations and
- 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'.

6.4 However, since that time the Council has also been made aware of the decision of the European Court of Justice in People Over Wind and Sweetman v Coillte Teoranta (c322/17). In light of this decision the Council considers it necessary to undertake additional HRA work including an AA of the potential for the LDP to adversely affect the above matters either alone or 'in-combination'. An Addendum to the Habitats Regulations Assessment (HRA) screening of the Deposit Plan previously prepared by Merthyr Tydfil County Borough Council (MTCBC) to inform the MTCBC Replacement Local Development Plan (LDP) (2016 – 2031) will therefore be published, including the up-dates sign-posted by NRW.

7. Additional Background Papers

7.1 The following additional background papers will be prepared to address issues raised during the Deposit Plan Consultation exercise:

- 1) Housing Land Supply Trajectory background paper update – to incorporate amendments to the summary tables and information contained in the Deposit Plan Housing Land Supply Trajectory background paper as suggested by WG and secondly, as a result of changes to housing allocations proposed as part of Focused Changes;
- 2) Affordable Housing background paper update – to incorporate factual updates following the proposed focused changes and in response to the issue raised by WG that the target to be delivered through the planning system as set out in LDP Policy SW2 should be based on housing requirement and not provision;
- 3) Landscape Sensitivity Assessment – in response to concerns raised by NRW that no assessment of landscape and visual sensitivity has been carried out to support the proposed solar energy search areas contained in Policy EcW8;
- 4) Addendum to the Renewable Energy Assessment (December 2018) – in response to the conclusions of the Landscape Sensitivity Assessment described above and to incorporate clarifications reading the constraints applied to the solar and wind energy assessments;
- 5) Local Nature Reserves (LNRs) – to provide additional justification for the local level designations and in response to comments received by the Friends of Nant Llwynog Park and others, that the proposed LNRs contained in LDP Policy SW10, should only include areas classified as semi-natural open space.

8. Statement of Compliance with the Community Involvement Scheme (CIS)

- 8.1 The Community Involvement Scheme (CIS) is set out in section 3 of the DA agreed between the Council and the Welsh Government, dated August 2016. The CIS details how and when the Council plans to involve the community and other stakeholders, listed in Appendix 2 of the DA, in the preparation of the Replacement LDP. Its aim is to make the process transparent, enable effective engagement and to build consensus on the Replacement LDP.
- 8.2 The CIS was shaped by the principles set out in the National Principles for Public Participation and the National Children and Young People's Participation Standards for Wales signed up to by the Joint Cwm Taf Public Engagement Strategy adopted by the County Borough Council as follows:
- 1) Engagement is designed to make a difference;
 - 2) Encourage and enable everyone to be involved, if they choose;
 - 3) Engagement is planned and delivered timely and appropriately;
 - 4) Work with relevant partner organisations;
 - 5) Information is jargon free, clear and understandable;
 - 6) Make it easier for people to take part;
 - 7) Enable people to take part effectively;
 - 8) Engagement is given the right resources to be effective;
 - 9) People are told the impact of their contribution and
 - 10) Learn and share lessons to improve the process of engagement.
- 8.3 The CIS also identifies the roles of those responsible for LDP preparation as follows:
- LPA - empowered by law to exercise statutory town planning functions within the County Borough outside the Brecon Beacons National Park;
 - Council Executive – comprising the Leader, the Cabinet (comprising Senior Councillors) with individual portfolios who determine the strategic management and policy development;
 - Councillors - Democratically elected representatives make decisions in the best interest of the County Borough as a whole and Full Council (All Council members) will take the final decisions at key stages throughout the plan preparation process;
 - Bedlinog Community Council - Democratically elected representatives of the people of Bedlinog for local matters and
 - Local Government Officers – professional officers employed by the Council to provide information and make recommendations to Councillors and implement their decisions;
 - LDP Steering Group – consisting of Senior Councillors and Senior Council Officers which consider the issues for the plan, its appraisal and assist in making recommendations;

- Topic based Working Groups – comprising those who expressed an interest in being involved in assisting in identifying key issues for the LDP, generating and developing alternative strategies, options and feeding into the work of the LDP Steering Group;
- Statutory Consultees - required to be consulted in accordance with LDP Regulations (see Appendix 2 of the DA) and
- General Consultees – (see Appendix 2 of the DA) added to during call for Expressions of Interest and consultation exercises.

8.4 The mechanisms for involving stakeholders was set out in Appendix 3 of the DA designed to maximise opportunities for joint engagement following these operating principles:

- Listening and engaging with our stakeholders;
- Clear communication;
- Embracing digital technology;
- Focusing on the key priorities and outcomes;
- Consistent and timely implementation of the strategy;
- Everyone is accountable;
- Aligning the budget to the key priorities and
- Promoting independence.

8.5 Paragraph 3.14 of the CIS stated that details of all involvement and consultation activities would be included in a 'Consultation Report' that would be updated as the Replacement LDP progressed through the key stages of plan preparation. In addition the outcomes of such consultation and engagement would be added to the Consultation Report. As such a comprehensive record of the pre-deposit LDP preparation as prescribed by the DA is set out in the Council's ICR, dated June 2018.

8.6 As stated in paragraphs 1.7 and 1.8 above this document builds upon the ICR and outlines the steps taken to publicise plan preparation. Appendix 3 of the DA set out the potential methods of involvement which could be employed for the key stages in the LDP preparation process and for each stakeholder group, listed in Appendix 2. It was stated in the DA that these would need to be adapted to involve relevant members of the community if required and that the particular methods to be used were likely to depend on the topic, the stage of plan preparation, the preferences of the consultees and the resources available to the Council.

8.7 Table 3 overleaf sets out the compliance with the Community Involvement Scheme and any deviation. This compares actions outlined in paragraph 3.2 above with the methods indicated in Appendix 3 of the DA.

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TABLE 3: Compliance with the Community Involvement Scheme (CIS)		
Deposit Preparation		
Action	As specified in DA	Action Taken
Date	September 2017 – May 2018.	October 2017 – June 2018.
Details of Involvement	<p>Targeted involvement during preparation of the Deposit LDP (incl. sites).</p> <p>Preparation and completion of detailed evidence.</p> <p>Consider and address observations and opinions raised at the 'pre-deposit' stage as appropriate.</p> <p>Preparation of SA.</p> <p>HRA Screening and AA (if necessary).</p>	<p>See Appendix 2 of the DA and below.</p> <p>Evidence prepared listed in paragraph 3.3 above.</p> <p>See Appendix 40 of the Initial Consultation Report (ICR).</p> <p>Deposit SA prepared June 2018 see section 5 above.</p> <p>HRA Screening re –run June 2018 see section 6 above.</p>
Method	<p>Group meetings including:</p> <ul style="list-style-type: none"> • LDP Steering Group; • Area/Topic Based Working Groups and • Cwm Taf Public Service Board. <p>Direct correspondence.</p> <p>Discretionary meetings.</p>	<p>Group meetings:</p> <p>LDP Steering group meetings held December 2017 to discuss LDP progress and March 2017 to discuss continuation of work on the evidence base and proposed content of Deposit Plan.</p> <p>Direct correspondence with internal and external bodies as set out in Appendix 2 of the DA in relation to Candidate Site Assessments e.g. Welsh Water, November 2017 – June 2018.</p> <p>Discretionary meetings including:</p> <ul style="list-style-type: none"> • NRW to discuss issues in relation to Candidate sites to discuss Candidate Sites September 2017. • Bedlinog Community Council November 2017 to discuss Candidate sites in Bedlinog. • WG/ Transport for Wales/Urbanists to discuss Hoover site March 2018. • Design Commission for Wales – to present Hoover Site Master Plan – May 2018. • MTCBC Highways and Engineering Department in April 2018 to Highway, engineering and drainage to discuss matters in relation to Candidate sites and Active Travel Workshop to marry up

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		the Integrated Network Plan with the LDP, June 2018.
Reporting mechanism	Full Council – May 2018. Details of targeted consultation and agreed Council response to observations made during the pre-deposit consultation added to the consultation report.	Reported to Full Council July 2018. Including issues raised during the pre-deposit Preferred Strategy public consultation in 2017 and recommended responses be noted.
Statutory 'Deposit' Consultation		
Action	As specified in DA	Action Taken
Date	June – July 2018	July 2018 - September 2018.
Details of Involvement	Six week public consultation. Open opportunity to comment on the Deposit Replacement Local Development Plan. Open opportunity to provide opinions on the Council's Sustainability Appraisal.	Took place between 30th July 2018 and 10th September 2018. As outlined in paragraph 3.3 above several drop-in sessions were held in venues from 13 th to 22 nd August 2018. As outlined in paragraph 3.3 above several drop-in sessions were held in venues from 13 th to 22 nd August 2018.
Method	Direct correspondence. Awareness raising via: Cwm Taf Community Engagement Hub; Merthyr Tydfil Council website; Merthyr Tydfil Council Twitter; Merthyr Tydfil Council 'Contact' Magazine; Public exhibitions; and Posters / leaflets. Documentation available at: Merthyr Tydfil Council Civic Centre; Merthyr Tydfil Council website; and Local Libraries.	Direct correspondence comprised letters and emails (see Appendices 2 – 4 and Appendix 2 of the DA). Awareness raising via: MTCBC website - see Appendix 11; MTCBC Twitter - see Appendix 12; Public drop-in sessions 9 - see paragraph 3.3; Easy read booklet - see Appendices 9 & 10 and Poster - see Appendices 7 & 8. Hard copies of all documentation was made available at: MTCBC Civic Centre and Unit 5 Offices and Local Libraries – see paragraph 3.2. Soft copies were made available on the Council website – see appendix 11.
Reporting mechanism	Details of involvement added to the consultation report.	Full Council July 2018, approved Deposit LDP and supporting documents for a statutory six week period of public consultation.

- 8.8 While every effort was made to fully comply with the content and objectives of the CIS some departure from the CIS was made at the Deposit Plan preparation stage. This specifically relates to meeting with the Cwm Taf

Board, utilising the Cwm Taf Hub and 'Contact' magazine. This can be explained as follows:

- Meeting with the Cwm Taf Public Service Board - this was not deemed necessary at the Deposit Plan preparation stage given that a comprehensive response was received from the board in relation to the Preferred Strategy and Candidates Sites Register Consultations which was used to inform the Candidates Sites Assessment (Candidates Sites Assessment background paper, June 2018). Earlier engagement in the form of topic based workshops on Wellbeing also feed into the preparation of the preferred strategy;
- Cwm Taf Hub – although the Hub website was utilised for the Preferred Strategy and Candidates Sites Register Public Consultations the Planning Team were unable to make use of it for the Deposit Plan Consultation. The Council had decided to stop using the Hub website prior to the consultation period (see paragraph 3.5 and Table 3 above). Alternatively, the Council made use of the Council's website, direct contact methods and advertising the public consultation 'drop in' events to raise awareness (as listed at paragraph 3.2 and Table 3).
- 'Contact' magazine – the magazine was utilised for the Preferred Strategy and Candidates Sites Register Consultations however given that it is only published quarterly the publication timetable fell outside that of the Deposit Plan consultation period. The Council did however prepare a press release (Appendix 5 & 6) which generated interest and resulted in front page coverage in the Merthyr Express newspaper dated August 2018, entitled '*Council sets out its 13 year plan for 2,250 new homes*'.

8.9 It is the view of the Council that the overall objectives of the CIS as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the WG LDP Manual.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 1: REPLACEMENT DEPOSIT LDP STATUTORY PUBLIC NOTICE - BILINGUAL

CYNGOR BWRDEISTREF SIROL MERTHYR TUDFUL

Deddf Cynllunio a Phrynu Gorfodol 2004
 Deddf Cynllunio (Cymru) 2015
 Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol)(Cymru) 2005 (Diwygio) 2015
 Rheoliadau Asesiadau Amgylcheddol o Gynlluniau Rhaglenni (Cymru) 2004
 Rheoliadau Cadwraeth Cynefinoedd a Rhywogaethau (Diwygio) 2012

Hysbysiad am Ymgynghoriad Cyhoeddus am Gynigion Adnau ar gyfer Cynllun Datblygu Lleol

**CYNLLUN DATBLYGU LLEOL AMNEWID
 CYNGOR BWRDEISTREF SIROL MERTHYR TUDFUL
 (CDU) 2016-2031**

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful (CBSMT) wedi paratoi dogfennau ar gyfer y CDU Amnewid. Bydd y CDU Amnewid, o'i fabwysiadu, yn disodli'r CDU cyfredol a fabwysiadwyd yn 2011 a bydd yn ffurfio sail ar gyfer penderfyniadau am faterion cynllunio'r defnydd o dir ym Mwrdeistref Sirol Merthyr Tudful (ac eithrio'r ardal oddi fewn i Barc Cenedlaethol Bannau Brycheiniog).

Mae'r dogfennau Adnau fel a ganlyn:

- Y CDU Adnau (yn cynnwys datganiad ysgrifenedig a chynigion a mapiau cyfyngiadau);
- Yr Adroddiad Gwerthuso Cynaliadwyedd (yn cynnwys Crynodeb Nad yw'n Dechnegol);
- Adroddiad Rheoliadau Cynefinoedd CDU Adnau; ac
- Adroddiad Ymgynghorol Cychwynnol

Mae'r dogfennau Adnau yn amodol ar ymgynghoriad ffurfiol 6 wythnos o hyd rhwng dydd Llun 30 Gorffennaf 2018 a dydd Llun 10 Medi 2018.

Caiff ein dogfennau cefnogol eraill hefyd eu cyflwyno ar gyfer ymgynghoriad yn ystod y cyfnod hwn.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

Planning and Compulsory Purchase Act 2004
 Planning (Wales) Act 2015
 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)
 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004
 The Conservation of Habitats and Species Regulations 2010 (as amended 2012)

Notice of Public Consultation on Deposit Proposals for a Local Development Plan

**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
 REPLACEMENT LOCAL DEVELOPMENT PLAN (LDP)
 2016-2031**

Merthyr Tydfil County Borough Council (MTCBC) has prepared Deposit documents for the Replacement LDP. The Replacement LDP will, upon adoption, supersede the current LDP which was adopted in 2011 and form the basis for decisions on land use planning matters in Merthyr Tydfil County Borough (excluding the area within the Brecon Beacons National Park).

The Deposit documents are as follows:

- The Deposit LDP (including a written statement and proposals and constraints maps);
- The Sustainability Appraisal Report (including a Non-Technical Summary);
- The Deposit LDP Habitat Regulations Assessment (HRA) Report; and
- An Initial Consultation Report.

The Deposit documents are subject to a formal 6 week public consultation between Monday 30th July 2018 and Monday 10th September 2018.

Other supporting background documents will also be issued for consultation during this period.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

Bydd yr holl ddogfennau ymgynghori a ffurflen ar gyfer gwneud sylwadau ar gael i'w harchwilio gan y cyhoedd ym mhrif swyddfeidd y Cyngor, Canolfan Ddinesig, Stryd y Castell, Merthyr Tudful, CF47 8AN a'r lleoliadau eraill a restrir isod yn ystod eu horiau agor arferol:

- Swyddfeidd y Cyngor, Uned 5, Parc Busnes Triangl, Pentrebach, Merthyr Tudful; CF48 4TQ
- Llyfrgell Ganolog Merthyr Tudful, Y Stryd Fawr, Merthyr Tudful; CF47 8AF
- Hwb Llyfrgell Rhydycar, Canolfan Hamdden Merthyr Tudful, Merthyr Tudful; CF48 1UT
- Llyfrgell Treharris, Stryd Perrott, Treharris, Merthyr Tudful; CF46 5ET
- Llyfrgell Dowlais, Stryd yr Eglwys, Dowlais, Merthyr Tudful; CF48 3HS
- Llyfrgell Gymunedol Aber-fan, Heol Pantglas, Aber-fan, Merthyr Tudful, CF48 4QE

Byddant ar gael ar-lein hefyd yma: www.merthyr.gov.uk/ReplacementLDP

Rhaid i sylwadau am y dogfennau Adnau a gwybodaeth gefnogol arall fod yn ysgrifenedig a'u cyflwyno i'r Cyngor Bwrdeistref Sirol yn y cyfeiriad a benodir isod rhwng dydd Llun 30 Gorffennaf 2018 a dydd Llun 10 Medi 2018.

Dylai sylwadau (yn cynnwys y rheini ar ffurf gwrthwynebiadau) fod yn benodol ynghylch y materion y maen nhw'n cyfeirio atynt. Dylai gwrthwynebiadau hefyd fod yn benodol ynghylch y newid a ddymunir, ar ba sail y maen nhw'n cael eu gwneud a'r prawf/profion o ddifffuantrwydd sy'n berthnasol iddynt (gweler isod).

Dylai'r sawl sy'n cyflwyno sylwadau sy'n cynnig newidiadau i'r CDU Adnau (yn cynnwys dyraniadau lleoliad newydd) ystyried a yw'n angenrheidiol i Werthusiad Cynaliadwyedd gyd-fynd â'i sylwadau. Pan fo gan newidiadau a gynnigir effeithiau cynaliadwyedd sylweddol dylai'r sylwadau gynnwys gwybodaeth berthnasol o ran Gwerthuso Cynaliadwyedd.

Mae'n bosibl y bydd sylwadau yn cyd-fynd â chais i dderbyn hysbysiad i gyfeiriad penodol, fod y CDU wedi cael ei gyflwyno i Lywodraeth Cymru i'w archwilio'n annibynnol o dan adran 64 Deddf Cynllunio a Phrynu Gorfodol 2004 a/neu fod y CDU yn cael ei fabwysiadu.

All consultation documents and a form for making representations will be available for public inspection at the Council's main offices, The Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN and other locations listed below during their normal opening hours:

- Council Offices, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF
- Rhydycar Library Hub, Merthyr Tydfil Leisure Centre, Merthyr Tydfil, CF48 1UT
- Treharris Library, Perrott Street, Treharris, Merthyr Tydfil, CF46 5ET
- Dowlais Library, Church Street, Dowlais, Merthyr Tydfil, CF48 3HS
- Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE

They will also be available online at: www.merthyr.gov.uk/ReplacementLDP

Representations on the Deposit documents and other supporting information must be made in writing and received by the County Borough Council at the address specified below between Monday 30th July 2018 and Monday 10th September 2018.

Representations (including those taking the form of objections) should specify the matters to which they relate. Objections should also specify the change sought the grounds on which they are made and the test(s) of soundness to which they relate (see below).

Representors proposing changes to the Deposit LDP (including new site allocations) should consider whether it is necessary for a Sustainability Appraisal to accompany their representation. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information.

Representations may be accompanied by a request to be notified at a specified address that the LDP has been submitted to Welsh Government for independent examination under section 64 of the Planning and Compulsory Purchase Act 2004 and/or the adoption of the LDP.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

Caiff yr holl sylwadau a wnaed yn ystod dyddiadau'r ymgynghoriad cyhoeddus a benodwyd eu cydnabod a'u hystyried gan y Cyngor cyn cyflwyno'r CDU ar gyfer Archwiliad. Caiff y CDU Adnau ei ystyried gan Archwiliwr annibynnol a fydd yn asesu a yw'n 'ddilys'. Ceir nifer o brofion ar gyfer dilysrwydd a gellir dod o hyd i'r rhain ar y ffurflen gwneud sylwadau sydd ar gael yma: www.merthyr.gov.uk/ReplacementLDP. Dylai gwrthwynebiadau i'r CDU Adnau gyfeirio at y profion hyn ble bynnag y bo'n bosibl.

Caiff sylwadau sydd wedi eu gwneud yn unol â'r hysbysiad hwn (hynny yw 'wedi eu gwneud yn briodol') eu hystyried gan Archwiliwr annibynnol a benodwyd i archwilio dilysrwydd y cynllun.

Dim ond y rheini sy'n gwneud sylwadau sy'n ceisio newid y CDU Adnau y mae eu sylwadau wedi 'eu gwneud yn briodol' sydd â'r hawl i ymddangos o flaen a chael eu clywed gan yr Archwiliwr yn yr Archwiliad (Adran 64 (6) Deddf 2004).

Gallwch un ai e-bostio sylwadau wedi eu cwblhau i devplanning@merthyr.gov.uk neu eu postio nhw at:

Pennaeth Cynllunio a Chefn Gwlad
Adran Cynllunio a Chefn Gwlad
Cyngor Bwrdeistref Sirol Merthyr Tudful
Uned 5, Parc Busnes Triangl
Pentrebach
Merthyr Tudful
CF48 4TQ

Os oes gennych unrhyw ymholiadau ynghylch sut i gyflwyno'ch sylwadau e-bostiwyd y Tîm CDU yma: devplanning@merthyr.gov.uk neu ffoniwch 01685 726279.

MISS J JONES
Pennaeth Cynllunio a Chefn Gwlad

All representations made during the public consultation dates specified will be acknowledged and considered by the Council prior to the submission of the LDP for Examination. The Deposit LDP will be considered by an independent Inspector who will assess whether it is 'sound'. There are a number of tests of soundness and these can be found on the form for making representations available at www.merthyr.gov.uk/ReplacementLDP. Objections to the Deposit LDP should make reference to these tests wherever possible.

Representations made in accordance with this notice (i.e. 'duly made') will be considered by an independent Inspector appointed to examine the soundness of the plan.

Only those making representations seeking to change the Deposit LDP whose representations were 'duly made' have the right to appear before and be heard by the Inspector at the Examination (Section 64 (6) of the 2004 Act).

You can either email completed representation forms to: devplanning@merthyr.gov.uk or post them to:

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

If you have any queries about how to submit your comments please email the LDP Team at devplanning@merthyr.gov.uk or Telephone 01685 726279.

MISS J JONES
Head of Planning and Countryside

APPENDIX 2: DEPOSIT REPLACEMENT LDP CONSULTATION EMAIL – WELSH AND ENGLISH

AILOSOD CYNLLUN DATBLYGU LLEOL MERTHYR TUDFUL 2016-2031: YMGYNGHORIAD CYHOEDDUS AR Y CYNLLUN ADNEUO

Yn dilyn ymgynghoriad cyhoeddus ar y 'Strategaeth a Ffeyrir' ar gyfer ailosod y CDLI ym mis Gorffennaf a mis Hydref 2017, mae Cyngor Bwrdeistref Sirol Merthyr Tudful (MTCBC) wedi cymeradwyo, ar gyfer ymgynghori, 'Cynllun Adneuo' ar gyfer y Cynllun Datblygu Lleol newydd (CDLI). Ar ôl ei fabwysiadu, bydd y CDLI newydd yn ffurfio sail ar gyfer penderfyniadau ar faterion cynllunio defnydd tir ym Mwrdeistref Sirol Merthyr Tudful (ac eithrio'r ardal ym Mharc Cenedlaethol Bannau Brycheiniog) tan 2031.

Cynhelir ymgynghoriad cyhoeddus chwe wythnos ar y 'Cynllun Adneuo' a phapurau cefndir eraill, o ddydd Llun 30 Gorffennaf 2018 tan ddydd Llun 10 Medi 2018.

Gweler y dogfennau atodedig am ragor o wybodaeth.

Yn gywir;

Miss J Jones

Pennaeth Cynllunio a Chefn Gwlad

Cyngor Bwrdeistref Sirol Merthyr Tudful

Dear Sir / Madam;

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

Following public consultation on the Replacement LDP 'Preferred Strategy' in July and October 2017 Merthyr Tydfil County Borough Council (MTCBC) has approved, for consultation, a 'Deposit Plan' for the replacement Local Development Plan (LDP). Upon adoption, the replacement LDP will form the basis for decisions on land use planning matters in Merthyr Tydfil County Borough (excluding the area within the Brecon Beacons National Park) until 2031.

A six week public consultation will take place on the 'Deposit Plan' and other background papers, from Monday 30th July 2018 until Monday 10th September 2018.

Please see the attached documents for further information.

Yours faithfully;

Miss J Jones

Head of Planning & Countryside

Merthyr Tydfil County Borough Council

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 3: REPLACEMENT DEPOSIT LDP CONSULTATION LETTER – WELSH

Ellis Cooper BSc. (Hons)
Dirprwy Brif Weithredwr
Deputy Chief Executive

Unit 5, Parc Fuszess
Triangl, Pentrebach,
Merthyr Tudful, CF48 4TQ

Unit 5, Triangle Business
Park, Pentrebach,
Merthyr Tydfil, CF48 4TQ

Ffôn/Tel: (01685) 725000
Ffacs/Fax: (01685) 374397
www.merthyr.gov.uk

Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

**Dyddiad/Date: 27 Gorffennaf
2018**

Ein Cyf./Our ref.: DP
Eich Cyf./Your ref:

Gofynnwch am/Please ask for: John Raine
Llinell Uniongyrchol/Direct Line: 01685 726279
e-bost/e-mail: devplanning@merthyr.gov.uk

Annwyl Syr / Madam,

**CYNLLUN DATBLYGU LLEOL AMNEWID MERTHYR TUDFUL 2016-2031: YMGYNGHORIAD CYHOEDDUS CYNLLUN ADNau (RHEOLIAD 17
CDU)**

Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Amnewid (CDU): 'Strategaeth a Phefrrir', mae Cyngor Bwrdeistref Sirol Merthyr Tudful (CBSMT) wedi cymeradwyo'r 'Cynllun Adnau' CDU at ddibenion ymgynghori a'r cyhoedd. Mae'r 'Cynllun Adnau' yn ffurfio drafft cyflawn y CDU Amnewid ac yn cynnwys y dogfennau canlynol:

a) Cynllun Adnau Amnewid 2016-2031 Datganiad Ysgrifenedig (Mehefin 2018)
b) Cynllun Adnau Amnewid 2016-2031 Map Cynigion (Mehefin 2018)
c) Cynllun Adnau Amnewid 2016-2031 Map Cyfyngiadau (Mehefin 2018)

Caiff ymgynghoriad cyhoeddus chwe wythnos o hyd ei gynnal ar y 'Cynllun Adnau' a'r dogfennau cysylltiedig rhwng dydd Llun 30 Gorffennaf a dydd Llun 10 Medi 2019.

Mae'r Cynllun Adnau Amnewid yn cyd-fynd â'r Adroddiad Ymgynghorol Cychwynnol (Mehefin 2018), Adroddiad Gwerthuso Cynaliadwydd Cynllun Adnau (Mehefin 2018) ac Adroddiad Sgrinio Aseidiadau Rheoliadau Cynefinoedd (Mehefin 2018) sydd hefyd yn ffurfio rhan o'r ymgynghoriad cyhoeddus. O'i fabwysiadu, bydd y CDU yn ffurfio sail ar gyfer penderfyniadau ynghylch defnydd o dir a materion cynllunio ym Mwrdeistref Sirol Merthyr Tudful (ac eithrio'r ardal oddi fewn i Barc Cenedlaethol Bannau Brycheiniog) tan 2031.

Bydd yr holl ddogfennau ar gael i'r cyhoedd eu harchwilio yn ystod yr ymgynghoriad cyhoeddus, ynghyd â ffurflen ar gyfer gwneud sylwadau, ym mhrif swyddfeidd y Cyngor, Canolfan Ddinesig, Stryd y Castell, Merthyr Tudful, CF47 8AN, a lleoliadau eraill a restrir isod yn ystod eu horiau agor arferol:

- Swyddfeidd y Cyngor, Uned 5, Parc Busnes Triangl, Pentrebach, Merthyr Tudful, CF48 4TQ.
- Llyfrgell Ganolog Merthyr Tudful, Stryd Fawr, Merthyr Tudful, CF47 8AF
- Hyb Llyfrgell Rhydycar, Canolfan Hamdden Merthyr Tudful, Merthyr Tudful, CF48 1UT
- LlyfrgellTreharris, Stryd Perrott, Treharris, Merthyr Tudful, CF46 5ET
- Llyfrgell Dowlais, Stryd yr Eglwys, Dowlais, Merthyr Tudful, CF48 3HS
- Llyfrgell Gymunedol Aber-fan, Heol Pantglas Road, Aber-fan, Merthyr Tudful, CF48 4QE

Byddant hefyd ar gael ar-lein yma: www.merthyr.gov.uk/ReplacementLDP neu oddi wrth Hyb Cwm Taf: www.cwmatafhub.co.uk

Rhaid i'r sylwadau a gyflwynir am y Cynllun Adnau fod yn ysgrifenedig a dylech eu derbyn erbyn canol nos ddydd Llun 10 Medi 2018. Gellir anfon ffurflen wedi ei chwblhau'n electronig i devplanning@merthyr.gov.uk neu ei phostio at: Bennaeth Cynllunio a Chefn Gwlad, Cyngor Bwrdeistref Sirol Merthyr Tudful, Uned 5, Parc Busnes Triangl, Pentrebach, Merthyr Tudful, CF48 4TQ.

Os oes gennych unrhyw ymholiadau am sut i gyflwyno'ch sylwadau e-bostiwyd y Tîm CDU yma: devplanning@merthyr.gov.uk neu ffoniwch 01685 726279 a gofyn i siarad ag aelod o'r Tîm CDU.

Yn gywir;

MISS J JONES
PENNAETH CYNLLUNIO A CHEFN GWLAD/HEAD OF PLANNING AND COUNTRYSIDE
Croesawn ohebu yn Gymraeg a fydd gohebu yn y Gymraeg ddim yn arwain at oedi. Rhwngwybod inni beth yw'ch dewis iaith e.e. Gymraeg neu'n ddwyieithog.
We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Let us know your language choice if Welsh or bilingual.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 4: REPLACEMENT DEPOSIT LDP CONSULTATION LETTER –ENGLISH

Ellis Cooper BSc. (Hons)
Dirprwy Brif Weithredwr
Deputy Chief Executive

Unit 5, Parc Fuzness
Triangl, Pentrebach,
Merthyr Tydfil, CF48 4TQ

Unit 5, Triangle Business
Park, Pentrebach,
Merthyr Tydfil, CF48 4TQ

Cyngor Bwrdeistref Sirol
MERTHYR TYDFIL
MERTHYR TYDFIL
County Borough Council

Ffôn/Tel: (01685) 725000
Ffacs/Fax: (01685) 374397
www.merthyr.gov.uk

Dyddiad/Date: 27th July 2018

Ein Cyf./Our ref.: DP
Eich Cyf./Your ref.:

Gofynnwch am/Please ask for: John Raine
Llinell Uniongyrchol/Direct Line: 01685 726279
e-bost/e-mail: devplanning@merthyr.gov.uk

Dear Sir/Madam;

REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031: DEPOSIT PLAN PUBLIC CONSULTATION (LDP REGULATION 17)

Following consultation on the Replacement Local Development Plan (LDP) 'Preferred Strategy', Merthyr Tydfil County Borough Council (MTCBC) has approved the LDP 'Deposit Plan' for public consultation purposes. The 'Deposit Plan' forms the full draft Replacement LDP and is comprised of the following documents:

- a) The Replacement Deposit Plan 2016-2031 Written Statement (June 2018)
- b) The Replacement Deposit Plan 2016-2031 Proposals Map (July 2018)
- c) The Replacement Deposit Plan 2016-2031 Constraints Map (July 2018)

A six week public consultation will take place on the 'Deposit Plan' and associated documents between Monday 30th July and Monday 10th September 2018.

The Replacement Deposit Plan is accompanied by an Initial Consultation Report (June 2018), the Deposit Plan Sustainability Appraisal Report (June 2018) and Habitats Regulations Assessment Screening Report (June 2018) which also form part of the public consultation. Upon adoption, the Replacement LDP will form the basis for decisions on land use planning matters in Merthyr Tydfil County Borough (excluding the area within the Brecon Beacons National Park) until 2031.

All consultation documents will be available for public inspection during the public consultation period, along with a form for making representations, at the Council's main offices, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN, and the other locations listed below during their normal opening hours:

- Council Offices, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF
- Rhydycar Library Hub, Merthyr Tydfil Leisure Centre, Merthyr Tydfil, CF48 1UT
- Treharris Library, Perrott Street, Treharris, Merthyr Tydfil, CF46 5ET
- Dowlais Library, Church Street, Dowlais, Merthyr Tydfil, CF48 3HS
- Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE

They will also be available online at: www.merthyr.gov.uk/ReplacementLDP or from the Cwm Taf Hub www.cwmtafhub.co.uk

Comments on the Deposit Plan must be made in writing and received by the Council by midnight Monday 10th September 2018. Completed forms may be sent electronically to devplanning@merthyr.gov.uk or posted to: The Head of Planning and Countryside, Merthyr Tydfil County Borough Council, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ.

If you have any queries about how to submit your comments please e-mail the LDP Team at devplanning@merthyr.gov.uk or call 01685 726279 and ask to speak to a member of the LDP Team.

Yours faithfully;

MISS J JONES
PENNAETH CYNLLUNIO A CHEFN GWLAD/HEAD OF PLANNING AND COUNTRYSIDE
Croesawn ohebu yn Gymraeg a fydd gohebu yn y Gymraeg ddim yn arwain at oedi. Rhwng wybod inni beth yw'ch dewis iaith e.e Cymraeg neu'n ddwyieithog. We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Let us know your language choice if Welsh or bilingual.

APPENDIX 5: REPLACEMENT DEPOSIT LDP CONSULTATION PRESS RELEASE – WELSH

CYNLLUN DATBLYGU LLEOL AMNEWID MERTHYR TUDFUL 2016-2031: YMGYNGHORIAD CYHOEDDUS Y CYNLLUN ADNAU

Yn dilyn ymgynghoriad cyhoeddus ar 'Strategaeth a Ffefrir' y CDU Amnewid yng Ngorffennaf a Hydref 2017, mae Cyngor Bwrdeistref Sirol Merthyr Tudful (CBSMT) wedi cymeradwyo, at ddibenion ymgynghorol, 'Gynllun Adnau' ar gyfer y Cynllun Datblygu Lleol Amnewid (CDLI.)

Bydd ymgynghoriad yn cael ei gynnal am gyfnod o chwe wythnos ar y 'Cynllun Adnau' a dogfennaeth gefnogol eraill, o Ddydd Llun, 30 Gorffennaf 2018 hyd Ddydd Llun, 10 Medi 2018 pan fydd modd gwneud sylwadau ar y Cynllun Adnau.

Mae'r Cynllun Adnau yn gwneud darpariaethau ar gyfer anghenion datblygu'r dyfodol hyd at 2031 ac yn cynnwys 2250 o gartrefi newydd ar dros 34 o ddryniadau safle a 35.6 hectar o dir cyflogaeth dros 5 safle. Mae hyn yn cynnwys 440 o gartrefi newydd, mannau cyflogaeth a mannau agored sydd wedi eu cynllunio ar gyfer Ardal Adfywio Strategol Hoover a ddynodwyd ym Mhentrebach a c Abercannaid, adeiladu ar welliannau metro arfaethedig De Ddwyrain Cymru a dryniadau safleoedd llaia ddynodwyd ledled Bwrdeistref Sirol Merthyr Tudful.

Mae'r Cynllun Adnau hefyd yn amlinellu polisiâu cynllunio lleol y bydd rhaid i geisiadau cynllunio'r dyfodol gael eu hasesu yn eu herbyn. Mae'n cynnwys penawdau tebyg i ddarpariaeth tai fforddiadwy, darpariaeth fanwerthu, diogelu mannau agored, mwynau a gwastraff, ynni adnewyddadwy, gofynion cynllunio a datblygu a diogelu'r amgylchedd. Mae hefyd yn dynodi dynodiadau amgylcheddol fel Ardaloedd Tirweddol Arbennig a Gwarchodfeydd Natur Lleol.

Yn dilyn yr ymgynghoriad ar y Cynllun Adnau, bydd y Cyngor yn ystyried sylwadau a'r angen i wneud newidiadau 'ffocws' bychain. Yna, bydd yn ofynnol i'r Cyngor gyflwyno'r CDLI i Lywodraeth Cymru ar gyfer 'Archwiliad Cyhoeddus' pan fydd Arolygydd Cynllunio annibynnol yn cael ei apwyntio i asesu 'cademid' y Cynllun. Mae'n cael ei ragweld y bydd hyn yn digwydd yn gynnar yn 2019.

Wedi i'r cynllun gael ei fabwysiadu, bydd y CDU Amnewid yn ffurfio'r sail ar gyfer penderfyniadau a fydd yn ymwneud â materion cynllunio defnydd tir yng Nghyngor Bwrdeistref Sirol Merthyr Tudful (ac eithrio'r ardal oddi fewn i Barc Cenedlaethol Bannau Brycheiniog) hyd at 2031.

Bydd nifer o ddiwyddiadau ymgynghorol, galw i mewn cyhoeddus yn cael eu trefnu yn ystod y cyfnod ymgynghorol lle y bydd swyddogion cynllunio ar gael i ateb unrhyw ymholiadau:

- Dydd Llun 13 Awst 2018 – y Llyfrgell, Canolfan Gymunedol Aber-fan: 1pm - 6pm
- Dydd Mawrth 14 Awst 2018 – Canolfan Siopa Santes Tudful, (ger Costa): 12pm - 5pm
- Dydd Iau 16 Awst 2018 – Y Bedlinog Inn, Bedlinog: 3pm – 7pm
- Dydd Sadwrn 18 Awst 2018 – Canolfan Siopa Santes Tudful, (ger Costa): 10am - 3pm
- Dydd Llun 20 Awst 2018 – Llyfrgell Dowlais, Dowlais: 1pm - 6pm
- Dydd Mawrth 21 Awst 2018 – Canolfan Dreftadaeth y Bwthyn, Parc Cyfarthfa: 1pm - 6pm
- Dydd Mercher 22 Awst 2018 – Llyfrgell Treharris, Treharris: 1pm - 6pm

Mae'n rhaid i sylwadau ar y Cynllun Adnau gael eu cyflwyno'n ysgrifenedig a'u derbyn gan y Cyngor **erbyn canol nos, Dydd Llun 10 Medi 2018**. Gallant gael eu hanfon yn electronig at devplanning@merthyr.gov.uk [<mailto:devplanning@merthyr.gov.uk>](mailto:devplanning@merthyr.gov.uk) neu eu postio at: Y Tîm CDLI, CBSMT, Uned 5, Parc Busnes Triongl, Pentrebach, Merthyr Tudful, CF48 4TQ.

Bydd swyddogion cynllunio y Tîm CDLI ar gael yn ystod oriau swyddfa arferol yn y cyfeiriad uchod i ateb unrhyw ymholiadau a c i ddarparu cyngor ar sut i wneud sylwadau.

Mae rhagor o wybodaeth ar y CDLI ar gael ar wefan y Cyngor: www.merthyr.gov.uk/ReplacementLDP [<http://www.merthyr.gov.uk/ReplacementLDP>](http://www.merthyr.gov.uk/ReplacementLDP)

APPENDIX 6: REPLACEMENT DEPOSIT LDP CONSULTATION PRESS RELEASE - ENGLISH

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

Following public consultation on the Replacement LDP 'Preferred Strategy' in July and October 2017 Merthyr Tydfil County Borough Council (MTCBC) has approved for consultation purposes a 'Deposit Plan' for the replacement Local Development Plan (LDP).

A six week public consultation will take place on the 'Deposit Plan' and other supporting documents from Monday 30th July 2018 until Monday 10th September 2018 when representations on the Deposit Plan can be made.

The Deposit Plan makes provision for future development needs up to 2031 including provision for 2250 new homes over 34 site allocations and 35.6 hectares of employment land over 5 sites. This includes 440 new homes, employment and open spaces planned at the Hoover Strategic Regeneration Area identified at Pentrebach and Abercanaid, building on planned South East Wales metro improvements, and other smaller site allocations identified across the Merthyr Tydfil County Borough.

The Deposit Plan also sets out local planning policies that future planning applications will be assessed against. This includes topics such as, affordable housing provision, retail provision, open space protection, minerals and waste, renewable energy, design and development requirements and environmental protection. It also identifies environmental designations such as Special Landscape Areas and Local Nature Reserves.

Following the Deposit Plan public consultation the Council will consider all duly made representations and the need for any minor 'focussed' changes. The Council is then required to submit the LDP to Welsh Government for an 'Examination in Public' where an independent Planning Inspector will be appointed to assess the 'soundness' of the Plan. This is anticipated to take place in early 2019.

Upon adoption, the Replacement LDP will form the basis for decisions on land use planning matters in Merthyr Tydfil County Borough (excluding the area within the Brecon Beacons National Park) until 2031.

A number of public consultation drop-in events will take place during the consultation period where planning officers will be available to answer any queries, as follows:

- Monday 13th August 2018 - Library, Aberfan Community Centre: 1pm - 6pm
- Tuesday 14th August 2018 - St Tydfil's Shopping Centre (near Costa): 12pm - 5pm
- Thursday 16th August 2018 - Bedlinog Inn, Bedlinog: 3pm – 7pm
- Saturday 18th August 2018 - St Tydfil's Shopping Centre (near Costa): 10am - 3pm
- Monday 20th August 2018 - Dowlais Library, Dowlais: 1pm - 6pm
- Tuesday 21st August 2018 - The Bothy Heritage Centre, Cyfarthfa Park: 1pm - 6pm
- Wednesday 22nd August 2018 - Treharris Library, Treharris: 1pm - 6pm

Representations on the Deposit Plan must be made in writing and received by the Council **by midnight Monday 10th September 2018**. These may be sent electronically to devplanning@merthyr.gov.uk or posted to: The LDP Team MTCBC Unit 5 Triangle Business Park Pentrebach Merthyr Tydfil CF48 4TQ.

APPENDIX 7: REPLACEMENT DEPOSIT LDP CONSULTATION POSTER – WELSH

Cynllun Datblygu Lleol Amnewid (CDLI)
2016-2031
Cynllun Adnau - Ymgynghoriad Cyhoeddus

Dydd Llun 30 Gorffennaf 2018 i Ddydd Llun 10 Medi 2018

Mae'r Cyngor wedi paratoi CDLI Adnau Amnewid a fydd yn llywio penderfyniadau cynllunio a datblygiadau'r dyfodol yn y Fwrdeistref Sirol. Mae'r Cyngor am glywed eich safbwyntiau ar y Cynllun Adnau a'r ddogfennaeth gefnogol.

Yn ystod y cyfnod ymgynghorol hwn, bydd y dogfennau adnau ar gael i'w harchwilio yn y lleoliadau canlynol yn ystod oriau agor cyffredin:

- Y Ganolfan Ddinesig, Stryd y Castell, Merthyr Tudful, CF47 8AN
- CBSMT, Uned 5, Parc Busnes Triongl, Pentrebach, Merthyr Tudful, CF48 4TQ
- Llyfrgell Ganolog Merthyr Tudful, Y Stryd Fawr, Merthyr Tudful, CF47 8AF
- Hwb Llyfrgell Rhydycar, Canolfan Hamdden Merthyr Tudful, Merthyr Tudful, CF48 1UT
- Llyfrgell Treharris, Stryd Perrott, Treharris, Merthyr Tudful, CF46 5ET
- Llyfrgell Dowlais, Stryd Dowlais, Dowlais, Merthyr Tudful, CF48 3HS
- Llyfrgell Gymunedol Aber-fan, Heol Pantglas, Aber-fan, Merthyr Tudful, CF48 4QE

Bydd y dogfennau ymgynghorol hefyd ar gael i'w gweld ar lein:
www.merthyr.gov.uk/ReplacementLDP

Bydd modd i chi alw i mewn i'r digwyddiadau ymgynghorol, cyhoeddus a fydd yn cael eu cynnal yn y canolfannau isod:

- Dydd Llun 13 Awst 2018 - Y Llyfrgell, Canolfan Gymunedol Aber-fan: 1pm - 6pm
- Dydd Mawrth 14 Awst 2018 - Canolfan Siopa Santes Tudful (ger Costa): 12pm - 5pm
- Dydd Iau 16 Awst 2018 - Tafarn y Bedlinog Inn, Bedlinog: 3pm - 7pm
- Dydd Sadwrn 18 Awst 2018 - Canolfan Siopa Santes Tudful (ger Costa): 10am - 3pm
- Dydd Llun 20 Awst 2018 - Llyfrgell Dowlais, Dowlais: 1pm - 6pm
- Dydd Mawrth 21 Awst 2018 - Canolfan Dreftadaeth y Bothy, Parc Cyfarthfa: 1pm-6pm
- Dydd Mercher 22 Awst 2018 - Llyfrgell Treharris, Treharris: 1pm - 6pm

Mae'n rhaid i bob sylw ar y Cynllun Adnau a'r dogfennau ymgynghorol eraill gael eu cyflwyno'n ysgrifenedig a'u derbyn yn y **cyfeiriad isod erbyn 10 Medi 2018**.

Gelli e-bostio ffurfienni sylwadau i: **devplanning@merthyr.gov.uk** neu eu postio i:
**Y Tîm CDLI, CBSMT, Uned 5, Parc Busnes Triongl,
Pentrebach, Merthyr Tudful, CF48 4TQ**

Os oes gennych unrhyw ymholiadau ynghylch sut y dylid cyflwyno'ch sylwadau, e-bostiwch **devplanning@merthyr.gov.uk** neu ffoniwch y tîm CDLI ar **01685 726279**.

Os hoffech gyfrannu at y digwyddiadau ymgynghorol trwy gyfrwng y Gymraeg, gadewch i ni wybod o leiaf 48 awr cyn y digwyddiad fel y gallwn drefnu fod Gwasanaeth Cyfieithu ar y Pryd ar gael.

APPENDIX 8: REPLACEMENT DEPOSIT LDP CONSULTATION POSTER – ENGLISH

Replacement Local Development Plan
(LDP) 2016-2031

Deposit Plan – Public Consultation

Monday 30th July 2018 to Monday 10th September 2018

The Council has prepared a Replacement Deposit LDP which will guide planning decisions and future development within the County Borough and is seeking views on the Deposit Plan and supporting documents.

During the consultation period the deposit documents will be available for inspection at the following locations during normal opening hours:

- Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN
- MTCBC, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF
- Rhydyar Library Hub, Merthyr Tydfil Leisure Centre, Merthyr Tydfil, CF48 1UT
- Treharris Library, Perrott Street, Treharris, Merthyr Tydfil, CF46 5ET
- Dowlais Library, Church Street, Dowlais, Merthyr Tydfil, CF48 3HS
- Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE

The consultation documents will also be available to view online at:
www.merthyr.gov.uk/ReplacementLDP

Public consultation drop-in events will be held on the following:

- Monday 13th August 2018 - Library, Aberfan Community Centre: 1pm - 6pm
- Tuesday 14th August 2018 - St Tydfil's Shopping Centre (near Costa): 12pm - 5pm
- Thursday 16th August 2018 - Bedlinog Inn, Bedlinog: 3pm - 7pm
- Saturday 18th August 2018 - St Tydfil's Shopping Centre (near Costa): 10am - 3pm
- Monday 20th August 2018 - Dowlais Library, Dowlais: 1pm - 6pm
- Tuesday 21st August 2018 - The Bothy Heritage Centre, Cyfarthfa Park: 1pm-6pm
- Wednesday 22nd August 2018 - Treharris Library, Treharris: 1pm - 6pm

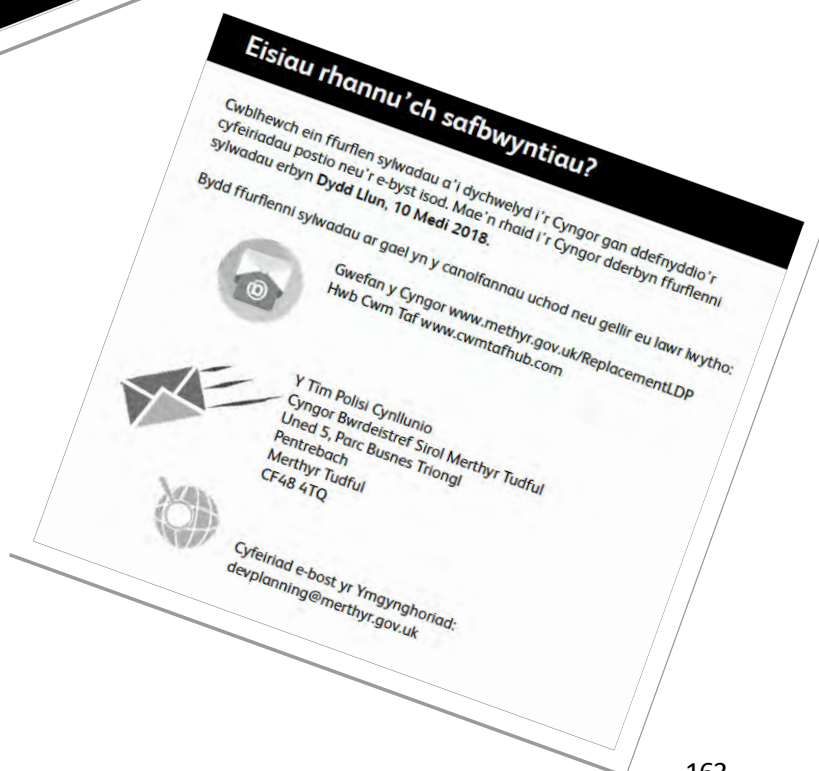
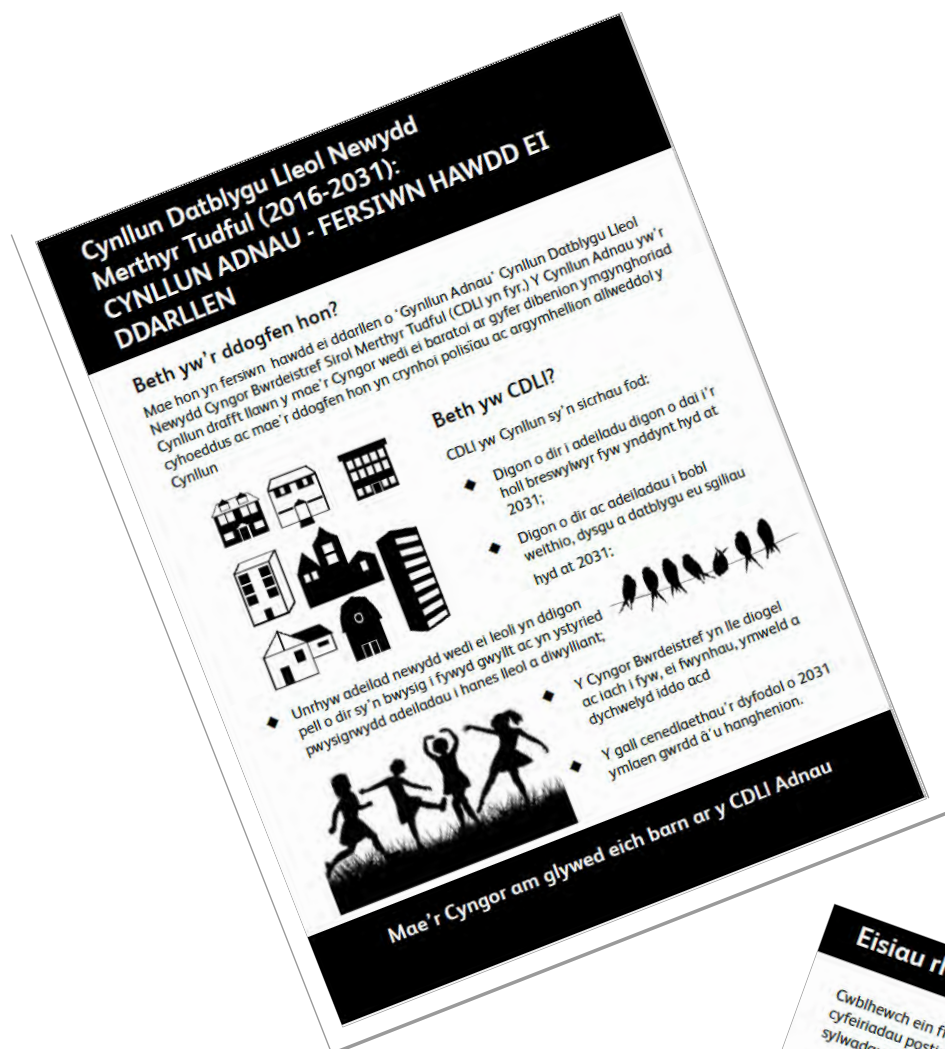
All comments on the Deposit Plan and other consultation documents must be made in writing and received **at the address below by 10th September 2018.**

Comment forms may be emailed to devplanning@merthyr.gov.uk or posted to:
**The LDP Team, MTCBC, Unit 5, Triangle Business Park,
Pentrebach, Merthyr Tydfil, CF48 4TQ**

If you have any queries about how to submit comments please e-mail devplanning@merthyr.gov.uk or call the LDP team on **01685 726279.**

If you would like to contribute to the consultation events in Welsh please let us know at least 48 hours in advance of the event so that we can arrange for Simultaneous Translation Services to be available.

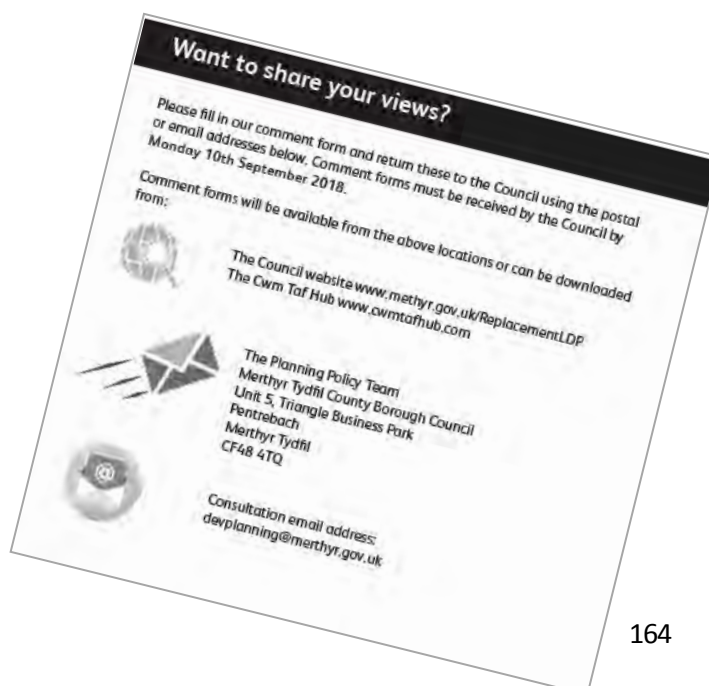
APPENDIX 9: REPLACEMENT DEPOSIT LDP EASY READ VERSION COVER - WELSH



MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 10: REPLACEMENT DEPOSIT LDP EASY READ VERSION COVER -
ENGLISH



MERTHYR TYDFIL COUNTY BOROUGH COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

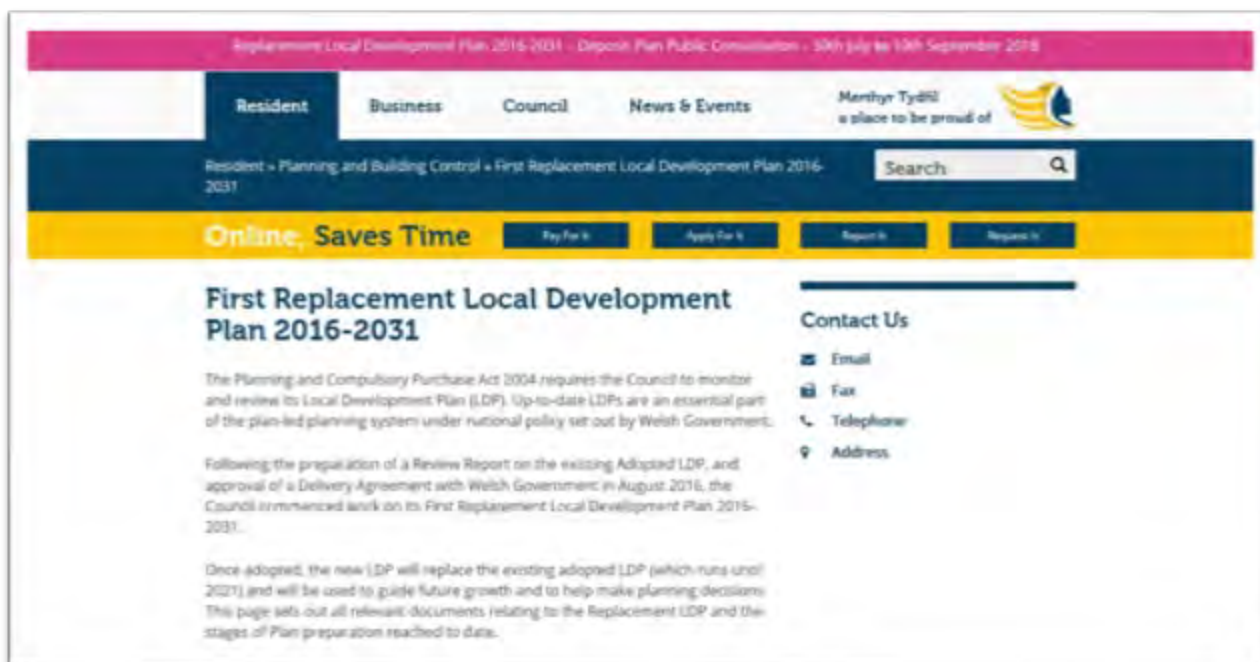
BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 11: REPLACEMENT DEPOSIT LDP COUNCIL WEBSITE

Merthyr Tydfil County Borough Council Website Banner and Eye Catcher:



Merthyr Tydfil County Borough Council Website Banner and Replacement LDP Webpage



Replacement Deposit Plan - Public Consultation

Following consultation on the Preferred Strategy in 2017 the Council has prepared and approved for public consultation purposes a Replacement Deposit Plan.

A 6-week public consultation on the Replacement Deposit Plan took place from Monday 30th July to Monday 10th September 2018. The Council will consider all representations received during this time and will consider whether any 'Focused Changes' to the Plan are necessary for soundness. An updated consultation report will be prepared prior to the submission of the Plan for independent Examination which is anticipated to take place in January 2019 following full Council approval.

The **Replacement Deposit Plan Representations Register (November 2018)** provides a copy of the duly made representations that were received by the Council during the Deposit Plan public consultation period. Hard copies of the Representations Register are available to view at Merthyr Tydfil County Borough Council, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ and at all other Deposit locations on request due to the size of the register. If you wish to view the register at these locations please contact officers in the LDP Team using the contact details below.

The Replacement Deposit Plan is comprised of:

- **Deposit Plan Written Statement June 2018**
- **Deposit Plan Proposals Map July 2018** (Online Interactive Map available [here](#))
- **Deposit Plan Constraints Map July 2018** (Online Interactive Map available [here](#))

The Replacement Deposit Plan is also accompanied by the following Deposit documents:

- **Replacement LDP Initial Consultation Report June 2018**
- **Deposit Plan Sustainability Appraisal Report June 2018**
- **Deposit Plan Sustainability Appraisal Non-Technical Summary June 2018**
- **Deposit Plan Habitats Regulations Assessment Screening Report June 2018**
- Other supporting background papers listed below.

An easy read version of the Replacement Deposit Plan is also available [here](#).

A full list of Deposit documents is provided below.

Core Deposit Consultation Documents:

- Deposit Plan Written Statement June 2018
- [Deposit Plan Proposals Map](#) (Online Interactive Map available [here](#))
- [Deposit Plan Constraints Map](#) (Online Interactive Map available [here](#))
- Replacement LDP Initial Consultation Report June 2018
- Deposit Plan Sustainability Appraisal Report June 2018
- Deposit Plan Sustainability Appraisal Non-Technical Summary June 2018
- Deposit Plan Habitats Regulations Assessment Screening Report June 2018

Deposit Plan background papers:

- Merthyr Tydfil Renewable Energy Assessment Report 2017 and June 2018 Addendum
- Heads of the Valley Smaller Scale Wind Turbine Development Landscape Sensitivity & Capacity Study April 2015
- Gypsy and Traveller Accommodation Assessment 2018 Update – June 2018
- Gypsy and Traveller Accommodation Assessment Approved 2016
- Special Landscape Areas background paper June 2018
- Sites of Importance for Nature Conservation background paper June 2018
- Merthyr Tydfil Local Housing Market Assessment 2014
- Housing Land Supply and Trajectory background paper June 2018
- Merthyr Tydfil Retail Study and Commercial Leisure Study June 2017
- South Wales Regionally Important Geological Sites Audit March 2012
- Population and Housing Requirements background paper June 2017
- Review of Green Wedges background paper June 2018
- Hoover Strategic Regeneration Area - Framework Masterplan June 2018
- Viability Assessment: Local Development Plan / Community Infrastructure Levy June 2018
- Merthyr Tydfil Employment Land Review June 2018

- Merthyr Tydfil Archaeology and Archaeologically Sensitive Areas background paper July 2017
- Merthyr Tydfil Strategic Flood Consequence Assessment (SFCA) June 2018
- Merthyr Tydfil Proposed New Bus Station Flood Consequence Assessment May 2016

- Merthyr Tydfil: Understanding Urban Character, Cadw 2015
- South East Wales Valleys Local Transport Plan January 2015
- Minerals Planning background paper June 2018
- Waste Planning background paper June 2018
- Affordable Housing background paper June 2018
- South Wales Regional Aggregates Working Party - Regional Technical Statement 1st Review August 2014
- South Wales Regional Aggregates Working Party - Annual Report 2016 published March 2018
- Site Assessment background paper June 2018
- Merthyr Tydfil Open Space Strategy June 2016
- Merthyr Tydfil Open Space Strategy Action Plan June 2016

Other relevant documents:

- Replacement LDP (2016 - 2031) Preferred Strategy June 2017
- Replacement LDP Delivery Agreement August 2016
- LDP (2006 - 2021) Review Report April 2016
- Replacement LDP (Pre Deposit) Initial Sustainability Appraisal Report June 2017
- Replacement LDP (Pre Deposit) Habitats Regulations Assessment Screening Report June 2017
- Merthyr Tydfil Local Development Plan 2006-2021 Written Statement, Adopted May 2011
- Replacement LDP Sustainability Appraisal Baseline Scoping Report January 2017

APPENDIX 12: REPLACEMENT DEPOSIT LDP SOCIAL MEDIA - TWITTER





Merthyr Tydfil CBC

@MerthyrCBC

Follow

A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at St Tydfil's Shopping Centre (near Costa) from 12pm – 5pm. Come and have your say...

17:00 AM - 13 Aug 2018



Merthyr Tydfil CBC

@MerthyrCBC

Follow

A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at the Aberfan Community Centre Library from 1pm – 6pm. Come and have your say

10:00 AM - 12 Aug 2018



Merthyr Tydfil CBC

@MerthyrCBC

Follow

A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at The Bedlinog Inn from 3pm – 7pm. Come and have your say...

8:27 AM - 15 Aug 2018



Merthyr Tydfil CBC

@MerthyrCBC

Follow

A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at Dowlais Library from 1pm – 6pm. Come and have your say...

8:28 AM - 19 Aug 2018



Merthyr Tydfil CBC

@MerthyrCBC

Follow

A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at The Bothy Heritage Centre, Cyfarthfa Park from 1pm – 6pm. Come and have your say...

8:29 AM - 20 Aug 2018



Merthyr Tydfil CBC

@MerthyrCBC

Follow


A consultation session on the Local Development Plan 2016-2031 is taking place tomorrow at Treharris Library from 1pm – 6pm. Come and have your say...

8:30 AM - 21 Aug 2018

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 13: REPLACEMENT DEPOSIT LDP CONSULTATION COMMENT FORM – WELSH



Cyngor Bwrdeistref Sirol
MERTHYR TYDFUL
MERTHYR TYDFIL
County Borough Council

CYNGOR BWRDEISTREF SIROL MERTHYR TYDFUL
CYNLLUN DATBLYGU LLEOL ADNAU 2016 – 2031

FFURFLEN YMATEB CYNLLUN ADNAU / GWERTHUSIAD CYNALIADWYEDD /
ASESIAD RHEOLIADAU CYNEFINOEDD

Rydym am gael eich safbwyntiau am y Cynllun Datblygu Lleol Adnau (CDU Adnau) a'r dogfennau sy'n cefnogi'r CDLI. Dylai'r ffurflen hon gael ei defnyddio ar gyfer yr holl sylwadau (hynny yw sylwadau neu wrthwynebiadau). Caiff nodiadau canllaw am sut i gwblhau eu darparu trosodd. Mae fersiynau electronig ar gael yma: www.merthyr.gov.uk/ReplacementLDP. Rhaid i'r Cyngor fod wedi derbyn eich sylwadau erbyn 10 Medi 2018.

RHAN 1: MANYLION CYSWLLT

Manylion Personol	Manylion Asiant (os yw'n gymwys)
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Enw Taf <input style="width: 220px;" type="text"/>	<input style="width: 220px;" type="text"/>
Cyferw <input style="width: 220px;" type="text"/>	<input style="width: 220px;" type="text"/>
Teitl Swydd <input style="width: 220px;" type="text"/> <small>(os yw'n berthnasol)</small>	<input style="width: 220px;" type="text"/>
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Rhif Ffôn <input style="width: 120px;" type="text"/>	<input style="width: 120px;" type="text"/>
Cyfeiriad e-bost <input style="width: 220px;" type="text"/>	<input style="width: 220px;" type="text"/>

Ticiwch os hoffech dderbyn gohebiaeth yn y Gymraeg ☐
Mae'n well gennym e-bostio. Ticiwch os fyddai'n well gennych dderbyn y diweddaraaf drwy'r post yn y dyfodol ☐

Noder fod pob sylw ar gael i'r cyhoedd ac na ellir eu trin yn gyfrinachol. Caiff eich gwybodaeth ei chadw ar Gronfa Ddata CDU y Cyngor a'i defnyddio mewn perthynas â pharatoi'r CDU yn unig.

Rhif ID y Cynrychiolydd* (os yw'n berthnasol)

*Bydd Rhif cynrychiolydd gennych os ydych wedi gwneud sylwadau yn ystod camau blaenorol o'r broses CDU Amnewid neu os ydych wedi gwneud cais i gael eich cynnwys ar gronfa ddata CDU y Cyngor. Caiff Rhif y Cynrychiolydd ei ddynodi ar chebiaeth blaenorol oddi wrth y Cyngor. Dyfynnwch y rhif hwn, os yw'n bosibl, i gynorthwyo'r Cyngor i'ch adnabod chi a chofnodi eich sylwadau.

DATGANIAD HYSBYSIAD PREIFAT

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful yn ymrwymedig i gynnal eich hawliau preifatrwydd. Dim ond at ddibenion cyfreithlon y byddwn ni'n defnyddio'ch gwybodaeth personol. Os hoffech wybod mwy am sut rydym yn defnyddio'ch gwybodaeth personol, darllenwch hysbysiadau preifatrwydd sydd ar gael ar ein gwefan (www.merthyr.gov.uk/council/data-protection-and-freedom-of-information/privacy-notices/?lang=cy-G8&). Os oes gennych unrhyw bryderon neu os hoffech wybod mwy am gydymffurfiaeth diogelu data, cysylltwch â'n Swyddog Diogelu Data ar 01685 725329 neu data.protection@merthyr.gov.uk.

Nodiadau canllaw:

- Cyflwynwch eich ymateb i'r Cynllun Adnau / Gwerthusiad Cynaliadwyedd / Asesiad Rheoliadau Cynefinoedd ar y ffurflen hon.
- Cyn cwblhau'r ffurflen, cyfeiriwch at nodiadau canllaw profion dilysrwydd yn yr Atodiad sy'n cyd-fynd ar ddiwedd y ffurflen hon.
- Byddai'n ddefnyddiol, ond nid yw'n angenrheidiol, pe byddai ffurflenni ar wahân yn cael eu cwblhau ar gyfer pob sylw yr ydych am ei gyflwyno (e.e. ar gyfer pob polisi neu ddyraniad safle). Neu, gellir cwblhau Rhan 2 ar wahân ar gyfer pob sylw, a'i atodi'n ddiogel at y brif ffurflen.
- Wrth wneud sylwadau defnyddiwch dudalennau ychwanegol yn ôl y gofyn, gan rifo pob tudalen yn glir.
- Noder y bydd yr holl sylwadau ar gael i'r cyhoedd eu gweld.
- Wrth nodi eich sylwadau dylech gynnwys yr holl wybodaeth a thystiolaeth gefnogol sy'n angenrheidiol i gefnogi'ch sylwadau. Byddwch ond yn gallu cyflwyno gwybodaeth bellach i'r archwiliad os yw'r Archwiliwr a benodwyd yn eich gwahodd chi i fynd i'r afael â materion y gallai ef neu hi eu codi. Os ydych yn ystyried bod newidiadau i'r Cynllun yn angenrheidiol bydd angen i chi ystyried a ddylai eich sylwadau gyd-fynd â Gwerthusiad Cynaliadwyedd. Caiff manylion pellach eu darparu o dan gwestiwn 2e.
- Pan fo grŵp yn rhannu safbwynt cyffredin ynghylch sut y mae'n dymuno gweld y Cynllun yn newid, fe fyddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen sengl gyda'i sylwadau yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath dylai'r grŵp ddynodi faint o bobl y mae'n eu cynrychioli a sut y cafodd y ddeiseb ei hawdurdodi. Dylid dynodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.
- Gellir cael ffurflenni sylwadau pellach oddi wrth y Tîm CDLI ar 01685 726277, 726279, 726220 or 727053, neu gellir lawrlwytho o wefan y Cyngor yma: www.merthyr.gov.uk/ReplacementLDP neu gallwch lungopio'r ffurflen hon.
- Os oes unrhyw gwestiynau gennych ynghylch ymateb mae croeso i chi gysylltu â'r Adran Gynllunio a Chefn Gwlad, a gofyn i siarad ag aelod o Dîm CDLI ar y rhifau ffôn uchod neu drwy e-bostio devplanning@merthyr.gov.uk.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

RHAN 2: Eich Sylwadau ac Awgrymiadau am Newidiadau (Defnyddiwch un adran yn Rhan 2 am bob sylw yr ydych am ei wneud)

2a. Pa ran o'r Cynllun Adnau (neu ddogfen gysylltiedig) ydych chi'n gwneud sylwadau arni?

Rhif Polisi (yn cynnwys rhif dyraniad safle os yw'n briodol)	
Rhif Tudalen / Paragraff	
Map Ceisiadau	
Map Cyfyngiadau	
Gwerthusiad Cynaliadwyedd (byddwch yn benodol o'r dudalen a'r paragraff)	
Asesiadau Rheoliadau Cynefinoedd (byddwch yn benodol o'r dudalen a'r paragraff)	
Arall (byddwch yn benodol)	

2b. A yw eich sylwadau'n cyflwyno Cefnogaeth, Gwrthwynebiad neu Sylw Cyffredinol ? (Ticiwch)

Cefnogaeth <input type="checkbox"/>	Gwrthwynebiad <input type="checkbox"/>	Sylw <input type="checkbox"/>
-------------------------------------	--	-------------------------------

2c. Cyn i chi gyflwyno eich sylwadau mewn manylder, fe fyddai'n ddefnyddiol gwybod a yw'r Cynllun yn ddilys ac yn bodloni gofynion gweithdrefnol. Os ydych yn meddwl bod y Cynllun yn ansicr / ddim yn ddilys, pa brawf o ran dilysrwydd ydy e'n ei fethu? (Ticiwch) Caiff manylion pellach o ran profion dilysrwydd eu darparu yn yr Atodiad ar ddiwedd y ffurflen hon.

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

2d. Cyflwynwch isod eich sylwadau ar y Cynllun Adnau (neu ddogfen gysylltiedig). Parhewch ar dudalen ar wahân (a ddylai gael ei labelu'n glir a'i hatodi) os yw'n angenrheidiol.

2e. Rhestrwch y newidiadau yr ydych am weld yn cael eu gwneud i'r CDU Adnau, os o gwbl, o ganlyniad i'r sylwadau (e.e. cynnwys polisi newydd neu ddiwygiedig, dyraniad safle neu gyd-destun cefnogol sy'n cael ei ystyried yn angenrheidiol ar gyfer dilysrwydd).

Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Neu os yw'r safle wedi cael ei gyflwyno fel 'Safle Ymgeisiol' yn gynharach yn y broses paratoi Cynllun darparwch enw'r safle ymgeisiol a rhif cyfeirnod.

Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan gwerthuso gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer gwerthuso cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr gwerthuso gynaliadwyedd a gynhaliwyd gan y Cynllun Adnau Amnewid. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi diwygiedig neu safle newydd. Gellir dod o hyd i fanylion pellach sy'n berthnasol i werthusiad cynaliadwyedd y Cynllun Adnau Amnewid a'r wybodaeth waelodlin ar wefan y Cyngor: www.merthyr.gov.uk/ReplacementLDP

Rhan 3: Beth sy' digwydd nesaf?

Yn ystod y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Archwiliwr a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Archwiliwr yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheini a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Archwiliwr yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y sawl sydd am roi tystiolaeth lafar.

3a. Ydych chi am i'ch sylwadau gael eu hystyried drwy 'sylwadau ysgrifenedig' neu ydych chi am siarad mewn sesiwn gwrandawriad o'r Archwiliad Cyhoeddus? (Ticiwch)

Nid wyf am siarad mewn gwrandawriad cyhoeddus ac yr wyf yn hapus i fy sylwadau ysgrifenedig gael eu hystyried gan yr Archwiliwr.	<input type="checkbox"/>
Rwyf am siarad mewn gwrandawriad cyhoeddus.	<input type="checkbox"/>

3b. Os ydych chi am gyfranogi mewn gwrandawriad, dynodwch isod beth yr ydych chi am siarad amdano yn y gwrandawriad cyhoeddus (e.e. Safle Tai yn Lleoliad X' neu 'Targed cyffredinol tai').

--

3c. Os yw'r sylwadau hyn yn cynrychioli deiseb, dynodwch faint o bobl sy'n cael eu cynrychioli:

--	--

3d. Os oes dogfennau ychwanegol wedi cael eu darparu i gefnogi eich sylwadau, rhestrwch nhw isod:

--

Ar ôl cwblhau arwyddwch a dyddiwch eich ffurflen sylwadau:

Arwyddwyd:		Dyddiad:	
------------	--	----------	--

Diolch am eich sylwadau am y Cynllun Adnau.

Peidiwch ag anghofio amgáu unrhyw ddogfennaeth berthnasol gyda'r ffurflen hon ac atodwch yn ddiogel unrhyw dudalennau ychwanegol a gwblheir.

Dylai ffurflenni sydd wedi eu cwblhau gael eu dychwelyd i'r Tîm CDLI at:

Pennaeth Cynllunio a Chefn Gwlad
Cyngor Bwrdeistref Sirol Merthyr Tudful
Uned 5
Parc Busnes Triongl
Merthyr Tudful
CF48 4TQ

Neu e-bostio i: devplanning@merthyr.gov.uk


Rhaid derbyn sylwadau erbyn 12 ganol nos ddydd Llun 10 Medi 2018.

Ni chaiff sylwadau a dderbynnir ar ôl y dyddiad hwn eu hystyried.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

APPENDIX 14: REPLACEMENT DEPOSIT LDP CONSULTATION COMMENT FORM – ENGLISH

 <small>Yngwilydd Merthyr Tydfil MERTHYR TYDFIL County Borough Council</small>	MERTHYR TYDFIL COUNTY BOROUGH COUNCIL REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031 DEPOSIT PLAN/SUSTAINABILITY APPRAISAL/HABITATS REGULATIONS ASSESSMENT RESPONSE FORM
<p>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. Your representations must be received by the Council by 10th September 2018.</p>	
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	
<p>Please tick if you would prefer correspondence in Welsh <input type="checkbox"/></p> <p>We prefer to correspond by e-mail. Please tick if you would prefer future updates by post <input type="checkbox"/></p> <p><i>Please note all comments will be publicly 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.</i></p>	
Representer ID Number* (if relevant) <input style="width: 100px;" type="text"/>	
<p><small>*You will have a Representer 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 Representer 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.</small></p>	

PRIVACY NOTICE STATEMENT

Merthyr Tydfil County Borough Council is committed to upholding your privacy rights. We will only use your personal information for lawful purposes. If you would like to find out more about how we use your personal information please read our privacy notices which are available on our website (www.merthyr.gov.uk/council/data-protection-and-freedom-of-information/privacy-notices/). If you have any concerns or would like to know more about data protection compliance please contact our Data Protection Officer on 01685 725329 or data.protection@merthyr.gov.uk.

Guidance notes:

- Please submit your response to the Deposit Plan/Sustainability Appraisal/Habitats Regulations Assessment on this form.
- Before completing the form, please refer to the soundness tests guidance notes in the accompanying Annex at the end of this form.
- It would be helpful, but not essential, if separate forms were completed for each comment that you wish to make (for example, for each policy or site allocation). Alternatively, a separate Part 2 could be completed for each comment, and securely attached to the main form.
- When making comments please use additional sheets as required, clearly numbering each additional sheet.
- Please note all comments will be made publically available.
- When setting out your representation please include all the information and supporting evidence necessary to support your representation. You will only be able to submit further information to the examination if the appointed Inspector invites you to address matters that he or she may raise. If you consider changes to the Plan are necessary you will need to consider whether your representation should be accompanied by a Sustainability Appraisal. Further details are provided under question 2e.
- Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the petition has been authorised. The group's representative (or chief petitioner) should be clearly identified.
- Additional representation forms can be obtained from the LDP Team on 01685 726277, 726279, 726220 or 727053, or may be downloaded from the Council's website at www.merthyr.gov.uk/ReplacementLDP or you may photocopy this form.
- If you have any questions about responding, please do not hesitate to contact the Planning and Countryside Department, asking to speak with a member of the LDP Team on the above telephone numbers or by emailing devplanning@merthyr.gov.uk.

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

BACKGROUND PAPER: DEPOSIT CONSULTATION REPORT

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 <input 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.

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

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"/>

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:	
---------	--	--------	--

Thank you for your comments on the Replacement Deposit Plan.

Please do not forget to enclose any relevant documentation with this form and
securely attach any additional completed sheets.

Completed forms should be returned to:

The LDP Team
Planning and Countryside
Merthyr Tydfil County Borough Council
Unit 5
Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TG

Or e-mailed to: devplanning@merthyr.gov.uk

Representations must be received by
12 midnight on Monday 10th September 2018.

Representations received after this time will not be considered.

**APPENDIX15: - REPLACEMENT LDP DEPOSIT PLAN REPRESENTATIONS AND COUNCIL
RESPONSE REPORTS BY ISSUE**

Representations & Council Responses juxtaposed Affordable Housing

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Affordable Housing

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D6//SW2		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The level of affordable housing need should be set out in the justification text of Policy SW2.

Document:DP Written Statement Policies & Proposals, p.23

Policy: SW2

Issue: DP Affordable Housing-DP Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The level of affordable housing need is now set out in paragraph 6.5.12 of the LDP Written Statement as part of a focused change. The overall level of need has also been corrected from 5505 to 5490 in line with the LHMA annual need figure.

Question: 2d **Representation Text**

Representation Text: . 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?

Question: 2e **Changes proposed**

Representation Text: . The affordable housing need of 5,505 units over the plan period should be set out in the reasoned justification to Policy SW2.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D10//SW2		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The affordable housing target contained in Policy SW2 needs to be clarified.

Document:DP Written Statement Policies & Proposals, p.23

Policy: SW2

Issue: DP Affordable Housing-DP Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The affordable housing target has been amended to 251 units to reflect the fact that the target should be based on the housing requirement, not the provision as suggested. Additional clarifications to the policy wording and reasoned justification have also been proposed to clarify that the figure represents a target to be achieved from development proposals over the plan period and to clarify the components of affordable housing target.

Question: 2d **Representation Text**

Representation Text: . 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?

Question: 2e **Changes proposed**

Representations & Council Responses juxtaposed Affordable Housing

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Affordable Housing

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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101.D10//SW2		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The affordable housing target contained in Policy SW2 needs to be clarified.
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Representation Text: . The affordable housing target contained in Policy SW2 should be based on the housing requirement, not the overall housing provision.

Representations & Council Responses juxtaposed Alternative Sites (new)

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Alternative Sites (new)

115

WYG

Agent: WYG

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D8//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Land at Rhydyar West should be allocated for housing to assist in meeting the overall housing target due to the uncertainty regarding the deliverability of a number of proposed allocations.

Document: DP Written Statement Policies & Proposals, p.22

Policy: SW1

Issue: DP Alternative Sites (new)-DP Alternative Sites (new)

Question Representation Texts

Question: Rec. by Officers

Council Response: The overall level of housing provision included in the LDP has been made in order to deliver the housing requirement of the sustainable growth strategy proposed by the Council. The housing requirement for the LDP strategy is 2250 dwellings, with an overall provision made for 2820 dwellings, in order to provide flexibility and to assist in the delivery of the strategy. The requirement of 2250 dwellings, whilst based on past build rates, is also an ambitious figure as the most recent trend-based Welsh Government population projections would only require 330 dwellings to be built over than Plan period. The level of growth proposed in the LDP therefore does tie in with Merthyr's position as a regional centre for the Heads of the Valleys, within the Cardiff Capital Region.

The LDP allocates land for 2195 dwellings, which equates to 97.6% of the housing requirement. The Council consider that this is an appropriate amount of land to allocate when coupled with an assumption of a windfall allowance that is based of historic trends (amounting to 572 units over a 15 year period). The components of supply identified in Policy SW3 combine to provide the overall housing provision of 2820 dwellings. This amounts to a flexibility allowance of 25.3% over the actual housing requirement of the LDP strategy. The Council consider this relatively high level of flexibility to be appropriate given the focus of the strategy on using previously developed land. The level of flexibility has also been considered appropriate by Welsh Government, the Home Builders Federation and infrastructure providers such as Welsh Water.

The Council accepts that there are a large number of housing allocations carried forward from the existing LDP. However, the fact that these sites have not been delivered as part of the previous plan can be attributed to the strategy of the existing Plan being over-ambitious (250 dwellings per annum, nearly double historic build rates) rather than the sites being completely unviable. The strategy of the Replacement LDP is in line with past build rates and allows sites to come forward at a more appropriate pace. Whilst a number of these units are included in Categories 3 and 4 of the JHLAS, this does not mean that they will not come forward during the Plan period. These categories mean that they are unlikely to come forward within the next 5 years.

The spatial distribution of allocations does broadly correspond with the areas of highest housing need. Cyfarthfa and Town are two of the top three areas of need, and are also two of the top three areas in terms of number of houses allocated. This issue is covered in Section 4 of the 'Housing Land Supply and Trajectory' Background Paper.

With regard to the two sites suggested by this representation, the Council stands by the assessments already carried out on these proposals. Site 11 (Candidate site ref: 62) is included within the settlement boundary, and as such, the principle of development at this site is acceptable subject to proposals satisfying relevant planning policies and other material planning considerations.

Site 5 (Candidate site ref: 23) is a much larger proposal with the majority of the proposed site situated outside the settlement boundary, and a significant portion of the site being classified as a Site of Special Scientific Interest (SSSI). Accordingly, the Council considers the allocation of this site inappropriate and not in accordance with the Strategy of the LDP.

Question: 2d Representation Text

Representation Text: 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.

Representations & Council Responses juxtaposed Alternative Sites (new)

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Alternative Sites (new)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D8//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Land at Rhydyar West should be allocated for housing to assist in meeting the overall housing target due to the uncertainty regarding the deliverability of a number of proposed allocations.

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 Rhydyar West site to provide deliverable homes within a sustainable location, in the regional centre of Merthyr Tydfil.

Question: 2e

Changes proposed

Representation Text: . 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.

Question: 3b

Subject at Public Examination Hearing

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

Representations & Council Responses juxtaposed Alternative Sites (new)

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Alternative Sites (new)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D8//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Land at Rhydycar West should be allocated for housing to assist in meeting the overall housing target due to the uncertainty regarding the deliverability of a number of proposed allocations.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Alternative Sites (new)

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Alternative Sites (new)

132 Merthyr Initiative Group

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
132.D4//SW3		03/09/2018	<input type="checkbox"/>	P	C	I	M		Summary: The site at Clwydyfagwr, Swansea Road (H6 should be included as a housing allocation as it is deliverable in the lifetime of the Plan.

Document: DP Written Statement Policies & Proposals, p.24

Policy: SW3

Issue: DP Alternative Sites (new)-DP Alternative Sites (new)

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The land at Swansea Road is currently allocated the Adopted LDP as site 'H6 – Clwydyfagwr' and is included in the Council's annual Joint Housing Land Availability Study (JHLAS). The site was not however submitted as a Candidate Site as part of preparation of the Replacement LDP. Given that there had been little progress with the site since adoption in 2011, coupled with the reduction in the level of housing growth proposed in the Replacement LDP, it was considered that it was not necessary to allocate the site in the Deposit Plan, and it could potentially come forward as a windfall site.

Since publication of the Deposit LDP, the landowner has progressed through a pre-application process on the site with an application for outline permission submitted in October 2018 for 40 dwellings. Given the progress on the site, and discussions with the landowner, the Council now considers that it is appropriate to allocate the site for 40 dwellings, with completions anticipated between 2022 and 2024. The allocation at this location further emphasises the importance of the Primary Growth Area in the housing strategy of LDP, and increases the range of sites for the market to develop.

A site assessment, including a Sustainability Appraisal, has also been prepared and included in updates of the relevant documentation.

Question: 2d Representation Text

Representation Text: . SW3 Clwydyfagwr, Swansea Road, a 1.79Ha site

This has the potential to provide for 48 housing units.

Why has this 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!

Question: 2e Changes proposed

Representation Text: . 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 – Clwydyfagwr, 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.

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.

Representations & Council Responses juxtaposed Alternative Sites (new)

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Alternative Sites (new)

281 Davies, Mr David

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
281.D1//SW3		09/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Amend Settlement boundary and allocate land to the ear of Oakfield Street, Aberfan (candidate site 103) for residential development.

Document: DP Written Statement Policies & Proposals, p.24

Site: 103/103: Land at Oakfield Street, Aberfan

Policy: SW3

Issue: DP Alternative Sites (new)-DP Alternative Sites (new)

Question Representation Texts

Question: Rec. by Officers

Council Response: The Council has assessed all candidate sites and full details are available to view in the Site Assessment background paper (June 2018). Part of Candidate site 103 (southern half of the site adjoining Oakfield Street) is allocated in the existing Local Development Plan 2006-2021 (residential site allocation H38) however development proposals have not been forthcoming. Highway access has been identified as a constraint in bring the site forward during the Replacement LDP plan period due the presence of a ransom strip. The remainder of the candidate site to the north would require access through the land adjoining Oakfield street and would represent a further extension of the settlement into the countryside which forms part of the Glamorganshire Canal Site of Importance for Nature Conservation (SINC). Therefore, it is not considered appropriate to amend the settlement boundary at this location or to allocate the site due to the identified deliverability constraints. Therefore, no change to the LDP is therefore considered necessary.

Question: 2d Representation Text

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

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

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

Question: 2e Changes proposed

Representation Text: . Amend Settlement boundary and allocate land to the ear of Oakfield Street, Aberfan for residential development.

Representations & Council Responses juxtaposed Community Facilities

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Community Facilities

107 Theatres Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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107.D1//SW13		30/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Trust is supportive of this policy, and welcomes reference that it applies to cultural facilities within the supporting text.No change required.
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Document:DP Written Statement Policies & Proposals, p.40

Policy: SW13

Issue: DP Community Facilities-DP Community Facilities

Question	Representation Texts
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Question:	Rec. by Officers
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<i>Council Response:</i>	Comments noted and support welcomed.
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Question: 2d	Representation Text
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<i>Representation Text:</i>	. The Trust is supportive of this policy, and welcomes reference that it applies to cultural facilities within the supporting text.
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by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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103.D3//EcW1		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Employment site allocation EcW1.1 at the Hoover Strategic Regeneration Area is located partially within Zone C2, as defined by the Development Advice Map.
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Document: DP Written Statement Policies & Proposals, p.58

Site: 105/104/EcW1.1: Hoover Strategic Regeneration Area

Policy: EcW1

Issue: DP Economy and Employment-DP Economy and Employment

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted. The Strategic Flood Risk Assessment (SFCA) prepared for the Deposit Plan identified the potential suitability of this area for commercial development (less vulnerable development) however development proposals would be required to demonstrate that they would satisfy the justification and acceptability tests set out in TAN15. A review of the model data currently available in this area indicated that this may be possible, as velocities are largely less than 0.3m/s. Depths are relatively variable and are lowest to the east and south, below 0.6m (figure 8 of the SFCA). Where depths are above this, ground raising could be considered, providing that there are no third-party impacts on flood risk. NRW have advised that further assessment in the form of a Flood Consequence Assessment for the site would be required to demonstrate that the site could satisfy the requirements of TAN15 in order to justify allocating the land located in zone C2.

There are no detailed development proposals for the site in order to base an assessment on and the land is in various private ownerships. The site was identified as under used / undeveloped land following the Employment Land Review and master planning process at the Hoover Strategic Regeneration Area with a view that future regeneration proposals would expand northwards to include the Willows Industrial Estate with the potential of landownerships changing. However, at present there is no new developer identified for the land and parts of the land allocated are in or have since come forward for various B2/B8 storage and distribution uses. Consequently, it is proposed to remove the allocation from the Deposit Plan and amend the existing employment site boundary accordingly in order to comply with the flood risk requirements contained in national policy and to more accurately reflect existing uses and proposals for the site. With the removal of the employment land, the Replacement LDP would continue to contain sufficient employment land supply with the identified employment land requirement over the Plan period being 14.46 hectares and the Plan containing 30.65 hectares allocated over a range of sites.

It should be noted that the Council's Regeneration department has commissioned further hydrologic modelling and flood mitigation assessments to consider potential future mitigation options for the Nant Morlais – River Taf convergence that results in areas of flood zone C2 in Merthyr Tydfil Town Centre and this work will also consider potential options to help bring forward development sites further downstream at the Willows Industrial Estate. It is hoped that the assessment will inform potential future funding bids to bring forward new development. Whilst this work will inform the consideration of potential flood mitigation options it is not anticipated that this would provide the detailed site level FCA required for a site allocation as this would require consideration of detailed development proposals that are currently unavailable and an assessment of third party impacts (in addition to other requirements identified at paragraph 4.2.11 of the SFCA).

Consequently, the allocation of employment land partly in flood zone C2 is proposed to be removed from the Plan as the specific impacts of development proposals will require further consideration once detailed development proposals are confirmed. The Council is satisfied that there is sufficient alternative employment land supply identified in the Plan and if new development proposals in this part of the HSRA come forward in the future they would not be prevented by the Plan's policies provided they can satisfy national policy requirements in relation to flood risk.

Question: 2d Representation Text

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D3//EcW1		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Employment site allocation EcW1.1 at the Hoover Strategic Regeneration Area is located partially within Zone C2, as defined by the Development Advice Map.

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.

Question: 2e Changes proposed

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

20/12/2018

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Representations & Council Responses juxtaposed Economy and Employment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
103.D3//EcW1		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Employment site allocation EcW1.1 at the Hoover Strategic Regeneration Area is located partially within Zone C2, as defined by the Development Advice Map.

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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119.D11//EcW1		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Support for the provision of employment allocations based in the specific locations. Dependent on the scale and size of proposals, and the end user, additional modelling, consents, pre-treatment or improvement works may be required.
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Document:DP Written Statement Policies & Proposals, p.58

Policy: EcW1

Issue: DP Economy and Employment-DP Economy and Employment

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted and support welcomed. A paragraph detailing the potential requirements dependent on the scale and size of the proposal will be added to the general supporting information for employment site allocations on page 108 of the Deposit Plan Written Statement. A paragraph is already included which details the potential requirements dependent on the end user as appropriate for each allocated site.

Question: 2d Representation Text

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D16		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation considers that improving facilities for existing businesses on industrial sites 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.

Document:DP Written Statement Context & Issues

Issue: DP Economy and Employment-DP Economy and Employment

Question *Representation Texts***Question:** **Rec. by Officers**

Council Response: We have protected employment sites in line with national policy and following a review of employment sites and premises undertaken in accordance with Welsh Government guidance. Further details can be found the Merthyr Tydfil Employment Land Review (June 2018). Consequently no changes to the Deposit Plan are necessary.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Improving facilities for existing businesses (allowing relocation for some) on industrial sites 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Heritage Trust would like to speak about a number of issues including:

Test 1 Fit
 Test 2 Appropriate
 Test 3 Delivery
 Aims
 Objectives
 Revision process and consultation comments
 Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep

Question *Questions of Soundness***Question: 2c** **Soundness Test 1**

Representation Text: .

Representations & Council Responses juxtaposed Economy and Employment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D16		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation considers that improving facilities for existing businesses on industrial sites 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.

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D17		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation considers there is a general shortage of available industrial and warehouse units across all sizes and considers there is a need for improvement and up-grading of existing estates.

Document:DP Written Statement Context & Issues

Issue: DP Economy and Employment-DP Economy and Employment

Question	Representation Texts
Question: <i>Council Response:</i>	Rec. by Officers Comments noted. The Deposit LDP has been informed by a review of employment sites and premises undertaken in accordance with Welsh Government guidance. Further details can be found the Merthyr Tydfil Employment Land Review (June 2018). Existing employment sites have been identified and protected and sufficient land has been allocated for new employment development in line with national policy. The employment land review also included a review of economic development in neighbouring areas and their supply/provision of sites.
Question: 2d <i>Representation Text:</i>	Representation Text . 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?
Question: 2e <i>Representation Text:</i>	Changes proposed . 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?
Question: 3b <i>Representation Text:</i>	Subject at Public Examination Hearing . The Heritage Trust wish to speak about a number of issues including: Test 1 Fit Test 2 Appropriate Test 3 Delivery Aims Objectives

Representations & Council Responses juxtaposed Economy and Employment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D17		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation considers there is a general shortage of available industrial and warehouse units across all sizes and considers there is a need for improvement and up-grading of existing estates.

Revision process and consultation comments

Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D18		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the issue of low skills levels in the County Borough, with a high proportion of its working age population with no qualifications (16 percent)

Document:DP Written Statement Context & Issues

Issue: DP Economy and Employment-DP Economy and Employment

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted. The Merthyr Tydfil Employment Land Review (June 2017) provides a comprehensive review of the employment needs of the area. It includes an employment land and premises review and considers future growth needs based on labour/employment trends by sector and past employment land uptake trends. This has been prepared in line with Welsh Government guidance and provides a robust evidence base for the Plan's employment policies. A range of existing industrial units and land for development is available and the Plan provides for sufficient employment land and contains policies to protect existing sites and premises. Whilst the Plan can protect existing sites and make sufficient provision for new employment land, it cannot directly impact skills and training decisions and support for skills training projects and the development of employer-education partnership schemes is outside the remit of the LDP. No changes to the Plan are therefore considered necessary.

Question: 2d Representation Text

Representation Text: . 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

Representations & Council Responses juxtaposed Economy and Employment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D18		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the issue of low skills levels in the County Borough, with a high proportion of its working age population with no qualifications (16 percent)
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.									

Question: 2e Changes proposed

Representation Text: . Support for skills and skills training projects – development of more employer-education partnership schemes

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:
 Test 1 Fit
 Test 2 Appropriate
 Test 3 Delivery
 Aims
 Objectives
 Revision process and consultation comments

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D57//EcW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the economic development evidence base and considers further study into local skills and training needs is would be useful to inform decision making. The representation seeks no specific change to the Plan.

Document:DP Written Statement Policies & Proposals, p.58

Policy: EcW1

Issue: DP Economy and Employment-DP Economy and Employment

Representations & Council Responses juxtaposed Economy and Employment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Economy and Employment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D57//EcW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the economic development evidence base and considers further study into local skills and training needs is would be useful to inform decision making. The representation seeks no specific change to the Plan.

Question Representation Texts

Question: Rec. by Officers

Council Response: The Employment Land Study (June 2017) provides a comprehensive review of employment land and premises and considers future growth needs based on labour/employment trends by sector and past employment land uptake trends. This has been prepared in line with Welsh Government guidance and provides a robust evidence base for the Plan's employment policies. A range of existing industrial units and land for development is available and the Plan provides for sufficient employment land and contains policies to protect existing sites and premises. Whilst the Plan can protect existing sites and make sufficient provision for new employment land, it cannot directly impact skills and training decisions. No changes to the Plan are therefore considered necessary.

Question: 2d Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of Issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Revision process and consultation comments

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D1		21/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: WG are pleased to see the 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.

Document:DP Written Statement Intro

Issue: -General Comments

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: NRW welcome the opportunity to provide comments on the Deposit Plan. Representations in relation to matters of soundness and clarity are included.

Document:DP Written Statement Intro

Issue: -General Comments

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D23		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP Written Statement

Issue: -General Comments

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. All representations received as part of LDP consultations are given full consideration and where considered necessary for soundness changes have been proposed as part of the focused changes to the Deposit Plan.

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
129.D6		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document: DP Proposals Map

Issue: -General Comments

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. The reference numbers from SW3.30 onwards, on the proposals map, were incorrect as stated. The online interactive maps contained the correct site referencing (consistent with the Replacement LDP Written Statement) and whilst changes to the PDF maps have been made incorrect labelling is shown on printed Deposit Plan proposals maps. This will be identified in the list of Focused Changes and the final proposals map will contain corrected labelling consistent with the reference numbers in the written statement.
Question: 2d	Representation Text
<i>Representation Text:</i>	. 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.
Question: 2e	Changes proposed
<i>Representation Text:</i>	. Proposed change – amend numbering on Deposit map for housing allocations.

Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: 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.

Document:DP Written Statement Context & Issues

Issue: -General Comments

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>The Deposit Plan has been produced in line with, and having regard to, national policy and emerging regional and national plans, policies and programmes. This includes consideration of the City Deal, which the Council is signed up to along with all other City Deal partners. Work on a Strategic Development Plan for South East Wales has yet to commence. However, the Plan's strategy is for higher growth than principle population and household projects indicate and this demonstrates the County Borough's contribution to the wider City Deal growth aspirations. Furthermore, the Replacement LDP Strategy locates development at the Hoover Strategic Regeneration Area and Primary Growth Area which will benefit from the South East Wales Metro improvements.</p> <p>Welsh Government are preparing a National Development Framework (NDF) which once adopted will form part of the statutory development plans system in Wales. This is in the early stages of preparation and a draft NDF is anticipated to be published in Summer 2019. Reference to these Plans is contained within the context section of the LDP Written Statement (paragraphs 2.2 to 2.10). The Replacement LDP has also been produced in consultation with Welsh Government, other Local Authorities, and other -statutory consultees (including utility providers). Consequently, it is considered that the Plan meets the tests of soundness in this regard.</p>

Question: 2d Representation Text

Representation Text: . 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.

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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wishes to speak on a number of issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Revision process and consultation comments

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

21/12/2018

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Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=General Comments

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: 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.

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed General Comments

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Gypsy and Travellers

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D7//SW8		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The authority should ensure their GTANA Update (2018) is signed-off by Welsh Ministers in advance of the LDP examination

Document:GTANA 2018, p.32

Policy: SW8

Issue: DP Gypsy and Travellers-DP Gypsy and Travellers

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The Welsh Ministers have now approved the updated Gypsy Traveller Accommodation Needs Assessment (2018). The study identifies there is no need for new site allocations during the Plan period as the identified needs can be met at existing sites. Consequently, no changes to the Deposit Plan are required.
Question: 2d	Representation Text
<i>Representation Text:</i>	. 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.

Representations & Council Responses juxtaposed Historic Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Historic Environment

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D10//CW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We advise that 'landscape character assessments' should be added to the features listed in paragraph 6.6.10.

Document: DP Written Statement Policies & Proposals, p.42

Policy: CW1

Issue: DP Historic Environment-DP Historic Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. It is agreed that reference to historic, cultural and landscape character assessments could be added to the paragraph. The Council's Landscape Character Assessments were prepared as part of the Merthyr Tydfil LANDMAP landscape Assessment undertaken in 2002 by White Consultants and assessments such as these could be referred to be developers.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Additional text requested regarding 'landscape character assessments'.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D18//CW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We advise that Parks and Gardens and Historic Landscapes of local interest should be added to the features listed in paragraph 6.6.15.

Document: DP Written Statement Policies & Proposals, p.42

Policy: CW1

Issue: DP Historic Environment-DP Historic Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Paragraph 6.6.15 specifically refers to the built environment and is therefore not the appropriate paragraph to refer to locally important Parks and Gardens and Historic Landscapes. However, it is considered appropriate to refer to them elsewhere in the supporting text i.e. paragraph 6.6.12.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Historic Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Historic Environment

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
103.D18//CW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We advise that Parks and Gardens and Historic Landscapes of local interest should be added to the features listed in paragraph 6.6.15.

Question: 2e Changes proposed

Representation Text: . Adding reference to Parks and Gardens and Historic Landscapes of local interest.

Representations & Council Responses juxtaposed Historic Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Historic Environment

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D26		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 18 in relation to heritage asset being left to decay and deteriorate which has not been recognised in the Deposit Plan. Test of soundness 1, 2 and 3 have therefore not been met in regards to this issue.

Document:DP Written Statement Context & Issues

Issue: DP Historic Environment-DP Historic Environment

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Key issue 18 – “National and local heritage designations based on past iron and coal industries need sensitive conservation”, was identified in the Sustainability Appraisal Baseline Scoping Report, dated January 2017 as an SA Topic Area – “Cultural Heritage (incl. Welsh language) and Historic Environment”, which includes a section on ‘Buildings at Risk’ which names buildings at most risk of decay (see pages 63 – 65). LDP Objective 9 Heritage and Cultural Assets: To support, enhance and promote all heritage, historic and cultural assets and Policy CW1: The Historic Environment seek to address this issue. Therefore, no change is considered to be required.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Heritage Trust concerns raised include:

Clear support for all heritage assets

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Heritage – draft policy proposal and its revision.

Question *Questions of Soundness*

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Historic Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Historic Environment

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
207.D26		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 18 in relation to heritage asset being left to decay and deteriorate which has not been recognised in the Deposit Plan. Test of soundness 1, 2 and 3 have therefore not been met in regards to this issue.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.1

132 Merthyr Initiative Group

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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132.D2//SW3		03/09/3018	<input type="checkbox"/>	E	C	I	M		Summary: Residential development is supported at the Hoover Factory site, but the façade at the main entrance, and the cricket field should be retained as part of any development.
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Document: DP Written Statement Policies & Proposals, p.24

Site: 71/71/SW3.1: Hoover Site 2

Policy: SW3

Issue: DP Housing Allocation SW3.1-DP Housing Allocation SW3.1

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The current proposed boundary of the housing allocation at the Hoover Factory site consists of the entire parcel of land between the A4054 and the railway line, and includes the sports field and the façade at the main entrance. In order to give an appropriate level of flexibility as to how the site is actually developed, the Council consider the current allocation boundary to be appropriate.

The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open space will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with Policy SW9: Planning Obligations and Policy SW10: Protecting and Improving Open Spaces of the Replacement LDP.

Similarly, with regard to the façade of the main entrance, the indicative masterplan shows that the building is unlikely to be retained in its current form. However, there will be scope to include some form of built development that has regard to the industrial heritage of the site, for example through the main entrance building as part of the redevelopment. This will also help to ensure that the development of the site is carried out in accordance with Policy CW1: The Historic Environment of the Replacement LDP.

Question: 2d Representation Text*Representation Text:* . 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?

Question: 2e Changes proposed*Representation Text:* . It is my view that the following allocations should be excluded from the Replacement LDP (2016-2031):

SW3.1 Part of Hoover Factory Site (440)

The 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.5

333 Lees, Mr Spencer

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
333.D1//SW3		02/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The housing allocation at Erw Las should be deleted as the land currently provides a valuable area of green space.

Document:DP Written Statement, p.24

Site: 15/SW3.5: Land at Erw Las, Gellideg

Policy: SW3

Issue: DP Housing Allocation SW3.5-DP Housing Allocation SW3.5

*Question Representation Texts***Question: Rec. by Officers**

Council Response: Whilst the site is currently amenity green space, the area is not defined as open space in the Council's adopted Open Space Strategy and has been deemed surplus to requirements by the Council's Estates department.

Further assessments of the site have indicated that the site is suitable for residential development. It is accessible from an adopted highway and adjoins an existing settlement. Development of the site would provide a logical small scale extension of the settlement and would contribute to local housing land supply. Whilst some constraints have been identified these are not considered to be untypical for the area or insurmountable. Therefore, no change to the Deposit Plan is proposed.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . The housing allocation at Erw Las, Gellideg should be deleted.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.8

132 Merthyr Initiative Group

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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132.D3//SW3		03/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Housing allocation SW3.8 should be deleted from the LDP due to issues relating to biodiversity and the historic environment.
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Document: DP Written Statement Policies & Proposals, p.24

Site: 109/108/SW3.8: Land South of Castle Park, Twyncarmel

Policy: SW3

Issue: DP Housing Allocation SW3.8-DP Housing Allocation SW3.8

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site is currently used as agricultural land, but was submitted as a candidate site by a local developer and the landowner is aware of its submission. The site consists of low value agricultural land, and the loss of this class of land is not deemed to be unacceptable, particularly as there is a significant amount of similar quality agricultural land in the County Borough.

As the site is situated within the Merthyr Tydfil Landscape of Outstanding Historic Interest, and lies adjacent to both a Scheduled Ancient Monument (SAM) and a Special Landscape Area (SLA), it has been identified that an Assessment of the Significance of the Impacts of Development on the Historic Landscape (ASIDOHL) will be required as part of any planning application on the site.

The site itself has does not have any significant nature conservation value, but does lie adjacent to a Site of Importance for Nature Conservation (SINC) and does provide a corridor for Great Crested Newt migration in the area. It has been suggested that these issues can be addressed by providing an appropriate ecological buffer zone along the extent of the site that borders the SINC, and providing a connective corridor that links the site to the Clwydyfagwr SINC to the East. This corridor may also be able to provide an appropriate linear SUDs solution for the development.

Taking all this information into consideration, the Site Assessment process identified that site is appropriate to allocate for residential development and is anticipated to deliver 160 dwellings in the latter part of the Plan period.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . It is my view that the following allocations should be excluded from the Replacement LDP (2016-2031):

SW3.8 South of Castle Park (160)

For the reasons given under 2d.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.30

336 Shankland, Mr John

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
336.D1//SW3		06/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Housing allocation SW3.30 should be deleted and the land should be designated as 'Community Amenity Land'

Document: DP Written Statement Policies & Proposals, p.24

Site: 7/SW3.30: Land at Taff Merthyr Garden Village (Storm Down)

Policy: SW3

Issue: DP Housing Allocation SW3.30-DP Housing Allocation SW3.30

Question Representation Texts**Question: Rec. by Officers**

Council Response: The site proposed as SW3.30 in the Replacement LDP was designated as land for informal recreation in the Merthyr Tydfil Borough Local Plan 1996-2006. This Plan would have been the primary document to inform planning decisions until the current Local Development Plan (2006-2021) was adopted in May 2011. Accordingly, any planning applications for residential development on this site would have been regarded as not being in accordance with the Local Plan adopted at that time.

The current LDP (adopted May 2011) does not carry any specific land use allocation/designation on the site in question. This change from an informal recreation designation to no designation was full consulted on as part of preparation of the 2006-2021 LDP, with the consultations taking place in accordance with a Delivery Agreement agreed with Welsh Government.

In 2016, following a statutory review of the LDP, work commenced on preparing a Replacement LDP that will cover the period 2016-2031. One of the initial pieces of work carried out was a Call for Candidate Sites, where the Council invited stakeholders to suggest sites for inclusion in the replacement LDP (suggestions could be for both development and protection of land). The land at Stormtown was proposed by the Council's Estates Department as a site for residential development. Furthermore, the Council's Open Space Strategy does not identify this site as an open space site with alternative functional green spaces identified in the area (shown on the LDP Constraints Map).

Following the Site Assessment process it was considered that there are not any insurmountable constraints and development of the site is considered to be realistic and deliverable within the Replacement LDP plan period. Consequently, no changes to the Deposit Plan in this respect are proposed.

Question: 2d Representation Text

Representation Text: Policy SW3.30 concerns land at Taff 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.

Question: 2e Changes proposed

Representation Text: 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

287 Davies, Mr Jim

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
287.D1//SW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The housing allocation should be removed and the site should not be developed as the site has a high level of nature conservation value.

Document: DP Written Statement Policies & Proposals, p.24

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: SW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout which took account of the sites topography.

Question: 2d Representation Text

Representation Text: 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 is 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 re-colonisation with saplings has not occurred, and the Wavy Hairgrass dominated sward is now favoured Vole hunting ground for the iconic Barn Owl.

6.To the west, this dry acid grassland is contiguous with species rich Marshy Grassland, and water course, that also prevent it from drying out. Culverting and /or draining this small wetland would be a severe blow to the SINC's viability.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
287.D1//SW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The housing allocation should be removed and the site should not be developed as the site has a high level of nature conservation value.

7.The major shortcoming of the 2007 SINC survey (done in September) is the absence of Invertebrate records. The Insects and Spiders all over for 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 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.

Question: 2e Changes proposed

Representation Text: . The housing allocation SW3.31 – Cwmfelin, Bedlinog should be deleted.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Housing on SINC at Cwm Felin Fields

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

289 Price, Mr Paul

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D1//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The proposed allocation does not meet soundness tests as the difficulty of developing the site has not been fully considered.

Document:DP Written Statement, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

The land at Craig y Hendre has not been allocated as the Council considers that it is unlikely that the site is capable of accommodating more than 10 dwellings (10 dwellings in the threshold that the Council has used in allocated residential sites). The site does however remain within the settlement boundary where the principle of residential development is acceptable subject to any proposals satisfying relevant planning policies and other material planning considerations.

Question: 2d Representation Text

Representation Text: . 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 the estate. This is in 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 form people to move into the area, given all

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D1//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The proposed allocation does not meet soundness tests as the difficulty of developing the site has not been fully considered.

the new development going on in 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.

Question: 2e Changes proposed

Representation Text: . 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 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 the 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.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D2//EnW3		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Consideration should be given to reducing the number of dwellings proposed on the site, given the known constraints in the area.

Petition of 12 signatures

Document: DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D2//EnW3		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Consideration should be given to reducing the number of dwellings proposed on the site, given the known constraints in the area.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

Question: 2d **Representation Text**

Representation Text: . 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;

No.4 - Judith & Clwyd Jones

No. 3 - Anne & Alan Powell

No. 2 - Rob & Karen Smart / Lauren Smart / James Sheen

No. 1 - Steve & Sian Bevan

No. 5 - Shirley & Paul Price

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.

Question: 2e **Changes proposed**

Representation Text: . Consideration should be given to reducing the number of dwellings proposed on the site.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D3//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The issues of land stability and the coal mining history of the site need to be fully considered.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as land stability as part of any planning applications on the site, and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D4//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Ecological issues will need to be closely considered as part of any development on this site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011 (the same point in time that the SINC designation was formalised).

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D4//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Ecological issues will need to be closely considered as part of any development on this site.

Question: 2d Representation Text*Representation Text:* . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D5//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: There are a significant number of species of birds and other types of wildlife that will need to be closely considered as part of any development on the site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC and will address concerns related to wildlife.

Question: 2d Representation Text*Representation Text:* . 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 onetime, suggesting they too are breeding successfully. Foxes are regular visitors.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D5//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: There are a significant number of species of birds and other types of wildlife that will need to be closely considered as part of any development on the site.
<p>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.</p> <p>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.</p> <p>5] Water courses also support water voles, which are again an important food source for many of these special birds.</p>									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D6//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Issues relating to drainage and flood risk will need to be closely considered as part of any development on the site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.

However, given comments received as part of the consultation on the Replacement Deposit LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission. Detailed consideration will be given to issues relating to drainage and flood risk as part of any planning application on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D6//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Issues relating to drainage and flood risk will need to be closely considered as part of any development on the site.
in the cold weather.									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D7//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The issues of land stability and the coal mining history of the site need to be fully considered.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as land stability as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d **Representation Text**

Representation Text: . 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).

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D8//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The services of existing dwellings will need to be closely considered when detailed development proposals are put forward.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D8//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The services of existing dwellings will need to be closely considered when detailed development proposals are put forward.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Protection of existing services is an issue that will be fully considered at planning application stage and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D9//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: There is an issue of low water pressure in the vicinity of the site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: DCWW have not raised any issues in regard to water supply in the area. Comments from DCWW on the previous planning application have stated that a connection to water supply can be made at the site, however a contribution from the developer may be required towards the provision of water infrastructure.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D10//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Access issues will need to be closely considered as part of any development proposals on this site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Access is an issue that will be fully considered at planning application stage and this issue is not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

The previous outline permission contained an access that satisfied the Council's Highways Department, and delivery of the site has been phased later on in the Plan period in order to allow sufficient time for issues such as access arrangements and ownership to be resolved.

Question: 2d **Representation Text**

Representation Text: . 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.

6] 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.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D11//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The issue of road safety will need to be closely considered as part of any development on this site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. All relevant highways issues will be fully considered at planning application stage and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP. In this respect, the previous outline permission contained an access that satisfied the Council's Highways Department.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D12//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The character of the village of Bedlinog needs to be closely considered when development proposals are put forward for the site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.24

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: SW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D12//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The character of the village of Bedlinog needs to be closely considered when development proposals are put forward for the site.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, and enables greater scope to ensure that the development reflects the character of the existing settlement.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D13//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Any development of the site should not be to the detriment of the attractiveness of the Bedlinog as an area to live.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, and enables greater scope to ensure that the development reflects the character of the existing settlement and increases the attractiveness of the village for new and existing residents.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D13//EnW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Any development of the site should not be to the detriment of the attractiveness of the Bedlinog as an area to live.

Question: 2d Representation Text

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D14//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The issue of potential air pollution will need to be closely monitored as part of any development proposals at this site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.24

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: SW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question Representation Texts

Question: Rec. by Officers

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration would be given to issues such as air pollution as part of the planning application process and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d Representation Text

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D15//CW1		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Archaeological issues will need to be closely considered as part of any development proposals on the site.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.42

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: CW1

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

20/12/2018

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D15//CW1		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Archaeological issues will need to be closely considered as part of any development proposals on the site.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration would be given to issues such as archaeology as part of the planning application process and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D16//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The representors disagree with certain scores under the Site Sustainability Appraisal.

Petition of 12 signatures

Document:DP Written Statement Policies & Proposals, p.24

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: SW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers the score attributed against each objective in the appraisal of the site in question to be consistent with the methodology contained within the Sustainability Appraisal Framework, and consistent with the assessments of other candidate sites that were considered. However, as the number of units allocated on the site has reduced from 50 to 30, the score relating to the SA Housing Objective has been reduced to '+' from '++'.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D16//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The representors disagree with certain scores under the Site Sustainability Appraisal.

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'.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D17//EnW3		09/09/2018	<input type="checkbox"/>	P	O		M		Summary: The proposed allocation does not meet soundness tests as the difficulty of developing the site has not been fully considered.

Petition of 12 signatures

Document: Review of SINCS background paper, p.16

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

The land at Craig y Hendre has not been allocated as the Council considers that it is unlikely that the site is capable of accommodating more than 10 dwellings (10 dwellings in the threshold that the Council has used in allocated residential sites). The site does however remain within the settlement boundary where the principle of residential development is acceptable subject to any proposals satisfying relevant planning policies and other material planning considerations.

Question: 2d **Representation Text**

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.D17//EnW3		09/09/2018	<input type="checkbox"/>	P	O		M		Summary: The proposed allocation does not meet soundness tests as the difficulty of developing the site has not been fully considered.

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 the estate. This is in 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 for people to move into the area, given all the new development going on in 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.

Question: 2e Changes proposed

Representation Text: . 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 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 the 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.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

335 Hughes, Mr Gareth

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
335.D1//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Petition of 2 signatures

Document: DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question *Representation Texts***Question: Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

Question: 2d Representation Text

Representation Text: . 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 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.

Question: 2e Changes proposed

Representation Text: . The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We dot think the site is suitable or desirable for housing.

Question *Questions of Soundness***Question: 2c Soundness Test 2**

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
335.D1//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
335.D2//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Petition of 2 signatures

Document: Review of SINCS background paper, p.16

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.</p> <p>By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).</p> <p>However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.</p>

Question: 2d Representation Text

Representation Text: . 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 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.

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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335.D2//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.
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Test 3

No developer has felt able to develop on this site before, despite it being available.

Question: 2e

Changes proposed

Representation Text: . The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We dot think the site is suitable or desirable for housing.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

337 Hughes, Mrs Catherine

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
337.D1//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Petition of 2 signatures

Document:DP Written Statement Policies & Proposals, p.51

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

Question: 2d Representation Text

Representation Text: . 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 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.

Question: 2e Changes proposed

Representation Text: . The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We dot think the site is suitable or desirable for housing.

*Question Questions of Soundness***Question: 2c Soundness Test 2**

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
337.D1//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
337.D2//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

Petition of 2 signatures

Document: Review of SINCS background paper, p.16

Site: 119/118/SW3.31: Cwmfelin, Bedlinog

Policy: EnW3

Issue: DP Housing Allocation SW3.31-DP Housing Allocation SW3.31

Question Representation Texts

Question: Rec. by Officers

Council Response: The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011. Detailed consideration will be given to issues such as access and size/design of dwellings on the site as part of any planning applications on the site and these issues are not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP.

By increasing the number of units proposed on the allocation from 18 in the current plan, to 50 in the Replacement LDP, the Council was attempting to maximise the housing on the site, whilst still delivering housing at an appropriate density (50 dwellings on the developable area would result in a density of 29 dwellings per hectare).

However, given comments received as part of the consultation on the Deposit Replacement LDP, the Council considers that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout, taking account of the sites topography.

Question: 2d Representation Text

Representation Text: . 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 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

Representations & Council Responses juxtaposed Housing Allocation SW3.31

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.31

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
337.D2//EnW3		09/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We don't think the site is suitable or desirable for housing.

No developer has felt able to develop on this site before, despite it being available.

Question: 2e Changes proposed

Representation Text: . The Cwmfelin Slopes are an important resources for the village. The village would be completely transformed by a busy roadway and all the additional traffic this would create. We dot think the site is suitable or desirable for housing.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

323 D'Cruz, Mr Brendan

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
323.D1/SW3.32/S		29/08/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field, Treharris should be removed as the pitch has historical significance, and the loss of the facility would exacerbate an already critical shortage of football pitches in the area.

Document:DP Written Statement Policies & Proposals, p.24, para.SW3.32

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

Question Representation Texts**Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I live in John Street, Treharris 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, comparing 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 Treharris is critical, with local teams having to use Cyfarthfa Park, Aberfan and Abercynon, given the shortage. The new development in Trelewis is insufficient, given competing interests of other communities, and Treharris Park is not fit for purpose.

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 9-11) yet you are proposing the replacement of a historic site previously used by Treharris Athletic Western Football Club for leisure purposes to be used to develop 15 new homes. The oldest football club in South Wales should be redeveloping its stadium, not letting it become a few more houses. As your plan states, there are limited alternative sites in the area of Treharris for this type of provision. Therefore, I state my objection to Site 32 Commercial Field, Treharris and the development of 15 dwellings.

Question: 2e Changes proposed

Representation Text: . Housing allocation 3.32 should be deleted

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

332 Williams, Mrs S

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
332.D1//SW3		01/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The housing allocation at Commercial Field, Treharris should be removed. Local youth teams have no pitch to play on, and the field also has historical significance.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Housing allocation 3.32 should be deleted

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

338 Jones, Mrs Leanne

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
338.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
338.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

339 Jones, Mrs Leanne

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
339.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

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Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
339.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
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Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

340 Davies, Ms Nia

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
340.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

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Proposal SW3.34 fails the Soundness Test 1, as identified in the Annex of the Comment Form, on the following grounds:

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Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
340.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
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Question: 2e Changes proposed

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Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

341 Jones, Mr Robert

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
341.D1//SW3		06/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

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Question: 2d Representation Text

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Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
341.D1//SW3		06/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
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Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

342 Lawson, Mrs Sharon

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
342.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

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Question: 2d Representation Text

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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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
342.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

343 Thomas, Mrs Elaine

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
343.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
343.D1//SW3		07/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

344 Jones, Mr Keiron

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
344.D1//SW3		05/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
344.D1//SW3		05/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness**Question: 2c Soundness Test 1**

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

345 Christopher, Mr Brian

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
345.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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?
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The plan fails on these counts as the development proposed in SW3.34 does not take into account:

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Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
345.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

346 Knight, Mr Rowan

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
346.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

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Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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?
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The plan fails on these counts as the development proposed in SW3.34 does not take into account:

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- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
346.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

347 Wathen, Mrs Bernadette

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
347.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

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Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines in SW3.34 in the Replacement Local Development Plan 2016 -2031 on the following grounds:

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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 [open] 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 [county] borough, or other [county] 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?
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by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
347.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e **Changes proposed**

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question **Questions of Soundness****Question: 2c** **Soundness Test 1***Representation Text:* .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

348 Clarkson, Mr Justin

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
348.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

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Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines in SW3.34 in the Replacement Local Development Plan 2016 -2031 on the following grounds:

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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 [open] 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 [county] borough, or other [county] 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?
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Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
348.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

349 Thomas, Mr Andrew

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
349.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

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Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
349.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

350 Rees, Mr Owain

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
350.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . - I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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 counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
350.D1//SW3		03/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e Changes proposed

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

351 Robins, Mr Alun

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
351.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . I object to the proposal to build houses on the site in Treharris outlines 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 [open] 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 [county] borough, or other [county] 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?
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- 3) Is the Plan compatible with other Council strategies?

The plan fails on these counts as the development proposed in SW3.34 does not take into account:

- Merthyr open Space Strategy 2016
- Wellbeing of Future Generations Act 2016

Development of a recreational space into housing in [an] area where such amenities are scarce has a direct negative impact on the health and well-being of the local population; social

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
351.D1//SW3		04/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: The housing allocation at Commercial Field should be removed as the inclusion of the site for housing is in conflict with Policy SW13 of the Replacement LDP.
inclusion and erodes local community cohesion.									

Question: 2e **Changes proposed**

Representation Text: . 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 [County] Borough. It is acknowledged by the Council in the LDP that provision of open spaces is "generally poor" 9paragraph 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.

Question **Questions of Soundness****Question: 2c** **Soundness Test 1***Representation Text:* .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

352 Hughes, Mr Rhys

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
352.D1//SW3		08/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The housing allocation at Commercial Field should be removed as new houses are not needed in Treharris, and the area needs adequate leisure facilities.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representations & Council Responses juxtaposed Housing Allocation SW3.32

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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352.D1//SW3		08/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The housing allocation at Commercial Field should be removed as new houses are not needed in Treharris, and the area needs adequate leisure facilities.
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Representation Text: . Housing allocation 3.32 should be deleted

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

353 Phillips, Ms Natalie

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
353.D1//SW3		08/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The site should remain as a playing field as there is no need for extra housing in Treharris and there is already limited open space/play facilities in the area.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
353.D1//SW3		08/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The site should remain as a playing field as there is no need for extra housing in Treharris and there is already limited open space/play facilities in the area.

I ask that you please consider all objections fairly as more houses are not what the Treharris ward need.

Question: 2e **Changes proposed**

Representation Text: Housing allocation 3.32 should be deleted

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

354 Phillips, Mr Patrick

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
354.D1//SW3		09/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The site should remain as a playing field as there is already limited open space/play facilities in the area.

Document: DP Written Statement Policies & Proposals, p.24

Site: 95/SW3.32: Commercial Field, Treharris

Policy: SW3

Issue: DP Housing Allocation SW3.32-DP Housing Allocation SW3.32

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The site was initially submitted as a Candidate Site by the Council's Estates Department in the early stages of preparing the Replacement LDP, as the situation at that time was that the existing lease was running out, and the site was deemed to be suitable for disposal.

Since the Deposit version of the Replacement LDP was prepared, the circumstances have changed on the site and it is now apparent that it will be appropriate to retain the playing field use on this site, enabling local youth teams to use the field.

The number of dwellings proposed on the site is not significant in regard to the overall delivery of the LDPs housing strategy. Accordingly, the housing allocation will be removed from the Plan, although the site remains within the settlement boundary, and should circumstances change in the future, it could contribute to the housing requirement as a windfall site.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Housing allocation 3.32 should be deleted

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Allocation SW3.32

324 Thomas, Mr Michael

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
324.D1//SW3		10/09/2018	<input type="checkbox"/>	P	S	W	M		Summary: Support for SW3.33 - Cilhaul, Treharris

Document:DP Written Statement Policies & Proposals, p.24 Site: 97/SW3.33: Cilhaul

Policy: SW3

Issue: DP Housing Allocation SW3.33-DP Housing Allocation SW3.33

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Support welcomed.**Question: 2d** **Representation Text***Representation Text:* . No text was included as part of the representation, but the 'Support' box was ticked on the representation form.

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D4//SW1		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Support for the overall strategy and level of growth proposed. Some water and sewerage constraints may require works to Welsh Water infrastructure, but it is unlikely that they will be insurmountable.

Document:DP Written Statement Policies & Proposals, p.22

Policy: SW1

Issue: DP Housing Requirement-DP Housing Requirement

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments are noted and welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D14		10/09/2018	<input type="checkbox"/>	E	O		M		Summary: A new/revised housing needs assessment should be carried out in order to ensure that the housing needs of local people are met.

Document:DP Written Statement Context & Issues

Issue: DP Housing Requirement-DP Housing Requirement

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The current Local Housing Market Assessment (LHMA) has been produced in accordance with Welsh Government guidance and identifies the level and type of affordable housing need across the County Borough. The LHMA covers the time period of 2014-2019, however the Council's Housing Strategy Department has not yet produced a new assessment. The Social Housing waiting lists in the County Borough have undergone significant change over the last year with the amalgamation of a number of waiting lists into a single Common Housing Register. In order to use the most up-to-date data and establish an accurate level of need, the Council intends to wait until at least April next year to update the LHMA. This will give the new Common Housing Register time to bed in and enable the WG methodology to be followed to assess the level of housing need.

The policies and allocations included the Replacement Deposit LDP will enable a range of types of housing need to be met across all parts of the County Borough. Further details regarding how the LDP addresses local housing needs is provided in the Housing Supply and Affordable Housing background papers.

Question: 2d Representation Text

Representation Text: . 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

Question: 2e Changes proposed

Representation Text: . A new/revised housing needs assessment should be carried out.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Revision process and consultation comments

Question *Questions of Soundness*

Question: 2c Soundness Test 1

20/12/2018

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D14		10/09/2018	<input type="checkbox"/>	E	O		M		Summary: A new/revised housing needs assessment should be carried out in order to ensure that the housing needs of local people are met.

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D56//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the plan revision and preparation process. In particular, regarding the consideration of population projections, housing provision and sites. A downward revision of projections and housing targets is sought.

Document:DP Written Statement Policies & Proposals, p.22

Policy: SW1

Issue: DP Housing Requirement-DP Housing Requirement

Question Representation Texts

Question: Rec. by Officers

Council Response: Welsh Government population projections are a starting point for projecting population growth for the Replacement Development Plan, and for Local Development Plans in general. Using these as a starting point, the Council generated a number of options and following consultation on the Preferred Strategy the level of growth proposed in the Replacement Deposit Plan is considered appropriate.

The figure quoted from the 2016 Review Report (indicating that the trend was for the population to increase to approximately 62,000 by 2031), was based on the 2011-based population projections, and was the most up to date data available at the time.

During early 2017, 2014-based population projections were released by Welsh Government. These figures indicated that the projected population growth for Merthyr Tydfil County Borough had slowed considerably, with a population high of approximately 59,300 reached in 2024, with the population then slowly decreasing to 59,011 by 2031. This population change during 2016-2031 would have resulted in a need for 330 dwellings (22 per annum).

As part of work undertaken prior to publication of a Preferred Strategy for the Replacement LDP, a range of options were looked at by the Council in regard to proposing a strategy for the Replacement LDP that delivered an appropriate level of population and housing growth.

The options examined were:

- Scenario A: Principal projection
- Scenario B: 10 year average migration projection
- Scenario C: Zero migration projection
- Scenario D: Dwelling led projection – 150 per annum (15 year ave. build rate)
- Scenario E: Dwelling led projection - 253 per annum (continuation of 2006 LDP Strategy)
- Scenario F: Jobs – led projection

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D56//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the plan revision and preparation process. In particular, regarding the consideration of population projections, housing provision and sites. A downward revision of projections and housing targets is sought.

- Scenario G: Zero UK migration projection
- Scenario H: Positive UK migration projection.

When all of these options were considered (including engagement with internal and external stakeholders through the LDP Steering and Working Groups), it was agreed that a dwelling led scenario, in line with past build rates (circa 150 dwellings a year) would be the appropriate level of growth to take forward in the Replacement LDP.

The number of dwellings proposed is considered both aspirational (as it is significantly higher than the WG principal projection) and deliverable, as the amount of dwellings required is in line with the amount of housing development that has taken place in Merthyr Tydfil County Borough over the past 20 -30 years.

Whilst the number of units allocated at the Hoover Strategic Regeneration (HSRA) is now 440 dwellings (opposed to the 'upto 1000' mentioned in the Preferred Strategy), this still represents a significant amount of the overall housing requirement (20% of the 2250 dwelling requirement), and the site remains the largest housing site in the County Borough.

Whilst the former Ivor Steelworks Site (Project Heartland), has been included as a regeneration site in the Deposit Replacement LDP, the site was never considered to directly contribute to the housing provision of the Replacement LDP due to known constraints on the site, and associated high development costs.

Goatmill Road was assessed as a candidate site and it was considered that it is appropriate to allocate the entire site as employment land. The Council is confident that the housing sites allocated in Policy SW3, in combination with the windfall allowance outlined in the Plan, provide enough appropriate land to deliver the housing requirement by 2031.

Information relating to housing land supply can be found in the Housing Supply background paper update (December 2018) and in Appendix 2 of the Replacement LDP Written Statement (as amended by the Focused Changes). The data indicates that the Council will have a land supply of over 6 years upon adoption, with this figure increasing to over 10 years later in the Plan period as more housing is delivered in accordance with the LDP housing requirement.

Question: 2d

Representation Text

Representation Text: . Going back to 2011, MTCBC seems to taken a rather casual approach to monitoring and reviewing the all-important population, housing and employment data. Local and national government was taken by surprise when the 2011 Census revealed that population projections had been wide of the mark. Merthyr Tydfil CBC was caught on the hop because it's 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 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".]

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D56//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the plan revision and preparation process. In particular, regarding the consideration of population projections, housing provision and sites. A downward revision of projections and housing targets is sought.

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.

Question: 2e Changes proposed

Representation Text:

1. Downward revision of 'in-migration' population 'targets'.
2. 2018 Merthyr Tydfil housing need review/study.
3. 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).

Question: 3b Subject at Public Examination Hearing

Representation Text:

- The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit

Test 2 Appropriate

Test 3 Delivery

Aims

Objectives

Revision process and consultation comments

Hoover regeneration strategy – original proposals and revisions

Representations & Council Responses juxtaposed Housing Requirement

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Requirement

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D56//SW1		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation comments on the plan revision and preparation process. In particular, regarding the consideration of population projections, housing provision and sites. A downward revision of projections and housing targets is sought.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D4//SW3		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The Housing Trajectory and Housing Land Supply Table should be included as appendices in the LDP Written Statement.

Document:DP Written Statement Policies & Proposals, p.24

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: In order to ensure effective implementation and monitoring of the plan's housing delivery the Housing Trajectory and Housing Land Supply table will be included as an Appendix of the LDP written statement as part of a Focused Change. The phasing of housing allocations as outlined in Table C of the 'Housing Land Supply and Trajectory' background paper will be included as an additional column in the allocations list in Policy SW3.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . The Housing Trajectory and Housing Land Supply Table should be included as appendices in the LDP Written Statement. 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D5//SW3		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Table 1 in the Deposit Plan should be updated to reflect Table 1 in the Preferred Strategy and to clarify that there is no double counting.

Document:DP Written Statement Policies & Proposals, p.24

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: In order to provide clarity with regard to the components of housing supply, Table 1 has been updated in accordance with Welsh Governments comments.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
101.D5//SW3		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Table 1 in the Deposit Plan should be updated to reflect Table 1 in the Preferred Strategy and to clarify that there is no double counting.

Question: 2e Changes proposed

Representation Text: . Table 1 in the Deposit Plan should be updated to reflect Table 1 in the Preferred Strategy and to clarify that there is no double counting.

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

115 WYG

Agent: **WYG**

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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115.D4//SW3		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: Marvel Ltd object to the current configuration of the boundary of the Brondeg housing allocation (SW3.4) as it does not reflect an existing outline planning permission.
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Document: DP Written Statement Policies & Proposals, p.24

Site: 120/119/SW3.4: Brondeg

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The boundary of the housing allocation and the settlement boundary will be amended to include two parcels of land at the West of the site, in order to reflect the previous planning permission referred to by the representor.

Question: 2d **Representation Text**

Representation Text: . 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.

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).

Question: 2e **Changes proposed**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . 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.

Question *Questions of Soundness*

Question: 2c **Soundness Test 2**

Representation Text: .

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D5//SW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The settlement boundary should be amended to include land currently in the settlement boundary in the adopted LDP, between existing housing at Brondeg and the Nant Cwm-Pant Bach watercourse

Document:DP Written Statement Policies & Proposals, p.24

Site: 120/119/SW3.4: Brondeg

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>The Council amended the settlement boundary in the Replacement LDP at this location in order to provide a more logical settlement boundary. It is considered that the existing curtilage of the 'Greenacres' property to the East; the curtilages of the properties at Brondeg to the North; and the extent of the housing allocation would provide a more logical settlement boundary in this area.</p> <p>There have been previous pre-application discussions surrounding the land in question, and given the constraints included in this area (the area includes SINC and TPO designations), and the fact that no firm proposals were subsequently submitted to the Council, it is considered that tightening the settlement boundary in this location provides clarity regarding this area of land. However, in line with another representation made by this representor, there will be some minor amendments to the settlement boundary on the Western section of the housing allocation to reflect a previous planning permission.</p>

Question: 2d Representation Text

Representation Text: . 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.

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.

Question: 2e Changes proposed

Representation Text: . The settlement boundary should be amended to include land currently in the settlement boundary in the adopted LDP, between existing housing at Brondeg and the Nant Cwm-Pant Bach watercourse.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
115.D5//SW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The settlement boundary should be amended to include land currently in the settlement boundary in the adopted LDP, between existing housing at Brondeg and the Nant Cwm-Pant Bach watercourse

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D2/4.1/		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Wording 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.

Document:Housing Land Supply and Trajectory, para.4.1

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Work on an updated LHMA will be carried out in early 2019 as the Council has recently moved to a Common Housing Register that requires a period of time to bed in and generate robust data. Where necessary, any appropriate updates to the Replacement LDP will be carried out as part of the LDP Examination. It is proposed that LDP paragraph 6.5.13 be amended to make reference to using the most up to date LHMA data in securing affordable housing on residential development.

Question: 2d **Representation Text**

Representation Text: . The HBF suggest wording be added tom 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.

Question: 2e **Changes proposed**

Representation Text: . Add additional wording to deal with the issue identified above.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D9//SW3		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP Written Statement Site Allocation Details, p.87

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. The Council considers that it is appropriate to include this information as an appendix to the LDP Written Statement to assist with the usability of the document and provide as much information as possible on the housing allocations included in the Plan. Including this information as part of the written statement provides clarity to developers/landowners regarding the level of work/potential costs associated with these sites.

The Site Allocation Details section in the Deposit Plan Written Statement will move from Section 8 to Appendix 1 as part of a proposed change.

Question: 2d **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D9//SW3		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Council Housing Land Prospectus link to document is an example that the HBF are aware of.

Question: 2e Changes proposed

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D11//SW3		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The HBF suggest that it would be helpful where possible to provide thresholds at which such studies are likely to be required.

Document:DP Written Statement Site Allocation Details, p.85

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Site Allocation Details section of the Deposit LDP (now included as Appendix 1) outlines the relevant studies required for each housing and employment allocation, and provides clarity for developers/landowners as to the level of work and potential cost required to bring each site forward.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Provide thresholds for when studies are usually required as suggested above.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D12//SW1		28/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: The HBF supports the proposed 25% flexibility allowance.

Document:DP Written Statement Policies & Proposals, p.22

Policy: SW1

Issue: DP Housing Supply-DP Housing Supply

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.D12//SW1		28/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: The HBF supports the proposed 25% flexibility allowance.
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Your comments are noted and welcomed

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.D14//SW3		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The HBF suggests that it would be clearer if the 25% flexibility was show as a separate figure.
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Document:DP Written Statement Policies & Proposals, p.26

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Components and Distribution of Housing Supply Table included under Policy SW3 has been amended to clarify the components of supply as part of a focused change. This table is now numbered Table 2.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . The 25% flexibility should be shown more clearly in Table 1.

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D5//SW3		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: DCWW support the spatial distribution of housing allocations across the County Borough. Some modelling work may be required dependant on the size and timing of sites coming forward.

Document:DP Written Statement Policies & Proposals, p.24

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments are noted and welcomed. Comments from DCWW on specific sites have also been incorporated into the Site Allocation Details appendix of the LDP Written Statement. Water supply has been raised as an issue on two sites in Trelewis and additional text is proposed to be added to the site detail for these allocations.

Question: 2d **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D14//SW3		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: DCWW request that reference to the capacity of networks be removed from individual site details in Section 8 of the LDP written statement. A piece of introductory text at the start of the site details section would be a more appropriate way forward.

Document:DP Written Statement Site Allocation Details, p.24

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council agrees with the changes suggested by DCWW and changes have been proposed to address this.

Question: 2d **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D14//SW3		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: DCWW request that reference to the capacity of networks be removed from individual site details in Section 8 of the LDP written statement. A piece of introductory text at the start of the site details section would be a more appropriate way forward.

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.

Question: 2e Changes proposed

Representation Text: . DCWW request that reference to the capacity of networks be removed from individual site details in Section 8 of the LDP written statement. A piece of introductory text at the start of the site details section would be a more appropriate way forward.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D15//SW3		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: General comments regarding current capacity; incorporating development proposals into future Capital Investment Programmes; assets being laid over private land; easements or diversions of existing assets.

Document:DP Written Statement Site Allocation Details, p.24

Policy: SW3

Issue: DP Housing Supply-DP Housing Supply

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Your comments are noted and welcomed. These issues have been incorporated into the site assessment process and the site allocation details section of the LDP. No further changes to the LDP are considered necessary.

Question: 2d Representation Text

Representation Text: . 1. The whole of the LPA area is served by our Cilfynydd wastewater treatment works (WwTW). There are no issues with this WwTW accommodating foul-flows at present, though there may come a time where improvements will be required in order to accommodate the full level of growth proposed.

2. Based on an anticipated adoption date of late 2019, the remainder of the LDP plan period up to 2031 will be over two of Welsh Water's Capital Investment Programmes (AMP7 – 2020-2025 and AMP8 – 2025-2030). Should reinforcement works be required at the Works, an investment scheme will be considered for inclusion within these future AMP programmes.

3. If assets need to be laid over private land, developers can serve a requisition notice on Welsh Water to undertake the works, the cost of which can be offset by the income generated from the development over a period of 12 years, with a contribution required if the income falls short of the cost.

4. Where there are assets crossing the site, protection measures will be required in the form of an easement width or diversion in order to maintain the integrity of the asset and allow for access if required. This will be at the developer's cost.

Representations & Council Responses juxtaposed Housing Supply

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Housing Supply

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
119.D15//SW3		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: General comments regarding current capacity; incorporating development proposals into future Capital Investment Programmes; assets being laid over private land; easements or diversions of existing assets.

5. The LPA may wish to contact their Environmental Health Department for their views on whether there is the potential for odour nuisance on proposed allocations that are in close proximity to our Waste Water Treatment Works (WwTW) or Sewage Pumping Stations (SPS).

6. The comments are subject to change as the LDP progresses.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D2//SW6		21/08/2018	<input type="checkbox"/>		C	W	M		Summary: The authority should repeat the key principles from the Framework/Masterplan into Policy SW6.

Document: DP Written Statement Policies & Proposals, p.30

Site: 105/104/EcW1.1: Hoover Strategic Regeneration Area

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. The Council has proposed changes to SW6 to incorporate the key design requirements set out in the Framework masterplan.

Question: 2d **Representation Text**

Representation Text: 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.

Question: 2e **Changes proposed**

Representation Text: The authority should repeat the key principles from the Framework/Masterplan into Policy SW6.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D3//EcW2		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15

Document: DP Written Statement Policies & Proposals, p.59

Site: 105/104/EcW1.1: Hoover Strategic Regeneration Area

Policy: EcW2

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Policy EcW2 states development will be permitted at the existing employment sites if it is an “appropriate” waste management facility. Paragraph 6.8.20 expands on this issue and states that such development proposals for waste management facilities would also need to satisfy the LDPs other design and environmental protection policies.

Policy EnW4: Environmental Protection states that new development will be expected to avoid flood risk and meet the requirements of TAN 15. The Council considers that this combination of policies clarifies the situation in regard to waste management facilities and flooding.

In addition to this, Policy EcW14: Waste Facilities identifies five existing employment sites as preferred areas of search for waste management facilities, and the employment land within the HSRA is not identified as one of these preferred areas and separate changes proposed to the Deposit Plan have removed the employment land allocation at the Willows Industrial Estate.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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101.D3//EcW2		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15
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Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D7//SW6		31/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: The representation is supportive of the regeneration of previously developed land at the Strategic Regeneration Area.

Document: DP Written Statement Policies & Proposals, p.30

Site: 105/104/EcW1.1: Hoover Strategic Regeneration Area

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Council welcomes the support for the designation of Hoover Strategic Regeneration Area. Specific land uses have been allocated within the regeneration area and the site allocation details for the Hoover Factory Site allocated for residential development includes the need for a hydraulic modelling assessment. The DCWW infrastructure plans show these are located to the edges of the Hoover Factory site and do not appear to present a significant constraint to the residential allocation. However, the site allocation details will be amended to clarify the assessment should extend to the sewerage network and changes to the site allocation details have been proposed. Elsewhere, a range of development proposals in the wider Hoover Strategic Regeneration Area are likely to come forward and development will be informed by refinements to the HSRA framework masterplan and ongoing flood modelling and assessment work. Development proposals will be assessed against the Plan's development management policies, including for example, Policy SW11: Sustainable Design and Placemaking, and separate changes have been proposed to clarify that development proposals will need to protect and provide relevant utility services and infrastructure. Therefore, no further changes are considered necessary to SW11.

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

134 Rees, Mr Alan

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
134.D1//SW6		05/09/2018	<input type="checkbox"/>	P	C	W	M		Summary: Representation comments on flooding issues at the Hoover Strategic Regeneration Area and raises concerns regarding the associated site allocation details.

Document: DP Written Statement Policies & Proposals, p.30

Site: 71/71/SW3.1: Hoover Site 2

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: Rec. by Officers

Council Response: A Strategic Flood Consequence Assessment (SFCA) has been prepared to inform the Deposit Plan. It identifies flood risks on the western banks of the River Taff where no allocation for highly vulnerable development has been made. The eastern banks comprising the existing Hoover Factory site are defined as Flood Zone B where there is a lower risk of fluvial flooding. Natural Resources Wales have been consulted regarding the housing allocation and not raised objections to the principle of residential development here. In addition, TAN 15: Development and Flood Risk permits the allocation of residential development in such areas. Should any localised issues be identified the Replacement LDP contains policies to require further assessments to be considered at planning application stage where these may be necessary (as required by Policy En4: Environmental Protection).

Question: 2d Representation Text

Representation Text: . 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 31st, 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 disreputation 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, who's 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

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
134.D1//SW6		05/09/2018	<input type="checkbox"/>	P	C	W	M		Summary: Representation comments on flooding issues at the Hoover Strategic Regeneration Area and raises concerns regarding the associated site allocation details.

- 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.
- \$ 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

Question Questions of Soundness

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

154 Rhondda Cynon Taf County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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154.D8/SW6		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Suggest the proposed new footbridge also includes provision for cyclists
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Document:DP Written Statement Policies & Proposals, p.30

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The framework masterplan prepared for the Hoover Strategic Regeneration Area dated June 1018, identifies the footbridge to establish links across the river together with the creation of a network of pedestrian and cycle routes, way-finding within the development to connect to existing strategic recreational routes (Taff and Trevithick Trail) and prioritising pedestrian and cycle movement through shared spaces. This is indicative only but it is recognised that there is the opportunity to ensure that a bridge would be for dual use and changes have been proposed to the policy wording and reasoned justification of the policy to clarify this.

Question: 2d **Representation Text**

Representation Text: . Policy SW6 – suggest the proposed new footbridge also includes provision for cyclists.

Question: 2e **Changes proposed**

Representation Text: . Policy SW6 – suggest the proposed new footbridge also includes provision for cyclists.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D30		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Land and the Hoover west bank area needs redevelopment as this area was initially relied upon to contribute a significant amount of housing in the Replacement LDP.

Document:DP Written Statement Context & Issues

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Council agrees with the representor that the land to the West of the River Taff should form part of the redevelopment of the Hoover site. Accordingly, the land is included within the boundary of the Hoover Strategic Regeneration Area (HSRA).

However, as the flooding issues on this area of land are, at this point in time, unresolved, the Council did not consider that it would be appropriate to allocate the land for a specific use in the Deposit Replacement LDP. As it is important for a LDP to be able to demonstrate compliance with national policy, and that its strategy is deliverable, relying on a significant number of house on this land would not be a sound approach to take forward. The 440 dwellings allocated on the Hoover Factory site still accounts for a significant proportion of the housing requirement at 20%.

The Council considered it to be more appropriate to allocate other suitable sites within the Primary Growth Area in order to ensure that the Replacement LDP makes appropriate provision in relation to the housing requirement. The land to the west of the River Taff remains within the settlement boundary, is situated in the HSRA, and subject to flooding issues being resolved (alongside other material planning considerations), development proposals on site could come forward within the timeframe of the Replacement LDP.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . The Merthyr Tydfil Heritage Trust has raised a number of issues in their representations. In relation to the Hoover Strategic Regeneration Area the Heritage Trust requests that the Master Planning includes a new Metro hub for light rail, bus, car, cycle and pedestrians at Brandy Bridge (instead of just a station and a park and ride on the Hoover sports ground) and that there is further investigation of flood risk from the River Taff and its tributaries and investment in appropriate flood mitigation.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Merthyr Tydfil Heritage Trust has raised a number of issues they wish to speak on at the examination including the Key Issues and the Hoover Strategic Regeneration Area.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D30		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Land and the Hoover west bank area needs redevelopment as this area was initially relied upon to contribute a significant amount of housing in the Replacement LDP.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D48//SW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Heritage Trust is disappointed that that proposals for the HSRA have been reduced. Assistance should be sought from Welsh Government and the Cardiff Capital Region to encourage comprehensive redevelopment of the area.

Document:DP Written Statement Policies & Proposals, p.31

Policy: SW7

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question Representation Texts

Question: Rec. by Officers

Council Response: The Council agrees with the representor that the Hoover Strategic Regeneration Area (HSRA) should be comprehensively redeveloped to create a well-connected, mixed-use neighbourhood, in accordance with the principles of the framework masterplan that accompanied the Deposit LDP.

However, as the flooding issues in certain areas of the HSRA, at this point in time, unresolved, the Council did not consider that it would be appropriate to allocate those parcels of land for a specific use in the Deposit Replacement LDP. As it is important for a LDP to be able to demonstrate compliance with national policy, and that its strategy is deliverable, relying on a significant number of dwellings on these parcels of land would not be a sound approach to take forward. The 440 dwellings allocated on the Hoover Factory site still accounts for a significant proportion of the housing requirement at 20%, and is an integral part of the strategy of the Replacement LDP. The Council considered it to be more appropriate to allocate other suitable sites within the Primary Growth Area in order to ensure that the Replacement LDP makes appropriate provision in relation to the housing requirement. The land to the west of the River Taff remains within the settlement boundary, is situated in the HSRA, and subject to flooding issues being resolved (alongside other material planning considerations), development proposals on the site could come forward within the timeframe of the Replacement LDP.

The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open space will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with Policy SW9: Planning Obligations and Policy SW10: Protecting and Improving Open Spaces of the Replacement LDP.

Similarly, with regard to the façade of the main entrance, the indicative masterplan shows that the building is unlikely to be retained in its current form. However, there will be scope to

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D48//SW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Heritage Trust is disappointed that that proposals for the HSRA have been reduced. Assistance should be sought from Welsh Government and the Cardiff Capital Region to encourage comprehensive redevelopment of the area.

include some form of built development that has regard to the industrial heritage of the site such as through the design of a main entrance building as part of the redevelopment. This will also help to ensure that the development of the site is carried out in accordance with Policy CW1: The Historic Environment of the Replacement LDP.

Question: 2d Representation Text

Representation Text: . Comments 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.

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.

Question: 2e Changes proposed

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D48//SW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Heritage Trust is disappointed that that proposals for the HSRA have been reduced. Assistance should be sought from Welsh Government and the Cardiff Capital Region to encourage comprehensive redevelopment of the area.

Representation Text: . 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.

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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Merthyr Tydfil Heritage Trust has raised a number of issues they wish to speak on at the examination including the Key Issues and the Hoover Strategic Regeneration Area.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D48//SW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Heritage Trust is disappointed that that proposals for the HSRA have been reduced. Assistance should be sought from Welsh Government and the Cardiff Capital Region to encourage comprehensive redevelopment of the area.

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D55//SW6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Additional land should be safeguarded for public transport infrastructure; the playing field should be retained as open space; and the factory façade and gatehouse should be retained as part of the development.

Document: DP Written Statement Policies & Proposals, p.30

Site: 71/71/SW3.1: Hoover Site 2

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question Representation Texts

Question: Rec. by Officers

Council Response: The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open space will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with Policy SW9: Planning Obligations and Policy SW10: Protecting and Improving Open Spaces of the Replacement LDP.

Similarly, with regard to the façade of the main entrance, the indicative masterplan shows that the building is unlikely to be retained in its current form. However, there will be scope to include some form of built development that has regard to the industrial heritage of the site, for example through the main entrance building as part of the redevelopment. This will also help to ensure that the development of the site is carried out in accordance with Policy CW1: The Historic Environment of the Replacement LDP.

Question: 2d Representation Text

Representation Text: . Hoover Strategic Regeneration Area

Hoover site 2 – north

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.

Question: 2e Changes proposed

Representation Text: . Additional land should be safeguarded for public transport infrastructure; the playing field should be retained as open space; and the factory façade and gatehouse should be retained as part of the development.

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D55//SW6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Additional land should be safeguarded for public transport infrastructure; the playing field should be retained as open space; and the factory façade and gatehouse should be retained as part of the development.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit
 Test 2 Appropriate
 Test 3 Delivery
 Aims
 Objectives
 Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
 Hoover regeneration strategy – original proposals and revisions

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D58//SW6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Replacement LDP does not identify how the increased flooding risk will be tackled. Further work needs to be carried out to address this issue.

Document:DP Written Statement Policies & Proposals, p.30

Policy: SW6

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D58//SW6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Replacement LDP does not identify how the increased flooding risk will be tackled. Further work needs to be carried out to address this issue.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Replacement LDP follows a precautionary approach to flooding, and has generally directed development away from areas at risk of flooding. No highly vulnerable development has been allocated in Development Advice Map (DAM) zone C2, and Policy EnW4 states that any new development proposals will be expected to meet the requirements of national policy in regards to flooding.

Land to the West of the River Taff at Pentrebach has been included within the Hoover Strategic Regeneration Area (HSRA), but does not carry a specific land use allocation, as the flooding issues at this location are unresolved at this point in time.

With regard to the Town Centre flooding issues, the new bus station site has been granted planning permission and flood risk was resolved as part of that process. Further assessment work is currently being undertaken to consider the issue of flooding at the current bus station site, other areas of the Town Centre, and land within the HSRA. This piece of work will identify the true extent of flood risk in the area and identify potential flood defence measures that would remove as much of the flood risk as possible.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Flood risk – an urgent study on River Taff and its tributaries and Welsh Government support for investment in appropriate flood mitigation.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Hoover regeneration strategy – original proposals and revisions

Question *Questions of Soundness*

Question: 2c **Soundness Test 1**

Representation Text: .

Question: 2c **Soundness Test 2**

Representation Text: .

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
207.D58//SW6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Replacement LDP does not identify how the increased flooding risk will be tackled. Further work needs to be carried out to address this issue.

Question: 2c **Soundness Test 3**

Representation Text: .

Representations & Council Responses juxtaposed Hoover Strategic Regeneration Area

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Hoover Strategic Regeneration Area (generally)

258

Elan Homes Ltd

Agent: JCR Planning Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
258.D2//EcW1		10/09/2018	<input type="checkbox"/>	E	S	I	M		Summary: The representation supports the partial inclusion of the Lowes and land West of Gethin Street in the Hoover Strategic Regeneration Area boundary however requests that additional land West of Gethin Street is in the HSRA boundary

Document:DP Written Statement Policies & Proposals, p.58

Site: 105/104/EcW1.1: Hoover Strategic Regeneration Area

Policy: EcW1

Issue: DP Hoover Strategic Regeneration Area (generally)-DP Hoover Strategic Regeneration Area (generally)

Question Representation Texts

Question: Rec. by Officers

Council Response: Support for inclusion of the Gethin the Hoover Strategic Regeneration Area (HSRA) is welcomed. The representation seeks the inclusion of additional land to the West of Gethin Street (submitted as candidate site 68) in the HSRA boundary (i.e. to extend the HSRA boundary to the south east). This area has been designated as a Site of Importance for Nature Conservation (SINC) in the LDP under Policy EnW3 as it contains SINC criteria quality neutral grassland, marshy grassland, standing open water, mosaic habitats, heath and grass heath communities; four of which are UK & Wales BAP Habitats and Section 7 Habitat of Principal Importance for the Conservation of Biological Diversity in Wales under the Environment Wales Act 2016. Further details reading the designation can be found in the SINC Review background paper (June 2018).

The land to the south east of the proposed HSRA boundary and provides opportunities for offsite mitigation and enhancement features. In addition, redevelopment of this land would require significant regrading of the Gethin Tip and would impact on the SINC designation along the former Glamorganshire Canal. Consequently, no changes to the Hoover Strategic Regeneration Area boundary at this location are considered to be appropriate.

Land at the Lowes and adjoining Gethin Tip to the north of the candidate site is included in the HSRA boundary. Whilst this land is not allocated for a specific use in the Replacement LDP it is considered that these areas represent the most realistic parcels of developable land (i.e. where there are fewer physical and nature conservation constraints to the redevelopment of the site). This part of the land West of Gethin Street would be accessed through land at the Lowes which is partly located in flood zone C2 as indicated on the NRW Development Advice Maps. Therefore, whilst this area is located in the HSRA, access and flooding issues would be the main constraint in bringing forward development proposals. If the site can be removed from flood zone C2 or proposals made acceptable though flood mitigation and the application of the TAN15 acceptability criteria, the site could contribute towards the wider redevelopment of the HSRA.

Question: 2d Representation Text

Representation Text: . We also offer support for the partial inclusion of part of the land in question as part of the 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.

Question: 2e Changes proposed

Representation Text: . However, through work currently being undertaken (which once completed will be provided to the Authority), we would ask that the whole of the land edged red from part of the HSRA to ensure a comprehensive strategic approach is taken to the regeneration fo the whole area as possible.

Question: 3b Subject at Public Examination Hearing

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.D5/6.5.50/SW		28/08/2018	<input type="checkbox"/>	E	O	I	M		Summary: A form of wording should be included in the LDP Written Statement to make it clear that planning obligations will only be secured in line with the tests in WG Circular 13/97.
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Document:DP Written Statement Policies & Proposals, p.33,
para.6.5.50

Policy: SW9

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Paragraph 6.5.50 of the LDP advises that national planning policy explains the 'appropriate use of planning obligations'. Policy SW9 itself states that planning obligations will be sought 'where appropriate' and criterion 4 of the policy includes the wording 'other relevant obligations' not on the Council's Regulation 123 List of Infrastructure. Paragraph 6.5.53 of the LDP also states that planning obligations sought must satisfy the test included in Regulation 122 of the CIL Regulations 2010 (as amended). Consequently, the Council considers that the current wording of Policy SW9 and associated text makes it clear that planning obligations will only be sought in accordance with national policy and legislation.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Include additional wording as suggested above.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The HBF would like the opportunity to discuss the detailed wording of the policy.

Question *Questions of Soundness***Question: 2c Soundness Test 1**

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.D7//SW9		28/08/2018	<input type="checkbox"/>	E	O	I	M		Summary: 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.
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Document:DP Written Statement Policies & Proposals, p.33

21/12/2018

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Representations & Council Responses juxtaposed Infrastructure and Delivery

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D7//SW9		28/08/2018	<input type="checkbox"/>	E	O	I	M		Summary: 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.

Policy: SW9

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that the current wording of the policy is appropriate as it gives sufficient flexibility to the Council to negotiate appropriate levels of planning obligations. Changing the word 'indicative' to 'target' may give the impression that the levels of affordable housing sought in Policy SW9 would be the maximum levels to be sought. Whilst the Plan seeks to provide developers with as much certainty as possible, there still has to be the flexibility in the policy to enable levels of affordable housing to be sought, both higher and lower than the levels stated in the policy, when development viability has been taken into consideration. Therefore, no change in this respect is proposed.

Question: 2d **Representation Text**

Representation Text: . With regard to the first point of this policy which states:
1. On site provision of affordable housing on sites of 10 homes or more at an indicative level of:
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.

Question: 2e **Changes proposed**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The HBF would like the opportunity to discuss the detailed wording of the policy.

Question *Questions of Soundness*

Question: 2c **Soundness Test 3**

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D2		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The Council should aim to ensure that the phasing of development in the LDP coordinates with DCWW AMPs where possible.

Document:DP Written Statement

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>The Council has engaged with DCWW since the initial stages of preparing the Replacement LDP, in order to establish as much certainty as possible in regard to water infrastructure over the LDP period.</p> <p>Comments received from DCWW throughout this period have indicated that they do not envisage any significant issues with the overall level of growth proposed, and the spatial distribution of that growth.</p> <p>However, as outlined in this representation, there is potential for issues to arise depending on how sites are phased, and how this coordinates with DCWWs investment plans. The overall provision included in the LDP Housing Trajectory has been phased in such a manner that there is a steady rate of development, rather than any significant peaks and troughs. This steady rate of housing development, combined with the 25% flexibility allowance, should enable the LDP strategy to be fulfilled without significant disparity from DCWWs AMPs.</p>
Question: 2d	Representation Text
<i>Representation Text:</i>	<p>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).</p> <p>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.</p>

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

154 Rhondda Cynon Taf County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D1/4.7/SW9		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation seeks a change to Policy SW9 Planning Obligations to add a specific infrastructure item covering Welsh Medium education to acknowledge a commitment from the Council to fund additional demand for Welsh Medium education school places.

Document:DP Written Statement Vision & Objectives, p.11, para.4.7

Policy: SW9

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The Council considers that the current situation in terms of which planning obligations are sought through S106 agreements, and which are covered by Community Infrastructure Levy (CIL), is the most appropriate arrangement for Merthyr Tydfil County Borough.

Education provision is an item included on the Council's CIL 123 list and this covers all mediums of education provision. Accordingly, contributions towards education provision cannot be secured via section 106 agreements in Merthyr Tydfil unless it is a site specific requirement. If this changed, the policy contains a final statement which covers all other relevant obligations not included on the regulation 123 list. Therefore, no change in this respect is considered to be required.

Question: 2d Representation Text

Representation Text: 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.

Representations & Council Responses juxtaposed Infrastructure and Delivery

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D1/4.7/SW9		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation seeks a change to Policy SW9 Planning Obligations to add a specific infrastructure item covering Welsh Medium education to acknowledge a commitment from the Council to fund additional demand for Welsh Medium education school places.

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.

Question: 2e Changes proposed

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D3//SW3		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Additional information relating to transport and highways issues should be added to the Site Allocation Details section.

Representations & Council Responses juxtaposed Infrastructure and Delivery

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D3//SW3		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Additional information relating to transport and highways issues should be added to the Site Allocation Details section.

Policy: SW3

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The Council considers that the Site Allocation Details section contains an appropriate amount of detail on each individual site, and clearly sets out the Councils expectations in regard to a number of issues, such as highways and transport, on the housing and employment allocations contained in the Replacement LDP. Furthermore, the Plan contains policies to ensure these issues can be full considered once detailed development proposals are available. Therefore, no changes to the Plan are proposed.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D4//SW3		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Additional information should be related to the Site Allocation Details Section, specifically relating to the Hoover Factory Site.

Representations & Council Responses juxtaposed Infrastructure and Delivery

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D4//SW3		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Additional information should be related to the Site Allocation Details Section, specifically relating to the Hoover Factory Site.
<hr/>									
Document:DP Written Statement Site Allocation Details, p.24				Site: 71/71/SW3.1: Hoover Site 2					
Policy: SW3				Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery					

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Council considers that the Site Allocation Details section contains an appropriate amount of detail on each individual site, and clearly sets out the Council's expectations in regard to a number of issues, such as highways and transport, on the housing and employment allocations contained in the Replacement LDP.

In addition to the Site Allocation Details section, a framework masterplan has been prepared for the Hoover Strategic Regeneration Area, and the principles outlined in this document have been incorporated into Policy SW6.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: .
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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D25		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Replacement LDP does not identify how the increased flooding risk will be tackled.

Document:DP Written Statement Context & Issues

Issue: DP Infrastructure and Delivery-DP Infrastructure and Delivery

Question Representation Texts**Question: Rec. by Officers**

Council Response: The Replacement LDP follows a precautionary approach to flooding, and has generally directed development away from areas at risk of flooding. No highly vulnerable development has been allocated in Development Advice Map (DAM) zone C2, and Policy EnW4 states that any new development proposals will be expected to meet the requirements of national policy in regards to flooding.

Land to the West of the River Taff at Pentrebach has been included within the Hoover Strategic Regeneration Area (HSRA), but does not carry a specific land use allocation, as the flooding issues at this location are unresolved at this point in time.

With regard to the Town Centre flooding issues, the new bus station site has been granted planning permission and flood risk was resolved as part of that process. Further assessment work is currently being undertaken to consider the issue of flooding at the current bus station site and other areas of the Town Centre. This piece of work will identify the true extent of flood risk in the area and identify potential flood defence measures that would remove as much of the flood risk as possible.

Question: 2d Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Revision process and consultation comments

Question Questions of Soundness**Question: 2c Soundness Test 1**

Representation Text: .

Representations & Council Responses juxtaposed Infrastructure and Delivery

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Infrastructure and Delivery

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
207.D25		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The Replacement LDP does not identify how the increased flooding risk will be tackled.

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Landscape and SLAs

115

WYG

Agent: WYG

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D7//EnW5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The designation of SLA3 Merthyr West Flank is not supported by credible evidence, contrary to soundness test 2, and should be deleted. Deletion of SLA 3 for the Plan. Soundness Test 2 has not been met in regard to this issue. Preferred Strategy

Document:DP Written Statement Policies & Proposals, p.54

Policy: EnW5

Issue: DP Landscape and SLAs-DP Landscape and SLAs

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>The Special Landscape Areas (SLAs) have been identified using methodology as recommended by national policy (PPW Edition 10, paragraphs 6.3.11 and 6.3.12). Full details are provided in the Merthyr Tydfil Special Landscape Areas Background Paper (June 2018). Section 7 sets out the methodology for the approach and section 8 provides the evaluation of the proposals SLAs against the identified strategic criteria. The Council considers that the approach is in accordance with national policy and LANDMAP guidance notes.</p> <p>Responses at the Preferred Strategy stage explained that the use of moderate LANDMAP evaluation scores (referred to at Table 1 and paragraph 7.5 of the background paper) were incorporated to reflect local landscapes with a unique significance to the County Borough Area. This is considered to be justified when considering SLAs which are local level non-statutory designations and has been applied consistently to potential SLA designations.</p> <p>Consequently the methodology utilised to identify the SLAs is considered to be robust and in line with national policy. The Council stands by its assessment and recommendations for SLA3: Merthyr West Flank (page 43-46) and no changes to the Deposit Plan are considered necessary.</p>

Question: 2d**Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Landscape and SLAs

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Landscape and SLAs

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D7//EnW5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The designation of SLA3 Merthyr West Flank is not supported by credible evidence, contrary to soundness test 2, and should be deleted. Deletion of SLA 3 for the Plan. Soundness Test 2 has not been met in regard to this issue. Preferred Strategy

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.

Question: 2e Changes proposed

Representation Text: . Deletion of SLA 3 for the Plan.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Landscape and SLAs

129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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129.D5//EnW5		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: Caerphilly CBC supports the proposed designation of Special Landscape Areas
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Document:DP Written Statement Policies & Proposals, p.54

Policy: EnW5

Issue: DP Landscape and SLAs-DP Landscape and SLAs

Question	Representation Texts
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Question:	Rec. by Officers
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Council Response:	Comments noted & support welcomed.
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Question: 2d	Representation Text
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Representation Text:	. Special Landscape Areas (Policy ENW20) (Support)
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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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Landscape and SLAs

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D28//EnW5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: High quality landscape areas, prominent views and traditional field boundaries need proactive management and protection.

Document:DP Written Statement Context & Issues, p.54

Policy: EnW5

Issue: DP Landscape and SLAs-DP Landscape and SLAs

*Question Representation Texts***Question: Rec. by Officers**

Council Response: The Replacement LDP contains a number of mechanisms which protect the landscape (including the historic landscape) of the County Borough. These comprise Policy SW4 – Settlement Boundaries, Policy SW11 – Sustainable Design and Placemaking, Policy CW1 – Historic Environment and Policy Enw5 – Landscape Protection. These have been produced in accordance with national policy and are considered to be appropriate in order to manage landscape impacts and protect the high quality and historic landscapes. Therefore, no changes to the Deposit Plan are considered necessary.

Question: 2d Representation Text

Representation Text: . 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 maintained – extra support in terms of the special landscape areas is welcome. Landscape protection must not be watered down.

Question: 2e Changes proposed

Representation Text: . Clear support for special landscapes is required – to include heritage landscapes such as views of Cefn Coed Viaduct.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit

Test 2 Appropriate

Test 3 Delivery

Aims

Objectives

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).

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.

*Question Questions of Soundness***Question: 2c Soundness Test 1**

Representation Text: .

by: 4
Filtered to show: (all of) Stage=D; Status=M; Issue=DP Landscape and SLAs

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D28//EnW5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: High quality landscape areas, prominent views and traditional field boundaries need proactive management and protection.

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.D9//EcW12		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation advises the LPA that only primary coal resources require safeguarding in draft PPW Edition 10 and if published before or during the examination this should be incorporated into the Plan.

Document:DP Written Statement, p.80

Policy: EcW12

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Comments noted. The Deposit Plan currently safeguards primary and secondary coal resources (excluding settlements and designations of national environmental and cultural importance) in accordance with MTAN2: Coal. Secondary coal resources will be excluded from the proposals map as part of a Focused Change resulting to the change of policy contained in Edition 10 of PPW.

Question: 2d Representation Text

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D13//EcW11		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation supports 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.

Document:DP Written Statement Policies & Proposals, p.78

Policy: EcW11

Issue: DP Minerals-DP Minerals

*Question Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted. Policy EcW11 makes specific reference to surface water drainage and ground water resources at criterion 5. A number of the criteria in the policy are also addressed in topic based development management policies. This includes policy SW11 which requires consideration of utilities infrastructure provision and Policy EnW4: Environmental Protection which requires consideration of surface and ground water impacts. Changes have been proposed to Policy EcW11 to remove duplication (under criterion points 2 to 7) when compared with the Plan's topic based development management policies. Notwithstanding this, to ensure the protection of water and sewerage infrastructure is covered in the Plan, policy SW11: Sustainable Design and Placemaking has been amended include reference to proving and protecting relevant utility services and infrastructure (at criterion 8).

Question: 2d Representation Text*Representation Text:* . 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.

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D5//EcW10		10/09/2017	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.

Document:DP Written Statement Policies & Proposals, p.77

Policy: EcW10

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy. Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D6//EcW13		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.

Document:DP Written Statement Policies & Proposals, p.81

Policy: EcW13

Issue: DP Minerals-DP Minerals

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D6//EcW13		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy. Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D7//CW1		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.

Document:DP Written Statement Policies & Proposals, p.42

Policy: CW1

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The document referenced sets out instances of Pennant Sandstone, Carboniferous Limestone, Basal Grit and Old Red Sandstone use in historic buildings in the identified Urban Character Areas of Merthyr Tydfil. There are two quarries in the County Borough with permitted reserves, Vaynor quarry which provides limestone and Gelligaer quarry which provides sandstone. Outside the permitted reserves Policy EcW10: Sustainability Supplying Minerals and Policy EcW13: Minerals safeguarding both safeguard known mineral resources in accordance with the BGS Aggregates Safeguarding Maps for Wales and as required by national planning policy. Therefore, it is considered that there is sufficient provision and safeguards within the Plan to ensure a sufficient supply of building stone.

Question: 2d **Representation Text**

Representation Text: . Footnote 27 refers to a document entitled Merthyr Tydfil: Understanding Urban Character Cadw: 2015

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D7//CW1		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that it is not clear how the requirements of Policy CW1: The Historic Environment can be met as there is no provision for local building stone in the minerals policies.

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.

Question: 2e Changes proposed

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D9//EcW1		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers the Sustainability Appraisal has not considered the implications on the mineral supply chain and raw material requirements that might arise from planned employment growth.

Document:DP Written Statement Policies & Proposals, p.58

Policy: EcW1

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.

Whilst specific reference to the impact on the level of employment development on the minerals supply has not been made, it is considered that the level of growth would not have a significant impact on the supply of minerals. The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.

Question: 2d Representation Text

Representation Text: . 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

Question: 2e Changes proposed

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D9//EcW1		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers the Sustainability Appraisal has not considered the implications on the mineral supply chain and raw material requirements that might arise from planned employment growth.

Representation Text: . Consider the implications of additional 36.65ha of employment land on mineral supply.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D10/6.8.89/Ec		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Adapt paragraph 6.8.89 to reflect PPW and reflect the requirements of the RTS and MTAN.

Document:DP Written Statement Policies & Proposals, p.77,
para.6.8.89

Policy: EcW10

Issue: DP Minerals-DP Minerals

Question Representation Texts

Question: **Rec. by Officers**

Council Response: Paragraph 6.8.89 of the LDP seeks to summarise the main roles of the Plan with regards to minerals planning. The points listed in the written statement cover the issues raised with regards to the adequate and sustainable supply of minerals and to minimise environmental costs. The paragraph is one of a number of introductory paragraphs before policies EcW10 to EcW13 and the reasoned justification that deal with more specific points. Welsh Government guidance advises that the Plan should not unnecessarily repeat national policy and in this case it is considered that it is not necessary to include reference to all points. Therefore, no change is considered necessary for soundness.

With regards to the Regional Technical Statement, the 2nd review has been commissioned however this is not anticipated to be finalised until the end of 2019. However, there is no indication that the existing pattern of supply needs to change significantly over the Plan period or that there will be a deficit of any particular type of aggregate.

Question: 2d **Representation Text**

Representation Text: . 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. "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." This should be the recognised role of the plan.

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

- The technical capability of one type of aggregate to interchange for another
- The relative environmental cost of substitution of one type of aggregate by another
- The relative environmental effects of changing patterns of supply; and

Whether adequate production capacity can be maintained to meet the required level of supply.

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.

Question: 2e **Changes proposed**

Representation Text: . Adapt paragraph 6.8.89 to reflect PPW and reflect the requirements of the RTS and MTAN.

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D10/6.8.89/Ec		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Adapt paragraph 6.8.89 to reflect PPW and reflect the requirements of the RTS and MTAN.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D11/6.8.92/Ec		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: comments on para 6.8.92 & considers that amendments should be made so that the paragraph clarifies the land bank position in relation to national policy requirements rather than commenting on the crushed rock reserves of two quarries.

Document:DP Written Statement Policies & Proposals, p.77,
para.6.8.92

Policy: EcW10

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. Permitted reserves at Vaynor and Gelligaer quarries comprise the aggregates landbank which is sufficient to provide a minimum 10-year supply throughout the plan period in accordance with the requirement of MTAN 1: Aggregates. It is considered that the paragraph could be amended to clarify that no new allocations have been made as there is a sufficient landbank of permitted reserves as required by MTAN1.

Question: 2d **Representation Text**

Representation Text: . 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 authority's landbank which is 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.

Question: 2e **Changes proposed**

Representation Text: . Amend text accordingly

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D12//EcW10		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation comments on the second bullet point of Policy EcW10 Sustainably Supplying Minerals and considers that it should be clarified that this applies throughout the plan period.

Document:DP Written Statement Policies & Proposals, p.77

Policy: EcW10

Issue: DP Minerals-DP Minerals

Representations & Council Responses juxtaposed Minerals

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D12//EcW10		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation comments on the second bullet point of Policy EcW10 Sustainably Supplying Minerals and considers that it should be clarified that this applies throughout the plan period.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The second bullet point of Policy EcW10 states that the Plan will contribute towards meeting society's need for a continuous and secure supply of minerals by maintaining a minimum 10-year landbank of permitted aggregate reserves. This would apply throughout the plan period as well as at the beginning. Therefore, it is considered that the change specified is not necessary. Changes are however proposed to paragraph 6.8.92 of the supporting text to explain the requirement of MTAN 1 to provide a minimum 10-years supply throughout the plan period.

Question: 2d **Representation Text**

Representation Text: . Sustainably Supplying Minerals 2nd bullet point states "Maintaining a minimum 10-year landbank of permitted aggregate reserves"

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

Question: 2e **Changes proposed**

Representation Text: . "Maintaining a minimum 10-year landbank of permitted aggregate reserves throughout the life of the development plan"

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D13//EcW10		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation comments on paragraph 6.8.98 under policy EcW10 and considers that the requirement for a minimum 10-year landbank of crushed rock during the entire plan period should be clarified.

Document:DP Written Statement Policies & Proposals, p.77

Policy: EcW10

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Paragraph 6.8.98 advises that the crushed rock landbank for Merthyr Tydfil indicated in the 2015 Swrawp annual report was more than 50 years. This is again the case in the 2016 Swrawp Annual Report. Consequently there is a sufficient landbank to satisfy the requirements of MTAN 1. The sentence referred to could be clarified by adding reference to the likelihood of their being more than 10 years landbank of reserves at the end of the Plan period.

Question: 2d **Representation Text**

Representation Text: . This paragraph states that "Merthyr Tydfil has a sufficient landbank to last beyond the plan period"

The requirement in Para. 49 of MTAN 1 is that '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.

Question: 2e **Changes proposed**

20/12/2018

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Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D13//EcW10		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation comments on paragraph 6.8.98 under policy EcW10 and considers that the requirement for a minimum 10-year landbank of crushed rock during the entire plan period should be clarified.

Representation Text: . Amend text accordingly.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D14//EcW11		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation objects to the use of the wording "development will only be allowed where..." in policy EcW11.

Document:DP Written Statement Policies & Proposals, p.78

Policy: EcW11

Issue: DP Minerals-DP Minerals

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted. It is considered that the list of criteria would apply whether or not the word 'only' is included. However, other changes are proposed in order to simplify the policy and reduce duplication in accordance with advice in the LDP Manual (see representation 122.D15) and this change has also been incorporated. The proposed change would be consistent with the wording of the Plan's other criteria based policies.

Question: 2d Representation Text

Representation Text: . This policy states that "Proposals for mineral extraction and associated development will only be allowed:...."

The is a general acceptance that Local Planning Authorities should plan positively for developments which is echoed in the consultation version of PPW. The word "only" 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

Question: 2e Changes proposed

Representation Text: . Delete the word "only".

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D15//EcW11		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: A number of the "Environmental Criteria" indicated in the bullet points simply repeat the requirements of other Policies in the plan.

Document:DP Written Statement Policies & Proposals, p.78

Policy: EcW11

Issue: DP Minerals-DP Minerals

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D15//EcW11		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: A number of the "Environmental Criteria" indicated in the bullet points simply repeat the requirements of other Policies in the plan.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. Whilst the criteria included are specific to the likely impacts and considerations for assessing minerals development it is acknowledged that the Plan's other topic based development management policies also sufficiently cover the required consideration of these issues. This includes Policies SW11, SW12, CW1 and EnW1 to EnW5. Changes are therefore proposed to focus the policy and avoid duplication in accordance with Welsh Government guidance contained in the LDP Manual, Edition 2 (paragraphs 2.2.1 and 2.3.4). An amendment to policy EnW4: Environmental Protection is also proposed to ensure the potential impacts of dust arising from minerals development are included in the policy.

Question: 2d **Representation Text**

Representation Text: . 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 the "Environmental Criteria" 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)

Question: 2e **Changes proposed**

Representation Text: . Review the bullet points and delete matters which are more appropriately addressed in the other identified policies in the plan.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D16/6.8.103/E		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation questions the evidence behind the assertion in paragraph 6.8.103 that mineral extraction can have significant consequences for the environment, health and amenity of local communities.

Document:DP Written Statement Policies & Proposals, p.78,
para.6.8.103

Policy: EcW11

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Plan's policies as a whole would be used to assess all mineral developments including those related to coal extraction where there can be a range of impacts. Furthermore, paragraph 75 of MTAN1 states that the potential impact on health must always be considered in relation to proposals for aggregate extraction. Therefore, reference to potential health and amenity impacts is considered to be relevant and justified. No change to the Deposit Plan is considered necessary.

Question: 2d **Representation Text**

Representation Text: . This paragraph states that "Mineral extraction can have significant consequences for the environment and on the health and amenity of local communities. (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

Representations & Council Responses juxtaposed Minerals

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by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D16/6.8.103/E		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation questions the evidence behind the assertion in paragraph 6.8.103 that mineral extraction can have significant consequences for the environment, health and amenity of local communities.

other forms of mineral extraction (non-energy) are linked to health effects on local communities. The Council should clarify this statement with supporting evidence.

Question: 2e Changes proposed

Representation Text: . If no evidence linking non-energy extraction to health impacts on local communities can be provided, this paragraph should be amended.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D17//EcW12		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation considers policy EcW12: Minerals Buffer Zones is not sufficiently clear regarding the description of buffer zones.

Document:DP Written Statement Policies & Proposals, p.80

Policy: EcW12

Issue: DP Minerals-DP Minerals

Question Representation Texts

Question: Rec. by Officers

Council Response: Policy EcW12 establishes buffer zones around permitted and active/inactive mineral sites in accordance with MTAN 1. These are identified clearly on the Proposals Map. To clarify the wording of the policy minor amendments have been proposed.

Question: 2d Representation Text

Representation Text: . Mineral Buffer Zones

MTAN 1, para. 70 requires and MPPW make it clear that Buffer Zones are to be established "around permitted and allocated mineral extraction sites". Policy EcW12 should be amended to accord with that policy requirement.

Question: 2e Changes proposed

Representation Text: . Amend text accordingly

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D18//EcW13		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation considers that Policy EcW13: Minerals Safeguarding should include reference to minerals infrastructure and building stone.

Document:DP Written Statement Policies & Proposals, p.81

Policy: EcW13

Issue: DP Minerals-DP Minerals

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D18//EcW13		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation considers that Policy EcW13: Minerals Safeguarding should include reference to minerals infrastructure and building stone.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Policy EcW13 sets out the criteria for considering development proposals within the areas of known minerals resources. The mineral resources safeguarded on the Deposit LDP Proposals Map have been identified in accordance with the BGS Aggregates Safeguarding Map for South East Wales and the Mineral Resource Map for South East Wales (with regards to Primary and Secondary Shallow Coal resources) as required by national policy. There is no requirement to provide specific sites or safeguarding for building stone and it is considered that there is adequate provision and safeguards within the Plan to ensure a sufficient supply of aggregates. The Plan also safeguards infrastructure under relevant policies such as EcW10: Sustainability Supplying Minerals and SW12: Improving the Transport Network. Therefore, no change to the policy is considered necessary.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Amend text and proposals map to include minerals infrastructure and building stone.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D19/6.8.113/E		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation comments on paragraph 6.8.113 under policy EcW13: Minerals Safeguarding and questions the inclusion of the 'stand-off' buffer distances that would typically be applied to prior extraction developments.

Document:DP Written Statement Policies & Proposals, p.81,
para.6.8.113

Policy: EcW13

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The paragraph provides supporting text regarding the consideration of prior extraction when assessing development proposals in accordance with Policy EcW13: Minerals Safeguarding. In particular, when considering the appropriateness of prior extraction it states that the environmental and amenity impacts of extraction will need to be considered (in accordance with criterion 2 of the policy). Reference is made to distances for hard rock, sand and gravel and coal where extraction would not generally be acceptable. This relates to the minimum distances indicated in MTAN 1 and MTAN 2 to protect sensitive land uses from mineral extraction operations. The supporting text advises these are distances where mineral working would generally not be acceptable. Whether mineral extraction closer to sensitive uses would be acceptable or not would need to be considered on a case by case basis.

Question: 2d **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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122.D19/6.8.113/E		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation comments on paragraph 6.8.113 under policy EcW13: Minerals Safeguarding and questions the inclusion of the 'stand-off' buffer distances that would typically be applied to prior extraction developments.
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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

Question: 2e Changes proposed

Representation Text: . Review this paragraph as it is contrary to national policy in PPW.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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122.D21		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation considers the proposed monitoring trigger point is too short and should be extended.
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Document:DP Written Statement Monitoring Framework

Issue: DP Minerals-DP Minerals

Question Representation Texts

Question: Rec. by Officers

Council Response: The requirement to provide a minimum 10 year landbank is set in national policy in MTAN1: Aggregates. Consequently, the identified trigger point is considered to be appropriate and no change is considered necessary. LDP Annual Monitoring Reports will be informed by the Swrawp Annual Reports which will indicate any emerging landbank or capacity issues. The County Borough has two hard rock quarries and permitted reserves at these sites currently provide a landbank in excess of 50 years. Therefore, there is not anticipated to be a need to consider new allocations during the plan period.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D22		10/09/2018	<input type="checkbox"/>	E	C		M		Summary: Representation considers the symbols used to denote permitted reserves are unclear on the Proposals Map.

Document:DP Proposals Map

Issue: DP Minerals-DP Minerals

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The proposals map identifies all permitted mineral reserves and this includes Vaynor and Gelligaer Quarries, Ffos-y-fran and two inoperative mines north of Bedlinog (Ffynonau Duon 3 and 4). There are a large number of symbols that need to be shown on the proposals map and grouping permitted reserves in this way has been necessary to clearly show all other relevant designations. The proposals map legend clearly labels the symbol as the permitted mineral reserves identified under Policy EcW12. No changes for soundness are therefore considered to be required.
Question: 2d	Representation Text
<i>Representation Text:</i>	. 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.
Question: 2e	Changes proposed
<i>Representation Text:</i>	. The quality of the proposals map needs to be improved.

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

124 The Coal Authority

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
124.D3//EcW10		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Coal Authority supports the inclusion of policy EcW10.

Document:DP Written Statement Policies & Proposals, p.77

Policy: EcW10

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed.

Question: 2d **Representation Text**

Representation Text: . Meets all tests.

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

Question *Questions of Soundness*

Question: 2c **Soundness Test 1**

Representation Text: .

Question: 2c **Soundness Test 2**

Representation Text: .

Question: 2c **Soundness Test 3**

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
124.D4//EcW11		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Coal Authority supports the inclusion of policy EcW11.

Document:DP Written Statement Policies & Proposals, p.78

Policy: EcW11

Issue: DP Minerals-DP Minerals

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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124.D4//EcW11		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Coal Authority supports the inclusion of policy EcW11.
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed.

Question: 2d **Representation Text**

Representation Text: . Meets all tests.

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

Question *Questions of Soundness*

Question: 2c **Soundness Test 1**

Representation Text: .

Question: 2c **Soundness Test 2**

Representation Text: .

Question: 2c **Soundness Test 3**

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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124.D5//EcW13		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Coal Authority supports the inclusion of policy EcW13.
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Document:DP Written Statement Policies & Proposals, p.81

Policy: EcW13

Issue: DP Minerals-DP Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed.

Question: 2d **Representation Text**

Representation Text: . Meets all tests.

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.

Representations & Council Responses juxtaposed Minerals

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Minerals

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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124.D5//EcW13		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: The Coal Authority supports the inclusion of policy EcW13.
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Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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124.D6		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation notes the consideration of these sites has included the risks posed by past coal mining activity and that the Plan identifies where a site is in a Development High Risk Area where a Coal Mining Risk Assessment would be required.
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Document:DP Written Statement Site Allocation Details

Issue: DP Minerals-DP Minerals

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted.

Question: 2d Representation Text

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
124.D6		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation notes the consideration of these sites has included the risks posed by past coal mining activity and that the Plan identifies where a site is in a Development High Risk Area where a Coal Mining Risk Assessment would be required.
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<i>Representation Text:</i> .									

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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103.D9//SW11		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: This policy sets out how development must contribute to the creation of attractive & sustainable places through high quality, sustainable & inclusive design & includes a list of 10 requirements.
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Document:DP Written Statement Policies & Proposals, p.37

Policy: SW11

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Noted however it is considered that the addition of 'colour' to the requirements of Policy SW11 is unnecessary. If this issue was particularly important in relation to a specific development, it could be controlled via the 'elevational treatment' and/or 'materials and detailing' criteria of Policy SW11. Therefore, this change is not considered appropriate.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . We advise that 'colour' should be added to the list in requirement number 1 as this is appropriate to local context.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D8//SW11		28/08/2018	<input type="checkbox"/>	E	O	W	M		Summary: 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.

Document: DP Written Statement Policies & Proposals, p.37

Policy: SW11

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question Representation Texts**Question: Rec. by Officers**

Council Response: The wording of the policy seeks to achieve a high standard of design in line with the National Sustainable Placemaking Outcomes set out in national planning policy. The individual criteria are considered to provide sufficient flexibility when determining planning applications and if a criterion is not relevant or appropriate to the development this would not prevent the consideration and determination of the proposal. As such, no change to the policy wording is considered necessary.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . The HBF request that the word 'will' should be changed to 'aim'.

Question Questions of Soundness**Question: 2c Soundness Test 3**

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D13//SW7		28/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: 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.

Document: DP Written Statement Policies & Proposals, p.31

Policy: SW7

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Representations & Council Responses juxtaposed Miscellaneous Policy Matters

Merthyr Tydfil County Borough Council Local Development Plan

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D13//SW7		28/08/2018	<input type="checkbox"/>	E	S	W	M		Summary: 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.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D8//SW7		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document: DP Written Statement Policies & Proposals, p.31

Policy: SW7

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted. The requirement for the hydraulic modelling assessments referenced has been included in the site allocation details for this site. Notwithstanding this, any developments which come forward on the site will be assessed against the Plan's policies, which include SW11, which as amended by proposed focused changes, includes the requirement to protect and provide sufficient utilities infrastructure.

Question: 2d Representation Text

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D9//SW9		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document: DP Written Statement Policies & Proposals, p.33

Policy: SW9

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed Miscellaneous Policy Matters

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D10//SW11		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: We are pleased to note the inclusion of criteria 4, which requires new development to contribute to sustainable drainage systems where appropriate.

Document:DP Written Statement Policies & Proposals, p.37

Policy: SW11

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

123 South Wales Police

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
123.D1//SW11		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: No reference is made in the LDP to Designing out Crime, Secured by Design or community safety.

Document: DP Written Statement Policies & Proposals, p.37

Policy: SW11

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts***Question:** **Rec. by Officers**

Council Response: Thank you for your comments, which are noted. Policy SW11 includes reference to “reducing the opportunity for crime and antisocial behaviour” (final bullet point) ensuring this issue will have consideration in the development management process. The issues raised are also addressed in national policy (TAN 12). Therefore no changes to the plan are considered necessary.

Question: 2d **Representation Text**

Representation Text: . 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).”

Question: 2e **Changes proposed**

Representation Text: . 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.

Representations & Council Responses juxtaposed Miscellaneous Policy Matters

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
123.D1//SW11		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: No reference is made in the LDP to Designing out Crime, Secured by Design or community safety.

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.”

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

124 The Coal Authority

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
124.D2//EnW4		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: 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.

Document:DP Written Statement Policies & Proposals, p.52

Policy: EnW4

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Comments noted and support welcomed.**Question: 2d** **Representation Text***Representation Text:* . Meets all tests.

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.

Representations & Council Responses juxtaposed Miscellaneous Policy Matters

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

132 Merthyr Initiative Group

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
132.D5//SW7		03/09/2018	<input type="checkbox"/>	P	C	I	M		Summary: 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.

Document:DP Written Statement Policies & Proposals, p.31

Site: 40: Heartlands

Policy: SW7

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Thank you for your comments, which are noted. The omission of this site from the Proposals Map was an error, and will be included as a mapping change in the focused changes schedule as an allocation for regeneration, in accordance with Policy SW7.

Question: 2d **Representation Text**

Representation Text: . 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 LDP (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?

Question: 2e **Changes proposed**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
132.D6		03/09/2018	<input type="checkbox"/>	P	C	I	M		Summary: These additional designations are welcome as they will help to preserve and enhance many of Merthyr Tydfil's Natural Environment, Historic Heritage & Cultural Assets.

Document:DP Written Statement Policies & Proposals

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . Other

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

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
132.D6		03/09/2018	<input type="checkbox"/>	P	C	I	M		Summary: These additional designations are welcome as they will help to preserve and enhance many of Merthyr Tydfil's Natural Environment, Historic Heritage & Cultural Assets.

- Employment
- Retail
- Minerals
- Renewable Energy
- Transport/Infrastructure Improvements
- Gypsy/Traveller 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 welcome as they will help to preserve and enhance many of Merthyr Tydfil's Natural Environment, Historic Heritage & Cultural Assets.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D6		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Is there rational behind specific policies within the draft revised LDP?
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Document:DP Written Statement Policies & Proposals

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted. The policies within the Replacement LDP have been produced in line with national policy and are supported by an up-to-date evidence base. The Council is satisfied that the Replacement LDP makes sufficient provision to deliver the strategy and reasoned justification has been provided for the site allocations at the Hoover Strategic Regeneration Area and Goat Mill Road in the Written Statement. Specifically, these allocations have been informed by site assessments, the Employment Land Review, a Strategic Flood Consequence Assessment, the Hoover Strategic Regeneration Area framework master plan and other technical studies prepared for the site.

Question: 2d Representation Text

Representation Text: . Can the rationale behind plan policies be demonstrated?
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').
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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives

Question *Questions of Soundness***Question: 2c Soundness Test 1**

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Miscellaneous Policy Matters

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Miscellaneous Policy Matters

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D15		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The quality and energy efficiency of the existing housing. There seem to be no proposals to address this issue.

Document:DP Written Statement Context & Issues

Issue: DP Miscellaneous Policy Matters-DP Miscellaneous Policy Matters

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. This quality and energy efficiency of the existing housing is not something that the LDP has the ability to directly influence as it is controlled under the Building Regulations and is typically only considered when there are physical alterations to a building. However, where new development requires planning permission Policy SW11 Sustainable Design and Placemaking addresses this issue (bullet points 6 and 7). Furthermore, policies EcW8 and EcW9 support renewable energy developments where appropriate.
Question: 2d	Representation Text
<i>Representation Text:</i>	. The quality and energy efficiency of the existing housing. There seem to be no proposals to address this issue.
Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	. The Heritage Trust wish to speak about a number of issues including: Test 1 Fit Test 2 Appropriate Test 3 Delivery Aims Objectives
Question	Questions of Soundness
Question: 2c	Soundness Test 1
<i>Representation Text:</i>	.
Question: 2c	Soundness Test 2
<i>Representation Text:</i>	.
Question: 2c	Soundness Test 3
<i>Representation Text:</i>	.

Representations & Council Responses juxtaposed Monitoring Framework

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D15		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Representation from NRW recommends that the Indicator, Target and Trigger Point text for 5.3 in the monitoring framework removes references to meeting TAN15 tests.

Document:DP Written Statement Monitoring Framework

Issue: DP Monitoring Framework-DP Monitoring Framework

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. In order to comply with TAN 15 it is agreed that indicator 5.3 should be amended to exclude reference to meeting TAN 15 tests.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Remove references to meeting TAN15 tests from Indicator 5.3.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D17//SW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Recommend that monitoring Indicators 9.1-9.3 be amended as it is unclear how it will be possible to determine if the objective to 'improve' is being met.

Document:DP Written Statement Monitoring Framework, p.22

Policy: SW1

Issue: DP Monitoring Framework-DP Monitoring Framework

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: These indicators have been included to measure the success of policies EnW2 and EnW3 which are included to provide protection for important habitats and species. Therefore, no amendments to these are considered necessary. However it is acknowledged that an additional indicator would be appropriate in order to measure the success of Policy EnW1 in promoting the resilience of ecosystems and requiring development proposals to maintain and enhance biodiversity interests.

Question: 2d **Representation Text**

Representation Text: . 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 (Page 123, Ref No. 9.1-9.3).

Question: 2e **Changes proposed**

Representations & Council Responses juxtaposed Monitoring Framework

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
103.D17//SW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Recommend that monitoring Indicators 9.1-9.3 be amended as it is unclear how it will be possible to determine if the objective to 'improve' is being met.

Representation Text: . Include an additional indicator to measure biodiversity improvements.

Representations & Council Responses juxtaposed Monitoring Framework

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D3		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers it too onerous to meet all the requirements of Policy SW11: Sustainable Design and Placemaking. If any changes are proposed the monitoring requirements of indicator 5.1 would also need to change.

Document:DP Written Statement Monitoring Framework

Issue: DP Monitoring Framework-DP Monitoring Framework

Question *Representation Texts*

Question: Rec. by Officers

Council Response: It is considered that Policy SW11 is in line with the sustainable design principles set out in national policy and that there is sufficient flexibility within the individual criterion set out in the policy. Consequently, no changes are proposed to the wording of the policy. Notwithstanding this, the wording of the monitoring indicator is considered to be appropriate whether the suggested change is made or not as it is monitoring the implementation of the policy. Therefore, no changes to the working of the monitoring indicator are proposed.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Make changes to indicator 5.1 in line with desired changes to Policy SW11.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D4		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Given that no reference is made to phasing in policies or accompanying justification text it is unclear why reference is made to them in indicators 1.2, 1.3, 1.5, 4.3 & 4.4.

Document:DP Written Statement Monitoring Framework

Issue: DP Monitoring Framework-DP Monitoring Framework

Question *Representation Texts*

Question: Rec. by Officers

Council Response: It is a requirement of Welsh Government to include Housing completion dates as core monitoring indicators (identified the in LDP Manual Edition 2 and draft Development Plans Manual Edition 3). These figures relate to the housing requirement figure and it is useful to include key milestones in order to better measure the plans effectiveness, therefore no changes to these inclimators have been proposed. Separate changes are proposed to include the Housing Trajectory and Land Supply Information in the appendices of the plan and under policy SW3 as requested by Welsh Government (see representation 101.D4/SW3).

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed Monitoring Framework

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D4		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Given that no reference is made to phasing in policies or accompanying justification text it is unclear why reference is made to them in indicators 1.2, 1.3, 1.5, 4.3 & 4.4.

Question: 2e Changes proposed

Representation Text: . Either remove periods or provide text to explain the periods and what purpose they serve.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D15//SW12		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: There is no benefit in monitoring the number of major applications accompanied by a travel plan as it is not specifically required by Policy SW12.

Document:DP Written Statement Monitoring Framework, p.38

Policy: SW12

Issue: DP Monitoring Framework-DP Monitoring Framework

Question Representation Texts

Question: Rec. by Officers

Council Response: Ensuring that the development plan is consistent with "minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport" is a requirement of PPW (Edition 10) paragraph 3.38 and - Chapter 4 Active and Social Places. TAN 18 states that Travel Plans demonstrate the benefits of sustainable transport and can help to reduce road traffic and promote walking, cycling and public transport. In this sense a Travel Plan can help demonstrate how a development can "encourage modal shift towards sustainable transport" as required under in Policy SW12.

Page 19, paragraph 3.11, of Draft Development Plans Manual Edition 3, states that LDPs should not repeat national policy. Transport Assessments and Travel Plans are therefore not specifically mentioned in Policy SW12. However, in Section 8: Site Allocation Details of the Deposit LDP under the title "General Supporting Information and Assessments" Travel Plans are listed. It is therefore considered that Indicator 6.2 is an appropriate local indicator to measure the effectiveness of Policy SW12 and no changes in this respect are proposed.

Question: 2d Representation Text

Representation Text: . Ref. no. 6.2 The HBF cannot see any benefit in monitoring this, as it does not relate directly to a policy requirement.

Question: 2e Changes proposed

Representation Text: . Delete indicator 6.2

Representations & Council Responses juxtaposed Monitoring Framework

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D20		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: In order to accord with MTAN1 amend wording of indicator 16.1 to read "Maintain a minimum 10-year landbank of permitted aggregate Reserves during the entire period of the development plan."

Document:DP Written Statement Monitoring Framework, p.129

Issue: DP Monitoring Framework-DP Monitoring Framework

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. For clarity, it is agreed that the core indicator should be amended to align with the wording of the MTAN requirements. A focused change is proposed to amend indicator 16.1 accordingly.
Question: 2d	Representation Text
<i>Representation Text:</i>	. Monitoring Target: -Maintain a 10-year bank of permitted aggregate reserves
	This does not accord with MTAN1 which requires a minimum landbank of 10 years during the entire period of the plan.
Question: 2e	Changes proposed
<i>Representation Text:</i>	. Amend wording to read "Maintain a minimum 10-year landbank of permitted aggregate reserves during the entire period of the development plan"

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Monitoring Framework

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D9		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The existing LDP has not been monitored affectively in relation to the loss of heritage assets which raises questions with regard to the soundness of the Monitoring Framework of the Replacement Deposit Plan in relation to Soundness Test 3.

Document:DP Written Statement Monitoring Framework

Issue: DP Monitoring Framework-DP Monitoring Framework

Question *Representation Texts***Question: Rec. by Officers**

Council Response: The sites referred to have all been the subject of detailed planning applications and or applications for Listed Building Consent which have been processed in accordance with relevant Planning Legislation and Guidance. The Council considers that there are sufficient monitoring proposals in the Replacement LDP and no changes in the respect are proposed.

Question: 2d Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including soundness Test 3 Delivery.

Question *Questions of Soundness***Question: 2c Soundness Test 1**

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D2		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP HRA Stage 1 Screening

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted. The Council has prepared a Deposit Plan Addendum - Habitats Regulations Assessment Revised Screening Report incorporating Appropriate Assessment based on the previous Deposit Plan Habitats Regulations Assessment Screening Report (June 2018) in response to developments in HRA case law. As part of this revision to the Habitats Regulations Assessment references to legislation has been updated and references to the 'Hirwaun meta-population' have been amended to 'Aberbargoed Grasslands Metapopulation' where necessary.

Question: 2d Representation Text

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

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D5//EnW2		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concern that there is no mention of European Protected Species, as listed in Schedules 2 and 4 of Conservation of Habitats and Species Regulations 2017 and seeks changes to policy EnW2 wording and supporting text.

Document:DP Written Statement Policies & Proposals, p.50

Policy: EnW2

Issue: DP Natural Environment-DP Natural Environment

Representations & Council Responses juxtaposed Natural Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D5//EnW2		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concern that there is no mention of European Protected Species, as listed in Schedules 2 and 4 of Conservation of Habitats and Species Regulations 2017 and seeks changes to policy EnW2 wording and supporting text.

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted. The changes suggested would ensure Policy EnW2 is in accordance and consistent with protected species legislation. It is therefore proposed to incorporate changes into Policy EnW2 and supporting paragraph 6.7.12.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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...'

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D6//EnW4		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concerns that the policy contains no provision to improve water quality and suggests changes to address this given the role the planning system can play in meeting the objectives of the Water Framework Directive.

Representations & Council Responses juxtaposed Natural Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D6//EnW4		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concerns that the policy contains no provision to improve water quality and suggests changes to address this given the role the planning system can play in meeting the objectives of the Water Framework Directive.

Document:DP Written Statement Policies & Proposals, p.52

Policy: EnW4

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Issues regarding water quality are understood to arise from a number of factors, including for example, overflows from abandoned mine workings and the risk of sewerage misconnections. However, the Council acknowledges the role the planning system can play in improving water quality though new development. Consequently, changes have been proposed to Policy EnW4 to include reference to improving water quality.

Question: 2d **Representation Text**

Representation Text: . 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D6//EnW4		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concerns that the policy contains no provision to improve water quality and suggests changes to address this given the role the planning system can play in meeting the objectives of the Water Framework Directive.

Question: 2e Changes proposed

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D7//EnW4		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concern that policy EnW4 as currently worded is contrary to TAN15 as it implies that an increase in flood risks could be acceptable whereas TAN15 requires that there should be no flooding elsewhere.

Document:DP Written Statement Policies & Proposals, p.52

Policy: EnW4

Issue: DP Natural Environment-DP Natural Environment

Question Representation Texts

Question: Rec. by Officers

Council Response: Policy EnW4 would be relevant to all forms of development, including less vulnerable development and development within flood zones B, C1. Whilst it is accepted that the acceptability criteria for flooding consequences (under paragraph A1.12 of TAN 15) requires that there is 'no flooding elsewhere' (i.e. downstream or elsewhere on third party land) however it is possible that less vulnerable development could be permitted in zone C2 which has some level of acceptable flood risk (i.e. in accordance with the justification and acceptability criteria in TAN15).

Furthermore, it may be possible to locate development outside of zone C2 as part of a development proposal. In this respect, TAN 15 paragraph 6.2 states that: "New development should be directed away from zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue. In zone C the tests outlined in sections 6 and 7 will be applied, recognising, however, that highly vulnerable development and Emergency Services in zone C2 should not be permitted". Consequently, it is considered appropriate for policy EnW4 to include a statement that summaries the aim of the policy i.e. to avoid areas of flood risk. It is however accepted that the support text to policy EnW4 at paragraph 6.7.24

Question: 2d Representation Text

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D7//EnW4		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Representation raises concern that policy EnW4 as currently worded is contrary to TAN15 as it implies that an increase in flood risks could be acceptable whereas TAN15 requires that there should be no flooding elsewhere.

Representation Text: . 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'.

Question: 2e Changes proposed

Representation Text: . 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...'

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D11//EnW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We suggest further detail is provided in the explanatory text for this policy on what is meant by ecosystem resilience.

Document:DP Written Statement Policies & Proposals, p.48

Policy: EnW1

Issue: DP Natural Environment-DP Natural Environment

Question Representation Texts

Question: Rec. by Officers

Council Response: The Environment (Wales) Act 2016 places a duty on public bodies to maintain and enhance biodiversity and to promote the resilience of ecosystems and updated references to ecosystem resilience have been incorporated into draft Planning Policy Wales (Edition 10). Therefore, whilst no specific changes to the wording of policy EnW1 are considered to be necessary, it is accepted that an additional introductory paragraph to policy EnW1 would assist in explaining the term and the overall aim of the policy – i.e. to maintain and enhance biodiversity interest as a whole by promoting ecosystem resilience including considering the extent, diversity, connectivity and condition of biodiversity (species and habitats) as set out in the Environment (Wales) Act.

Opportunities to integrate with existing Green Infrastructure and to provide new features will help meet these biodiversity objectives. However, it is acknowledged that Green Infrastructure as a whole will require consideration early in the planning and design stages of development proposals and not just where there are specific biodiversity impacts. Consequently, references to green infrastructure and examples have been included in the updated supporting text to policy EnW1 and new text has been added under policy SW11: Sustainable Design and Placemaking.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D11//EnW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We suggest further detail is provided in the explanatory text for this policy on what is meant by ecosystem resilience.

With regard to paragraph 6.7.6, further detail of how the biodiversity value of a site can be established is provided in the Council's Nature and Development Supplementary Planning Guidance referenced in paragraph 6.7.11. The SPG includes detailed guidance and includes reference using suitably qualified ecologists, CIEEM guidelines and British Standard Guidance. To clarify this approach to establishing biodiversity value, changes are proposed to paragraph 6.7.6 to advise that this will typically be achieved through a biodiversity survey and ecological impact assessment that is proportionate in nature to the development proposals. This would involve biodiversity desktop and field studies and would result in comprehensive ecological impact assessments where required.

With regard to paragraph 6.7.7, it is agreed that the supporting text could benefit from reference to a site in supporting a particular species or assemblage and amended text has been proposed. The term 'stepping stone' is included in national policy under paragraph 5.4.3 of PPW and is a commonly used term within government, academic research, and Chartered Institute for Ecology and Environmental Management (CIEEM) reports and documents. These are sites that assist habitat connectivity for species migration, dispersal or genetic exchange. Other sites may provide continuous or direct habitat connectivity for the same purpose. For clarity amended supporting text to policy EnW1 has been proposed.

With regard to paragraph 6.7.8, it is accepted that most sites will contain some biodiversity value with the exception of rare instances. Amendments are proposed to clarify the supporting text. With regards to the requirement to establish the biodiversity value of a site, this is included in the earlier paragraph 6.7.6 and changes are proposed to clarify that this would typically be established through biodiversity site surveys and ecological impact assessments. In addition, 'Biodiversity' as a term will also be included in the Plan's glossary.

With regard to paragraph 6.7.9, it is agreed that the suggested amendments to the supporting text improve clarity and consistency with the Environment (Wales) Act and these have been incorporated into the proposed changes. With regards to the consideration of 'like for like' compensation, it is accepted that this should not relate to a literal interpretation and should relate to overall biodiversity interest with the aim to maintain and enhance biodiversity. It is considered the proposed changes clarify this requirement and aims of the policy.

With regard to paragraph 6.7.10, this paragraph is included to ensure development proposals can be considered in accordance with the Environment (Wales) Act duty to maintain and enhance biodiversity and ensure this can be implemented without placing disproportionate or onerous restrictions where new development can be justified in accordance with national planning policy. Changes are proposed to ensure consistency with Environment (Wales) Act and consistency of the terms used. The changes include reference to considering opportunities for greater enhancement wherever possible in order to address the concerns raised. The list of enhancement features provides examples and is not exhaustive. Further guidance is provided in the Council's Nature and Development Supplementary Planning Guidance.

Question: 2d**Representation Text**

Representation Text: . 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

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103.D11//EnW1		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: We suggest further detail is provided in the explanatory text for this policy on what is meant by ecosystem resilience.

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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D12//EnW2		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation seeks various changes to paragraphs 6.7.12 to 6.7.14 to clarify references to SSSI designations, the consideration of protected species.

Document:DP Written Statement Policies & Proposals, p.50

Policy: EnW2

Issue: DP Natural Environment-DP Natural Environment

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D12//EnW2		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation seeks various changes to paragraphs 6.7.12 to 6.7.14 to clarify references to SSSI designations, the consideration of protected species.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments relating to paragraph 6.7.12 and the references to SSSI designations and descriptions are noted and changes have been proposed to address these.

Comments relating to paragraph 6.7.13 and the Council's legal duty to have due regard to the conservation of protected species whether or not advice is provided by NRW are noted. Changes have been proposed to clarify this.

Comments relating to paragraph 6.7.14 and the implications of development on protected sites or species are noted. To be justified under the policy development proposals must clearly outweigh the impacts on the protected sites and species and there must be no suitable alternatives in accordance with legislation and national policy. The policy also requires that the proposal contributes to the protection, enhancement and positive management of the site, or in the case of protected species where there are appropriate avoidance, mitigation and compensation measures. As each case will need to be assessed on its own merits it is considered appropriate to elaborate on this requirement, however, it is accepted there may be cases where this is not possible. Therefore, changes have been proposed to the paragraph clarify this element of the policy.

Question: 2d **Representation Text**

Representation Text:

. 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.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D13//EnW3		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation seeks to include reference to geodiversity into the criteria and supporting text of policy EnW3.

Document:DP Written Statement Policies & Proposals, p.51

Policy: EnW3

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. Policy EnW3 applies to geodiversity and Regionally Important Geological Sites (RIGS). The consistent reference to geodiversity is therefore considered to be appropriate and changes to the policy wording (criterion 4) have been proposed. In addition, changes to paragraph 6.7.19 has also been made as a consequential change inline earlier amendments regarding the promotion of biodiversity on development sites and to include reference to geodiversity.

Question: 2d **Representation Text**

Representation Text: . 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."

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D14//EnW4		07/09/2018	<input type="checkbox"/>	E	C		M		Summary: Representation requests additional explanatory text to explicitly mention SuDS, as this would encourage the long-term reduction of diffuse pollution which is one of the biggest factors impacting water quality in the River Taff.

Document:DP Written Statement Policies & Proposals, p.52

Policy: EnW4

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. Changes have been proposed to policies EnW4: Environmental Protection and SW11: Sustainable Design and Placemaking to incorporate consideration of water quality improvement. This has included adding reference to sustainable drainage systems and improving water quality which addresses the issue raised.

Question: 2d **Representation Text**

Representation Text: . 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.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D16//SW11		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation highlights some of the benefits of Green Infrastructure improvements and requests that more detail is added regarding the consideration of Green Infrastructure in the design of new development under policy SW11.

Document:DP Written Statement Policies & Proposals, p.37

Policy: SW11

Issue: DP Natural Environment-DP Natural Environment

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. The Council has proposed changes to a separate representation from Natural Resources Wales which provide further information regarding the incorporation of green infrastructure into new development.

Question: 2d	Representation Text
<i>Representation Text:</i>	<p>Green infrastructure (GI)</p> <p>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.</p> <p>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.</p> <p>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:.....</p> <p>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."</p> <p>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.</p>

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Agent: **WYG**

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D6//EnW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation relates to the proposed Sites of Importance for Nature Conservation (SINC) boundaries some of which overlap with the Cwm Glo a Glyndyrus SSSI.

Document:DP Written Statement Policies & Proposals, p.51

Policy: EnW3

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council's approach to the SINC review is provided in the Sites of Importance for Nature Conservation background paper (June 2018). In relation to this designation, access to the land has historically not been permitted. For practical reasons, where access is permitted, SINC surveys across the County Borough have focussed on known boundary issues and known or likely changes since the previous Local Development Plan. Landowners, landowner attitudes and permissions often change. Amendments to SINC boundaries are based on the best available known evidence at the time. The boundary changes at points F, H and I marked on the representation map are based on the Cwm Glo a Glyndyrus SSSI boundary changes confirmed since the previous LDP.

Sites of Special Scientific Interest (SSSI) were originally notified under the National Parks and Access to the Countryside Act 1949, SSSIs were then re-notified under the Wildlife and Countryside Act 1981. Improved provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way Act 2000. Landowners have an obligation, under legislation, to manage a SSSI in a way which helps conserve its special features with NRW providing the landowner with details of legislation affecting the site, management practices, activities likely to cause damage, activities requiring permission on site and those activities that are exempt. NRW are the statutory body with the powers to enforce SSSI issues.

Cwm Glo SSSI was first notified on 23rd January 2003. The Cwm Glo a Glyndyrus SSSI notification of enlargement was made on 17th July 2008 with a site area of 203.1ha. Following evidence, representations and objections by the landowner to NRW through the process of notifying SSSI amendment to the site boundaries were made with the current Cwm Glo a Glyndyrus SSSI being confirmed on 8th April 2009 with a reduced area of 181.3ha. MTCBC is confident that the Countryside Council for Wales (now NRW), as statutory nature conservation body for Wales, had sufficient rigorous and evidence based systems and process to confirm the final SSSI boundary as it currently exists and has no evidence to the contrary.

A SSSI is a statutory designation for nationally important sites with detailed "Guidelines for the Selection of Biological SSSI" (Part 2: Detailed Guidelines for Habitats and Species Groups).whereas SINC designation is based on regionally important criteria (Mid-Valleys SINC Criteria). When comparing the (SSSI) "Part 2: Detailed Guidelines for Habitat and Species Groups" with the (Mid-Valleys SINC Criteria) "Part 2: Detailed Criteria for Selection" the former always meet the latter criteria for the habitats present within Cwm Glo a Glyndyrus SSSI.

The area marked J lies outside Cwm Glo a Glyndyrus SSSI and within Rhydyar West SINC. The site was originally designated after being surveyed by David Clements Ecology Ltd (as detailed in the Rhydyar West Survey and Assessment for SINC designation Report dated May 2006). The alleged impact (upon the SINC) from "the addition of higher fertility soils during the construction of the A470" occurred in 1996/1997, a significant duration prior to the SINC surveys and designation. The National Terrestrial Phase 1 Habitat Survey (Countryside Council for Wales), undertaken prior to the construction of this portion of the A470, also shows this area as semi-natural habitat within area J evidencing a continuation of this habitat over a reasonable period of time.

Access to the land in question has historically not been permitted and no new evidence has been submitted, or changes observed, to justify amendments the SINC designation in this area (for example an ecology survey of site J). Therefore, in the absence of this evidence changes to the SINC's designation are not considered to be appropriate. No changes to the Deposit Plan SINC designation are therefore proposed.

Question: 2d **Representation Text**

Representation Text: On behalf of Marvel Ltd, which has landholdings covered by SINC numbers 12 (Cwm Glo a Glyndrys) and 36 (Rhydyar 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 "Criteria for the Selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D6//EnW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation relates to the proposed Sites of Importance for Nature Conservation (SINC) boundaries some of which overlap with the Cwm Glo a Glyndyrus SSSI.

and Rhondda CynonTaff (The 'Mid-Valleys Area') is subject to designation.

The revised delimitations of these SINCs 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.

12. Cwm Glo a Glyndyrus

The citation for this SINC reads as follows:

"This SINC contains the Cwm-Glo a Glyndyrus 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*)."

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).

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 fringed 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

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D6//EnW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation relates to the proposed Sites of Importance for Nature Conservation (SINC) boundaries some of which overlap with the Cwm Glo a Glyndyrus SSSI.

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.

Question: 3b Subject at Public Examination Hearing

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

Question Questions of Soundness

Question: 2c Soundness Test 2

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D6//EnW1		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The HBF do not consider the use of the term 'Ecosystem Resilience' is clear or well enough explained.

Document: DP Written Statement Policies & Proposals, p.48

Policy: EnW1

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts***Question: Rec. by Officers**

Council Response: The term 'ecosystem resilience' is a commonly used term within nature conservation and planning guidance (such as PPW Edition 10) and is included in the Environment (Wales) Act 2016 Section 6. Changes to the supporting text under policy EnW1: Nature Conservation and Ecosystem Resilience and Policy SW11: Sustainable Design and Placemaking: have been proposed in response to representations from Natural Resources Wales. The changes make reference to the legislative duty on public bodies to maintain and enhance biodiversity including promoting the resilience of ecosystems (see representation 103D.11/EnW1). The changes also provide examples of how development can maintain and enhance biodiversity and in so doing promote ecosystem resilience. This includes, for example, considering the use of green infrastructure as part of development proposals.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Consider different wording or provide better explanation.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D23		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment son Key Issue 15 in relation to green wedges, green corridors etc
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Document:DP Written Statement Context & Issues

Issue: DP Natural Environment-DP Natural Environment

Question *Representation Texts***Question: Rec. by Officers**

Council Response: The issues raised under Key issue 15 (A wide range of species and habitats are under threat. Greater connectivity is needed between green corridors and green spaces) are addressed by the Replacement LDP through its policy framework. This includes designating areas Sites of Importance for Nature Conservation and including development management policies that require consideration of green infrastructure and the promotion of ecosystem resilience though maintaining and enhancing biodiversity.

Green wedges are not a mechanism created for the purpose of ecological connectivity, though they may, to some extent, perform that function they are to prevent the physical coalescence of settlements. It is considered that the best method for the maintenance and enhancement of ecological connectivity is through prioritising the protection and improvement of the best quality habitats in the County Borough. In this regard the geographical distribution and protection afforded by SINC (Sites of Importance for Nature Conservation), SSSI (Sites of Special Scientific Interest) and Open Spaces/Local Nature Reserves are deemed to be far more likely to maintain and enhance ecological connectivity at all scales rather than the more limited areas afforded by Green Wedge designation.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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..

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust wish to speak about a number of issues mentioned in their comments including:

Test 1 Fit

Test 2 Appropriate

Representations & Council Responses juxtaposed Natural Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D23		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment son Key Issue 15 in relation to green wedges, green corridors etc
Test 3 Delivery Aims Objectives Revision process and consultation comments Active Travel, footpaths, cycleways, rights of way, bridleways 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.									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D24		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 16 in relation to water quality

Document:DP Written Statement Context & Issues

Issue: DP Natural Environment-DP Natural Environment

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. Whilst water quality in the area has improved in recent years the River Taff remains at 'moderate' status and water quality has been identified as one of the key issues within the LDP. Policy wording changes (to policies EnW4: Environmental Protection and SW11: Sustainable Design and Placemaking) have been proposed in response to representations made by NRW (see representation 103.D14//EnW4) which address the need to consider water quality improvement in new development proposals.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Heritage Trust concerns raised include:

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Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D24		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 16 in relation to water quality

- 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..

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust would like to speak about a number of issues mentioned in their comments, including:

- Test 1 Fit
- Test 2 Appropriate
- Test 3 Delivery
- Aims
- Objectives
- Revision process and consultation comments

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D31		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 25 in relation to the River Taff corridor

Document:DP Written Statement Vision & Objectives

Issue: DP Natural Environment-DP Natural Environment

Representations & Council Responses juxtaposed Natural Environment

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Natural Environment

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D31		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 25 in relation to the River Taff corridor
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: A Strategic Flood Consequence Assessment (SFCA) has been prepared to inform the Deposit Plan. It identifies flood risks on the western banks of the River Taff where no allocation for highly vulnerable development has been made. The eastern banks comprising the existing Hoover Factory site are defined as Flood Zone B where there is a lower risk of fluvial flooding. Natural Resources Wales have been consulted regarding the housing allocation and not raised objections to the principle of residential development here and TAN 15: Development and Flood Risk permits the allocation of residential development in such areas. Should any localised issues be identified the Replacement LDP contains policies to require further assessments where these may be necessary (for example, Policy En4: Environmental Protection).

The Council's Regeneration department have commissioned further hydraulic modelling work and flood mitigation assessments to consider potential future flood mitigation options for the Nant Morlais – River Taff convergence that results in areas of flood zone C2 in Merthyr Tydfil Town Centre. This assessment work will also consider potential development sites at The Willows / Abercanaid. Whilst this work will inform the consideration of potential flood mitigation options it is not anticipated that this would provide the detailed site level FCA required for plan allocations. With regards to the Dragon Parc site at Abercanaid, the landowner is preparing further hydraulic modelling work and flood mitigation assessments to further consider opportunities for residential and employment development at the site.

With regards to the opportunities to incorporate green infrastructure and active travel along the river corridor, these features are highlighted in the Hoover Strategic Regeneration Area Framework Masterplan (June 2018). This document sets out key urban design principles which will inform development proposals at the strategic site. Reference to these has been incorporated into the wording Policy SW6: Hoover Strategic Regeneration Area as part of a focused change to the Deposit Plan. This includes adding further details to the supporting text regarding the importance of the river corridor, green infrastructure and active travel.

Question: 2d **Representation Text**

Representation Text: 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).

Question: 2e **Changes proposed**

Representation Text: 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D31		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 25 in relation to the River Taff corridor
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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..

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Heritage Trust would like to speak about a number of issues mentioned in their representations including:

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives
Revision process and consultation comments

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

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Elan Homes Ltd

Agent: JCR Planning Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
258.D3//EnW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation objects to the Gethin Tip section of Maes Abercanaid/ Abercanaid Fields (east of the A470) being allocated as a SINC.

Document:DP Written Statement Policies & Proposals, p.51

Policy: EnW3

Issue: DP Natural Environment-DP Natural Environment

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation relates to SINC 20 which was originally designated in the adopted LDP 2011 and was resurveyed in July 2016. This confirmed that the site continues to meet Mid Valleys SINC Criteria. Further details can be found in the Sites of Importance for Nature Conservation background paper (June 2018). No supporting evidence has been received to support the claim that it does not meet the criteria as suggested. Consequently, no changes to the SINC designation in the Deposit Plan are proposed.

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.D8//SW10		07/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP Written Statement Policies & Proposals, p.35

Policy: SW10

Issue: DP Open Spaces-DP Open Spaces

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. The requirement for improvements to Open Spaces has been made through the Deposit LDP Policy SW9: Planning Obligations and further reference is made in paragraph 6.5.68 under policy SW11. However, it is agreed that this should be included in Policy SW10 given the overall aim of the policy is to protect and improve open spaces and for consistency and clarity. Changes have been proposed to include reference to improving open spaces.
Question: 2d	Representation Text
<i>Representation Text:</i>	. 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.
Question: 2e	Changes proposed
<i>Representation Text:</i>	. Add in reference to achieve Improvement to Open Spaces.

Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

143 Smart, Mr James

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
143.D1//SW10		10/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Objection to the proposed Nature Reserve at Nant Llwynog & Coed yr Hendre, Bedlinog. Test of soundness 1, 2 and 3 have not been met in regards to this issue.

Document: DP Written Statement Policies & Proposals, p.35

Policy: SW10

Issue: DP Open Spaces-DP Open Spaces

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The attached plans are 35 years old, and given the time that has passed and the fact that the site has not been developed in that time, it is clear that plans for sheltered accommodation on this site have been long abandoned and are highly unlikely to come forward within the plan period. As stated there has been other sheltered accommodation developed in the area and other housing sites allocated in the area could be used for such accommodation to address identified needs.

The purpose of Local Nature Reserves (LNRs) is to see local sites protected to conserve and enhance biodiversity and improve access to nature for education purposes and to provide areas where people can derive pleasure from nature. During the consultation process held for the Open Space Strategy local residents of all ages identified a desire to see more 'wildlife' in open spaces above any other factors and LNR designation is in response to this. Furthermore, the use of LNRs would comply with Section 6 of the Environment (Wales) Act 2016, which recognises the need to improve awareness and participation in the natural world and with the Council's Well-being Objectives which seek to encourage people to spend more time outdoors in good quality accessible green space and to help wildlife flourish. Finally, the Council's Active Travel Integrated Network Plan, currently being considered by the Welsh Government, includes proposals to up-grade footpaths and cycleways in the vicinity of the proposed LNR. Consequently, the proposed LNR designation is considered to be justified. Further details can be found in the Local Nature Reserves background paper (December 2018).

Question: 2d Representation Text

Representation Text: . 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 Bedling 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 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.

Question: 2e Changes proposed

Representation Text: . 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

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Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
143.D1//SW10		10/09/2018	<input type="checkbox"/>	P	O	W	M		Summary: Objection to the proposed Nature Reserve at Nant Llwynog & Coed yr Hendre, Bedlinog. Test of soundness 1, 2 and 3 have not been met in regards to this issue.
around the Bedlinog community and the Merthyr Tydfil Borough as a whole.									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: . The plan does not have regard to national policy i.e. Access

Question: 2c Soundness Test 2

Representation Text: . 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.

Question: 2c Soundness Test 3

Representation Text: . 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.

Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

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207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D11		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation comments on Key Issue 2 regarding service provision, as it is considered that development on open space will limit opportunities for healthy life-styles and well-being activities.

Document:DP Written Statement Context & Issues

Issue: DP Open Spaces-DP Open Spaces

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The plan proposes a sustainable level of population growth which seeks to facilitate an increase in the County Borough's population. Aligning service provision with demographic changes will need to be considered by service providers alongside plan growth identified in the LDP.
	The only development proposed on existing open space in the Replacement LDP is for housing on site 32: Commercial Fields, Treharris. However, given a change in circumstances on this site this is proposed to be removed though a focused change to the Plan. Identified open spaces are shown on the LDP Constraints Map.
	With regards to the protection and provision of open space, the Plan would require new developments to contribute to open space provision through policies SW9 and SW10. Policy SW10 also seeks to prevent the unjustified loss of existing Open Space

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Heritage Trust concerns raised include:

Protect open spaces – allocate sites in wards as suggested by the Open Space Strategy

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including green open space – potential loss of green open space due to unnecessary development.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D11		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation comments on Key Issue 2 regarding service provision, as it is considered that development on open space will limit opportunities for healthy life-styles and well-being activities.

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D13		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment on Key Issue 5 regarding Open Spaces as there seems to be no proposals to improve the sufficiency or the quality of open space or to allocate land for additional allotment gardens, playgrounds or play areas.

Document:DP Written Statement Context & Issues

Issue: DP Open Spaces-DP Open Spaces

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Policy SW10 proposes a number of Local Nature Reserves throughout the County Borough for protection and use by local people. In line with the Council's Open Space Strategy the Plan's focus is on improving existing open spaces identified in the Open Space Strategy. These are identified on the LDP Constraints Map. Furthermore, Policy SW9 Planning Obligations (page 33) requires contributions for the provision of new open space and improvement of existing open space on sites of 10 homes or more. However, in order to support improvements open spaces provision it is proposed to add text to Policy SW10 to include reference to improving the quality, quantity and access to open spaces (see response to representation 103.D8/SW10).
Question: 2d	Representation Text
<i>Representation Text:</i>	. Access to sufficient quality open space varies but is generally poor across the County Borough.
	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 gardens, playgrounds or play areas in local communities. (Suggestions are made in the Open Space strategy report.)
Question: 2e	Changes proposed
<i>Representation Text:</i>	. Heritage Trust concerns raised include:
	Protect open spaces – allocate sites in wards as suggested by the Open Space Strategy
Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	. The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including lack of proposals to improve provision of open space at community level.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

21/12/2018

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Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D13		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment on Key Issue 5 regarding Open Spaces as there seems to be no proposals to improve the sufficiency or the quality of open space or to allocate land for additional allotment gardens, playgrounds or play areas.

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

288 Friends of Nant Llwynog Park

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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288.D2//SW10		03/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: Re-write policy SW10 to ensure that semi-natural areas have biodiversity as the priority use and redraw the boundary of the proposed Local Nature Reserve at Old Colliery site Coed yr Hendre and Nant Llwynog to remove the existing playing fields.
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Document:DP Written Statement Policies & Proposals, p.35

Policy: SW10

Issue: DP Open Spaces-DP Open Spaces

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted and support welcomed. To ensure greater land management clarity and reduce confusion it is agreed that the policy should make reference to conserving biodiversity and the boundary for Old Colliery Site Coed-y-Hendre and Nant Llwynog proposed Local Nature Reserve (LNR) should be amended to exclude the existing sports pitches. For consistency the sports pitches, amenity greenspace and play areas are also proposed to be removed from the Goitre Lane and Ifor Tip proposed LNRs as part of focused changes.

Question: 2d Representation Text*Representation Text:* . 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 Llwynog, 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 kept 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.

Question: 2e Changes proposed

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Friends of Nant Llwynog Park has requested to speak on the role of the plan in designating new nature reserves it will greatly assist in the understanding of the value of the natural world and its significance for the public.

Representations & Council Responses juxtaposed Open Spaces

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Open Spaces

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
288.D2//SW10		03/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: Re-write policy SW10 to ensure that semi-natural areas have biodiversity as the priority use and redraw the boundary of the proposed Local Nature Reserve at Old Colliery site Coed yr Hendre and Nant Llwynog to remove the existing playing fields.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
288.D3//SW10		03/09/2018	<input type="checkbox"/>	E	S	I	M		Summary: 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.

Document:Open Space Startegy and Action Plans, p.35

Policy: SW10

Issue: DP Open Spaces-DP Open Spaces

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Friends of Nant Llwynog Park has requested to speak on the role of the plan in designating new nature reserves it will greatly assist in the understanding of the value of the natural world and its significance for the public.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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119.D1		31/08/3018	<input type="checkbox"/>	E	C	W	M		Summary: We welcome the early engagement taking place between the LPA and Welsh Water.
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Document:DP Written Statement

Issue: DP Plan Preparation-DP Plan Preparation

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted. The Council has had early engagement with Dwr Cymru Welsh Water which has informed development of the Plan's strategy and any site specific comments have been incorporated into the site allocation details where appropriate.

Question: 2d Representation Text

Representation Text: . 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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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129.D1/2.10/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.
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Document:DP Written Statement Context & Issues, para.2.10

Issue: DP Plan Preparation-DP Plan Preparation

Question	Representation Texts
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Question:	Rec. by Officers
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Council Response:	Your comments are welcome and noted.
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Question: 2d	Representation Text
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Representation Text:	. 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.
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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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

134 Rees, Mr Alan

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
134.D2		05/09/2018	<input type="checkbox"/>	P	S	W	M		Summary: General support for the plan and consultation process, including praise for the comprehensive and informative evidence base, its on-line accessibility and courteous manner of officers staffing drop-in sessions.

Document:DP Written Statement

Issue: DP Plan Preparation-DP Plan Preparation

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Comments noted and supported welcomed.**Question: 2d** **Representation Text**

Representation Text: . 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 resources 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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D49		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Appreciate the good work that has gone into producing detailed strategies and supporting documents and acknowledge the effort gone into the public consultation exercise.
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Document:DP Written Statement

Issue: DP Plan Preparation-DP Plan Preparation

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted and support welcomed. The consultation process for the Deposit Replacement LDP comprised a multi-faceted approach in line with the Delivery Agreement agreed with Welsh Government at the start of the plan preparation process. Unfortunately, the Council no longer subscribes/supports to the Cwm Taf Hub website. Alternative engagement and public consultation methods were employed and this has been noted in the Deposit Plan Consultation Report (December 2018). For example, direct contact was made with all representors included on the LDP database either through email or letter. A pop-up banner and eye-catcher was included on the front page of the Council's Website and the process was 'Tweeted' on the Council's twitter account. Posters were distributed and a number of drop in sessions were held throughout the County Borough area during the consultation period. Planning officers were also available during normal office hours to answer any queries relating to the replacement LDP and the public consultation. There is no longer a legal requirement to publish public notices in local papers, however, an article on the consultation process appeared on the front page of the Merthyr Express during the consultation period which carried over onto the inside pages.

Question: 2d Representation Text

Representation Text: 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.

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.

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.

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.

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.

Going back to 2011, MTCBC seems to taken a rather casual approach to monitoring and reviewing the all-important population, housing and employment data.

Local and national government was taken by surprise when the 2011 Census revealed that population projections had been wide of the mark.

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 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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D49		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Appreciate the good work that has gone into producing detailed strategies and supporting documents and acknowledge the effort gone into the public consultation exercise.

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.

Question: 3b**Subject at Public Examination Hearing**

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Revision process and consultation comments.

Representations & Council Responses juxtaposed Plan Preparation

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D49		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Appreciate the good work that has gone into producing detailed strategies and supporting documents and acknowledge the effort gone into the public consultation exercise.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Plan Preparation

288 Friends of Nant Llwynog Park

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
288.D1		03/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: The Friends recognises the role Town planning has to play in balancing the need for development alongside the preservation, enhancement and promotion of local landscape and heritage assets.

Document:DP Written Statement Vision & Objectives, p.8

Issue: DP Plan Preparation-DP Plan Preparation

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Comments noted and support welcomed.**Question: 2d** **Representation Text**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Friends of Nant Llwynog Park has requested to speak on the role of the plan in designating new nature reserves it will greatly assist in the understanding of the value of the natural world and its significance for the public.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Renewable Energy

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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101.D8//EcW8		21/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that the REA is unclear on the constraints that have been applied. The authority should clearly list the constraints and any buffers that have been applied along with the rationale for this approach.
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Document:DP Written Statement Policies & Proposals, p.71

Policy: EcW8

Issue: DP Renewable Energy-DP Renewable Energy

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Comments noted. The constraints that were applied in the Renewable Energy Assessment (REA) have been clarified in an addendum to the study dated December 2018. This includes additional justification provided by Regen, the specialist consultants who prepared to the REA, where required and updated recommendations following the preparation of a Landscape Sensitivity Study (December 2018) to support the identification of the local search areas for solar energy.

With regards to the grid connection distances, the solar resource assessment in the REA uses a 2km grid connectivity buffer as proximity to the grid reduces connection costs. In Regen's experience, grid connection costs over 2km are typically higher which can impact on the economic viability of ground-mounted solar energy projects. This buffer distance is considered appropriate as Regen's analysis shows that nearly all solar farms developed to date fall within this distance (or closer) to the 33kV or higher voltage electricity network. Regen have provided a ground mounted resource assessment mapped against existing and proposed solar farms for the whole of the south Wales Western Power Distribution licence area. This level of correlation stands for every region assessed to date by Regen using this methodology, which in addition to south Wales includes, in England, the West Midlands, East Midlands, East of England, South East, Southern and South West licence areas.

The 2km grid connectivity distance was not applied for the large scale (2MW) wind assessment as this scale of wind energy projects are more financially viable and lengthier connection distances to the grid are more realistic. Consequently, no grid connection restriction was applied to the large scale wind energy assessment (2MW). With regards to the smaller scale wind assessments (500kW), areas that were more than 2km from a 33kV or higher power line were removed due to the impact of longer connection distances on the viability of schemes for this scale of turbine.

Finally, as suggested by Welsh Government the summary tables for renewable heat and electricity set out in the addendum to the REA (Figures 12 and 13) will be inserted as a focused change to the reasoned justification to Policy EcW8 and included in the monitoring framework.

Question: 2d Representation Text

Representation Text: 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.

Question: 2e Changes proposed

Representation Text: 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.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Renewable Energy

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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103.D4//EcW8		07/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: The representation raises concerns regarding the Local Search Areas for ground-mounted solar energy and requests further supporting evidence to assess landscape and visual sensitivity to solar farms within the County Borough.
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Document:DP Written Statement Policies & Proposals, p.71

Policy: EcW8

Issue: DP Renewable Energy-DP Renewable Energy

Question	Representation Texts
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Question: Rec. by Officers

Council Response: Thank you for your comments, which are noted. The Council has prepared a Landscape Sensitivity Study (December 2018) which provides further supporting evidence for the local search areas. This provides a strategic landscape assessment which assesses the landscape value and susceptibility to solar energy development in order to identify the sensitivity of the search areas identified. Further details are provided in the background paper and the Renewable Energy Assessment (REA) Addendum dated December 2018. As a result of this exercise, one of the solar search areas (Merthyr Road), has been discounted as a Local Search Areas for solar development due to its very high landscape sensitivity. The remaining three local search areas are considered to be appropriate to be identified as search areas. The explanatory text, within Policy EcW9, for the remaining Local Search Areas has been amended to take into account the results of the Landscape Sensitivity Study, as have the resource summary tables where necessary which are set out in the REA Addendum dated December 2018.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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.

Question	Questions of Soundness
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Question: 2c Soundness Test 2

Representation Text: .

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Renewable Energy

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D12//EcW8		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP Written Statement Policies & Proposals, p.71

Policy: EcW8

Issue: DP Renewable Energy-DP Renewable Energy

Question *Representation Texts***Question: Rec. by Officers**

Council Response: Comments noted. Changes are proposed to Policy SW11, Sustainable design and Placemaking, to ensure that development proposals take account of existing infrastructure and any necessary protection measures.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . We would recommend that a criteria is added to ensure that existing services and infrastructure are taken account of in any proposals.

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

262 Hammerson (Merthyr) Ltd*Agent:* **GL Hearn**

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
262.D2//EcW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation objects to the wording of Policy EcW3 (Retail Hierarchy – supporting retailing provision) and seeks a number of amendments to avoid stymieing retail development and to be in accordance with national policy.

Document:DP Written Statement Policies & Proposals, p.62

Policy: EcW3

Issue: DP Retail-DP Retail

*Question Representation Texts***Question: Rec. by Officers**

Council Response: Cyfarthfa Retail Park provides a self-contained out of town retail offer, which is physically detached by the intervening topography and land uses, and is some 900 metres walking distance from Merthyr Town Centre Bus Station. Consequently, while Cyfarthfa Retail Park may be considered as an 'edge of centre' site, it is not considered to form part of Town Centre and falls outside of the Plan's retail hierarchy which seeks to promote the retail centres first approach advocated in national policy. This approach is advocated in the Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) which provides the up-to-date evidence base for the Plan's retail policies.

In this respect, PPW Edition 10 (para 4.3.10) and TAN4 (para 4.6) require local authorities to establish a local retail hierarchy using local definitions that considers the nature, type and strategic role to be performed by retail and commercial centres. The retail hierarchy has been reviewed as part of the Merthyr Tydfil Retail and Commercial Leisure Study which found the hierarchy remains appropriate and that no changes are required (para 5.19-5.23 refers). No changes to the Plan's retail hierarchy identified under Policy EcW3 are therefore proposed. However, it is accepted that references to Cyfarthfa Retail Park in the supporting text could be clarified and changes to paragraph 6.8.27 are proposed to recognise the edge-of-centre location of Cyfarthfa Retail Park.

With regards to making reference specifically to edge-of-centre sites and the requirements for bulky goods retailing, the policy requires an assessment of need and the application of the sequential test for any development outside the retail hierarchy. Out-of-centre retail development will be permitted where it is justified. Therefore, it is considered that the wording of the policy is not unnecessarily restrictive. By setting out the town and local centres in the retail hierarchy, and by requiring justification for development outside these areas, the policy is in accordance with the 'town centre first' approach advocated in national policy. It is considered inappropriate to amend the wording of policy EcW3 to cover all possible circumstances given the aim of the policy is to set out the Plan's retail hierarchy. Instead, Policy EcW6: Out-of-Town Retailing Areas recognises existing out of town retailing areas including Cyfarthfa Retail Park and it sets out the criteria that new out of town retailing development will be assessed against.

Proposals for bulky comparison goods or showroom type retailers at out-of-town locations could be justified though the sequential test and retail impact assessments which can consider edge and out of centre sites following the consideration of appropriate alternatives located within the retail hierarchy. The specific locational needs could be sufficiently explained as part of these assessments.

Further guidance regarding retail need, the Sequential Test and Retail Impact Assessments is provided in TAN4: Retail and Commercial Development. These assessments are referenced at paragraphs 6.8.29 and 6.8.33 under policy EcW3 and changes have been proposed to paragraph 6.8.53 under Policy EcW6 to further clarify this. These paragraphs also reference the 2,500 sqm floorspace threshold for requiring Retail Impact Assessments, referred to in TAN4, and clarify that assessments for smaller scale retail proposals, which are proportional to potential impacts, may also be required as referenced in national policy (paragraph 8.2 of TAN4).

With regards the wording of the final statement in policy EcW3, the policy wording states that outside the retail hierarchy proposals will only be permitted where they avoid causing harm to town/local centre vitality and viability (following an assessment of need and the application of the sequential test). Therefore, the policy does not prevent development that causes harm but requires that the proposals avoid causing harm. This would be demonstrated and assessed though the supporting evidence and justification submitted as part of a planning application. This is considered in accordance with PPW paragraph 4.3.20 which states: "New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community, and should not be allowed if they would be likely to put development plan retail strategy at risk. The extent of a sequential test should be agreed by pre-application discussion between the planning authority and the developer".

Representations & Council Responses juxtaposed Retail

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D2//EcW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation objects to the wording of Policy EcW3 (Retail Hierarchy – supporting retailing provision) and seeks a number of amendments to avoid stymieing retail development and to be in accordance with national policy.

Policy EcW3 therefore clearly sets out the retail hierarchy and that retail development outside the hierarchy will be permitted where sufficient justification can be provided. It is considered inappropriate to include further detail into the policy and that the policy as drafted is in accordance with national policy. Therefore, no changes to the wording of Policy EcW3 are proposed.

With regards to the description of Cyfarthfa Retail Park, supporting paragraph 6.8.27 under policy EcW3 and Policy EcW6 recognise Cyfarthfa Retail Park as an existing out of town retail centre together with three other out of town retailing areas. Notwithstanding this, changes to paragraph 6.8.27 are proposed to more accurately reflect the 'edge-of-centre' location of Cyfarthfa Retail Park.

Under policies EcW3 and EcW6 it would be for the developer to justify new retailing development through the sequential test or a retail impact assessment (that is proportionate to the nature of the proposal) where this is required. The consideration of out of town retailing development as part of the evidence submitted in support of a planning application could therefore consider the specific links with and nature of potential impacts on the town centre and local centres together with any other relevant justification. The planning application process is considered to be the appropriate stage to set out such detailed matters. The Merthyr Tydfil Retail and Commercial Premises Study (June 2017) provides the up-to-date evidence base and review of the County Borough's retailing areas which could be referred to when preparing development proposals. Consequently, reference to this document is proposed to be added to supporting paragraph 6.8.27.

Question: 2d Representation Text

Representation Text: . 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

Representations & Council Responses juxtaposed Retail

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D2//EcW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation objects to the wording of Policy EcW3 (Retail Hierarchy – supporting retailing provision) and seeks a number of amendments to avoid stymieing retail development and to be in accordance with national policy.

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.

Question: 2e Changes proposed

Representation Text: . See above text

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Representations & Council Responses juxtaposed Retail

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D2//EcW3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation objects to the wording of Policy EcW3 (Retail Hierarchy – supporting retailing provision) and seeks a number of amendments to avoid stymieing retail development and to be in accordance with national policy.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D3//EcW4		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation requests further justification and explanation regarding the provision for projected comparison goods (3,736sqm) and food and beverage (2,136sqm) floorspace headroom but does not specify a change to the Plan.

Document:DP Written Statement Policies & Proposals, p.64

Policy: EcW4

Issue: DP Retail-DP Retail

Question Representation Texts

Question: Rec. by Officers

Council Response: The Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) has identified up to 5,360sqm of vacant retail floorspace in the town centre and, whilst not specifically allocated, the existing bus station site provides an additional opportunity site that could be developed, provided development proposals can satisfy the TAN15 acceptability and justification tests.

In this respect the Strategic Flood Consequence Assessment prepared to inform the Replacement LDP found that:

"Although the site is predicted to flood during the 1% AEP plus 25% climate change scenario according to the Bus Station model, it is noted that, as outlined previously, flood depths for the site are relatively shallow. This suggests that the majority of the site could be lifted above flood levels using minimal ground raising and raised finished floor levels. However, it must be demonstrated that any ground raising will not have a negative impact on flood risk to 3rd party land. It has been assumed that the far south western corner of the site will be omitted from future development plans as it lies in an existing topographic depression. Based on the existing data available, the site is considered unsuitable for allocation. However, a site specific FCA for the site could demonstrate otherwise".

With regards to accommodating future growth the Retail and Commercial Leisure Study (June 2017) at paragraphs 6.14 to 6.16 advised that:

"Consistent with the sequential approach, Merthyr Tydfil town centre as the largest town centre would be expected to be the main focus for retail and leisure development given it has the best prospects for attracting in-centre investment from developers and multiple operators.

The existing stock of premises should have a role in accommodating projected growth. Vacant shops within designated centres could accommodate the long term retail and food/beverage floorspace projections. The reoccupation of vacant commercial units should be the priority in the town centre and local centres. The Merthyr Tydfil Bus Station site should continue to be allocated to accommodate any remaining floorspace requirement especially now that plans to relocate the bus station benefit from planning permission.

Out of centre development site allocations are not required to accommodate projected needs".

Representations & Council Responses juxtaposed Retail

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D3//EcW4		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation requests further justification and explanation regarding the provision for projected comparison goods (3,736sqm) and food and beverage (2,136sqm) floorspace headroom but does not specify a change to the Plan.

The Merthyr Tydfil Retail and Commercial Leisure Study (paragraph 6.8) and LDP (paragraph 6.8.36) is clear that there is only limited potential scope for new convenience retailing to support new development at the Hoover Strategic Regeneration Area. Policy EcW4 makes provision for this identified local convenience retail need. With regards to comparison goods retailing, the Retail and Commercial Leisure Study considers that the Council should concentrate new investment in the town centre to address the imbalance with out-of-town retailing areas and to meet wider regeneration objectives. Furthermore, it is considered that the vacant units and the bus station site in the town centre could accommodate the projected growth (paragraph 6.10). The potential for future comparison and food and drink retailing headroom to be met within the town centre, and the priority to utilise existing vacant premises and sites within the town centre, is reflected in LDP paragraphs 6.8.38 to 6.8.39 under policy EcW4: Retail Allocation. In this respect, no changes to the LDP to are considered to be required.

The Council is working with Welsh Government to secure funding to relocate the existing bus station and this is anticipated to take place in the early phases of the Replacement LDP. The existing bus station site is owned by the Council and the area of open space adjoining Avenue De Clichy is owned by Rockspring Property Investment Managers LLP who own and manage the adjoining St Tydfil Shopping Centre. Therefore, given the Council's aspirations for future retailing development on this key town centre opportunity site, and the fact that the site is within the control of the Council with adjoining land in the ownership St Tydfil Shopping Centre, there is high confidence that the site would be developed for retail and commercial uses in the early phases of the Replacement LDP plan period.

It should also be noted that the Council's Regeneration department has commissioned further hydrologic modelling and flood mitigation assessments to consider potential future mitigation options for the Nant Morlais – River Taf convergence that results in areas of flood zone C2 in Merthyr Tydfil Town Centre. Whilst this work will inform the consideration of potential flood mitigation options it is not anticipated that this would provide the detailed site level FCA required for a potential retail allocation as this would require consideration of detailed development proposals and an assessment of third party impacts (in addition to other requirements identified at paragraph 4.2.11 of the SFCA).

Consequently, it is considered that there remains sufficient scope within the town centre and other established centres to accommodate future retailing growth and in accordance with the findings of the Retail and Commercial Leisure Study (June 2017) no further retail allocations are considered to be necessary to meet the projected retail headroom. As paragraphs 6.8.34 to 6.8.39 set out the priorities for future retailing provision no further changes to the supporting text are considered necessary.

Question: 2d Representation Text

Representation Text: . 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).

Representations & Council Responses juxtaposed Retail

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Retail

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
262.D3//EcW4		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representation requests further justification and explanation regarding the provision for projected comparison goods (3,736sqm) and food and beverage (2,136sqm) floorspace headroom but does not specify a change to the Plan.

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.

Question: 2e Changes proposed

Representation Text: . See above text

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Settlement Boundaries and Rural Development

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Settlement Boundaries and Rural Development

115

WYG

Agent: WYG

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D9/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology and definition of 'low-impact tourism, leisure and recreation 'and the appropriateness of the term '.

Document:DP Written Statement Policies & Proposals, p.27,
para.6.8.56 and 6.5.32

Policy: SW4

Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	<p>Comments noted. The wording of Policy SW4 and Policy EcW7, is considered appropriate to protect the county borough's 'countryside locations' from inappropriate development and to support appropriate tourism, leisure and recreation development that minimises environmental impacts in these locations.</p> <p>In this regard, Planning Policy Wales (Edition 10) paragraphs 5.5.2 and 5.5.3 state:</p> <p>"5.5.2 The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism. In addition to supporting the continued success of existing tourist areas, appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.</p> <p>5.5.3 In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment".</p> <p>In particular, PPW references that "... appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors." Policies SW4 and EcW7 therefore set out what is considered to be appropriate tourism-related development in the County Borough are considered to be in accordance with national policy.</p> <p>This approach is also considered to be in line with PPW paragraph 3.56 Development in the Countryside which states that "new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design" and paragraph 5.5.3 which further states that "In rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy. Here development should be sympathetic in nature and scale to the local environment".</p> <p>Majority of the land outside settlement limits in the County Borough are upland areas or steeply sloping valley sides where new development is likely to have significant landscape and visual impacts. In addition, there are a number of historic landscape and nature conservation designations located outside settlement boundaries such as Sites of Importance for Nature Conservation, Sites of Special Scientific Interest and Landscapes Historic Interest (the Merthyr Tydfil Landscape of Outstanding Historic Interest and the and Gelli-gaer Common Landscape of Special Historic Interest) as well as upland areas in close proximity to the Brecon Beacons National Park where large scale or developments with more significant impacts would not be appropriate.</p> <p>Therefore, the policy approach to ensure new tourism, recreation or leisure developments are low impact in nature is considered appropriate in the context of the County Borough. Where exceptional development is proposed, for example where there is an overriding need for development of regional or national importance, this could be considered on its own merits. Welsh Government guidance contained in Local Development Plans Manual, Edition 2, (paragraph 2.3.4) advises that LDPs should not include policies to cover every eventuality. Policies SW4 and EcW7 are considered to provide sufficient detail and are local policies that are appropriate to consider new tourism, recreation or leisure development proposals in the area. Consequently, no change for soundness is considered to be required.</p>

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Settlement Boundaries and Rural Development

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D9/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology and definition of 'low-impact tourism, leisure and recreation' and the appropriateness of the term '.

Question: 2d Representation Text

Representation Text: . 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D9/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology and definition of 'low-impact tourism, leisure and recreation 'and the appropriateness of the term '.

and 3).

Question: 2e Changes proposed

Representation Text: . 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 6.5.32 should be deleted.

Question: 3b Subject at Public Examination Hearing

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

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

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119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D6//SW4		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: We welcome the inclusion of a settlement boundary policy in order to encourage development in the urban areas.

Document:DP Written Statement Policies & Proposals, p.27

Policy: SW4

Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed.

Question: 2d **Representation Text**

Representation Text: . 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.

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Settlement Boundaries and Rural Development

124 The Coal Authority

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
124.D1//SW4		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: 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.

Document: DP Written Statement Policies & Proposals, p.27

Policy: SW4

Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Comments noted and support welcomed.**Question: 2d** **Representation Text***Representation Text:* . Meets all soundness tests

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.

Question *Questions of Soundness***Question: 2c** **Soundness Test 1***Representation Text:* .**Question: 2c** **Soundness Test 2***Representation Text:* .**Question: 2c** **Soundness Test 3***Representation Text:* .

Representations & Council Responses juxtaposed Settlement Boundaries and Rural Development

Merthyr Tydfil County Borough Council Local Development Plan

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129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
129.D4/6.5.29/SW		10/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Caerphilly CBC continues to resist the de-designation of the green wedge in the locality of Llancaiach Fawr.

Document: DP Written Statement Policies & Proposals, p.27, para.6.5.29

Policy: SW4

Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted. The Council has considered the need for green wedges in the County Borough against national policy and the policy provisions of the LDP. The justification for this approach is contained in the Review of Green Wedges background paper (June 2018). It was concluded that there is no need for green wedge designations in the County Borough as the Plan's settlement boundary and development in the countryside policies are sufficient to prevent coalescence and to control inappropriate development (see background paper sections 8 and 9). The Council stands by this assessment. With regards to development pressure in the area referred to at Trelewis the background paper states:

"Development of candidate site 6: Land to the East of Trelewis would extend the settlement of Trelewis further eastwards along Gelligaer Road towards the listed Llancaiach Fawr Manor, although the site would be separated by the Nant Caeach and mature trees and vegetation that run along the County Borough boundary. To the east of Llancaiach Fawr there is no further development for some distance (approximately 1.5km). The built up areas of Trelewis and Nelson are closely related with development extending along the B4255 Shingrig Road (consisting of existing residential development and stable buildings) and are separated by the Cwm Bargoed railway line that runs north-south. Development of the site would extend the built up area of Trelewis further south of Gelligaer Road but would maintain approximately 300 metres distance between the edge of the development and Shingrig Road to the south west. Therefore, development of the site would not lead to the coalescence of Trelewis with Nelson. If the site were to be developed it is considered that the replacement LDPs settlement boundary policy would be sufficient to control inappropriate development in the countryside here".

Question: 2d Representation Text

Representation Text: . 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
129.D4/6.5.29/SW		10/09/2018	<input type="checkbox"/>	E	O	W	M		Summary: Caerphilly CBC continues to resist the de-designation of the green wedge in the locality of Llancaiach Fawr.
<p>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.</p> <p>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.</p> <p>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.</p>									

Question: 2e

Changes proposed

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

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136 James, Mr Alan

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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136.D1//SW4		05/09/2018	<input type="checkbox"/>	P	C	W	M		Summary: Alter settlement boundary to include land at Maes Meyrick, Heolgerrig
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Document:DP Proposals Map Northwest, p.27

Policy: SW4

Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The cottage referred to in your representation has been unoccupied for approximately 50-60 years, and little to none of it remains, with the land having more of a relationship with the open countryside than with the built development and settlement of Heolgerrig. As such, the extension of the Settlement Boundary at this location is not considered appropriate or justified. However, if an application for a replacement dwelling were to come forward at this location, this could be assessed against Policy SW4 which permits the re-use, adaption, or replacement of rural buildings and dwellings.

Question: 2d **Representation Text**

Representation Text: . I refer to the LDP second consultation.

I have land at the north of Heolgerrig known as Maes Meyrick, which borders the existing development boundary.

You will recall there is considerable correspondence within your department regarding applications for a single dwelling on my land, resting immediately.

May I respectfully refer you to the Policy SW4: Settlement Boundaries.

To encourage development within 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 the 1960s by a gentlemen 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 derelict.

May I respectfully draw your attention to a case in the England and Wales high court: CDC2020 plc vs Ferreira. Tuesday 5th May 2005. Lord Justice Lloyd in his judgement stated:

"The dominant owner must manifest an intention to abandon the right and in order to 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 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
136.D1//SW4		05/09/2018	<input type="checkbox"/>	P	C	W	M		Summary: Alter settlement boundary to include land at Maes Meyrick, Heolgerrig

same distance south east of my land. Could my request then be construed as infill development.

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 existign 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 develop a single dwelling and access.

I have for 18 years tried through all correct channels and followed all the correct procedures to gain this development. Your sympathetic consideration of this applicatiojn would be greatly appreciated.

Question: 2e

Changes proposed

Representation Text: . 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 develop a single dwelling and access.

I have for 18 years tried through all correct channels and followed all the correct procedures to gain this development. Your sympathetic consideration of this application would be greatly appreciated.

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258 **Elan Homes Ltd** *Agent:* **JCR Planning Ltd**

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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258.D1//SW4		10/09/2018	<input type="checkbox"/>	E	S	I	M		Summary: Support the inclusion of Gethin Tip within Settlement Limits
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Document: DP Written Statement Policies & Proposals, p.27 Site: 68: Land West of Gethin Road, Abercanaid

Policy: SW4 Issue: DP Settlement Boundaries and Rural Development-DP Settlement Boundaries and Rural Development

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcomed. The inclusion of the site within the settlement boundary will enable the consideration of to appropriate development proposals as windfall development. The Council would welcome a request for pre application advice and looks forward to receiving a formal application in due course.

Question: 2d **Representation Text**

Representation Text: . 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 SW4), as we are currently working on a planning application for its comprehensive development for a residential led scheme with elements of open space.

Representations & Council Responses juxtaposed Tourism, Leisure and Recreation Development

Merthyr Tydfil County Borough Council Local Development Plan

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115 **WYG** *Agent:* **WYG**

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D1/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology of 'low-impact tourism, leisure and recreation, ' referred to in Policy EcW7, and definition referred to in paragraphs 6.8.56 and 6.5.32

Document:DP Written Statement Policies & Proposals, p.68,
para.6.8.56 and 6.5.32

Policy: EcW7

Issue: DP Tourism, Leisure and Recreation Development-DP Tourism, Leisure and Recreation Development

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. Policy EcW7 sets out the instances where the Council would favour new tourism, leisure and recreation development. The wording of Policy SW4 and Policy EcW7, is considered appropriate to protect the county borough's countryside locations from inappropriate development and to support appropriate tourism, leisure and recreation development in these locations.

In this regard, Planning Policy Wales (Edition 10) paragraphs 5.5.2 and 5.5.3 state:

"5.5.2 The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism. In addition to supporting the continued success of existing tourist areas, appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.

5.5.3 In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment".

In particular, PPW references that "... appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors." Policies SW4 and EcW7 therefore set out what is considered to be appropriate tourism-related development in the County Borough are considered to be in accordance with national policy.

This approach is also considered to be in line with PPW paragraph 3.56 Development in the Countryside which states that "new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design" and paragraph 5.5.3 which further states that "In rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy. Here development should be sympathetic in nature and scale to the local environment".

Majority of the land outside settlement limits in the County Borough are upland areas or steeply sloping valley sides where new development is likely to have significant landscape and visual impacts. In addition, there are a number of historic landscape and nature conservation designations located outside settlement boundaries such as Sites of Importance for Nature Conservation, Sites of Special Scientific Interest and Landscapes Historic Interest (the Merthyr Tydfil Landscape of Outstanding Historic Interest and the and Gelli-gaer Common Landscape of Special Historic Interest) as well as upland areas in close proximity to the Brecon Beacons National Park where large scale or developments with more significant impacts would not be appropriate.

Therefore, the policy approach to ensure new tourism, recreation or leisure developments are low impact in nature is considered appropriate in the context of the County Borough. Where exceptional development is proposed, for example where there is an overriding need for development of regional or national importance, this could be considered on its own merits. Welsh Government guidance contained in Local Development Plans Manual, Edition 2, (paragraph 2.3.4) advises that LDPs should not include policies to cover every eventuality. Policies SW4 and EcW7 are considered to provide sufficient detail and are local policies that are appropriate to consider new tourism, recreation or leisure development proposals in the area.

by: 4

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D1/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology of 'low-impact tourism, leisure and recreation, ' referred to in Policy EcW7, and definition referred to in paragraphs 6.8.56 and 6.5.32

Furthermore, all new development in the countryside would need to comply with the Plan's other design, landscape, environment and nature conservation policies and the requirement to minimises environmental impacts and for proposals to be of an appropriate scale to its surroundings is consistent with the requirements of requirements of these policies. Consequently, no change for soundness is considered to be required.

Deposit LDP Paragraph 6.8.56 gives examples of low-impact tourism but the list is not exhaustive and alternative development proposals where justified could be given favourable consideration. Although this includes tourism capable of being removed without leaving a trace it does preclude other types of appropriate development or restrict development to this type only. It is therefore not considered that this is too onerous, but would ensure development is both sympathetic in nature and scale to the local environment whilst helping to avoid damage to the environment, consistent with the Plans other policies.

Finally, with regards to the Destination Management Plan, the Deposit LDP at paragraph 6.8.53 states that "The strategy supports the delivery of the Council's 'Destination Management Plan' by supporting a variety of high quality tourist, leisure and recreation facilities and visitor accommodation" and it is considered that the Plan's policies though favouring tourism, leisure and recreation development in appropriate locations is consistent with the aims of the DMP strategy.

Question: 2d

Representation Text

Representation Text: . 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D1/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology of 'low-impact tourism, leisure and recreation, ' referred to in Policy EcW7, and definition referred to in paragraphs 6.8.56 and 6.5.32

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).

Question: 2e Changes proposed

Representation Text: . 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 delete]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" delete].

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 should be deleted.

Question: 3b Subject at Public Examination Hearing

Representation Text: . WYG have requested to speak on a number of issues including matters relating to leisure/tourism.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D1/6.8.56 and		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Marvel Ltd object to the use of terminology of 'low-impact tourism, leisure and recreation, ' referred to in Policy EcW7, and definition referred to in paragraphs 6.8.56 and 6.5.32

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D2//EcW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: There is insufficient recognition given to the role the tourism and leisure industries can play in providing sustainable and economic growth

Document:DP Written Statement Policies & Proposals, p.68

Policy: EcW7

Issue: DP Tourism, Leisure and Recreation Development-DP Tourism, Leisure and Recreation Development

Question Representation Texts

Question: Rec. by Officers

Council Response: The Council considers that there is sufficient recognition given to the role the tourism and leisure can play in supporting economic growth and health and wellbeing. Due to the range of policy areas tourism, leisure and recreation covers this is set out in various section of the Deposit Plan. For example, reference is made to the role the tourism and leisure industries can play in providing sustainable growth, including economic growth, in the County Borough in the first line of Paragraph 6.8.53 in the Deposit LDP which states: "Tourism, leisure and recreation is vitally important to the economy of Merthyr contributing to making it both productive and enterprising." Secondly, LDP paragraph 6.8.55 make specific reference to 'our primary attractions' including 'BikePark Wales and the Rock Summit UK centre'.

Whilst specific reference is not made to the Wellbeing of Future and Generations Act under Policy Ew7, the Replacement LDP Strategy and policies as a whole have been developed in accordance with the 7 wellbeing goal and 5 ways of working. In this respect, a statement of compliance is contained in the Sustainability Appraisal Addendum (December 2018). An example of where the Plan specifically refers to the Wellbeing Act in relation to leisure and recreation is under policy SW10: Protecting and Improving Open Spaces where in paragraph 6.5.59 it is stated "Open spaces which are accessible, well-designed and maintained make a significant contribution to our local well-being objective for children and adults to have good physical and mental well-being". Paragraph 6.50 further states "Accordingly, our Open Space Strategy and associated Action Plans provide a long-term framework to protect and improve the quality and accessibility of our network of 139 Open Spaces recorded in the Open Space Strategy".

The Merthyr Tydfil Retail and Commercial Leisure Study (page 17) whilst focussing on the town centre acknowledges recent changes to national policy and quotes paragraph 10.1.5 of the then Planning Policy Wales (Edition 9) which stated that "Policies should encourage a diversity of uses in centres. Other appropriate retail and commercial centre uses are financial and professional services (A2), food and drink (A3), offices (B1), hotels (C1), educational and other non-residential establishments (D1), leisure (D2) and certain other sui generis uses such as launderettes and theatres." This is consistent with updated national policy contained in PPW Edition 10 (paragraphs 4.3.21 and 4.3.32). This approach to supporting uses that are complementary to retail and commercial centres is recognised in paragraph 6.8.54 of the Deposit LDP which states that "In-line with the Welsh Governments 'town centre' first principle a 'sequential approach' will be adopted when determining planning applications for complementary uses such as hotels and leisure facilities where these are proposed outside a Town Centre location".

Section 4 of the Merthyr Tydfil Retail and Commercial Leisure Study makes several references to Merthyr Tydfil Leisure Village (Rhydyar Leisure Park), an edge of town facility which includes a 20 room hotel and a competition sized swimming pool complemented by a learner pool and flume slide. Under the sequential approach to be applied to complementary town centre uses, paragraph 6.8.1 of the LDP advises that "if a suitable site or building is not available for retail and other complementary commercial development within a centre, consideration should be given to edge-of-centre sites and if no such sites are suitable or available, only then should out-of-centre sites be considered". This is in line with the 'town centre first' principle.

Furthermore, Policy EcW2: Protecting Employment sites, makes provision for non-B-class uses where it can be "demonstrated that the proposal would not lead to an unacceptable change in the nature of the employment site and where the existing use is inappropriate or the land / premises are surplus to the requirements of the employment market". Paragraph 6.8.19 further states that "Acceptable complementary commercial service outside B class uses are also permitted under policy EcW2". These include fitness gyms and paragraph 6.8.21

Representations & Council Responses juxtaposed Tourism, Leisure and Recreation Development

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Tourism, Leisure and Recreation Development

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D2//EcW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: There is insufficient recognition given to the role the tourism and leisure industries can play in providing sustainable and economic growth

states that such uses for example include fitness/sports centre where the intended customer base is further afield than the users of the existing employment site providing they satisfy the above criteria and other relevant policies of the Plan ensuring that there are no unacceptable conflicts with existing users. In addition, Policy SW11: Sustainable Design and Placemaking also requires development to 'promote the creation of healthy and active environments' and provision of appropriate tourism, leisure or recreation provision as part of wider development proposals would be consistent with this policy.

Finally Deposit LDP Policy SW12: Improving the Transport Network encourages a modal shift towards sustainable transport including cycling and walking. Paragraph 6.5.74 puts walking and cycling at the top of the transport hierarchy and recognises open access walking routes such as The Heads of the Valleys Route, The Celtic, The Taff, Trevithick and Taff Bargoed Trails.

Given that several points of policy described above allow for a wide range of tourism, leisure or recreation provision, distributed throughout the Plan area based on 'the centre first principle' whilst protecting employment sites, open spaces and long distance walks it is not considered necessary to amend the Plan's policies or allocate specific new sites for tourism, leisure or recreation facilities in the LDP.

With regards to candidate site 28 for leisure and tourism use at West Merthyr (232 hectares), this site lies outside the settlement boundary and allocating such a significant site for leisure/tourism it would be contrary to the Plan's town centre first approach and the Plan's spatial development strategy. Furthermore, the site contains a number of significant nature conservation designations including the Cwm Glo a Glyndyrys SSSI and development resulting in the loss of such as designation would need to be of national significance. In addition, national policy contains a general presumption against development likely to damage a SSSI. It is therefore, not considered appropriate nor necessary to allocate the site for leisure/tourism uses.

Question: 2d

Representation Text

Representation Text:

. 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.

Question: 2e

Changes proposed

Representation Text:

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

Representations & Council Responses juxtaposed Tourism, Leisure and Recreation Development

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Tourism, Leisure and Recreation Development

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
115.D2//EcW7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: There is insufficient recognition given to the role the tourism and leisure industries can play in providing sustainable and economic growth

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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . WYG have requested to speak on a number of issues including matters relating to the potential allocation of the Rhydycar West site to assist with the required housing delivery.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Tourism, Leisure and Recreation Development

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D29		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 23 in relation to leisure and tourism and the need to resist the developing over, around and in the vicinity of heritage and green assets as well as poorly considered attempts to improve or enhance them.

Document:DP Written Statement Context & Issues

Issue: DP Tourism, Leisure and Recreation Development-DP Tourism, Leisure and Recreation Development

*Question Representation Texts***Question: Rec. by Officers***Council Response:* The Replacement LDP recognises the importance of the County Borough's built heritage and natural environment and will seek to conserve and enhance these through the Plan's policies.

For example, this is reflected in Policy SW11: Sustainable Design and Placemaking which makes specific reference for new development to integrate effectively with the 'historic environment.' Paragraph 6.6.1 states that "The sense of pride and pleasure a community feels in its surroundings and the attractiveness to visitors is significantly impacted by the maintenance and upkeep of buildings of historic value" and paragraph 6.6.2 states that "Accordingly, our local well-being objective is to support our communities to protect, develop and promote our heritage and cultural assets".

Furthermore, policy CW1: The Historic Environment states that, "The integrity of our historic environment assets will be conserved and enhanced" and paragraph 6.6.5 states that "Although much of our historic environment is fragile and can easily be compromised by poor design, its careful conservation can help bring positive change, enterprise and regeneration". Paragraph 6.6.9 further states that "The Plan seeks to ensure that the conservation of the whole historic environment is taken into consideration in the determination of applications in relation to statutorily designated and non-statutory designated heritage and cultural assets" and paragraph 6.6.8 states that "When preparing development proposals that may affect the historic environment it is of primary importance to understand the value and significance of individual historic assets". Finally, paragraph 6.6.54 in specific relation to encouraging and promote leisure and tourism states that "proposals will be supported if they help to bring about sensitive refurbishment and re-use of historic buildings".

In relation Borough's natural environment Policy SW10: Protecting and Improving Open Spaces makes specific reference to protecting open spaces with 'significant nature or historic conservation importance' and to enabling 'access to nature' whilst contributing to 'our local well-being objective for children and adults to have good physical and mental wellbeing'. Paragraph 6.7.1 states, "Our natural environment provides important services essential to our well-being"; and paragraph 6.7.4 further states that, "Our local well-being objective is for communities to protect, enhance and promote our natural environment and countryside". Policy SW11: Sustainable Design and Placemaking also requires that development contributes to the provision of green infrastructure, including open space. Policies EnW1-3 and EnW5 seek to promote the protection and conservation of biodiversity interests, ecosystems, important habitats and species and the natural environment.

Finally, whilst Policy CW2 seeks to support the development of the Cyfarthfa Heritage Area as a visitor attraction it is considered that adequate protection against poorly considered attempts to improve or enhance the area and its surroundings is provided by the Plan policies and designations in line with national policy. It is therefore considered that adequate provision has been made to protect, conserve and enhance the County Borough's heritage assets and important open spaces/green assets.

Question: 2d Representation Text*Representation Text:* . 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.

Representations & Council Responses juxtaposed Tourism, Leisure and Recreation Development

Merthyr Tydfil County Borough Council Local Development Plan

by: 4

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Tourism, Leisure and Recreation Development

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D29		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 23 in relation to leisure and tourism and the need to resist the developing over, around and in the vicinity of heritage and green assets as well as poorly considered attempts to improve or enhance them.

Question: 2e Changes proposed

Representation Text: . Heritage Trust concerns raised include:

Clear support for all heritage assets

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including at West Merthyr the – 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).

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D8//SW12		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Consider the implications of the proposed transport network improvements on aggregate requirements. A resources assessment & supply chain considerations should be included in the plan.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Planning Policy Wales requires development plans to take account of and be consistent with strategies and policies contained in Local Transport Plans (paragraphs 5.3.6). Paragraph 5.3.12 further states that "Development plans should include all proposals for new roads and major improvements to the primary road network over the plan period, and set out the broad policy on priorities for minor improvements." the inclusion of the heads of the Valleys Road improvement scheme, a Welsh Government proposal, and the range of other local transport schemes is therefore in line with national policy. With the exception of new access and estate roads to be provided as part of development sites that are allocated, there are no other proposals new road building. Consequently, no changes to the policy are considered necessary.

Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.

Paragraph 3.15.8 of the Sustainability Appraisal Baseline Scoping Report also notes the recommendations of the RTS 1st Review to encourage "the use of construction, demolition and excavation waste as an alternative to primary land-won aggregates; safeguarding resources of both crushed rock aggregates and land-based sand and gravel; and safeguarding existing railheads in order to provide a full range of sustainable transport options".

Whilst specific reference to the impact on the level of employment development on the minerals supply has not been made, it is considered that the level of growth would not have a significant impact on the supply of minerals. The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves. It is therefore concluded that implications and requirements of the plan with regard to resource assessment and supply chain requirements have been fully considered during Plan preparation.

Question: 2d Representation Text

Representation Text: . 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 fully consider the implications and requirements of the plan a resources assessment and supply chain considerations should be considered in the plan.

Question: 2e Changes proposed

Representation Text: . Consider the implications of the proposed transport network improvements on mineral supply.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
129.D3//SW12		10/09/2018	<input type="checkbox"/>	E	S	W	M		Summary: Identify the safeguarded route of the Cwm Bargoed rail line and rail head on the proposals map.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted and support welcomed. There are no confirmed proposals for the Cwm Bargoed rail line however it is agreed the whole of the Cwm Bargoed rail line should be protected for future use. This has been included as part of a focused change to the Deposit Plan.
Question: 2d	Representation Text
<i>Representation Text:</i>	SW12 Improving the Transport Network 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
Question: 2e	Changes proposed
<i>Representation Text:</i>	Proposed change – Identify the safeguarded route of the Cwm Bargoed rail line and rail head on the proposals map.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

154 Rhondda Cynon Taf County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D5//SW12		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: There does not appear to be reference to strategic bus corridors and proposed works to raise standards and provide bus priority measures such as bus lanes or remodelling junctions.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Deposit Plan has been prepared in line with the South East Wales Local Transport Plan; the major schemes relating to the County Borough have been included in the Replacement Deposit LDP comprising the development of a new bus station. Whilst other smaller bus improvements, relating to bus stop enhancements, are not specifically mentioned in the Plan, Policy SW12 as written supports a modal shift towards sustainable transport including enhancement of bus facilities. It is therefore considered that the policy is in accordance with the Local Transport Plan and the requirements of national policy. No changes to the policy in this respect are proposed.

Question: 2d Representation Text

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D6//SW12		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The document does not appear to recognise the importance of Prince Charles Hospital and the College as trip attractors for the wider area

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Comments noted. There are daily buses to Prince Charles Hospital and the dualling of the A465 Heads of the Valleys Road should alleviate longer terms issues arising from trips generated to and from the wider area, Cynon Valley and the hospital. The college is situated directly opposite the bus station and within walking distance of the train station. Whilst trip generation to both sites is recognised, it is not considered any changes to the Plan or policy SWS12 in this respect are necessary.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . 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.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D9/6.5.73/SW		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Consider an additional point to read 'encourage active travel journeys and reduce the need to travel by private motor vehicles' in Policy SW11.

Document:DP Written Statement Policies & Proposals, p.37,
para.6.5.73

Policy: SW11

Issue: DP Transport-DP Transport

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	Comments noted. For consistency and clarity it is agreed that reference should be made to Active Travel Routes in paragraph 6.5.73 and a focused change has been proposed accordingly.
Question: 2d	Representation Text
<i>Representation Text:</i>	. Consider inclusion of 'active travel routes' after train routes in paragraph 6.5.73.
Question: 2e	Changes proposed
<i>Representation Text:</i>	. 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 routes' after train routes in paragraph 6.5.73.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D19//SW12		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: Comments on Key Issue 11 in relation to revising the Active Travel network routes currently shown on the Proposals Map

Document:DP Written Statement Context & Issues, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Active Travel does not include walking and cycling for recreational purposes, but rather for making key local journeys by physically active means, like walking or cycling for short journeys for specific purposes e.g. walking/cycling to the shops, children walking to school and commuting to work or to train stations. The Replacement Deposit Plan included draft consultation routes that were proposed by the public and as such their accuracy had not been verified and the routes were draft, awaiting approval by Welsh Government.

Following the County Borough's successful application for funding, a total of £365,000 has been awarded from the Welsh Government's Local Transport Fund towards upgrading Active Travel Routes in Merthyr Vale and the development of plans for access to the South East Wales Metro stations. The Council's Active Travel Integrated Network Plan has now been verified and agreed by the Welsh Government. Consequently, the Proposals Map will be up-dated to reflect existing approved routes.

With regards to the Merthyr-Abernant Tunnel, a grant of £125,000 has been awarded to Rhondda Cynon Taf County Borough Council to continue its partnership work with the County Borough in investigate re-opening of the tunnel to provide a direct, traffic-free route from Merthyr Tydfil to Aberdare. This is also proposed as part of the Integrated Network Map and highlighted in paragraph 6.5.75.

Question: 2d Representation Text

Representation Text: . Whilst there are extensive walking and cycling routes they are not well connected. The number of people who walk or cycle for trips of less than 5km is low. East-west travel is difficult.

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 Active Travel and those proposed for the Active Travel network map up to 2031.

In reality, far too many footways and pavements in Merthyr Tydfil are narrow and many have street light, telephone pole and other obstructions.

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.

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).

Aspirational Active Travel cycleway proposals – set out on the draft revised LDP constraints plan – are flawed (and the map itself appears to have 'errors').

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.

Question: 2e Changes proposed

Representation Text: . Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map - add in Merthyr Tydfil Heritage Trust A465 dualling proposals.

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.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D19//SW12		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: Comments on Key Issue 11 in relation to revising the Active Travel network routes currently shown on the Proposals Map

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Active Travel, footpaths, cycleways, rights of way, bridleways, 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, 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).

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D20//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation comments on Key Issue 12 in relation to the new bus station and advocates a new metro 'hub' at Brandy Bridge on the fringe of the Hoover Regeneration Area near the town centre.

Document:DP Written Statement Context & Issues, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question Representation Texts

Question: Rec. by Officers

Council Response: Comments noted. Proposals for a new Metro station have been included in the Hoover Regeneration Area – Framework Masterplan, June 2018 to the south of Brandy Bridge and land is safeguarded under Policy SW12: Improving the Transport Network (see scheme 4). The scheme does not form part of the first phase of the Transport for Wales's metro proposals but it is anticipated the proposal could come forward in the next rail franchise period. It is considered this issue is sufficiently addressed in the Replacement Deposit Plan and no further changes are considered necessary.

Question: 2d Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D20//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation comments on Key Issue 12 in relation to the new bus station and advocates a new metro 'hub' at Brandy Bridge on the fringe of the Hoover Regeneration Area near the town centre.

Question: 2e Changes proposed

Representation Text: . 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).

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the fact that a Metro hub is needed so as to ensure bus, foot, cycle, car to Metro light rail.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D21//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation Comments on Key Issue 13 in relation to the South Wales Metro, MTHT object to the loss of the Hoover Sports grounds

Document:DP Written Statement Context & Issues, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question Representation Texts

Question: Rec. by Officers

Council Response: Improvements to Pentrebach Station are part of the South Wales Metro project which is due to receive EU structural funding to undertake improvement works on the Merthyr, Treherbert, Aberdare and Rhymney lines by 2023/24. This will include £21.1m for doubling part of track on the Merthyr line, new platforms and an improved interchange at Merthyr Tydfil station and a new platform, access improvements and increased parking facilities at Pentrebach Station, which do not constitute a hub. Policy SW12: Improving the Transport Network –includes reference to Pentrebach Park and Ride, as shown on the Proposals Map.

The new Metro hub near brandy bridge included in the Hoover Regeneration Area – Framework Masterplan, June 2018 has been strategically placed to serve both the proposed new development and within close proximity to the proposed Metro network. This has been safeguarded under policy SW12 and it is anticipated the proposal could come forward in the next rail franchise period. It is considered this issue is sufficiently addressed in the Replacement Deposit Plan and no further changes in this respect are considered necessary.

Although the existing sports facilities will be lost, compensation in the form of new open space will be required and provided within the scheme. Whilst the front facade of the Hoover factory building is not listed or formally protected, it is hoped that the industrial heritage of the site can be reflected in development proposals for the site and this has been reflected in

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D21//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Representation Comments on Key Issue 13 in relation to the South Wales Metro, MTHT object to the loss of the Hoover Sports grounds

policy SW6 relating to the Hoover Strategic Regeneration Area. However, retaining specific buildings is unlikely to be possible as this this would be difficult to achieve this given the layout requirements and viability of the scheme. New development will be designed in such a way as to reflect the existing facade at the entrance. The framework master plan provides illustrations as to how this might be achieved (see page 7 of the master plan). Development proposals will also need to satisfy the design policies of the Plan, such as Policy SW11, and issues such as highway and access arrangements and detailed design requirements can be considered further as part of the pre application and planning application process.

Question: 2d Representation Text

Representation Text: . The South Wales Metro project will improve access to Cardiff.

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. 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

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the fact that the Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D22		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 14 in relation to Twynrodyn AQMA

Document:DP Written Statement Context & Issues

Issue: DP Transport-DP Transport

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D22		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key Issue 14 in relation to Twynyrodyn AQMA
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation comments on air quality and transportation with particular reference to the Twynyrodyn AQMA. In March 2018 the Council agreed to consult on traffic management and engineering changes to a Twynyrodyn Hill, comprising three options, as part of an action plan to reduce nitrogen oxide levels in the area. Following the 12-week consultation period feedback was considered and a finalised plan sent to Welsh Government regarding the AQMA. The Council has put forward traffic management proposals to alleviate congestion and these are currently being considered by Welsh Government. No changes to the Deposit Plan in this respect are considered to be required.

Question: 2d **Representation Text**

Representation Text: . 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 19th century has not been improved or adapted into a road network suitable for modern cars, pedestrians and cyclists.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Heritage Trust wish to speak about a number of issues including:

Test 1
Test 2
Test 3
Aims
Objectives

Question *Questions of Soundness*

Question: 2c **Soundness Test 1**

Representation Text: .

Question: 2c **Soundness Test 2**

Representation Text: .

Question: 2c **Soundness Test 3**

Representation Text: .

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D50//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key issue 11: Whilst there are extensive walking and cycling routes they are not well connected and Active Travel routes

Document:DP Constraints Map, p.39

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Active Travel Routes are shown on the Proposals Map. Strategic footpaths and cycleway routes are shown on the Constraints Map and it is agreed that there some inconsistencies when compared with recognised recreational routes such as the Taff Trail, Trevithick trail, Celtic Trail, Heads of the Valleys route. Changes have been proposed to show corrected recreational routes on the Constraints Map.

Key issue 11 relates to existing 'extensive walking and cycling routes' which can relate to both Active Travel Routes and recreational routes such as Public Rights of Way and other recognised recreational routes such as The Taff and Trevithick Trail. It does not specifically refer to the quality of the routes. No further changes are considered to be necessary in this respect.

Question: 2d **Representation Text**

Representation Text: . 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.

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.

Unfortunately we have to report that:
Active Travel standards and the planning of routes and networks is unsatisfactory in Merthyr Tydfil.

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.

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.

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.

A copy of the Heritage Trust summation is attached.

Also a copy of the Heritage Trust's initial submission to Merthyr Tydfil CBC in the present Active Travel consultation.

Question: 2e **Changes proposed**

Representation Text: . 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. There are many issues with paths of less than recommended standards. Even the 'blue riband' route the Taff Trail is sadly deficient for some sections of its length.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D50//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Key issue 11: Whilst there are extensive walking and cycling routes they are not well connected and Active Travel routes

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Active Travel, footpaths, cycleways, rights of way, bridleways, and the A465 dualling including 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D51/6.5.75/S		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: The Abernant tunnel should be safeguarded for a heritage cycleway to the A470 together with the old railway track from the A470 leading to the tunnel.

Document:DP Written Statement Policies & Proposals, p.38,
para.6.5.75

Policy: SW12

Issue: DP Transport-DP Transport

Question Representation Texts

Question: Rec. by Officers

Council Response: Support welcomed. Policy SW12: Improving the Transport Network seeks to support the development of the Active Travel Integrated Network routes. These have now been agreed with Welsh Government. Paragraph 6.5.75 states that "Significant socio-economic benefits would be brought by re-connecting Merthyr Tydfil and Aberdare through the disused Merthyr to Abernant railway tunnel, and as such is included on the Integrated Active Travel Network Map". This route would be developed as part of the Active Travel programme of works. A grant of £125,000 has been awarded to Rhondda Cynon Taf County Borough Council to continue its partnership work with the County Borough to investigate re-opening the tunnel to provide a direct, traffic-free route from Merthyr Tydfil to Aberdare. No changes to the Deposit Plan are considered to be required in this respect.

Question: 2d Representation Text

Representation Text: . 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. These include:
Access to Merthyr – Abernant tunnel: the line of the dismantled railway line north west of the tunnel across the Rhydyrcar West site should be safeguarded for a heritage cycleway to the

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D51/6.5.75/S		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: The Abernant tunnel should be safeguarded for a heritage cycleway to the A470 together with the old railway track from the A470 leading to the tunnel.
A470.									

Question: 2e Changes proposed

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Merthyr - Abernant Tunnel and the 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).

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D52//SW12		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: The line of the old railway (across the Taff Trail at the listed Brunel designed Glamorganshire Canal bridge) should be safeguarded for a cycleway to link across the A470.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question Representation Texts

Question: Rec. by Officers

Council Response: Part of the Taff Trail/Active Travel Route MT17 (Rhydycar to Aberfan Cemetery) runs under the dismantled railway at Rhydycar Skew Bridge (Grade II listed). The route proposed along the bridge crossing over the line of the former Glamorganshire Canal meets a dead end at the A470. Therefore an alternative route has been proposed as part of the Active Travel Integrated Network. This comprises a new route (MT46) leading from MT7 linking to another proposed route (WS32) utilising existing paths which lead to an existing footbridge/cycleway that crosses the A470 near the Orbit Centre. These links would provide alternative provision to the proposed route. The Active Travel Routes are proposed as part of policy SW12 and no further changes to the Plan are considered necessary.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D52//SW12		10/09/2018	<input type="checkbox"/>	E	C	I	M		Summary: The line of the old railway (across the Taff Trail at the listed Brunel designed Glamorganshire Canal bridge) should be safeguarded for a cycleway to link across the A470.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representation Text: . Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including cycleways.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D53//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Parts of this area should not be protected as an employment area and should be protected to confirm public access through the site along the existing roadway/footpath/cycleway.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question Representation Texts

Question: Rec. by Officers

Council Response: The industrial site has been identified as a long standing existing employment site and as such has been given appropriate status under policy EcW2 in order to protect the employment function of the County Borough. Further details are provided in the in the Council's Employment Land Review background paper (June 2018). Future development proposals here would need to satisfy the Plan's other policies including those to conserve and enhance the historic environment. No changes for soundness in this respect are considered to be necessary.

With regards to the protection of public access routes, the Taff Trail/Active Travel Route MT6 run along the south of the site adjacent to the Pontycnafau (grade II* listed building)/ Pont y Cafnau Tramroad Bridge (Scheduled Ancient Monument) which links onto Active Travel Route MT8 and leads onto MT7 to the Cefn Railway Viaduct (grade II* Listed building). The route

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D53//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Parts of this area should not be protected as an employment area and should be protected to confirm public access through the site along the existing roadway/footpath/cycleway.

is also protected as part of the Taff Trail a national cycle route.

A footpath/cycleway currently runs from the south of the site at Pontycfnau Tramroad Bridge leading through the western edge of the industrial site, also used as a private roadway, onto the limekilns south of Cefn Bridge (grade II* listed building) where it joins Active Travel Route MT7 to the Mormon Church. This is not a Public Right of Way (PRoW) and therefore has no legal designation. However, a parallel route to the west of this route, outside of the Industrial Estate, was considered as part of the Integrated Network Map of Active Travel Route links which could provide access from Pontycfnau Bridge and serve as a link to route MT7. The confirmed Integrated Network Map routes will be shown on the Replacement LDP Proposals Map and are recognised under policy SW12. No further changes in this respect are considered to be required.

Question: 2d Representation Text

Representation Text: . Cyfarthfa Heritage Area
EFI Astex Estate
– the eastern section of this area should not be protected as an employment area and should be protected to confirm public access to Pontycfnau Bridge and also north along the old tramroad route to Cefn Coed old bridge

Question: 2e Changes proposed

Representation Text: . Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Cyfarthfa Heritage Area (including EFI Astex and Williamstown) and the lack of progress on care, repair and future upkeep and rights of way.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D54//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The corridor of land from Williamstown Bridge to the Cyfarthfa Ironworks site should not be included in the protected employment area but instead be safeguarded as a potential cycleway linking sections of the Taff Trail.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D54//SW12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The corridor of land from Williamstown Bridge to the Cyfarthfa Ironworks site should not be included in the protected employment area but instead be safeguarded as a potential cycleway linking sections of the Taff Trail.

Document:DP Written Statement Policies & Proposals, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	As part of the Active Travel Integrated Network Plan, route WS33 has been proposed from Brecon Road past the EFI Industrial Estate along Pandy Close to Cyfarthfa Industrial Estate linking with Active Travel Route MT7 (Pontycafnau Bridge to Mormon Church) and will comprise a shared cycling and walking route leading onto proposed route MT46 which will link to the Taff Trail. This route will provide the link desired and will be shown as a proposed active travel route alongside all other approved Active Travel Integrated Network Plan routes shown on the LDP Proposals Map.

Question: 2d	Representation Text
<i>Representation Text:</i>	. Cyfarthfa Industrial Estate 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

Question: 2e	Changes proposed
<i>Representation Text:</i>	. Revise Active Travel network and footpath / cycleway networks on Deposit LDP Constraints Map.

Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	. The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Cyfarthfa Heritage Area (including EFI Astex and Williamstown) and the lack of progress on care, repair and future upkeep and cycleways.

Question	Questions of Soundness
Question: 2c	Soundness Test 1
<i>Representation Text:</i>	.

Question: 2c	Soundness Test 2
<i>Representation Text:</i>	.

Question: 2c	Soundness Test 3
<i>Representation Text:</i>	.

Representations & Council Responses juxtaposed Transport

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Transport

331 Griffiths, Mr Paul

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
331.D1/SW12		24/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: Proposed Active Travel route (39) is shown going through 2 private dwellings (Gwaunfarren Grove), where there is no path and should therefore be deleted.

Document:DP Proposals Map Northeast, p.38

Policy: SW12

Issue: DP Transport-DP Transport

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Comments noted. This route was proposed during the Active Travel Integrated Route Map public consultation and as such it was not agreed or confirmed on the ground. The Council's Active Travel Integrated Network Plan has now been approved by Welsh Government and the confirmed active travel routes will be amended on the Replacement LDP Proposals Map as part of a focused change to show all approved routes. This would mean that the route in question would be redirected to avoid any conflict with private dwellings.

Question: 2d Representation Text

Representation Text: . <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 – is it is currently impossible to walk that path.

Question: 2e Changes proposed

Representation Text: . 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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D1		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The list of key issues starts with a very negative point & should be balanced by additional wording

Document:DP Written Statement Context & Issues, p.7

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The summaries of key issues listed for the replacement plan comprise issues that were identified in the SA Baseline Scoping Report, dated January 2017, and through early public consultation and stakeholder engagement. One of the issues identified is that the latest 'population projections show a declining population from 2024 onwards' and a 'trend of losing working age people to elsewhere in the UK' (see page 23 of the Baseline Scoping Report). Further details are also provided in the Initial Consultation Report as well as the Deposit Plan Consultation Report. Although it is agreed that without any policy intervention, there is likely to be a less coordinated approach to the delivery of new housing and other development, it is considered the Plan contains appropriate policies that respond to the key issues identified and that issue raised has been address though the Replacement LDP. Therefore, it is not necessary to amend the key issues as suggested.

Question: 2d Representation Text

Representation Text: . 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'.

Question: 2e Changes proposed

Representation Text: . Include a further key issue as suggested above.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.D10		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The HBF would suggest that the Council should give more weight to the impact of City Deal and metro, and Merthyr's strong positon at the north of the region.

Document:DP Written Statement Strategy, p.11

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Comments noted. It is considered that Paragraph 2.4 of the Deposit Plan adequately emphasises the County Borough's position as being 'strategically located at the centre of the heads of the Valleys geographic and economic region to the north of the 'Cardiff Capital Region'. In addition, paragraph 2.10 states that 'the South East Wales 'Cardiff Capital Region' is committed to the preparation of a Strategic Plan as part of the City Deal. The County Borough is committed to playing its part in regional planning and discussions are on-going with regional partners regarding the future arrangements for an SDP'. This has also been demonstrated though the Plan's policies and allocations. No changes further in this respect are considered to be required.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.D10		28/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: The HBF would suggest that the Council should give more weight to the impact of City Deal and metro, and Merthyr's strong position at the north of the region.
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Question: 2d

Representation Text

Representation Text: . LDP Growth Strategy
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.

Question: 2e

Changes proposed

Representation Text: . 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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.D3//SW6		31/08/2018	<input type="checkbox"/>	E	C	W	M		Summary: 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.

Document:DP Written Statement Strategy, p.13

Policy: SW6

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted and support welcome.

Question: 2d **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D1/1.4/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Update footnote 5

Document:DP Written Statement Intro, p.1, para.1.4

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Given that PPW 10 has now been published it is acknowledged that the reference to national policy contained in PPW Edition 9 should be amended including the footnote on page 36.

Question: 2d **Representation Text**

Representation Text: . Footnote 5

This footnote should be updated to recognize the consultation on PPW V10.

Question: 2e **Changes proposed**

Representation Text: . Update footnote 5

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D2/1.12/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Include reference to RTS and MTANs.

Document:DP Written Statement Intro, p.3, para.1.12

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: It is not considered necessary to include reference to all Plan, Policies and Programmes that have been considered as part of Plan preparation. However, it is acknowledged that reference should be made to Mineral Technical Advice Notes (MTANs) consistent with reference to other national guidance referred to in paragraph 1.12 of the Deposit Plan.

Question: 2d **Representation Text**

Representation Text: . Reference is made to PPW and TANs.

The plan should also be considered in combination with the Regional Technical Statement (RTS) and MTANs.

Question: 2e **Changes proposed**

Representation Text: . Include reference to RTS and MTANs.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D2/1.12/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Include reference to RTS and MTANs.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D3/1.13/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: The representation considers that no assessment is made in the SA Report of the implications on mineral supply chain and raw material requirements.

Document:DP Written Statement Intro, p.3, para.1.13

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.

The level of growth in the Replacement LDP has been identified with reference to historic past build rates. There are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Consider the implications of additional housing and infrastructure on mineral supply.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D4/2.8/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives

Document:DP Written Statement Context & Issues, p.5, para.2.8

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.D4/2.8/		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The summaries of key issues listed in Figure 1, comprise issues that were identified in the Baseline Scoping Report, dated January 2017 and evidence gathered from community involvement as part of the Plan preparation process. Furthermore, the key issue also recognises approved reserves in the County Borough as well as the need to protect/safeguard mineral resources. In addition, the Plan contains appropriate policies to address both safeguarding and supply. Consequently is not is considered necessary to amend the key issue in Figure 1.

The SA Objectives are outlined in Appendix 3: Strategic Framework attached to the Sustainability Appraisal Report which is based on Strategic Environmental Assessment (SEA) Topics as required by the relevant legislation. These objectives are used to appraise the 'sustainability' of the plan. As illustrated on page 87-88 a number of decision aiding questions were used to assess the Plan's growth and spatial options and these included a questions in relation to both the safeguarding of mineral resources and providing sustainable levels of extraction in the Plan area.

The need to ensure the supply of minerals is recognised in LDP Objective 18 and at paragraph 4.42, Policy SW4: Settlement Boundaries, and at paragraph 6.8.89, Policy EcW10: The Sustainable Supply of Minerals. In addition, Policy SW12 safeguards the Cwm Bargoed rail line and rail head including future extension of the line to Dowlais Top. It is therefore concluded that the Plan has had regard to the safeguarding of infrastructure and sustainable supply of minerals as well as the protection of minerals resources.

Question: 2d **Representation Text**

Representation Text: . Figure 1 refers to the "protection" of mineral resources.

Our previous comments from August 2017 referred to the Sustainable Supply of Minerals. The Council's Initial 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 to meet society's needs.

Question: 2e **Changes proposed**

Representation Text: . Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives (Figure 2).

by: Representation No

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129 Caerphilly County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
129.D2		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: Caerphilly CBC has no concerns with the level of growth proposed in the Replacement LDP and welcome the reference to the level of growth within the context of other plans, programmes and strategies including the Cardiff Capital Region City Deal.

Document:DP Written Statement Strategy

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Comments noted and welcomed.**Question: 2d** **Representation Text***Representation Text:* . 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.

by: Representation No

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132 Merthyr Initiative Group

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
132.D1		03/09/2018	<input type="checkbox"/>	E	S	I	M		Summary: I support the mid-Growth option 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.

Document:DP Written Statement Strategy, p.7

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts***Question:** **Rec. by Officers***Council Response:* Support is welcomed.**Question: 2d** **Representation Text**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Merthyr Village Initiative Group which to speak in relation to housing sites SW3.1 Part of the Hoover Factory Site, SW3.8 South of Castle Park, SW3 Swansea Road and SW7 The Former Ivor Steel works.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

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154 Rhondda Cynon Taf County Borough Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
154.D7//SW12		10/09/2018	<input type="checkbox"/>	E	C	W	M		Summary: LDP Objective 7 – suggest revising this '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'.

Document:DP Written Statement Vision & Objectives, p.38

Policy: SW12

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: Rec. by Officers

Council Response: Objective 7 in the Deposit LDP reads 'To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links'. It is considered that the Objective as currently worded is sufficient to support and promote the development of active travel routes and therefore no changes to the objective are considered necessary.

Question: 2d Representation Text

Representation Text: . 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'.

Question: 2e Changes proposed

Representation Text: . 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'.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

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207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D2		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The LDP revision does not align with Well-being Goals where development is proposed & considers the LDP aims & objectives do not fit well with the 5 well-being objectives outlined for the Cwm Taff well-being strategy

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The Replacement LDP's vision, strategy and objectives have been informed by the Council's wellbeing aims set out in the Merthyr Tydfil Wellbeing Statement 2017-2022 and early review work to inform the Cwm Taf Wellbeing Strategy 2018-2023 that was published later in 2018 following the Merthyr Tydfil Wellbeing Statement.

This includes the wellbeing assessment review commissioned by the Cwm Taf Public Services Board and prepared by Netherwood Sustainable Futures and PwC. The workshops undertaken for this review were designed to inform the Replacement LDP and informed the LDP Objectives. Further details can be found in: Cwm Taf: Understanding our Communities – Wellbeing Assessment Consultation Brief Analysis Report December 2016. Development of the Replacement LDP strategy and objectives were also subject to early stakeholder engagement through the establishment of stakeholder working groups. This included working groups for the themes (1) Population and Community facilities, (2) Heritage, Leisure and Countryside (3) Housing Viability (4) Economic Development and Tourism, as well as public consultation on the LDP Preferred Strategy. The stakeholder engagement and consultation outlined has been undertaken in accordance with the Community Involvement Scheme contained within the Delivery Agreement. Further details can be found in the LDP Initial Consultation Report at Sections 7 and 8. The Council has also reviewed the Cwm Taf Wellbeing Strategy 2018-2023 and considers the Replacement LDP is in accordance with the Strategy's wellbeing aims.

The Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act. No changes to the Deposit Plan in this respect are therefore is considered necessary.

Question: 2d Representation Text

Representation Text: . 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

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the LDP Objectives and how these relate to wellbeing goals.

Question *Questions of Soundness*

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D2		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The LDP revision does not align with Well-being Goals where development is proposed & considers the LDP aims & objectives do not fit well with the 5 well-being objectives outlined for the Cwm Taff well-being strategy

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the Deposit Plan in relation to Soundness Test 1 (Does the Plan Fit?). MT LDP revision is 'out of step' in time with its neighbours Caerphilly and Rhondda Cynon Taf LDPs and ignores Blaenau Gwent CBC.

Document:DP Written Statement Strategy

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: All neighbouring authorities including Caerphilly, Rhondda Cynon Taf, Blaenau Gwent County Borough Councils, Brecon Beacons National Park and Powys County Council were consulted early in the process as Statutory Consultees and have not raised objections to the Deposit Plan's Growth and Spatial Strategies. The Council has also considered other local and regional Plans Policies and Programmes as part of the Sustainability Appraisal and the plan making process as required by SA guidance and in accordance with the tests of soundness. The Council considers the Replacement LDP Strategy is realistic and deliverable and there are no conflicts with proposals in adjoining local authority areas.

Up-to-date LDPs are an essential part of a plan-led system and in line with national policy the Council is required to undertake a full review of the adopted LDP at intervals no longer than every 4 years from the date of adoption. The review report completed in April 2016 also considered the possibility of preparing Joint Plans (see page 27 of the Review Report). However, given that the evidence gathered and consideration of the monitoring data the Review supported a full revision of the Merthyr Tydfil LDP and due to the uncertainty of the timescales of preparing a replacement Plan with neighbouring authorities it was concluded that the Council should follow a full revision procedure. This approach was agreed by the Welsh Government in August 2016 in a Delivery Agreement comprising a timetable and Community Involvement Scheme committing the Council to producing its replacement LDP in accordance with the stated timescales and consultation processes.

As part of the Cardiff Capital Region Merthyr Tydfil CBC is committed to the preparation of a Strategic Development Plan (regional plan) and whilst work and yet to formally commence, discussions are on-going with regional partners regarding governance arrangements.

Finally, with regards to consideration of wellbeing objectives, the Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act.

Question: 2d Representation Text

Representation Text: . 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

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D3		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the Deposit Plan in relation to Soundness Test 1 (Does the Plan Fit?). MT LDP revision is 'out of step' in time with its neighbours Caerphilly and Rhondda Cynon Taf LDPs and ignores Blaenau Gwent CBC.

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 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Test 1 Fit

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D4		10/06/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the LDP Deposit Plan in relation to Soundness Test 2. The LDP & supporting documents do not demonstrate that the growth development proposals are appropriate for the area, not every community is served well.

Document:DP Written Statement Strategy

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D4		10/06/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the LDP Deposit Plan in relation to Soundness Test 2. The LDP & supporting documents do not demonstrate that the growth development proposals are appropriate for the area, not every community is served well.

Question Representation Texts

Question: Rec. by Officers

Council Response: The Replacement LDP is not a continuation of the current LDP strategy, with the timescale for implementation extended. When work commenced on the Replacement LDP in 2016, all relevant issues and evidence were revisited, and a number of scenarios in terms of the level of growth and the spatial distribution of any growth were considered. At the time of producing the Review Report in 2016, the 2011-based Welsh Government population projections were available.

In order to generate the various scenarios in terms of the County Borough's population, the Council has, in line with national guidance, used the most recent Welsh Government population projections as a starting point. At the time of producing the Review Report in 2016, the 2011-based Welsh Government projections were the most recent figures in the public domain. The 2014-based projections were released in early 2017 and these remain the most up-to-date projections at the present time. The scenarios examined are clearly set out in the LDP background paper: Population and Housing Requirements. This paper clearly sets out the differences for Merthyr Tydfil shown in the last 4 sets of WG population projections.

The Council has not simply chosen a number of houses that it thinks is appropriate to build in the County Borough, but has considered a variety of issues in coming to the decision that the proposed strategy of the Replacement LDP is the most appropriate strategy for the County Borough. The consideration of the various strategic options was carried out as part of work undertaken in preparing the Preferred Strategy, with engagement taking place with a variety of stakeholders.

The most recent Local Housing Market Assessment (LHMA) has been produced in accordance with Welsh Government guidance and outlines the level and location of affordable housing need in the County Borough. Work on an updated LHMA will be carried out in early 2019 as the Council has recently moved to a Common Housing Register that requires a period of time to bed in and generate robust data. Pending the findings of the updated assessment, any appropriate updates to the LDP or any background papers will be highlighted as necessary as part of the LDP Examination.

The Viability Assessment produced to accompany the Deposit Replacement LDP does not assume low levels of development costs, but contains robust information on development costs based on previous experience of developments in the area, and where survey work such as ground investigations have taken place, this has also been considered.

The employment sites contained in the Replacement LDP are either existing employment sites, or new allocations that have been subject to the site assessment process, and have then been determined as being appropriate to allocate for employment use.

Question: 2d Representation Text

Representation Text: . 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. The draft revision of the LDP is locally specific because it includes much detail and work on a range of sites at community level.

NO. 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.

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207.D4		10/06/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the LDP Deposit Plan in relation to Soundness Test 2. The LDP & supporting documents do not demonstrate that the growth development proposals are appropriate for the area, not every community is served well.

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 local and Heads of the Valleys market is needed.

Evidence in the form of inquiries about industrial unit availability is also unsatisfactory.

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.

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.

Does it seek to meet assessed needs and contribute to the achievement of sustainable development?

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.

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, Abercanaid 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.

Have the 'real' alternatives been properly considered? ☐

NO. There has not been proper consideration of the only other options put forward for discussion and consultation.

Those options were:

-No population growth (discounted because it would lead to the council cutting services)

-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.

Is it coherent and consistent?

YES & NO. 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.

Is it logical, reasonable and balanced?

NO. There are attempts to justify a range of site proposals against sustainability, well-being and other objectives.

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.

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.

Question: 3b

Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the LDP Strategy and Objectives and how these comply with the tests of soundness.

Question

Questions of Soundness

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207.D4		10/06/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Strategy of the LDP Deposit Plan in relation to Soundness Test 2. The LDP & supporting documents do not demonstrate that the growth development proposals are appropriate for the area, not every community is served well.

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Test 2. Although the LDP sets out a series of key issues for sustainability most of these do not appear to be addressed as are the well-being issues (as recommended for the Cwm Taf FGA strategy).

Document:DP Written Statement Context & Issues

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The key issues were initially identified through the baseline scoping work and evidence gathering exercise, the results of which were published in the Sustainability Baseline Scoping Report, dated January 2017. The Initial Sustainability Appraisal (ISA) Report dated June 2017, up-dated and built upon that work. Given that Sustainability Appraisal (SA) is an iterative process the ISA was further up-dated to consider the Deposit Plan. The consideration of these issues is discussed at paragraphs 5.2 - 5.17 of the Deposit Plan SA report.

In addition, an integrated approach was taken for the community to raise issues related to wellbeing and Replacement LDP. The opportunity was afforded through the Cwm Taf: Understanding Our Communities Stakeholder Workshops, held in response to the Future Generation and Well-being Act (FGA). In particular, the Cultural, Economic and Social Well-being workshops were designed to inform the Replacement LDP, with the Environmental well-being workshop, being specifically run to focus on key issues for the LDP. Further details can be found in: Cwm Taf: Understanding our Communities – Wellbeing Assessment Consultation Brief Analysis Report December 2016 and The LDP Initial Consultation Report at Sections 7 and 8. It should also be noted that the stakeholder engagement undertaken is in accordance with the Community Involvement Scheme contained within the Delivery Agreement approved by Welsh Government.

Figure 1 of the Deposit LDP is a summary of many of those issues raised through the SA process together with those raised through community involvement, which has informed the LDP. It is considered that the summary of the key issues reflects those identified in the Cwm Taf Wellbeing Strategy. It is however recognised that the LDP cannot deliver all the well-being outcomes as the Plan is reliant on appropriate development proposals coming forward and some issues extend beyond the direct influence of the 'land-use planning system'.

The Council has prepared an assessment of compliance with the Wellbeing of Future Generations Act and this is contained in the SA Report Addendum (December 2018). It is considered that the LDP Objectives respond to the aims in the Merthyr Tydfil Wellbeing Statement, the Cwm Taf Wellbeing Strategy 2018-2023 and the Wellbeing of Future Generations Act.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D5		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Test 2. Although the LDP sets out a series of key issues for sustainability most of these do not appear to be addressed as are the well-being issues (as recommended for the Cwm Taf FGA strategy).

Question: 2d Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Test 2 Appropriate.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Vision of the Deposit Plan in relation to Soundness Test 2 (Is the Plan appropriate?). The vision is bland and the strategy as a whole is negative due to the refusal to tackle issues raised.

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The Replacement LDP vision and strategy are considered appropriate for the County Borough and have been developed through extensive public consultation and engagement which is set out in the Initial Consultation Report and Deposit Plan Consultation Report. A number of issues are raised in the representation and whilst the Plan contains a number of policies to address specific issues, such as the provision and protection of open space though the planning system, there will be some wellbeing issues that the LDP cannot directly influence. Whilst the plan seeks to facilitate the management of such matters as flood risk, town/district centre regeneration, the historic environment and support and promote the development of Active Travel Routes it is appropriate development schemes from coming forward. Notwithstanding this, it is considered that Policies SW10, SW12, CW1, CW2, En W4 and EcW3 – 5 address these issues in line with national policy.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D7		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on the Vision of the Deposit Plan in relation to Soundness Test 2 (Is the Plan appropriate?). The vision is bland and the strategy as a whole is negative due to the refusal to tackle issues raised.

Question: 2d Representation Text

Representation Text: . Are the vision and the strategy positive and sufficiently aspirational?
The vision – as suggested previously by MTHT – is bland.
The strategy as a whole is negative because:
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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including Aims and Objectives.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D8		10/09/2018	<input type="checkbox"/>	E	O		M		Summary: The Plan will not deliver because housing targets won't be met, there will be a loss of open space with lack of support from WG & the City Region for infrastructure improvements & mitigation measures required to bring sites forward

Document:DP Written Statement Strategy

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D8		10/09/2018	<input type="checkbox"/>	E	O		M		Summary: The Plan will not deliver because housing targets won't be met, there will be a loss of open space with lack of support from WG & the City Region for infrastructure improvements & mitigation measures required to bring sites forward

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that the housing requirement contained in the Replacement LDP is deliverable when considered against the fact that the level of housebuilding proposed (150 units per annum) is in line with a rate of housebuilding that has been achieved in Merthyr Tydfil for a significant period of time. Also, the range of sites allocated in the Plan, coupled with the other components of supply, maximises the likelihood of the Strategy being delivered. This significant level of flexibility contained in the overall housing provision (25% above the housing requirement) again maximises the likelihood of the Strategy being delivered.

The Council is still able to make this level of overall housing provision, despite being unable to allocate certain sites for housing, as stated in this representation. Whilst these sites have not been allocated for housing, they remain within settlement limits and could come forward for development should the site specific constraints be overcome. This again highlights the flexibility of the LDPs housing strategy which will help to ensure delivery of the Replacement LDP Strategy.

With regard to the point made by the representor that, "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", the Council considers this statement to be incorrect.

The improved station/Metro Hub at Pentrebach remains a project included in the first phase of Metro improvements, and coupled with Welsh Government purchasing the Hoover Factory site, this gives a firm indication that there is support from Welsh Government and the Cardiff City Region to deliver the LDP strategy in Merthyr Tydfil County Borough. There is also likely to be funding available through the City Deal's Stalled Sites Fund which aims to bring forward housing on sites that have proven difficult to develop due to high development costs.

Question: 2d **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D8		10/09/2018	<input type="checkbox"/>	E	O		M		Summary: The Plan will not deliver because housing targets won't be met, there will be a loss of open space with lack of support from WG & the City Region for infrastructure improvements & mitigation measures required to bring sites forward

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.

Question: 2e Changes proposed

Representation Text: . 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.....

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust has requested to speak on a number of issues including the Revision process

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D10		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment in relation to Key Issue 1. Private sector house building is unlikely to arrest the population decline or the out migration of young people and key housing sites.

Document:DP Written Statement Context & Issues

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D10		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment in relation to Key Issue 1. Private sector house building is unlikely to arrest the population decline or the out migration of young people and key housing sites.
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The 2016 Review Report does not state that the enhanced growth target of the current adopted had been met. The Report states that the population had indeed reached 59,000, but this was from a much higher base level population in 2006 than was initially thought. Essentially, the long term issue of population decline in the County Borough had started to reverse earlier than the data available at the time was indicating.

At the time of the Review Report, the most recent WG projections (2011-based) were indeed projecting the population to grow to over 62,000 by 2031. However, when the 2014-based projections were published, they indicated a much slower level of population growth in the County Borough, with some population decline actually forecast towards the end of the new LDP period. Whilst these two sets of projections resulted in different housing requirements (91 dwellings per annum for the 2011 projections, dropping to 22 dwellings per annum for the 2014 projections), the strategy of building 150 dwellings a year was considered appropriate by Council as it remained far enough above the trend scenario to be regarded as ambitious (more so under the 2014 figures), but also a dwelling requirement that is also deemed deliverable when looking at what can realistically be achieved in Merthyr Tydfil County Borough.

The Council agrees that simply building houses alone will not automatically increase the population. However, coupled with the significant regeneration works that have taken place over the past ten years; the increased attractiveness of Merthyr as a place to live, work and spend leisure time; and the accessibility of Merthyr Tydfil (which will be enhanced further through the Metro proposals and the final phase of A65 dualling), the Council consider that the level of housing growth proposed in the Replacement LDP is appropriate and will contribute to a sustainable level of population growth in the County Borough, enabling the vision of the LDP to be fulfilled.

The Council is still able to make an overall housing provision of 2820 dwellings (25% above the housing requirement of 2250 dwellings), despite being unable to allocate certain sites for housing, as stated in this representation. Whilst the sites in question have not been allocated for housing, they remain within settlement limits and could come forward for development should the site specific constraints be overcome. This again highlights the flexibility of the LDPs housing strategy which will help to ensure delivery of the Replacement LDP Strategy.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . Heritage Trust concerns raised include amongst other things:
Downward revision of 'in-migration' population 'targets'

2018 Merthyr Tydfil housing need review/study

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).

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . The Heritage Trust would like to speak about a number of issues including:

02/01/2019

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D10		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comment in relation to Key Issue 1. Private sector house building is unlikely to arrest the population decline or the out migration of young people and key housing sites.

Test 1 Fit
Test 2 Appropriate
Test 3 Delivery
Aims
Objectives

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments in relation to Key Issue 3 in relation to the Strategy

Document:DP Written Statement Context & Issues

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on a key issue identified as one of the local issues for the Replacement LDP to address. The Replacement LDP contains development management policies that aim to promote good design and sustainable placemaking principles. This includes policies to preserve and enhance the local historic environment and cultural heritage. No change to the plan is considered necessary in this respect.

Question: 2d Representation Text

Representation Text: . 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.

Question: 2e Changes proposed

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D12		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments in relation to Key Issue 3 in relation to the Strategy
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Representation Text: . 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..

Question: 3b Subject at Public Examination Hearing

Representation Text: . The Merthyr Tydfil Heritage Trust have raised a number of issues, including the following:

Heritage – draft policy proposal and its revision
 Well-being – objectives and proposals (or lack of)
 Active Travel, footpaths, cycleways, rights of way, bridleways
 Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.
 Hoover regeneration strategy – original proposals and revisions
 Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep
 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D32		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: General comments on Deposit Plan objectives
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Document:DP Written Statement Vision & Objectives

02/01/2019

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy AccessNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D32 10/09/2018 ☐ E O I M Summary: General comments on Deposit Plan objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Replacement LDP objectives are considered appropriate for the County Borough and have been developed through extensive public consultation and engagement as set out in the Initial Consultation Report and Deposit Plan Consultation Report. The development of the objectives has also been prepared in accordance with the approved delivery agreement and community involvement scheme.

The objectives are considered to be locally appropriate and address the key issues identified through the review of plans, policies and programmes, the updated evidence base, stakeholder engagement and public consultation. The Replacement LDP is required to be prepared in accordance with national planning policy and take account of new evidence and other national, regional and local plans, policies and the wording and range of issues covered by the objectives reflects this.

Consequently, no changes are considered to be necessary for soundness.

Question: 2d **Representation Text**

Representation Text: . 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.

Question: 2e **Changes proposed**

Representation Text: . 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.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . 1.Test 1 Fit
2.Test 2 Appropriate

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D32		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: General comments on Deposit Plan objectives
<p>3.Test 3 Delivery</p> <p>4.Aims</p> <p>5.Objectives</p> <p>6.Revision process and consultation comments</p> <p>7.Heritage – draft policy proposal and its revision</p> <p>8.Well-being – objectives and proposals (or lack of)</p> <p>9.Active Travel, footpaths, cycleways, rights of way, bridleways</p> <p>10.Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.</p> <p>11.Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail</p> <p>12.Hoover regeneration strategy – original proposals and revisions</p> <p>13.Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep</p> <p>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</p> <p>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)</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D33		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 1

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D33		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 1
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Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that the housing requirement contained in the Replacement LDP is deliverable when considered against the fact that the level of housebuilding proposed (150 units per annum) is in line with a rate of housebuilding that has been achieved in Merthyr Tydfil for a significant period of time. Also, the range of sites allocated in the Plan, coupled with the other components of supply, maximises the likelihood of the Strategy being delivered. This significant level of flexibility contained in the overall housing provision (25% above the housing requirement) again will assist with the delivery of the Strategy.

The Council has allocated a range and choice of sites. This has included prioritising brownfield regeneration sites where these are considered deliverable. This includes the allocation of a significant number of dwellings at the Hoover Strategic Regeneration Area, which aims to locate future new development close to planned public transport and metro improvements. In addition, a significant proportion of sites have some element of past mining or industrial activity on the site and would not result in a loss of best and most versatile agricultural land. These sites have been assessed by the Council and are considered to be appropriate to allocation in the Replacement LDP.

With regards to the housing requirement, the Council has, in line with national guidance, used the most recent Welsh Government population projections as a starting point and tested various scenarios. At the time of producing the Review Report in 2016, the 2011-based Welsh Government projections were the most recent figures in the public domain. The 2014-based projections were released in early 2017 and these remain the most up-to-date projections at the present time. The scenarios examined are clearly set out in the LDP background paper: Population and Housing Requirements. This paper clearly sets out the differences for Merthyr Tydfil shown in the last 4 sets of WG population projections.

The Council has not simply chosen a number of houses that it thinks is appropriate to build in the County Borough, but has considered a variety of issues in coming to the decision that the proposed strategy of the Replacement LDP is the most appropriate strategy for the County Borough. The consideration of the various strategic options was carried out as part of work undertaken in preparing the Preferred Strategy, with engagement taking place with a variety of stakeholders. This has included consideration of local housing needs, the range of deliverable sites within the replacement Plan period, past build trends, the need for the continued regeneration of local communities and other key evidence such as development viability evidence.

Question: 2d **Representation Text**

Representation Text: LDP Objective 1 Sustainable Population Growth: To encourage a sustainable level and distribution of population growth.
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.

Question: 2e **Changes proposed**

Representation Text: Amend to:
To encourage a sustainable level and distribution of population and to support sustainable communities.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: 1. Test 1 Fit
2. Test 2 Appropriate
3. Test 3 Delivery
4. Aims
5. Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D33		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 1
<p>6.Revision process and consultation comments</p> <p>7.Heritage – draft policy proposal and its revision</p> <p>8.Well-being – objectives and proposals (or lack of)</p> <p>9.Active Travel, footpaths, cycleways, rights of way, bridleways</p> <p>10.Hoover sports ground and factory – need for protection as heritage assets and renewal as a sports/cricket ground.</p> <p>11.Metro hub – needed so as to ensure bus, foot, cycle, car to Metro light rail</p> <p>12.Hoover regeneration strategy – original proposals and revisions</p> <p>13.Cyfarthfa Heritage Area (including EFI Astex and Williamstown) – lack of progress on care, repair and future upkeep</p> <p>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</p> <p>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)</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D34		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 2

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D34 10/09/2018 ☐ E O I M Summary: Comments on Objective 2

Question Representation Texts

Question: Rec. by Officers

Council Response: The Objective currently states to protect and enhance Welsh language and culture and the amendments suggested (to include reference to 'support and develop' rather than enhance) are not considered to significantly change objective or its application to the Plan's policies. Therefore, no change for soundness is considered necessary. Furthermore, in response to the matters raised regarding the Plan's impact on and consideration of Welsh Language the Plan states:

4.10The Plan's objectives seek to protect and enhance the Welsh Language and Culture in the County Borough. The impact of the LDP on the Welsh language and culture has been assessed using an integrated approach in the Sustainability Appraisal of the Plan. SA Objective 17 aims to ensure that the plan facilitates "services and facilities that support distinctive local culture and the Welsh language." Accordingly, the Plan's policies and allocations have been assessed against this objective.

4.11The strategy aims to attract people into the County Borough. Although the LDP cannot directly influence how many of these will be Welsh speakers, the level of growth proposed is likely to sustain communities and result in investment being attracted to facilitate improvements to assets of cultural significance, and this may help to retain Welsh speaking residents. The Strategy to increase the County Boroughs population would also indirectly contribute to the promotion of the Welsh language by providing housing in areas within the catchments of either of the two Welsh primary schools in the County Borough.

4.12The scoping work indicated that there are no significant concentrations of Welsh speakers within the County Borough, with the percentage of Welsh speakers in each ward varying between 6% and 11%. Similarly, data that looks at individual skills (ability to read, write and understand Welsh) also indicates that there is little variation across the County Borough. These figures indicate that the designation of areas where Welsh language is particularly sensitive/significant is not appropriate within the County Borough.

Question: 2d Representation Text

Representation Text: . LDP Objective 2 Welsh Language and Culture: To protect and enhance 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.

Question: 2e Changes proposed

Representation Text: . Amend to:
To protect, support and develop Welsh language and culture.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D34		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 2
<p>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</p> <p>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)</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D35		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 3

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation provides comment on LDP Objective 3 regarding housing provision but does not consider an amendment is necessary. With regards to the housing requirement generally, the Council has, in line with national guidance, used the most recent Welsh Government population projections as a starting point and tested various scenarios. At the time of producing the Review Report in 2016, the 2011-based Welsh Government projections were the most recent figures in the public domain. The 2014-based projections were released in early 2017 and these remain the most up-to-date projections at the present time. The scenarios examined are clearly set out in the LDP background paper: Population and Housing Requirements. This paper clearly sets out the differences for Merthyr Tydfil shown in the last 4 sets of WG population projections.

The Council has not simply chosen a number of houses that it thinks is appropriate to build in the County Borough, but has considered a variety of issues in coming to the decision that the proposed strategy of the Replacement LDP is the most appropriate strategy for the County Borough. The consideration of the various strategic options was carried out as part of work

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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Rep'n/Para/Policy AccessNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D35 10/09/2018 ☐ E O I M Summary: Comments on Objective 3

undertaken in preparing the Preferred Strategy, with engagement taking place with a variety of stakeholders. This has included consideration of local housing needs, the range of deliverable sites within the replacement Plan period, past build trends, the need for the continued regeneration of local communities and other key evidence such as development viability evidence. The housing therefore considers the level of housing requirement and provision to be appropriate.

Question: 2d Representation Text

Representation Text: 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.

Question: 3b Subject at Public Examination Hearing

Representation Text:

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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text:

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D35		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 3
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Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D36		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 4
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question	Representation Texts
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Question: Rec. by Officers

Council Response: The representation comments on objective 4 and suggests wording changes to include reference to promoting the reuse of previously developed land specifically within settlement boundaries. The objective is one of 18 overarching objectives that supplement the Strategy. The LDP contains more detailed policies that address the strategic issues raised by the objectives and this change is not considered necessary for soundness.

Question: 2d Representation Text

Representation Text: . 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 'Heartlands' proposal at the former Ivor Works is also kicked into touch.

Question: 2e Changes proposed

Representation Text: . Amend to:
To promote the suitable reuse of previously developed land within settlement boundaries and the continued renewal and regeneration of local communities and local centres.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D36		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 4
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- 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D37		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 5
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D37 10/09/2018 ☐ E O I M Summary: Comments on Objective 5

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation suggests rewording the objective so that regeneration is seen as supporting community infrastructure and open space. As the objective relates to infrastructure, it is considered these are the main focus of the objective and the outcome is to support the continued regeneration of local communities and that the suggested change would have no impact on the resulting policies of the Plan. Consequently, the Council considers that no change is necessary for soundness.

Question: 2d **Representation Text**

Representation Text: . LDP Objective 5 Infrastructure: To ensure that community infrastructure and open space supports the regeneration of local communities. 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.

Question: 2e **Changes proposed**

Representation Text: . Amend to:
LDP Objective 5 Infrastructure: To ensure that the regeneration of local communities supports community infrastructure and open space.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . 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
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12.Hoover regeneration strategy – original proposals and revisions
13.Cyfarthfa Heritage Area (including EFl 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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D37		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 5
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Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D38		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 6
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 6 and suggests adding a requirement for independent design review. The Replacement LDP contains more detailed policies which seek to address high quality design and it is not necessary to include reference to independent design reviews within the wording of the overarching objective as the matter can be adequately assessed at the development management stage and individual schemes referred to the Design Commission for Wales where necessary. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

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

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.

Question: 2e Changes proposed

Representation Text: . Amend to:
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.
To support measures and promote initiative which mitigate the predicted effects of climate change.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D38		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 6
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Question: 3b Subject at Public Examination Hearing

Representation Text:

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
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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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D39		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 7
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Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D39 10/09/2018 ☐ E O I M Summary: Comments on Objective 7

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The representation comments on objective 7 and suggests adding specific reference to a potential Metro hub and increasing the emphasis on Active Travel routes. The Replacement LDP contains more detailed policies which deal with improving the transport network, and give more detail in regard to the Hoover Strategic Regeneration Area. The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.
Question: 2d	Representation Text
<i>Representation Text:</i>	<p>. LDP Objective7 Transport: 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>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>
Question: 2e	Changes proposed
<i>Representation Text:</i>	<p>. Amend to: To support an integrated transport system with a new Metro hub at Brandy Bridge, to develop and protect Active Travel routes and networks. 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 Travel network and public transport.</p>
Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	<p>. 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</p>

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D39		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 7
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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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D40		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 8
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 8 and suggests explicitly stating that existing facilities will be protected. The Replacement LDP contains detailed policies which deal with protecting and improving community facilities (including open space). The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

Representation Text: . LDP Objective 8 Community Facilities: To support existing community facilities and suitable community led development. 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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D40 10/09/2018 ☐ E O I M Summary: Comments on Objective 8

Question: 2e Changes proposed

Representation Text: . Amend to:
To support and protect existing community facilities and suitable community-led development.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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207.D41		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 9
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question	Representation Texts
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Question: **Rec. by Officers**

Council Response: The representation comments on objective 9 and suggests removing the word 'enhance' from the objective and referencing CADW's conservation principles. The Replacement LDP contains detailed policies which deal with the Historic Environment, and the Council considers this policy sufficiently robust to protect the County Boroughs heritage assets. The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d **Representation Text**

Representation Text: . LDP Objective 9 Heritage and Cultural Assets: To protect, enhance and promote all heritage, historic and cultural assets. This objective should be re-worded. The objective should read "to protect, conserve and restore all heritage, historic and cultural assets". 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.

Question: 2e **Changes proposed**

Representation Text: . Amend to:
To protect, conserve and restore all heritage, historic and cultural assets and to ensure that Cadw's conservation principles are applied.

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . 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

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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207.D41		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 9
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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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

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207.D42		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 10
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 10 and suggests removing the word 'principle' from the overarching objective. The Replacement LDP contains detailed policies which deal with the Natural Environment, and the Council considers this policy sufficiently robust to protect the County Boroughs environment. The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

Representation Text: . LDP Objective 10 To improve ecosystem resilience and connectivity which support Biodiversity: habitats and species of principle importance. 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'.]

Question: 2e Changes proposed

Representation Text: . Amend to:
To require improvement of ecosystem resilience and connectivity which supports biodiversity, habitats and species of importance.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D42 10/09/2018 ☐ E O I M Summary: Comments on Objective 10

Question: 3b Subject at Public Examination Hearing

Representation Text:

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-fan – 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D43 10/09/2018 ☐ E O I M Summary: Comments on Objective 11

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Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D43 10/09/2018 ☐ E O I M Summary: Comments on Objective 11

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The representation comments on objective 11 and suggests replacing the word 'enhance' with the word 'improve' in the overarching objective. The Replacement LDP contains detailed policies which deal with the countryside and landscape, and the Council considers this policy sufficiently robust to protect the County Boroughs environment. The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.
Question: 2d	Representation Text
<i>Representation Text:</i>	. LDP Objective 11 Countryside and Landscape: To protect and enhance the character and appearance of the landscape and the countryside. 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". The word 'enhance' should be replaced by 'improve'. [Enhancement might be construed as change ranging from 'cosmetic' or token (and temporary) to substantial development.]
Question: 2e	Changes proposed
<i>Representation Text:</i>	. Amend to: 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.
Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	. 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

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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207.D43		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 11
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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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D44		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 12
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 12 and suggests amending the wording to clarify the objective. The Council considers that the objective is clear in what it is seeking to achieve and that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

Representation Text: . LDP Objective 12 Economic Development: To provide and safeguard appropriate land for economic and skills development.
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?

Question: 2e Changes proposed

Representation Text: . Amend to:
To safeguard and allocate appropriate land for sustainable economic development and for skills development.

Question: 3b Subject at Public Examination Hearing

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

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207.D44		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 12
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Representation Text: .

- 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D45		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 14
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Document:DP Written Statement Vision & Objectives

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy AccessNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D45 10/09/2018 ☐ E O I M Summary: Comments on Objective 14

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 14 and suggests including reference to village centres and well-being. The Replacement LDP contains detailed policies which deal with retail centres and the retail hierarchy, and the Council considers that this approach is sufficiently robust to protect and enhance the County Boroughs local centres. The Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

Representation Text: LDP Objective 14 Town and Local Centres: To develop the town and local centres as accessible, attractive, viable and vibrant places. This objective needs clarification as it should include 'village centres' as well as 'local centres'. 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. 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. So: "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."

Question: 2e Changes proposed

Representation Text: Amend to: 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: 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)

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207.D45		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 14
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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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D46		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 15
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Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question Representation Texts

Question: Rec. by Officers

Council Response: The representation comments on objective 15 and suggests removing the reference to an all-year-round tourism industry, as the term could be used to undermine other essential safeguards in the draft revised LDP. The Replacement LDP contains detailed policies which deal with leisure and tourism proposals, and also contains policies that provide the safeguards referred to in the representation. As the LDP should be read as a whole, the Council considers that the suggested change would have no impact on the resulting policies of the Plan. No changes are therefore considered necessary for soundness.

Question: 2d Representation Text

Representation Text: . LDP Objective 15 Leisure, Recreation and Tourism: To support sustainable tourism, leisure and recreation developments and encourage an all-year-round tourism industry. "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.

Question: 2e Changes proposed

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.D46		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 15
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Representation Text: . Amend to:
To support sustainable and appropriate tourism, leisure and recreation development.

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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 EFl 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.

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy AccessnNo DateLodgd Late? Source Type Mode Status Status Modified Summary

207.D47 10/09/2018 ☐ E O I M Summary: Comments on Objective 18

Document:DP Written Statement Vision & Objectives

Issue: DP Vision Strategy Objectives-DP Vision Issues Strategy Objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The current LDP (2006-2021) does not allocate land for a waste management facility, however the land is designated as an area of search for waste management facilities, along with a number of other industrial areas in the County Borough (an approach consistent with national policy). There are no firm proposals at present, however the Replacement LDP adopts a similar approach to the current LDP, with the Goatmill Road area included as an area of search for waste management facilities.

Question: 2d **Representation Text**

Representation Text: . LDP Objective 18 Sustainable Resources & Waste: To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities.

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.

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?

Question: 3b **Subject at Public Examination Hearing**

Representation Text: . 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 EFL 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
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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.

Representations & Council Responses juxtaposed Vision, Strategy & Objectives

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No
Filtered to show: (all of) Stage=D; Status=M; Issue=DP Vision Issues Strategy Objectives

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D47		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: Comments on Objective 18

Question	Questions of Soundness
Question: 2c	Soundness Test 1
Representation Text: .	
Question: 2c	Soundness Test 2
Representation Text: .	
Question: 2c	Soundness Test 3
Representation Text: .	

Representations & Council Responses juxtaposed Waste

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Waste

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D27		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representations provides comment on Key Issue 21 in relation to Waste and raises concerns that details of waste management proposals are yet to be made public.

Document:DP Written Statement Context & Issues

Issue: DP Waste-DP Waste

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The Goatmill Road site is allocated for B1/B2/B8 uses under policy EcW1: Provision of Employment Land. It is also identified as an area of search for Waste Management facilities under policy EcW14: Waste Facilities. The Council is aware of recent market interest in the site for B2/B8 waste management uses as noted in the Employment Land Review. However, there has been no request for pre application advice and no planning application has been submitted. Whilst a good network of waste management facilities exists in terms of residual waste processing, the Council is required to support the development of a sustainable network of waste management facilities in line with Welsh Government Policies and programmes. Consequently, Policy EcW14 identifies a number of 'areas of search' for such facilities that could accommodate new facilities. Further details are provided in the Council's Waste Planning background paper (June 2018).
Question: 2d	Representation Text
<i>Representation Text:</i>	<p>The Ffos-y-fran land reclamation scheme is on-going and some other mineral reserves still have permission. A good network of waste facilities exists.</p> <p>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.</p> <p>The employment land review for the draft revised LDP / deposit 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.</p>
Question: 2e	Changes proposed
<i>Representation Text:</i>	<p>Heritage Trust concerns raised include:</p> <ol style="list-style-type: none"> 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..
Question: 3b	Subject at Public Examination Hearing
<i>Representation Text:</i>	The Heriage Trust wish to speak on a number of matters mentioned in their representation, including the following:

Representations & Council Responses juxtaposed Waste

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D; Status=M; Issue=DP Waste

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.D27		10/09/2018	<input type="checkbox"/>	E	O	I	M		Summary: The representations provides comment on Key Issue 21 in relation to Waste and raises concerns that details of waste management proposals are yet to be made public.
<p>Test 1 Fit</p> <p>Test 2 Appropriate</p> <p>Test 3 Delivery</p> <p>Aims</p> <p>Objectives</p> <p>Revision process and consultation comments</p> <p>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.</p>									

Question Questions of Soundness

Question: 2c Soundness Test 1

Representation Text: .

Question: 2c Soundness Test 2

Representation Text: .

Question: 2c Soundness Test 3

Representation Text: .