

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



**ADRODDIAD YMGYNGHORI CYCHWYNNOL | INITIAL CONSULTATION REPORT**

**Mehefin 2018 | June 2018**

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<b>CONTENTS</b>	<b>PAGE</b>
<b>Executive Summary</b>	<b>3</b>
<b>1. Introduction</b>	<b>4</b>
<b>2. The Planning Inspectorate (PINS) Members Training</b>	<b>5</b>
<b>3. Review Report Consultation</b>	<b>5</b>
 <b>KEY STAGE: DELIVERY AGREEMENT</b>	
<b>4. Delivery Agreement Consultation</b>	<b>7</b>
 <b>KEY STAGE: PRE-DEPOSIT PARTICIPATION</b>	
<b>5. Expression of Interest Consultation</b>	<b>9</b>
<b>6. Call for Candidate Sites</b>	<b>9</b>
<b>7. Cwm Taf: Understanding Our Communities Stakeholder Workshops</b>	<b>10</b>
<b>8. Merthyr Tydfil County Borough Council (MTCBC) Replacement Local Development Plan (LDP) Steering and Working Groups</b>	<b>11</b>
<b>8.1 Replacement LDP Working Groups</b>	
<b>8.2 Replacement LDP Steering Group</b>	
<b>9. SA Baseline Scoping Report Consultation</b>	<b>12</b>
 <b>KEY STAGE: PRE-DEPOSIT CONSULTATION</b>	
<b>10. Preferred Strategy</b>	<b>14</b>
<b>11. Initial Sustainability Appraisal (ISA)</b>	<b>19</b>
<b>12. Habitat Regulations Assessment (HRA) Screening Report</b>	<b>20</b>
<b>13. Background and Other Papers</b>	<b>21</b>
<b>14. Details and Methods of Involvement</b>	<b>22</b>
<b>15. Candidate Sites Consultation</b>	<b>24</b>

<b>APPENDICES</b>	<b>PAGE</b>
1: Planning Inspectorate (PINS) – Plan- making Presentation	25
2: Summary of consultation representations to the draft Delivery Agreement (DA)	27
3: Notes of PINS Advisory Meeting	29
4: DA - Self-assessment of how CIS meets Annex A Criteria Set	31
5: WG Agreement of MTCBC DA for the 1ST Replacement Plan	33
6: Expression of Interest (EOI) Consultation Forms	34
7: Expression of interest Consultation (EOI) - Media Notifications	36
8: Call for Candidate Sites - Letters, Email & Media Notifications	37
9: Cwm Taf Understanding Our Communities Environmental Well-being Workshop Notes	39
10: Replacement LDP Working Groups - Terms of Reference	41
11-18: Notes of Meetings of Replacement LDP Working Groups	42
19: Replacement LDP Steering Group - Terms of Reference	56
20-25: Notes of meetings of Replacement LDP Steering Group	58
26: NRW Response to Draft SA Baseline Scoping Report	70
27: Cadw Response to Draft SA Baseline Scoping Report	76
28: Summary of Consultation Representations – ISA	77
29: NRW - Data Request Form	83
30: Consultations - draft HRA Screening Report	85
31: NRW response to - draft HRA Screening Report	87
32: Summary of consultation representations - HRA Screening Report	88
33: Notice of Public Consultation on Pre-Deposit Proposals	89
34: Pre-deposit Consultation Response Form	91
35: Pre-deposit Consultation letters & Emails	96
36: Pre-deposit Consultation Drop-in Public Exhibitions / Events	98
37: Pre-deposit Consultation – Poster	99
38: Pre-deposit Consultation - Media Notifications	100
39: Meeting with the Merthyr Tydfil Borough Wide Youth Forum (MTBWYF)	103
40: Pre-deposit Consultation –Executive Summary of Responses	105
41: Pre-deposit Consultation –Summary of Responses	141
42: Candidates Sites Register Consultation – Letters and Emails	142
43: Candidates Sites Register Consultation – Media Notifications	143

## Executive Summary

- 0.1 The Council adopted the Merthyr Tydfil Local Development Plan (LDP) 2006-2021 on 25th May 2011. Up-to-date LDPs are an essential part of a plan-led planning system. Therefore since adoption, the adopted Plan has been monitored on an annual basis. A review of the adopted LDP commenced in May 2015 and the preparation of a 1<sup>st</sup> replacement LDP was approved by Merthyr Tydfil County Borough Council (MTCBC) on 20th April 2016.
- 0.2 A Delivery Agreement (DA) for its preparation was agreed by WG on 10<sup>th</sup> 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 would be included in an Initial Consultation Report required under LDP Regulation 17(c).
- 0.4 This document represents this 'Initial Consultation Report' covering the pre-deposit plan preparation stage for the replacement plan. This will be updated as the replacement LDP progresses through the key stages of plan preparation. In accordance with the Regulations, this report identifies:
  - 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.
- 0.5 Appendix 40 of this report 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 have influenced the preparation of the Deposit LDP.

## 1 Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 (section 62) places a duty on all local planning authorities in Wales to prepare a Local Development Plan (LDP) for their area. The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 "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 and an assessment of the extent to which the LDP's strategy, policies and development sites are being delivered has been provided in six Annual Monitoring Reports (AMRs) produced to date.
- 1.4 Section 69 of the 2004 Act requires Local Planning Authorities (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 is formally adopted by the Council.

INITIAL CONSULTATION REPORT

- 1.7 This document represents the 'Initial Consultation Report' required under LDP Regulation 17(c) covering the pre-deposit plan preparation stage for the first replacement plan. In accordance with the Regulations, this report identifies:
- d) Bodies engaged or consulted at the pre-deposit public consultation stage;
  - e) The steps taken to publicise plan preparation, and how this complies with the CIS contained in the DA and
  - f) The main issues raised, and how they have influenced the preparation of the Deposit LDP.
- 1.8 The appendices to this report contain, amongst other information, summaries of the representations made at the pre-deposit consultation stages together with how the Council has responded to the issues raised.

## **2. The Planning Inspectorate (PINS) Members Training**

- 2.1 On 13<sup>th</sup> January 2016 the Planning Inspectorate gave a presentation to Merthyr Tydfil County Borough Council Members explaining the LDP Review Process (a copy is attached at Appendix 1). It included the Reg. 41 requirement that LPAs must commence a full review of its LDP every four years from the date of its initial adoption. In addition, they explained that Chapter 10 of the LDP Manual requires a mandatory Review Report be drafted presenting the revision required from two options i.e. the Short Form or Full revision process and the triggers to set the process in motion.
- 2.2 In essence short form would take 12 – 18 months to complete with representations restricted to proposed changes only. A long form is required if the strategy needs to be amended and requires a Preferred Strategy (PS) consultation with some additional cost but minimal risk. Both forms are adopted in their entirety and in both cases up-to date information and sound evidence base is essential.
- 2.3 Triggers include significant contextual change e.g. in national legislation or significant concerns arising from the AMRs such as policy effectiveness or building development progress rates.

## **3. Review Report Consultation**

- 3.1 To ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date or whether changes are needed a S69 full review of

INITIAL CONSULTATION REPORT

an LDP is required at intervals not longer than every 4 years from initial adoption. A plan review should draw upon published AMRs, evidence gathered through updated survey evidence (as set out in S61 – see 5.3.1.1) and pertinent contextual indicators, including relevant changes to national policy.

- 3.2 The Report to Full Council on 20th April 2016 appeared as Item 1354. It included a copy of the Review Report itself and a completed Equality Impact Assessment (EQIA) Form. A copy of the latest AMR published at that time was also attached. Dated October 2015, it covered the period from 1st April 2014 to 31st March 2015 and was submitted to the WG prior to preparation of the Review Report.
- 3.3 The Review Report concluded that the Development Strategy, which underpins the adopted LDP, is not being delivered. While there are signs of improving economic conditions, there remains uncertainty over when delivery rates can reach the level necessary to meet the requirements of adopted the Strategy.
- 3.4 It was therefore considered that both the level and spatial distribution of growth required reconsideration in order to establish whether the current adopted LDP Strategy is the most appropriate for delivering growth up to 2031.
- 3.5 In addition, whilst many other aspects of the adopted LDP were considered to be functioning effectively, contextual changes including the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 (FGA) and the Environment (Wales) Act 2016 together with changes to the evidence base brought to the fore the need to revise certain policies and allocations within the adopted Plan. With particular regard to the well-being goals set out in the FGA it seemed prudent to also reconsider the Plan's Vision and Objectives.
- 3.6 At the 20th April 2016 meeting the Council resolved that:
- a) The Merthyr Tydfil Local Development Plan (2006 – 2021) Review Report be approved and
  - b) The Planning Division commence work on the preparation of a Replacement Local Development Plan utilising the full revision procedure.

- 3.7 The 20th April 2016 Council report can be viewed on the council website at:

<http://democracy.merthyr.gov.uk/ieListDocuments.aspx?CId=159&MID=2234&LLL=0#A126576>

As required by the 2004 Act the Review Report was published on the council website within six months from start of the review process and can be viewed at:

<https://www.merthyr.gov.uk/media/2165/merthyr-tydfil-local-development-plan-2006-2021-review-report-april-2016.pdf>

## KEY STAGE: DELIVERY AGREEMENT

### 4. Delivery Agreement (DA) Consultation

- 4.1 For the preparation of an LDP Revision and further to the conclusions of the Review Report, a DA is required. A DA is a public statement of how and when stakeholders and the community can contribute to the preparation of the replacement LDP. It comprises two key elements a separate timetable and a CIS. The timetable comprises the key stages for preparing the replacement LDP. The aim of the CIS is to make the process transparent, enable effective engagement and to build consensus on the replacement LDP.
- 4.2 The DA must be submitted to WG at the start of the process and following agreement be publicised and specific consultation bodies and appropriate general consultation bodies be notified that the draft DA has been prepared [Regulations 9(4A&5) & 10(2)].
- 4.3 A draft DA dated June 2016 was prepared. It identified the 'principles' of the Council's participation strategy; the role of the LPA, Councillors and Officers; the methods of engagement; the bodies, agencies and organisations to be involved; and the Council's expectations of all stakeholders and participants who become involved in the process. In addition, the CIS stated that details of all involvement and consultation activities will be included in an Initial Consultation Report that would be updated as the replacement LDP progresses through the key stages of plan preparation.
- 4.4 A targeted consultation was undertaken on the draft DA on 7<sup>th</sup> June 2016. It included, PINS, WG, Natural Resources Wales (NRW), Cadw and MTCBC officers comprising the Chief Executive, Directors, Chief Officers and Heads of Services. A summary of their responses is attached at Appendix 2. PINS



INITIAL CONSULTATION REPORT

suggested an 'Advisory Visit' regarding Review/Revision procedures. The Visit was held on 16<sup>th</sup> June 2017 and notes of the meeting are attached at Appendix 3.

4.5 Following this, a Report was presented to Full Council on 13<sup>th</sup> July 2016 recommending that the Replacement Merthyr Tydfil LDP (2016-2031) – DA be submitted to the WG for agreement. At that meeting the Council resolved that:

- a) The Replacement Merthyr Tydfil LDP Plan (2016 – 2031) DA be approved;
- b) The DA be submitted to the WG for agreement and
- c) Delegation of authority to the Leader and Portfolio Member for Regeneration, Planning and Countryside in consultation with the Corporate Director Place and Transformation to authorise any amendments to the DA be agreed.

4.6 The council approved DA was formally submitted to the WG for agreement on 14<sup>th</sup> July 2016, together with a brief summary of how the DA meets the assessment criteria set out in Annex A<sup>1</sup> of the LDP Manual (Edition 2 – August 2015). A copy of the self assessment is attached at Appendix 4.

4.7 An agreement letter on behalf of the WG Cabinet Secretary for Environment and Rural Affairs for the DA on the MTCBC Replacement LDP was received on 10<sup>th</sup> August 2017. The letter confirmed agreement to the timetable as provided for by Section 63(4) of the Planning and Compulsory Purchase Act 2004 and Regulation 9 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. A copy of the agreement letter is attached at Appendix 5.

4.8 In addition, the letter stated that a published version of the DA should be made publically available in accordance with the requirements indicated in Regulation 10. Consequently, copies of the WG agreed DA were sent to the original targeted consultees and neighbouring LPAs. It was also published on the Council website in August 2016. This can be viewed at:

<https://www.merthyr.gov.uk/media/2432/website-council-approved-replacement-ldp-delivery-agreement.pdf>.

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<sup>1</sup> Regulation 9 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005

## KEY STAGE - PRE-DEPOSIT PARTICIPATION

### 5. Expression of Interest Consultation

- 5.1 Pre-deposit participation began with an invitation for specific, environmental and general consultation bodies, other consultees and the general public to be included on a data-base of interested parties in the preparation of the replacement MTCBC LDP, known as the 'Expression of Interest' consultation.
- 5.2 A questionnaire, a copy of which can be found, attached at Appendix, in both Welsh and English, was created to capture responses. The Expression of Interest consultation, which ran from 4<sup>th</sup> to 19<sup>th</sup> August 2016, included direct email and letters to Statutory and General Consultees, known interested parties and stakeholders.
- 5.3 A notice was published in *Contact* magazine which is delivered to all households in the County Borough in addition to being published on the council Website. A copy is attached at Appendix 7.
- 5.4 Expressions of interest were invited separately on both the MTCBC and Cwm Taf Engagement Hub websites as well as being tweeted on the Council Twitter account, also illustrated in Appendix 7.

### 6. Call for Candidate Sites

- 6.1 Following the Expression of Interest Consultation, in accordance with the CIS and *Appendix 1 - Timetable for LDP Revision* of the DA<sup>2</sup>, a request for nominations for sites proposed to be included in the replacement LDP, to be referred to as 'Candidate Sites', took place between 8<sup>th</sup> September 2016 and 2<sup>nd</sup> December 2016.
- 6.2 As specified in the CIS and *Appendix 3 – Potential Involvement Methods and Decisions at Key Stages in Plan Preparation* of the DA, this process comprised:
- Targeted letters and emails to interested parties (internal and external);
  - A press release;
  - A feature in Issue 44 of *Contact* Magazine (available on the Council Website and delivered to all residents in the County Borough area);
  - Notices on the Council and Cwm Taf Engagement Hub websites and
  - Tweets on the Council Twitter page.

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<sup>2</sup> Replacement Merthyr Tydfil Local Development Plan 2016-2031- Delivery Agreement agreed with Welsh Government in August 2016.

Copies of the letters, emails and media calls are attached at Appendix 8.

- 6.3 As shown in Appendix 3 of the DA, meetings were also held with known landowners including Council Departments (Property and Estates and Physical Regeneration) with regard to their Candidate Site nominations.
- 6.4 All submissions were acknowledged by the Planning Division and nominees contacted to ensure the boundaries submitted were correct and fulfilled the necessary requirements. The results of the call for candidate sites were published in a Candidate Sites Register, made available at the time of the PS Consultation to be discussed later. Altogether 98 sites were included in the register at that time.

## **7. Cwm Taf: Understanding Our Communities Stakeholder Workshops**

- 7.1 In response to the FGA the Cwm Taf Public Services Board prepared four well-being briefing documents looking at the cultural, economic, environmental and social well-being of people and communities with the aim of preparing a Well-being Assessment Report.
- 7.2 Following this the board commissioned consultants<sup>3</sup> to explore key issues and responses arising from the briefing notes through stakeholder workshops as part of a well-being assessment consultation. In-line with Appendix 3 of the DA, the Cultural, Economic and Social Well-being workshops were designed to inform the Replacement LDP, with the Environmental well-being workshop, held on 4<sup>th</sup> November 2016, being run to focus on key issues for the LDP. Prior to this Environmental Headlines were identified as:
1. SUSTAINABLY MANAGE LAND in urban areas and the countryside to enhance community and environmental resilience to climate change;
  2. Unlock the outdoor environment's potential to improve people's PHYSICAL AND MENTAL WELLBEING;
  3. Raise awareness of Cwm Taf's unique BIODIVERSITY and encourage people to help wildlife thrive;
  4. Create and support opportunities for CHILDREN to learn and interact with the outdoor environment to enhance physical, mental and social development and
  5. The key Environmental Support and empower COMMUNITIES who want to manage and improve their local areas (urban and wild).

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<sup>3</sup> Netherwood Sustainable Futures and PwC

- 7.3 The results of this workshop are attached at Appendix 9. The findings of all the stakeholder workshops can be found in the *Cwm Taf: Understanding our Communities – Wellbeing Assessment Consultation Brief Analysis Report*<sup>4</sup>.

## **8. Merthyr Tydfil County Borough Council Replacement LDP Steering and Working Groups**

### **8.1 Replacement LDP Working Groups**

- 8.1.1. In line with Appendix 3 of the DA, four topic based working groups were set up on the basis of the Expressions of Interest consultation, comprising a wide range of organisations as follows:

- 1) Population and Community facilities – meetings held on 7<sup>th</sup> November 2016 and 25<sup>th</sup> January 2017;
- 2) Heritage, Leisure and Countryside - meetings held on 9<sup>th</sup> November 2016 and 27<sup>th</sup> January 2017;
- 3) Housing Viability – meetings held on 9<sup>th</sup> November 2016 and 2<sup>nd</sup> February 2017 and
- 4) Economic Development and Tourism - meetings held on 17<sup>th</sup> November 2016 and 30<sup>th</sup> January 2017.

- 8.1.2 Their main purpose was to assist in the in the generation of alternative strategies and options and relay their views to the Replacement LDP Steering Group for consideration. A copy of their *Terms of Reference* is attached at Appendix 10 and notes of the meetings are attached at Appendices 11 -18.

### **8.2 Replacement LDP Steering Group**

- 8.2.1 The inaugural meeting of the Replacement LDP Steering Group, as specified in Appendix 3 of the DA, was held on 16<sup>th</sup> November 2016. At that meeting an overview of the stages of the LDP process and how it fits in with the Regional and National Development Plan processes was presented. The Steering Group was then taken through eight differing population projections and how these could impact land use development on the ground.

- 8.2.2 Discussion took place with regard to how differing land uses could be accommodated including schools, housing and open space and how this

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<sup>4</sup> Report from Netherwood Sustainable Futures and PwC to Cwm Taf Public Services Board - Cwm Taf: Understanding Our Communities – Wellbeing Assessment Consultation: Brief Analysis Report, Dr. Alan Netherwood (Netherwood Sustainable Futures) and Jeff Brown (PwC), 12<sup>th</sup> December 2016.

could impact service provision such as waste and recycling. Feedback from the Working Groups, that had already taken place, was also given. The *Terms of Reference*, attached at Appendix 19, were also agreed where the Steering Group would oversee the Working Groups but any decision making would be undertaken by Full Council. Notes of that meeting are attached at Appendix 20.

- 8.2.3 Two further meetings of the Steering Group were held prior to publication of the PS on 24<sup>th</sup> January and 21<sup>st</sup> March 2017. These meetings discussed the pre-deposit documents (see below) including the PS - Vision and Objectives, Sustainability Appraisals of the Growth & Spatial distribution options, the Initial Sustainability Appraisal Report and Habitats Regulations Screening Assessments, Candidate Sites and the PS Consultation. Minutes of these meetings are attached at Appendices 21 and 22.
- 8.2.4 A further meeting of the Steering Group was held on 6<sup>th</sup> December 2017. This was organised to inform new members (due to Council elections in May 2017) of the replacement LDP process and progress made so far in that process. New *Terms of Reference* were tabled attached at Appendix 23 and notes of that meeting are attached at Appendix 24.
- 8.2.5 Following this an additional meeting of the Steering Group was held in March 2018 to discuss continuation of work on the Evidence Base, including an Affordable Housing/ CIL Viability Report, an Education Provision Background Paper, a Strategic Flood Consequence Assessment (SFCA, an extended Gypsy/Traveller Accommodation Assessment (GTAA)) and the preparation of a masterplan for the proposed Hoover Strategic Site. The group was also informed with regard to the proposed content of the Deposit Plan, future Council reporting schedule and the next steps in the LDP Deposit plan process. Notes of the meeting are attached Appendix 25.

## **9. Sustainability Appraisal - Baseline Scoping Report (Incorporating Strategic Environmental Assessment Health Impact Assessment and Equalities Impact Assessment)**

- 9.1 The Planning and Compulsory Purchase Act 2004 and Planning Policy Wales (Edition 9, November 2016) require SA to be carried out during the preparation of an LDP. Extant guidance (Welsh Government, 2015) also recommends that SA incorporates the requirements for Strategic Environmental Assessment (SEA) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which in turn implements the

requirements of the EU SEA Directive (European Parliament, Council of the European Union, 2001).

- 9.2 The purpose of an SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 9.3 SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. The scoping stage is the first stage of the SA process, identifying the scope and level of detail of the information to be included in the SA Report.
- 9.4 MTCBC commissioned independent specialist consultants *Enfusion Ltd* to provide expert advice on the SA process for the preparation of the 1st Replacement Merthyr Tydfil LDP. On the advice of *Enfusion*, the Council chose to integrate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes within the overarching SA process.
- 9.5 In line with *Appendix 1* of the DA, a draft SA Baseline Scoping Report was prepared which set out the context, objectives and approach of the assessment; and identified relevant environmental, economic and social issues and objectives.
- 9.6 The SEA Directive requires that the authorities responsible for preparing plans should consult with Consultation Bodies. For MTCBC, these are NRW and Cadw. In accordance with *Appendix 3* of the DA, comments were therefore invited from these statutory 'Environmental Consultees' between 21st December 2016 and 25th January 2017 and their responses are attached at Appendices 26 and 27. Following this the Scoping Report was amended in the light of these responses and published in January 2017.

## KEY STAGE - PRE-DEPOSIT CONSULTATION

### 10. Preferred Strategy (PS)

- 10.1 As part of the preparation process for the replacement LDP, the Council is required to publish and consult upon a PS<sup>5</sup>. The publication of the PS for consultation is the first formal publication in the replacement LDP process. The PS sets out the broad approach that the replacement LDP intends to take in order to ensure that the County Borough is developed in a sustainable manner over the plan period. It also provides the strategic framework for detailed policies, proposals and land use allocations which will subsequently be included in the Deposit LDP 2016-2031.
- 10.2 In line with Appendix 3 of the DA, a I Report was presented to Full Council on 28<sup>th</sup> June 2017 to seek approval for a 6-week period of public consultation for pre-deposit proposals documents. The Council was also informed that the Candidate Sites Register along with other topic and background papers, whilst not being formal pre-deposit proposals documents, would be published alongside the pre-deposit documentation for comment during the 6-week period of public consultation.
- 10.3 Additionally they were informed that the opportunity to submit further Candidate Sites would also be provided during the consultation period and that with the exception of the Hoover Strategic Regeneration Area, detailed decisions on which sites will be selected as allocations would be made when agreeing the 'Deposit Plan' in 2018.
- 10.4 At the 28<sup>th</sup> June 2017 meeting Council resolved that the following pre-deposit proposals documents for the Replacement Merthyr Tydfil Local Development Plan (2016 – 2031) be approved for a 6 week period of public consultation:
- (a) The Preferred Strategy
  - (b) The Initial Sustainability Appraisal Report
  - (c) The Habitats Regulations Assessment Screening Report.
- 10.5 Copies of the Council Report and Minutes of the meeting can be viewed on the Council website at: <http://democracy.merthyr.gov.uk/>

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<sup>5</sup> Planning and Compulsory Purchase Act 2004 S62 (as amended by the Planning (Wales) Act 2015 s11); The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, Regulations 14, 15 & 16; The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015, Regulation 16A.

**INITIAL CONSULTATION REPORT**

- 10.6 As illustrated in Appendix 3 of the DA, the Pre-Deposit Consultation on the Preferred Strategy began on Friday 14<sup>th</sup> July 2017. Details of how to comment and where the public and others could view the other supporting documents were set out on page 41 of the PS.
- 10.7 A total of 41 individuals and organisations made representations during the LDP Preferred Strategy consultation, with a total of 232 individual representations relating to the Preferred Strategy and background papers. Of these 84 (36%) provided support, 29 (13%) objected and 119 (51%) provided general comment.
- 10.8 The following table illustrates the breakdown of representations by policy or theme and whether support, objection or comment was received.

<b>Preferred Strategy Section / Policy</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>	<b>Total Representations</b>
Preferred Strategy Generally	3		15	18
Introduction			4	4
Key Issues	1		4	5
Vision	13		2	15
Preferred Strategy growth level	15	1	9	25
Low Growth Option	1			1
Preferred Strategy spatial distribution	15	1	7	23
Urban extension option		4		4
Objectives Generally	11		2	13
Objective 1			1	1
Objective 2			5	5
Objective 3		1	3	4
Objective 4		1	1	2
Objective 8	2			2
Objective 9		1		1
Objective 10			3	3
Objective 14		2	1	3
Objective 16	1			1
Policies (general)	8			8
Policy SW1			1	1



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

**INITIAL CONSULTATION REPORT**

Policy SW2			3	3
Policy SW3			4	4
Policy SW4	1	1	2	4
Policy SW5	1	4	2	7
Policy SW6	1		1	2
Policy SW7			1	1
Policy SW8	2		4	6
Policy SW9			4	4
Policy SW10			5	5
Policy SW11	1		3	4
Policy SW12		1		1
Policy SW13			1	1
Policy SW17			1	1
Policy CW15		1	5	6
Policy CW16	1	1	2	4
EnW17			1	1
EnW18		1	1	2
EnW19		2	1	3
EnW20	2	1	1	4
EcW21	2		1	3
EcW22			1	1
EcW23			3	3
EcW24			3	3
EcW26			1	1
EcW27			4	4
EcW28			1	1
Monitoring			1	1
SINC Review Paper	1			1
Green Wedge background paper	1	1		2
Gypsy and Traveller Accommodation Assessment			1	1
SLA Paper		5	2	7
LDP Review Report	1			1
Retail Study			1	1
<b>Total</b>	<b>84</b>	<b>29</b>	<b>119</b>	<b>232</b>

- 10.9 General support for the Council's Preferred Strategy was received from statutory consultees and other respondents with 15 (60%) of the 25 representations supporting the proposed 'mid growth' and spatial distribution option, with 9 respondents providing objection or comment. Some respondents raised questions as to how the Plan would ensure the level of growth identified could be delivered and sought clarifications. In particular, some questioned the reliance on a significant allocation at the Hoover Strategic Regeneration Area (for up to 800 dwellings).
- 10.10 Further evidence has been prepared to inform the Deposit Plan in order to respond to these issues. This has included the preparation of a Strategic Flood Consequence Assessment (SFCA) to consider the impact of flood risks and consequences, in particular at the Hoover Strategic Regeneration Area. The Council has worked with Welsh Government and Transport for Wales who have land interests at the strategic site, in order to prepare a framework master plan for the Strategic Regeneration Area. This illustrates what the future redevelopment of the area might look like and provides a 'proving layout' for the Hoover Factory site. Flood modelling work has found that land at Dragon Parc and at the Gethin Tip area is currently unsuitable as a residential allocation in the Plan. Prior physical mitigation works would be required and these are being investigated by the land owners of the Dragon Parc site. It is hoped that these areas west of the river Taff will provide future regeneration opportunity sites. Further details can be found in the Hoover Strategic Regeneration Area - Framework Masterplan (June 2018) referenced as a background paper.
- 10.11 The Hoover Strategic Regeneration Area is allocated to provide 440 dwellings. Whilst this is a reduction on the levels envisioned, it is by far the largest residential site allocation in the Plan. It will also be a focus for future regeneration including new employment and local retail provision and will maximise the benefits and opportunities provided by the planned Cardiff Capital Metro improvements. The Council has also undertaken site assessments of the submitted candidate sites and is confident that the LDP can deliver the Preferred Strategy with the allocation of a range and choice of sites whilst maintaining 70% of residential allocations in the Primary Growth Area and 30% in the Other Growth Area.
- 10.12 With regards to the alternative "urban extension" spatial distribution option, a number of objections were received. In particular, Natural Resources Wales have advised that in principle they do not support the option due to the potential impact on the nationally protected Cwm Glo and Glyndyrys SSSI. In addition, Rhondda Cynon Taf County Borough Council agreed with the

INITIAL CONSULTATION REPORT

findings of the Initial SA report which considers this option in relation to development of the SSSI as inappropriate given the suitability of the alternative spatial options. The Rural Action Cwm Taf Group and Merthyr Initiative also considered that the urban extension spatial option would cause harm to the SSSI.

- 10.13 With regards to the LDP Objectives, 35 individual comments were received. Whilst specific representations were not received on all 17 objectives, general support was provided with 14 comments (40%) supporting the LDP Objectives, 5 objecting and 16 providing additional comment.
- 10.14 A number of the representations suggested minor wording changes or clarifications to the Objectives which where agreed have been incorporated. For example, clarification was requested regarding Objective 3 regarding the promotion of previously developed land for the diverse supply of housing. This Objective has been split (to provide an additional objective) in order to clarify the objective to promote the suitable reuse of previously developed land, and to ensure the sufficient supply of land for housing.
- 10.15 With regards to the draft planning policies included in the Preferred Strategy 88 individual representations were received, of which 19 supported the policies, 12 objected and 57 provided additional comment.
- 10.16 No major infrastructure issues were raised by utility providers although some phasing of developments may be required to coincide with future Dwr Cymru Welsh Water investment. The Council has consulted with DCWW in as part of the Candidate Site assessments. It is understood that the delivery of sites would not be unduly restricted and any DCWW requirements have been referenced in site assessments. It is understood that projects can only be considered for inclusion in the AMPs once their allocation is confirmed in an adopted Plan and therefore limited details of the AMP7 (2020-2025) AMP8 (2025-2030) will be available.
- 10.17 Caerphilly County Borough Council were supportive of the Preferred Strategy but requested some clarifications e.g. regarding the links with the Economic Growth Strategy. As mentioned above, additional evidence, in the form of an Employment Land Review, has been prepared to inform the Plan.

INITIAL CONSULTATION REPORT

- 10.18 Rhondda Cynon Taf identified that the proposed future growth would increase demand for Welsh medium secondary education within RCT. In this respect, Community Infrastructure Levy contributions could be used to fund additional improvements where necessary.
- 10.19 Other comments referred to the content and requirements of the Deposit Plan or sought refinements to the LDP Objectives and Preferred Strategy policies e.g. including reference to the potential future Strategic Development Plan (SDP) and additional topics for Plan policies to cover such as leisure and tourism.
- 10.20 A summary all representations at the Pre-deposit Consultation stage and the Council's responses are provided at Appendix 40.

## 11 Initial Sustainability Appraisal (ISA)

- 11.1 An Initial Sustainability Appraisal (ISA) Report was prepared as part of the pre-deposit documents for the emerging replacement LDP up-dating and building upon the Baseline Scoping Report. It will be further developed to inform the Deposit Plan and on adoption the Council will publish a statement explaining how the SA has influenced the LDP<sup>6</sup>.
- 11.2 The main purpose of the ISA is to identify the likely significant economic, environmental, social and cultural effects (LSEs) of the replacement LDP and to address the requirements of the SEA directive<sup>7</sup>. It is a strategic assessment to inform decision making and can identify potential mitigation measures.
- 11.3 The Vision, Objectives and Key Policies included within the PS are intended to provide some measures to mitigate potential negative effects and maximise positive effects. The ISA assesses the vision, objectives, strategic options, and key policies included within the PS, and states how the SA has influenced the PS. By including suitable Sustainability Objectives, the integrated assessment also enabled a Health Impact Assessment (HIA)<sup>8</sup>, Equalities Impact Assessment (EqIA)<sup>9</sup> and a Welsh Language Impact Assessment<sup>10</sup>. It considers

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<sup>6</sup> Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, Regulation 12 (2) & (3)

<sup>7</sup> EU SEA Directive 2001/42/EC

<sup>8</sup> HIA is not a statutory requirement for Councils; however health considerations are a requirement of the SEA process and thereby the overall SA process.

<sup>9</sup> Public bodies have a duty under the Equality Act 2010 Statutory Duties (Wales) Regulations 2011. Regulation 5 & 6 to assess the impact of their policies on different population groups to ensure discrimination does not take place.

INITIAL CONSULTATION REPORT

ways to mitigate any likely significant negative impacts and proposes monitoring indicators for sustainability trends.

- 11.4 Although the SEA Directive requires consultation with Environmental Consultation Bodies it does not require full consultation with the public or other bodies until the Environmental Report (in this case, the SA) on the Deposit Plan is finalised. However, the Directive does require early and effective consultation with the public in order to better inform plan and decision making. Therefore MTCBC sought wide consultation on the ISA and also prepared a Non-Technical Summary as part of the wider PS consultation exercise. A summary of responses to the ISA are attached at Appendix 28.
- 11.5 In total, 35 representations were recorded with 7 supporting the assessment, 22 objecting and 6 providing comment. The majority of objections related to the initial Sustainability Appraisal of candidate sites and the approach used to assess sites against the sustainability objectives or the specific scores assigned to individual SA objectives. Other comments requested clarification regarding the assessment although no fundamental concerns were raised regarding the appraisal of the Strategy options.
- 11.6 Some minor amendments have been made to the application of the assessment when assessing specific objectives (e.g. the use of specific distance thresholds in assessments). The Sustainability Appraisal requires value based judgments and is a strategic assessment with an inherent level of uncertainty. Where there are uncertainties these have been acknowledged and where evidence is available this has also been referred to.
- 11.7 The Deposit Plan Sustainability Appraisal Report contains site level SAs of strategy compliant sites recommended for allocation (i.e. sites proceeding stage 2). Consequently, site level SAs for candidate sites not recommended for allocation have not been reviewed. Further details of the site assessments are included in the Site Assessment background paper.

## 12 Habitats Regulations Assessment (HRA) Screening Report

- 12.1 A Habitats Regulations Assessment (HRA) is required by Habitats Directive (92/43/ECC) as set out in the Conservation of Habitats and Species Regulations 2010. HRA is also commonly referred to as Appropriate

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<sup>10</sup> TAN 20 states that the SA should assess evidence of the impacts of the spatial strategy, policies and allocations on the Welsh language and the Planning (Wales) Act 2015 contains provisions for the consideration of the Welsh language in the appraisal of development plans.

INITIAL CONSULTATION REPORT

Assessment (AA), although requirement for AA is first determined by an initial 'screening' stage undertaken as part of the full HRA.

- 12.2 Consequently, a HRA Screening Report was prepared to consider the potential for the PS to adversely affect the integrity of Natura 2000, also known as European, sites. These sites comprise:

- ★ Special Areas of Conservation (SAC) and Candidate SACs (cSACs)<sup>11</sup> ;
- ★ Special Protection Areas (SPA) and potential SPAs (pSPAs)<sup>12</sup> and
- ★ Ramsar sites<sup>13</sup>.

- 12.3 Given that there is no Natura 2000 site within the County Borough the HRA Screening Report focuses on the likelihood of significant impact on the ten European Sites situated within 15km of the County Borough area.

- 12.4 A NRW Data request form was completed and forwarded to NRW requesting information to be included in the HRA Report and is attached at Appendix 29.

- 12.5 In line with Appendix 3 of the DA, neighbouring local authorities, Storey Arms and NRW were consulted during preparation of the HRA Screening Report. Correspondence is attached at Appendices 30.

- 12.6 As statutory consultee NRW were also consulted on the draft HRA Screening Report. Their response is attached at Appendix 31.

- 12.7 MTCBC carried out public consultation on the HRA Screening, as part of the wider PS consultation exercise. NRW's representation supported the screening report and agreed that at the PS stage there was unlikely to be an impact on European sites. Two further representations provided comment. No changes to the Preferred Strategy HRA were considered necessary. A summary of responses received are attached at Appendix 32.

### 13. Background and Other Papers

- 13.1 In addition to the above mentioned pre-deposit proposals documents comprising; The Preferred Strategy; Initial Sustainability Appraisal Report & Non-Technical Summary and Habitats Regulations Assessment Screening Report, a number of other core documents, background papers and

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<sup>11</sup> As designated under the Habitats Directive 1992/ The Conservation of Habitats and Species Regulations 2010 Regulation 61.

<sup>12</sup> As classified under the EC Wild Birds Directive 1979 as amended in 2009.

<sup>13</sup> As designated under the Convention on Wetlands of International Importance, Ramsar, Iran 1971, Ramsar Convention Secretariat.

INITIAL CONSULTATION REPORT

documents for information only were included in the Pre-Deposit Consultation as follows:

- ★ Public Notice (see Appendix 33);
- ★ Consultation Response Form (see Appendix 34);
- ★ Candidate Sites Register 2017 (refer to paragraph 6 above);
- ★ Easy Read Preferred Strategy 2017;
- ★ Population & Housing Requirements Background Paper 2017;
- ★ Review of Green Wedges Background Paper 2017;
- ★ Review of Sites of Importance for Nature Conservation(SINC) Background Paper 2017;
- ★ Special Landscape Areas (SLA) Background Paper 2017;
- ★ Merthyr Tydfil Retail and Commercial Leisure Study 2017;
- ★ Merthyr Tydfil Local Housing Market Assessment (LHMA) 2014-19;
- ★ Merthyr Tydfil Gypsy Traveller Accommodation Assessment (GTAA) 2016;
- ★ Cwm Taf: Understanding Our Communities – Wellbeing Assessment Consultation: Brief Analysis Report (refer to paragraph 7 above);
- ★ Regional Technical Statement for the North and South Wales Regional Aggregates Working Party – 1<sup>st</sup> Review 2014 and
- ★ South Wales Regional Aggregates Working Party Annual Report for 2014.

Information only documents:

- ★ LDP Review Report (refer to paragraph 3 above);
- ★ Open Space Strategy and Open Space Strategy Action Plan (consultation period March - April 2016).

## 14. Details and Methods of Involvement

- 14.1 These were set out in *Appendix 3* of the CIS of the DA, which includes intended Stakeholder groups listed in *Appendix 2- External Consultees*, comprising Specific Consultation Bodies, Environmental Consultation Bodies, General Consultation Bodies and Other Consultees. These groups were directly targeted with Letters and or emails in both Welsh and English as appropriate. Examples of these are attached at *Appendix 35*.
- 14.2 During the consultation period hard copies of the above documents were made available at the following locations:

- ➡ Council Offices, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN;

INITIAL CONSULTATION REPORT

- Council Offices, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ;
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF;
- Merthyr 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 and
- Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE.

14.3 Electronic copies were also made available on-line at:

- [www.merthyr.gov.uk](http://www.merthyr.gov.uk) and
- [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

14.4 These were also made available, together with large plans of the County Borough and ward level plans showing the submitted Candidate Sites, at Drop-in Public Exhibitions / Consultation events where members of the LDP team were in attendance to answer any queries. These were held at:

- Tuesday 18th July 2017 - Dowlais Library - 1 – 6pm
- Wednesday 19th July 2017 – Aberfan Community Library - 1 – 6pm
- Saturday 22nd July 2017 – Merthyr Food Festival (Penderyn Square) – 10-3pm
- Monday 24th July 2017 - Bedlinog Inn, 1 – 6pm
- Tuesday 25th July 2017 – Parc Taf Bargoed 12 - 4pm
- Wednesday 26th July 2017 – Cyfarthfa Park Bothy 1– 6pm

Photographs of the events are attached at Appendix 36.

14.5 As specified in the CIS the events were advertised on a Poster, printed in both Welsh and English, widely placed throughout the County Borough. A copy is attached at Appendix 37. The events were also publicised on the County Borough and Cwm Taf websites and Twitter feeds as illustrated in Appendix 38.

14.6 In addition a Stakeholder Event was held with the Merthyr Tydfil Borough Wide Youth Forum (MTBWYF), on 1st August 2017 in the Civic Centre. A copy of the meeting notes are attached at Appendix 39.

14.7 A summary of the responses received as a result of the PS Consultation, the main issues raised, the Council's responses and how they have influenced the preparation of the Deposit LDP is attached at Appendix 40.



## 15. Candidate Sites Consultation

- 15.1 The submission of 'Candidate Sites' to the Council was invited between 30<sup>th</sup> August 2016 and 2<sup>nd</sup> December 2016. Some 98 sites were submitted for consideration, either for development or protection, at that time. At the same time as the public consultation on the Preferred Strategy comments on the Candidate Sites Register (June 2017) were invited and this afforded an additional opportunity to submit new candidate sites. A further 5 sites were submitted for consideration and were included in the Candidates Sites Register (October 2017). The updated Register containing all 103 candidate sites received and site level Sustainability Appraisals underwent public consultation from 13<sup>th</sup> October 2017 to 24<sup>th</sup> November 2017. This afforded residents and other stakeholders an opportunity to provide additional information and to make comment on sites of interest to them.
- 15.2 The Consultation comprised targeted bilingual emails, and letters, notifications on the Council websites and Twitter and the Cwm Taf Hub Website. In line with the CIS, a stakeholder meeting was also held with Bedlinog Community Council, the only Community Council within the County Borough, to discuss Candidate Sites nominated within Bedlinog Ward. Examples of the letters and emails are attached at Appendix 41 and copies of the web and twitter notifications are attached at Appendix 42.
- 15.3 Ten individual responses were received in addition to responses received in relation to the PS Consultation. All candidate sites and other site allocations that have been considered by the Council as part of the drafting of the Deposit Plan are included in the Site Assessment background paper<sup>14</sup> which sets out the Council's site assessment process. It includes detailed site assessments for all strategy compliant sites. Up dated site level SAs were included for sites recommended for allocation.
- 15.4 Where relevant the additional information submitted in the candidate site consultation has been included as part of the site assessment process set out in the background paper. It is important to note that public objection to a particular site in itself is not a sufficient reason to rule sites out of the process. There needs to be sound planning reasons for the selection or rejection of a particular site. These could relate to location and accessibility issues, environmental and physical constraints, the ability to address the Plan's strategy and objectives, infrastructure requirements, development viability, and overall deliverability of the site.

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<sup>14</sup> Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 – 2031, Site Assessment Background Paper, May 2018.

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

## INITIAL CONSULTATION REPORT

### APPENDIX 1: PLAN MAKING - PLANNING INSPECTORATE 13 JANUARY 2016

#### Slide 1

 The Planning Inspectorate  
Yr Arolygiaeth Gynllunio

**Plan Making**

Tony Thickett and Paul Selby  
Planning Inspectorate  
13 January 2016: Merthyr Tydfil CBC

#### Slide 2

**Outline**

**LDP Review**

- Process
- What to consider
- Full revision or short form?

**Plan making**

- Process
- Evidence

#### Slide 3

**LDP Review**

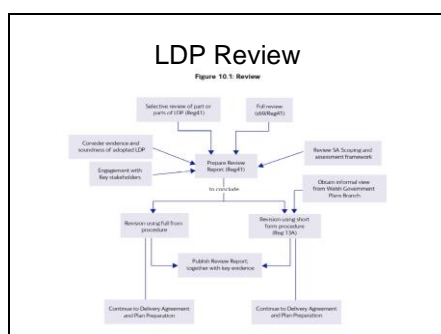
Local Development Plan – adopted May 2011

An LPA must commence a full review of its LDP every four years from the date of its initial adoption (Reg 41)

LDP Manual Chapter 10:

- Triggers
- Review Report (mandatory)
- Revision required? If so, two options:
  - Short Form process or
  - Full revision process

#### Slide 4



#### Slide 5

**LDP Review**

**Triggers:**

- Significant contextual change, e.g.:
  - in national policy or legislation
  - in local context (e.g. closure of a significant employment site that undermines the local economy)
  - in development pressures or needs and investment strategies of major public and private investors.
- Significant concerns from the findings of the AMR in terms of policy effectiveness, progress rates, and any problems with implementation.

#### Slide 6

**LDP Review**

**Triggers:**

- Has national policy changed to the extent that the LDP is no longer in accord with PPW?
- Is the LDP delivering the growth in housing, employment and other development the area needs?
- Do we have a 5 year land supply?
- Is growth happening where we need it to?
- Is the LDP Strategy working?
- Are specific policies working effectively / as anticipated?
- Is the plan delivering SA/SEA objectives satisfactorily?
- Is the LDP still sound?

#### Slide 7

**LDP Review**

The **Review Report** should clearly set out:

- What has been considered in the review
- Which key stakeholders have been engaged
- Where changes are required – what needs to change and why, **based on evidence**; including:
  - Issues and objectives,
  - Strategy,
  - Policies,
  - The SA, and
  - The implications of anticipated revisions on any parts of the plan that are not proposed to be revised.
- It must make a conclusion on the revision procedure to be followed, i.e. full or short form.

#### Slide 8

**Full or Short Form?**

**Full revision:** same process as for plan preparation.

**Short form revision process (Part 4A):**

- For circumstances where the issues involved are not of sufficient significance to justify undertaking the full revision procedure.
- The proposed revisions should not:
  - make the strategy unsound, and / or
  - make the strategy incoherent or unrecognisable, and / or
  - result in a plan distinctly different to the one adopted.

#### Slide 9

**Short Form**

- Process should take around 12 months, 15 to 18 months if a call for candidate sites is required
- **Be very sure that short form is the right choice**
- No need for full pre deposit consultation but LPAs 'must notify those specific consultation bodies which the LPA considers may have an interest in the proposed revisions, and any general consultation body that the LPA considers appropriate, and invite each to make representations'.
- At deposit stage representations should only relate to the proposed changes.

# MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

### INITIAL CONSULTATION REPORT

Slide 10

#### Short Form

##### Examination

- Revisions considered within the context of the adopted LDP.
- Inspector will disregard representations which do not relate to the proposed revisions
- Inspector has to be satisfied that the whole plan would be sound if the proposed revisions are incorporated into the LDP
- It is the revised LDP in its entirety which is adopted
- Once adopted the revised LDP will supersede the existing plan

Slide 11

#### Long Form

- If the strategy needs to be amended (and long form is process required) – **no need to start from scratch / reinvent the wheel**
- Parts of the plan that remain 'sound' may be retained in their existing form (subject to evidence)
- Examination will focus on the **revisions** (but may be extended to other parts of the plan if there is good reason to)
- Long Form requires one extra stage (i.e. Preferred Strategy consultation): some additional time and cost – but less risk
- As with Short Form – the LDP in its entirety is adopted

Slide 12

#### Plan Making

##### PPW

- LDPs should be clear and concise, setting out a vision based strategy for the plan area that has regard to the Wales Spatial Plan.
- It is for each LPA to determine the content of the LDP for its area, in accordance with the legislation and having regard to national policy and to local circumstances.
- LPAs must ensure that they have sufficient information on which to base sound LDP strategies and policies and development management decisions.

Slide 13

#### Plan Making

- Up-to-date evidence essential, including for plan revisions, e.g.:
  - Housing need and supply
  - Affordable Housing
  - Gypsy and Travellers
  - Employment
  - Retail
  - Viability
  - Deliverability
  - SA/SEA
- PINS' 2015 Examination Procedural Guidance – Appendix provides more guidance

Slide 14

#### Plan Making

- Any deviation from what the evidence shows will need to be explained and,
- Difficult decisions will need to be made

Slide 15

#### Plan Making

##### Examination

- Procedural requirements
- Soundness tests:
  - Does the plan fit?
  - Is the plan appropriate?
  - Will the plan deliver?
- See PINS' LDP Examination Procedural Guidance (2015)

Slide 16

#### Plan Making

- The LDP **must be owned** by the Council as a whole, not just the planners.
- It should be informed by and inform the decisions of other delivery departments and agencies – internally & externally.
- The LDP **must have a reasonable prospect of being delivered** ('aspirational but realistic')

Slide 17

#### Thank You

– Questions?

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

**INITIAL CONSULTATION REPORT**

**APPENDIX 2: SUMMARY OF CONSULTATION REPRESENTATIONS TO TARGETED CONSULTATION ON DRAFT DELIVERY AGREEMENT**

No.	Rep No.	Organisation Name/ Individual Surname	Document ref.	Date	Summary of Representation Comments	Rep Type	Council's Response
1	101	WG	Draft DA	08/06/16	No fundamental issues to report. Support a shorter timeframe of under 4-years and note the preparation period of 3 years and 3 months which includes an appropriate slippage period of up to 3 months.	Email	Noted.
2	102	PINS	Draft DA	08/06/16	The Inspectorate would only normally comment on the timetable. Offered an Advisory Visit from the Planning Inspectorate in relation to your LDP revision regarding Review / revision procedures.	Email	Meeting arranged for 16/06/16.
3	103	NRW	Draft DA	10/06/16	No comments on the Draft Delivery Agreement.	Email	Noted.
4	102	PINS	Draft DA	16/06/16	Guidance on exact cost per day of Inspector examination to be confirmed by PINS.	Meeting	MTCBC to keep PINS updated on timetabling of LDP examination. Notes of meeting attached as Appendix 3.
5	104	Cadw	Draft DA	21/06/16	Noted a number of contextual changes to the historic environment related policies since the adoption of the current LDP and that these will need to be reviewed as part of the revision process of the LDP. There will also be a need to consider the information contained in the revised Chapter 6 of Planning Policy Wales due to be issued in Autumn 2016 in this process.	Email	Noted.
6	102	PINS	Examiners Costs	22/06/17	The relevant Fee is set out in The Local Inquiries, Qualifying Inquiries and Qualifying Procedures (Standard Daily Amount) (Wales) Regulations 2011.	Email	Noted.
7	102	PINS	Advisory Visit	01/07/16	With regard to emergence of National Development Management Policy in PPW the existing LDP Policies will be reviewed against them and the replacement LDP would refer to them.	Email	Noted

### APPENDIX 3: NOTES OF PINS ADVISORY MEETING

#### Merthyr Tydfil CBC and the Planning Inspectorate Replacement LDP Advisory Meeting 16/06/16 10:00

##### Attendees:

Tony Thickett – Director for Wales (PINs)  
Chris Sweet - Planning Officer (PINs)  
Kym Scott - Planning Officer (PINs)  
Rob Sparey - Planning Officer/Planning and Environment Manager (PINs)  
Judith Jones – Head of Planning and Countryside (Merthyr Tydfil CBC)  
Justin Waite – Group leader Policy & Implementation (Merthyr Tydfil CBC)  
Chris O'Brien – Planning Policy Officer (Merthyr Tydfil CBC)  
Craig Watkins – Planning Policy Officer (Merthyr Tydfil CBC)  
David James – Development Control Officer (Merthyr Tydfil CBC)

#### 1. BACKGROUND/INTRODUCTION

- **Discussion – Review Report** replacement plan, previous strategy not delivered particularly housing.
- Dwellings target not achieved at any stage, not achieved 5yr land supply.
- Particularly challenging to deliver B1 employment space.
- Contextual changes: population figure change, revised estimates regarding 2013 stabilisation of population.
- Well Being Act objectives: consider objectives and visions of LDP to align with this, zero carbon energy not delivered.
- LDP policies not being changed for the sake of changing, if effective policy will remain, change where necessary.
- **Discussion – Delivery Agreement**, timetabling, commitment to meeting examination, revision/examination in shorter time frame.
- Submission 2019, possible adoption Dec 2019.
- **Action** – Merthyr CBC to keep PINs updated on timetabling of LDP examination.
- **Discussion – Evidence Base** local circumstances, LDP should be signposted for evidence.
- Evidence needs to be good sound viability evidence to be probed by Inspector, deliverability is a key problem as developers change stance on sites etc. Strategic sites = specific viability evidence. Other allocations = generalised area-based viability evidence.
- Larger sites more closely looked at regarding viability and deliverability. Assumptions made in viability evidence regarding land values (realistic), etc must be robust. Industry will question evidence harshly.
- Renewable Energy sites: identifying potential search areas should be upfront about identification, grid capacity can change, community engagement regarding potential sites. Clear from LDP where these sites are located, if no accurate target there is nothing to examine. WG appear to push for this proactive stance from LPAs regarding renewable sites (have advised other LPAs on this matter).
- LDP should bring some certainty to communities, level of assurance about potential location of renewable energy.
- Evidence base on employment allocations scrutinised more closely, targets likely to be looked at, questions raised regarding allocation of sites. Over-provision to be justified, maybe in line with adjoining LPAs. Certain flexibility, over allocation for anticipation of investment etc. Background evidence to justify allocations.
- Mindful of balance and variety of employment.
- **Discussion – Spatial Shift** spatial distribution and allocation limited, Merthyr geographically constrained, opportunity to re-focus development limited, no major spatial shift justify in evidence.
- Possible development opportunities with Metro project, employment growth etc. Though this needs to be realistic.
- Greater emphasis on deliverability, site allocation.

INITIAL CONSULTATION REPORT

## 2. EXAMINATION LENGTH AND RESOURCES

- **Discussion – Target Length**, submission 2019 and adoption December 2019.
- No significant changes to hearing procedures.
- **Discussion – Programme Officer**, must be appropriate degree of separation, potential for training at PINs Bristol.
- **Discussion – Welsh Language** may have an impact on timetabling, runs by LPA standards, publication should be translated.
- **Discussion – Reserve Sites** worth having back up list if work already carried out on evidence base. Don't allocate sites if not viable from evidence.

## 3. SUBMISSION DOCUMENTS

- **Discussion – Evidence Base Documents**, not too long, think about relevance etc. concentrate on exactly what is needed.
- **Discussion – Hard Copies**, electronic/hard copies some flexibility.

## 4. POST-DEPOSIT CHANGES TO THE LDP

- No discussion points raised.

## 5. SUSTAINABILITY APPRAISAL AND OTHER EVIDENCE

- **Discussion – TAN 20** regard to Welsh language, background paper to assess this, implications on local area, Welsh schools rising as an issue.
- Approach depends on percentage of Welsh speakers.
- If significant numbers, allocation of housing could dilute Welsh language population, etc. Look at trends/projections.

## 6. EXAMINATION DOCUMENTS

- No discussion points raised.

## 7. DELIVERABILITY AND FLEXIBILITY

- **Discussion – Housing Trajectory**, not legally required, but is needed. Need to demonstrate 5yr housing supply.
- **Discussion – Monitoring Framework**, indicators should clearly demonstrate the effect of the policy they relate to. The information required for monitoring should be readily available.
- **Discussion – CIL**, joint examination alongside LDP occurred in England, not in Wales, benefits and dis-benefits of doing both at same time. Can be done in Wales.

## 8. AOB

- **Discussion – Role of Guidance**, legislation referring to Welsh Assembly/Government means taken as having the same meaning.
- **Discussion – Scrutiny of LDP**, soundest tests for examination, in line with national policy, locally specific need evidence and justification, some flexibility of approach, but must be evidenced.
- **Housing**: evidence to show land value, developer to make it viable, can be generic nominal development, different levels of scrutiny.
- Innovative community housing models examples.
- **Discussion – Wellbeing of Future Generations Act & Environment (Wales) Act** Sustainability principles to be followed, understanding new act(s) and impact on LDP.
- **Discussion – Relationship with SDP & NDF** implementation in line with LDP, monitor development of NDF in 2018 alongside LDP.
- **Discussion – Emergence of National Development Management Policy in PPW**; existing LDP Policies will be reviewed against them. Where relying on National Development Management Policies, the replacement LDP would refer to them
- **Discussion – Gypsy Traveller Site Allocations** duty under housing act, transition sites, cross-boundary issues to be addressed. Need for static sites, mindful of new duties and responsibilities.
- **Discussion – Finance** costs of Inspector examination has increased, planning officer time to scope plan cuts down expected time.
- **Action** – guidance on exact cost per day of Inspector examination to be confirmed.

**INITIAL CONSULTATION REPORT**

**APPENDIX 4: DA - SELF-ASSESSMENT OF HOW CIS MEETS ANNEX A CRITERIA SET**

<b>Annex A - LDP Manual 2015 (Edition 2)</b>	<b>Meets Criteria</b>	<b>MTCBC REPLACEMENT LDP DA Community Involvement Scheme (CIS)</b>
Is the CIS concise and easy for the public, voluntary organisations and businesses to relate to and understand how they will be involved in the process?	Yes:	The CIS is explained by section 3 of the delivery agreement (DA). Appendix 3 of the DA details how stakeholders will be involved in the process.
Does it set out clearly the authority's approach and standards for involvement and how these link to other relevant local consultation approaches?	Yes:	The approach and standards are shaped by the Joint Cwm Taf Public Engagement Strategy.
Does this approach meet the key principles at 4.1.4 of the Manual?	Yes:	Early involvement will take place within the first six months of the timetable. Section 3 of the DA explains the CIS encourages open and honest debate on realistic development alternatives in the search for a consensus. Section 3.10 of the DA commits to seeking the involvement of groups that are traditionally difficult to involve in the plan preparation process
Are the statutory consultation periods and consultee organisations included?	Yes:	Appendix 3 identifies the statutory consultation periods and consultee organisations included.
Are you engaging with stakeholders responsible for the delivery of the strategy?	Yes:	Appendix 2 identifies stakeholders that will be engaged in the process.
Have you summarised the involvement of those affected in drawing up the CIS?	Yes:	Appendix 3 summarises the involvement of those affected in preparing the CIS.
Does the CIS include relevant stakeholder groups, given the nature of the authority's area?	Yes:	Appendix 2 identifies stakeholders that will be engaged in the process. Many of these are specific to Merthyr Tydfil.
Is it clear about the type of involvement proposed for each relevant stage and task, and do these techniques/processes appear appropriate to the task/stage?	Yes:	Appendix 3 clarifies the type of involvement proposed for each relevant stage and task which are considered appropriate at each stage.
Does the authority demonstrate the ability to resource and manage the processes?	Yes:	Sections 2.3 - 2.5 of the DA identifies the resources available to deliver the CIS.
Are there clear roles for Members, Executive and officers?	Yes	Section 3.4 of the DA explains the roles for Members, the Council Executive and officers.
Is there a means of establishing a representative cross-section of views?	Yes	Section 3.3 of the DA explains the 'Citizens' Panel' can be used as a control group to consider whether consultation responses received are reflective of the views of the wider population.
Is it clear what is expected from participants at each stage?	Yes:	Section 3.13 of the DA identifies what is expected from participants at each stage.
Does it show how the output from community involvement in each stage/task will be communicated to participants and interested parties (feedback mechanisms)?	Yes:	Section 3.15 of the DA explains the feedback mechanisms.
Is it clear how the output will be transparently recorded as influencing the plan and SA?	Yes:	Sections 3.14 of the DA explains that details of all involvement and consultation activities will be included in a Consultation Report that will be updated as the replacement LDP progresses through the key stages of plan preparation.
Does it indicate how the authority will monitor (and change) the CIS?	Yes:	Section 2.11 & 2.12 of the DA explains how the authority will monitor (and change) the CIS?



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

## INITIAL CONSULTATION REPORT

### APPENDIX 5: WG AGREEMENT FOR MTCBC FOR THE DA 1ST REPLACEMENT PLAN





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

**INITIAL CONSULTATION REPORT**

**APPENDIX 6: EXPRESSION OF INTEREST CONSULTATION FORMS**

MERTHYR TYDFIL DEVELOPMENT PLAN EXPRESSION OF INTEREST					
Personal Details					Agent (if applicable)
Name of Organisation (if applicable)					
Title:					
First Name:					
Surname					
Address:					
Post Code:					
Email Address:					
Preferred Contact Number:					
Preferred correspondence language	Welsh <input type="checkbox"/>	English <input type="checkbox"/>	Bilingual <input type="checkbox"/>		
Please tick one box only					
If you are responding on behalf of an organisation, what is its primary aim?					
We prefer to correspond by e-mail. If you do not have an e-mail address, would you be happy to be contacted by letter?	YES <input type="checkbox"/>		NO <input type="checkbox"/>		
Please tick one box only					
Are there any particular land-use issues that you are concerned about?					
The following information is voluntary, and is asked only because it would help the Council to know how representative those involved in the preparation of the Plan are of residents generally. The information will be kept entirely confidential					
Gender: Please tick one box only	Male <input type="checkbox"/>		Female <input type="checkbox"/>		Prefer not to say <input type="checkbox"/>
Age group:  Please tick one box only	16-24 <input type="checkbox"/>	25-44 <input type="checkbox"/>	45-59 <input type="checkbox"/>	60+ <input type="checkbox"/>	Prefer not to say <input type="checkbox"/>
Ethnic group: (e.g. white, Chinese)					Prefer not to say <input type="checkbox"/>
Disability Do you have a long-term illness that limits the activities you can undertake?  Please tick one box only	YES <input type="checkbox"/>		NO <input type="checkbox"/>		Prefer not to say <input type="checkbox"/>
Employment status:  Please tick one box only	Working full-time <input type="checkbox"/>	Working part-time <input type="checkbox"/>	Looking after home/family <input type="checkbox"/>	Student <input type="checkbox"/>	
	Retired <input type="checkbox"/>	Permanently ill <input type="checkbox"/>	Unemployed <input type="checkbox"/>	Prefer not to say <input type="checkbox"/>	

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

## INITIAL CONSULTATION REPORT

### APPENDIX 7: MEDIA NOTIFICATIONS- EXPRESSION OF INTEREST CONSULTATION

#### Merthyr Tydfil County Borough Council - Contact Magazine

### Merthyr Tydfil's Local Development Plan

The Council has started to prepare a 'replacement Local Development Plan' (LDP). Once complete, the replacement LDP will set priorities for the development and use of land within the County Borough, excluding the area in the Brecon Beacons National Park, until 2031. If you wish to be included on the Council's LDP database and receive updates on the preparation of the plan and opportunities for involvement please contact the Planning & Countryside Department Tel: 01685 726213 and or Email: [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk)

#### Merthyr Tydfil County Borough Council - Twitter Account



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

**Merthyr Tydfil CBC**  
@MerthyrCBC  
Official Twitter site for Merthyr Tydfil CBC providing our latest news, events and updates. See also our website or call the contact centre on 01685 725000

TWEETS 5,022 FOLLOWING 375 FOLLOWERS 5,726 LIKES 344

Tweets Tweets & replies Media

**Merthyr Tydfil CBC** @MerthyrCBC · 43s  
We are set to prepare our Local Dvpt Plan & want you to be involved & kept updated. Interested? Find out more here...[bit.ly/2ao2im9](https://bit.ly/2ao2im9)

#### Cwm Taf Engagement Hub - MTCBC: 1st Replacement LDP – EOI- questionnaire

<b>Step 1:1.00-1:</b> Title	<b>Step 1:2.00-1:</b> - First name
<b>Step 1:3.00-1:</b> - Surname	<b>Step 1:4.00-1:</b> - Address
<b>Step 1:5.00-1:</b> - Post code	<b>Step 1:6.00-1:</b> - Preferred contact number
<b>Step 1:7.00-1:</b> - E-mail address	
<b>Step 1:8.00-1:</b> - We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Please let us know your language choice (English/Welsh/Bilingual).	
<b>Step 2:9.00-1:</b> - If you are responding on behalf of an organisation, what is its primary aim?	
<b>Step 2:10.00-1:</b> - We prefer to correspond by e-mail. If you do not have an e-mail address, would you be happy to be contacted by letter?	
<b>Step 2:11.00-1:</b> - Are there any particular land-use issues that you are concerned about?	
<b>Step 3:12.00-1:</b> - Gender (Male/Female)	<b>Step 3:13.00-1:</b> - Age group (16-24/25-44/45-59/60+)
<b>Step 3:14.00-1:</b> - Ethnic group (e.g. White, Chinese)	
<b>Step 3:15.00-1:</b> - Employment status (Working full-time/ Working part-time/ Looking after home and or family/ Student/ Retired/ Permanently ill/ Unemployed)	
<b>Step 3:16.00-1:</b> - Disability - Do you have a long-term illness that limits the activities you can undertake?	

## APPENDIX 8: CALL FOR CANDIDATE SITES - LETTERS/EMAILS & MEDIA NOTIFICATIONS

Dear Sir/Madam

### RE: MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031: CALL FOR CANDIDATE SITES

Merthyr Tydfil County Borough Council is preparing a replacement Local Development Plan (LDP) for the County. It will contain planning policies and allocations to guide development in Merthyr Tydfil up to 2031.

As part of evidence gathering to inform the LDP, the Council is requesting nominations for sites proposed to be included in the LDP. These will be referred to as 'Candidate Sites' and will be considered by the Council before issuing the full draft LDP for consultation (also known as 'deposit') in 2018.

Sites nominated should be in a sustainable location for their intended purpose. For example sites nominated for housing should be located so that they can be well serviced by existing infrastructure and services. Sites nominated for housing should also be of sufficient size to accommodate at least 10 homes. In accepting submissions the Council makes no guarantee that the Candidate Site will be included ("allocated") in the deposit LDP.

Information received in respect of candidate sites, apart from contact details, will be placed on a Candidate Site Register, which will be made available for public inspection on the Council's website, and at the Planning and Countryside Department.

Site nominations must include the following information (further information may be required at a later stage):

- Name and contact details (including e-mail address where possible) of proponent.
- An up to date plan of the site (preferably on an Ordnance Survey base at scale of 1:1250 or 1:2500) with the site edged with a red line, and a blue line drawn around any immediately adjoining land in the same ownership.
- The current use of the site and an indication of the suggested future land use of the site.
- The amount of infrastructure and or any mitigation you anticipate providing to facilitate the development.
- An indication of expected land values, marketability and prospects the nomination will be delivered by 2031.
- Any further information you feel will assist in the future assessment of the site.

Sites nominations **must be submitted by 4.30pm on Friday 2<sup>nd</sup> December 2016** to: Head of Planning and Countryside, Merthyr Tydfil County Borough Council, Unit 5, Pentrebach, Merthyr Tydfil, CF48 4TQ or [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) (NB - 10MB limit per email).

Yours faithfully

MISS J JONES

PENNAETH CYNLLUNIO A CHEFN GWLAD/HEAD OF PLANNING AND COUNTRYSIDE

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

## INITIAL CONSULTATION REPORT

### Merthyr Tydfil County Borough Council - Contact Magazine –Issue 44

#### Candidate sites

The Council are also looking for nominations for sites proposed to be included in the LDP.

If you would like to submit a site for development, or to be protected in the LDP, please contact the Planning Policy team via [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) for further information.

Sites nominations must be submitted by 4.30pm on Friday 2nd December 2016.

In accepting submissions the Council makes no guarantee that the Candidate Site will be included ("allocated") in the deposit LDP.

### Council Website

#### Planning Consultations

##### CALL FOR CANDIDATE SITES - REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016 – 2031.

The Council has begun the process of preparing a 'replacement Local Development Plan' (LDP) with an approved Delivery Agreement indicating completion of a new Plan in late 2019.

One of the first pieces of work that informs the LDP is the Council requesting nominations for sites proposed to be included in the LDP. These will be referred to as 'Candidate Sites' and will be considered by the Council before issuing the full draft LDP for consultation (also known as 'deposit') in 2018.

If you would like to submit a site for development, or to be protected in the LDP, please contact the Planning Policy team via [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) for further information. Sites nominations must be submitted by 4.30pm on Friday 2nd December 2016.

In accepting submissions the Council makes no guarantee that the Candidate Site will be included ("allocated") in the deposit LDP.

#### Contact Us

- Email
- Fax
- Telephone
- Address

#### Were you looking for?

- Interactive open spaces map.
- Open Space Strategy

### Council Twitter page

**CONTACT** all your council information at [www.merthyr.gov.uk](http://www.merthyr.gov.uk)1st November 2016Page 5



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

**Merthyr Tydfil CBC**  
@MerthyrCBC

Official Twitter site for Merthyr Tydfil CBC providing our latest news, events and updates. See also our website or call the contact centre on 01685 725000

TWEETS	FOLLOWING	FOLLOWERS	LIKES
5,282	396	5,844	402

Tweets

Tweets & replies

Media



**Merthyr Tydfil CBC** @MerthyrCBC · 31s  
Rydym yn paratoi cynllun datblygu lleol newydd. Ydych chi am gyflwyno safle ar gyfer datblygu? [bit.ly/2bOAWa1](http://bit.ly/2bOAWa1)



**Merthyr Tydfil CBC** @MerthyrCBC · 42m  
We are preparing a new Local Dvpt Plan. Do you want to submit a site for dvpt or to be protected in the LDP? [bit.ly/2bOAngv](http://bit.ly/2bOAngv)

## APPENDIX 9: CWM TAF UNDERSTANDING OUR COMMUNITIES – NOTES ENVIRONMENTAL WELLBEING ASSESSMENT WORKSHOP 4<sup>TH</sup> NOVEMBER 2016

### ENVIRONMENTAL WELL-BEING

This section provides an overview of key issues that emerged at the Environmental well-being workshop. These are split into four categories: **strategic issues** that may need emphasis in the assessment, response analysis and well-being plan; potential **practical responses** that could be pursued via the well-being plan; specific issues which need addressing in the **well-being briefing paper; and further opportunities and challenges** that could be addressed in the response analysis and plan.

It is recommended that the Assessment authors consider the following with regard to the well-being assessment and plan:

- is this something that we need to know more about right now?
- is this something we need to know in developing our response analysis?
- is this something that needs to be included as an item in the Well-being Plan itself to increase our knowledge?

ENVIRONMENT: strategic issues that need greater emphasis in the assessment, response and plan.	ENVIRONMENT: potential practical responses by the PSB and partners
<p><i>Care will need to be taken that the following strategic issues are emphasised and not lost throughout plan preparation:</i></p> <ul style="list-style-type: none"> <li>• Huge public land ownership is a major asset and opportunity for collective action from the public sector.</li> <li>• Use of land and built environment as a catalyst for</li> <li>• improving physical and mental well-being through: <ul style="list-style-type: none"> <li>• Skills development</li> <li>• Combating isolation</li> <li>• Social bonding in community</li> <li>• Community capacity to develop and lead</li> </ul> </li> <li>• Culture arts and language to describe relationship to environment</li> <li>• Climate change resilience as a key determinant of well-being, access to services, inward investment, public sector finance, community resilience – cuts across WBA – not just in environment.</li> <li>• Opportunities for environmental projects for up-skilling communities and individuals and funding – encouraging local stewardship.</li> <li>• Alternative and meantime land use of sites in public ownership –e.g. wildlife, renewables, food, leisure, culture, conservation skills.</li> <li>• Role of volunteers and community groups to develop skills and invest in environmental capital.</li> <li>• Stronger links with Brecon Beacons National Park via landscape, economy, tourism, health work.</li> <li>• Role of environment in attracting/deterring</li> </ul>	<p><i>Attendees saw the following as opportunities for the PSB to action through the partnership itself and individual organisations:</i></p> <ul style="list-style-type: none"> <li>• Increase access to information of what is around – e.g. use of apps Geocache, PROW, Forest Schools</li> <li>• Active travel activity should link to community facilities, employment, and leisure and wildlife interest – correlate and map this.</li> <li>• Increase accessibility to publically owned land. Statutory landowners to support communities to engage in local environment. Involve communities, sustainable land management, and information from PSB – sharing info and co-ordinate approach.</li> <li>• New dialogue with communities – promotion – the countryside is theirs to use – and a community asset and should be a source of community pride - challenge pervasive culture “there is nothing for kids to do” – curriculum changes.</li> <li>• Need to build leadership and skills among decision makers to recognise and understand the links and between environmental and other aspects of wellbeing and create and support connections</li> </ul>

INITIAL CONSULTATION REPORT

inward investment – attractiveness as a place to live and work – Cwm Taf's environmental 'offer'.	
<b>ENVIRONMENT: specific issues for the Assessment 'Briefing' paper.</b>	<b>ENVIRONMENT: opportunities and challenges to inform response.</b>
<p><i>Attendees felt that the following issues needed further data/information/acknowledgement in addition to the above:</i></p> <ul style="list-style-type: none"> <li>• Needs more urban focus</li> <li>• Needs a greater focus on housing</li> <li>• Link should be made between environment, economy and public transport, active travel</li> <li>• Role of leisure and recreation in the environment</li> <li>• Crime and perception of place (wildfires – dangers through apps)</li> <li>• Role of private sector as environmental stewards, and their impact on environmental quality.</li> </ul>	<p><i>Attendees identified the following issues which may need to be explored more fully in the response analysis:</i></p> <ul style="list-style-type: none"> <li>• Each community's and individual's relationship with and view of the environment will be different and diverse in different areas of Cwm Taf.</li> <li>• This will be dependent on the landscape, environmental assets, and social economic conditions. Interventions should recognise this diversity.</li> <li>• Cultural change (digitisation) has resulted in reduced outdoor use.</li> <li>• Entry level activity for people's engagement with the outdoors.</li> <li>• Children and wild play – co-ordinated approach parents, children, schools, youth groups. Early year's intervention to connect with the outdoors.</li> <li>• Perception of environment: safety barrier.</li> <li>• Green tech focus –need to develop skills on this</li> </ul>

## APPENDIX 10: REPLACEMENT LDP 2016-2031-WORKING GROUPS TERMS OF REFERENCE

### Purpose of the LDP Steering Group

The purpose of the Group is to agree a strategy for the Merthyr Tydfil Local Development Plan (LDP) 2016-2031.

### Principal Aim of the Group

To consider options for, and agree a sound and sustainable land use plan which:

- Reflects the aspirations of the local community and other stakeholders;
- Provides a basis for rational and consistent development management decisions;
- Guides growth and change whilst protecting local diversity, character and sensitive environments;
- Represents land use elements of the Local Wellbeing objectives.

### Membership Mandate

The following are essential to ensure the success of the Steering Group:

- An understanding of, and a commitment to, the LDP process. Training will be provided at the first meeting;
- A commitment to achieving consensus and working together in a spirit of trust and cooperation;
- A commitment to pragmatism and understanding what can be achieved within the context of relevant legislation and guidance;
- A commitment to raising only legitimate spatial issues;
- A commitment to LDP timetable/meeting deadlines.

### Composition of LDP Working Groups

In order to ensure that the LDP is representative of a wide range of organisations and stakeholders, each working group will be attended by relevant officers from within the Council, and appropriate stakeholders that have either expressed an interest to be involved in the LDP process, or stakeholders that the Council believe will be able to make a positive contribution to the Plan making process.

### Substitutes

It is accepted that some members may not be able to make every meeting. However, it is important that representation from all relevant service areas are present at the meetings, therefore, a Substitute for the nominated member can attend any meeting, but the substitute must satisfy the following criteria:

- The substitute complies with the requirements of the Membership mandate;
- The substitute is fully aware of the outcomes of previous meetings and is in a position to actively participate.

### Meeting Chair

The Working Group meetings will generally take the form of a facilitated discussion. Whilst it would not normally be the case that such meetings would require a Chair, the meetings will need to have a mechanism for resolving issues that cannot be agreed by mutual compromise (should such occasion arise). Therefore, the Group Leader - Planning Policy and Implementation will chair the meetings.

### Relationship to other LDP groups

Four LDP working groups have been set up on the basis of expressions of interest made through questionnaires circulated by the Planning Policy section. These working groups comprise a wide range of organisations and cover the following topics:

- Housing Viability and Delivery;
- Heritage, Countryside and Leisure;
- Economic Development and Tourism;
- Population and Community Facilities;
- There will also be direct meetings with other stakeholders, e.g. utilities companies.

The Working Groups assist in the generation of alternative strategies and options. This information will then be relayed to the LDP Steering Group for consideration.

### Meeting Frequency

It is envisaged that the Steering Group will meet as and when necessary during the preparation of the LDP up to Deposit stage.



## **APPENDIX 11: REPLACEMENT LDP 2016-2031 POPULATION AND COMMUNITY FACILITIES WORKING GROUP - MINUTES OF MEETING**

**Date:** Monday, 7 November 2016  
**Time:** 2.00 p.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Natasha Lade, MTCBC, Planning Policy (NL)  
Craig Flynn, MTCBC, Education (CF)  
Andrea Jones, MTCBC, Estates (AJ)  
Ewan McWilliams, MTCBC, Performance and Scrutiny (EM)  
Alison Harris, Voluntary Action Merthyr Tydfil (AH)  
Ken Long, Communities First South Cluster (KL)

### **1. Introduction and Apologies**

Apologies were received from: Chris O'Brien, MTCBC, Policy  
Mark Anderton, MTCBC, Adult Services  
Suzanne Davies, MTCBC, Partnerships  
Samia Saeed-Edmonds, Cwm Taf University Health Board

### **2. Working Group Terms of Reference (TOR)**

CW presented the TOR (attached).

No issues were raised regarding the TOR.

### **3. Explanation of LDP Process**

CW explained the LDP process, the various stages involved and how it was aspirational but realistic. It was advised there is a 3½ year timetable, compared to the last one which was 4½ years, but took nearer to 6 years.

EM referred to the Wellbeing objectives which will be publicised in March 2017 and how these will fit with the LDP timetable.

EM asked whether a sustainability appraisal will need to be created. CW advised that we will use what we have, best practice and standard topics and will look at decision aided topics.

AH queried the Community Asset Transfer. CW advised if there are any gaps or facilities that have been missed they will be flagged up.

EM questioned from a heritage/conservation perspective why we have got to this stage and whether the LDP will have strength to protect buildings? CW advised protection is already in place, but it comes down to money/funding. If funding is not available the buildings will deteriorate, but was encouraged that Regeneration Department now have a better idea of what needs to be protected.

### **4. Population Scenarios**

CW presented graph projections and summary.

KL asked whether the empty housing stock would be taking into consideration. CW advised Inspectors will not allow the empty houses brought back into use to be counted as new housing. KL expressed that this was a shame as many of these properties had large land space around them.

KL also raised concern regarding the downsizing of Afon Taf High School. CW advised that sites such as Redrow Trelewis and Project Riverside were taken into consideration with regard to school rationalisation and with regard to Afon Taf; projections showed there was sufficient capacity, even with the new housing sites, over the next 15 years.

AH queried whether bungalows are being factored into future development, due to the aging population. CW advised that although there was no specific policy, this may be looked at as part of the 10%



**INITIAL CONSULTATION REPORT**

affordable housing, possibly half of them to be bungalows. Early talks have already taken place with the Housing Association and Housing Department.

EM referred to the HMA being incorrect. CW advised it is how it is calculated by Welsh Government, because numbers are so high, it has over the assessed amount required. E.G. Over 300 affordable homes against 200 assessed as necessary. CW noted that Cardiff seeks up to 30% affordable housing, against Merthyr Tydfil asking for between 5 – 10%).

**5. Issues arising from Baseline Review**

EW asked how we address the loss of working age people. Do we want to bring them back after they've been to University? What is the role of the LDP in achieving this? How do we encourage first time buyers?

CW suggested that politically, if the South Wales Valley becomes better connected to Cardiff, this will increase the number of people in Merthyr. Looking back at housebuilding, there has been two spikes of migration; it clearly shows where houses have been built over a two year period for the following two years there was positive migration, leading to an increase in population.

EM asked whether there is a plan for extra care schemes. CW advised Housing Association are looking into this and in terms of planning, less land will be needed for high rise buildings. CW referred to an example of an extra care scheme.

AH expressed concern regarding these types of sites due to lack of infrastructure surrounding them. CW advised that candidate sites selection criteria would need to be considered, such as bus stops, shops, GP surgeries.

AH raised the point that distance/time getting to Cardiff is no different from people travelling within Cardiff and this should be promoted as a positive for Merthyr Tydfil.

EM agreed with this and referred to the Taff Trail cycle route sometimes being quicker than travelling by car.

CW asked for suggestions for improvement.

EM suggested preservation of small business, can we make sure we improve how interconnected we are AJ referred to the Asset Group and different Authorities coming together to discuss businesses. CW referred to the retail study and how Brecon, Ebbw Vale and wider area were interacting and how we were capitalising on Merthyr Tydfil being the main town, and also the physical interaction within top half of Merthyr Tydfil and train links are already there.

AJ asked whether burial space has been looked at as they were struggling to find land. A small extension has been looked at for Pant cemetery. AH expressed this as a priority due to the ageing population.

EM questioned whether Adult Services are looking at projections. CW advised that 1:1 meetings will take place to address these issues.

EM asked whether anyone from planning was in attendance at the Heritage Event. CW advised that Joanna Hughes, Conservation and Heritage Officer were present.

**5. AOB and date of next meeting**

CW anticipated that next meeting will take place during early January 2017 and that by that time an initial sustainability report would be available and also be in a position to look at candidate sites.

EM asked could current use of land be altered to be considered for candidate sites. CW advised that it would help if we owned or had land owner consent.

EM Biodiversity – Forestry Commission/Wellbeing Event will get involved. E.G. Sites such as Bike Trail.

AJ requested that a copy of the presentation be provided with the Minutes (attached).

## **APPENDIX 12: REPLACEMENT LDP 2016-2031 HOUSING / VIABILITY WORKING GROUP - MINUTES OF MEETING**

**Date:** Wednesday, 9 November 2016  
**Time:** 10.00 a.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
Natasha Lade, MTCBC, Planning Policy (NL)  
David James, MTCBC, Planning Policy (DJ)  
Matthew Davies, Hafod Housing (MD)  
Matthew Jones, Maxiom (MJ)  
Mark Harris, Home Builders Federation (MH)  
Rob Humphreys, Merthyr Tydfil Housing Association (RH)  
Karen Courts, Merthyr Tydfil Housing Association (KC)  
Nicole Davies, Cwm Taf Local Health Board (ND)  
Julian Pike, MTCBC, Housing & Housing Renewals (JPi)  
Lisa Emerson, MTCBC, Property & Estates (LE)  
Andrea Jones, MTCBC, Property & Estates (AJ)  
James Poole, Redrow Homes (JPo)  
Gary Colston, Merthyr Valleys Homes (GC)

### **1. Introduction and Apologies**

No apologies were received.

### **2. Working Group Terms of Reference (TOR)**

COB presented the TOR (attached).

No issues were raised regarding the TOR.

### **3. Explanation of LDP Process**

COB explained the LDP process, the various stages involved and how it was aspirational but realistic. It was advised there is a 3½ year timetable, compared to the last one which was 4½ years, but took nearer to 6 years.

ND queried the potential changes to Local Authorities (LAs) in Wales (mergers etc.) would have any impact on Merthyr Tydfil's LDP, and asked what neighbouring LAs are doing in terms of their LDPs. COB advised that we are not aware of any such changes occurring in the near future, and that Caerphilly have withdrawn their deposit LDP.

MH queried if MTCBC had been approached to produce a joint plan with neighbouring LAs. COB advised that the issue has been discussed with neighbouring LAs, but given timescales, it was decided to progress with our own LDP.

MH commented that there is an appetite for regional working from Welsh Government. COB advised of the need for an LDP in the County Borough, and that Welsh Government were supportive of MTCBC producing a replacement LDP. CW commented that there it is likely that the proposals put forward in the LDP would be similar to those that would be put forward in a regional plan, if such a plan were to come forward.

MH highlighted that a longitudinal viability study of the planning process is soon to be published by Welsh Government, and the need for housing viability to be considered early on in the LDP process.

### **4. Population Scenarios**

CW presented graph projections and summary.

INITIAL CONSULTATION REPORT

MH queried the relationship between house building and increases in population, and suggested that other factors may have influenced this. CW acknowledged that this was likely, but affirmed that there is a strong link between increased rates of house building and increased population, citing historic trends.

MH raised the issue of the 'trapped household' factor. CW acknowledged this issue but advises that no data in relation to it is available.

LE queried the intentions regarding the building of additional schools, or extending existing ones. CW advised that this would depend on the locations of allocated housing sites.

MH commented that the allocation of specific large housing sites was the primary reason for the withdrawal of Caerphilly's LDP.

ND commented that health life expectancy is poor in MTCBC, which along with the increasing older population, has implications for the type of housing that would be required.

## 5. Issues arising from Baseline Review

CW explained the issues.

MD highlighted the cost of providing extra facilities and care for an aging population, and commented on the viability of building bungalows and that medium-range products have not been successful in Merthyr Tydfil.

MH commented on rent-to-buy schemes. CW commented that these have not been successful in Merthyr Tydfil.

KC commented that MTHA have limited land-banks, which would be needed to support the LDP scenarios outlined. CW commented that privately-owned land should come forward during the candidate sites process. CW also commented that MTCBC and other public bodies have land-banks, and that some areas of land could be better utilised than it currently is.

MH commented that private land-owners and public bodies are prone to land-banking, rather than house-builders, and that these sites may be included in LDPs even though they are not viable. CW advised that some allocated sites which have not been developed and are therefore unlikely to be included in the replacement LDP without strong viability evidence.

ND commented that public service boards are working with Welsh Government to produce asset management plans, which should highlight opportunities.

COB advised that we have made contact with various bodies (e.g. Welsh Water and Natural Resources Wales) to put forward sites that they own.

MH highlighted that the point should be made to land-owners that viability and deliverability are crucial, and will be more closely scrutinised than for the previous (existing) LDP.

MJ queried what MTCBCs/the LDPs vision was, regarding population and growth, and what capacity does the County Borough have for growth. COB advised that the vision would be shaped by MTCBCs Well-being Objectives, and would be agreed by the LDP steering group. COB also advised that the current LDP identified the capacity for 4000 additional homes in the County Borough and, as this amount has not been delivered, this remaining capacity is still available and will be factored into the replacement LDP. CW advised that the County Borough is in a good location and is well-provisioned, in terms of transport links, utility infrastructure and other infrastructure (health, education etc.), to support an increased population.

MJ queried how dependant the LDP would be on the private sector. CW advised that the private sector would build the majority of the new homes proposed in the LDP, regardless of which strategy option is chosen and, therefore that strategy needs to be realistic and deliverable.

COB commented that development such as the South Wales Metro would change the way that people commute around the region, particularly with improvements to the links between Cardiff and the Valleys towns. CW commented that the Metro would have benefits for the City Region, but may

INITIAL CONSULTATION REPORT

require a shift in thinking where LAs accept that Valleys towns are primarily commuter towns for Cardiff.

**6. AOB and date of next meeting**

COB explained the next stages of the LDP and advised that a more detailed discussion of the LDP options will be had following the submission of candidate sites and the sustainability review.

JP queried whether the minutes of all working groups will be circulated to attendees, and commented that economic and social issues also need to be addressed to reverse population decline in the County Borough. COB agreed, and advised that all minutes would be sent to attendees.

MH commented that, in general, not many new houses are being built in Wales, but Merthyr Tydfil was in a good position to be viable.

COB queried what the thresholds of demand were for house-builders/RSLs. MH advised that these were gained using information from previous local developments. JP advises that the development in Trelewis had sold well, and had had a help-to-buy element. MH advises that help-to-buy had had an impact, and advised that, generally, if more than one large site was being constructed in the south of the County Borough, and one or two in the north, then it would not be viable for additional larger sites to be constructed at that time. KC advised that MTHA are guided by where tenants want to live, and therefore build in areas of demand. MD commented that new developments need to be sustainable and viable as they age, and therefore should be built in areas that people want to live.

COB advised that the next working group meetings would be in January, and thanked attendees.

MD requested that a copy of the presentation be provided (attached).

## **APPENDIX 13: REPLACEMENT LDP 2016-2031 HERITAGE, LEISURE & COUNTRYSIDE WORKING GROUP - MINUTES OF MEETING**

**Date:** Wednesday, 9 November 2016  
**Time:** 2.00 p.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Judith Jones, MTCBC, Planning & Countryside (JJ)  
Rolf Brown, MTCBC, Countryside (RB)  
Tom Bramley, MTCBC, Landscape (TB)  
Gill Hampson, MTCBC, Biodiversity (GH)  
Andrea Jones, MTCBC, Property & Estates (AJ)  
Tony Chaplin, MTCBC, Ward Councillor, Biodiversity Partnership (TC)  
Hefin Jones, Merthyr Tydfil Heritage Trust (HJ)  
Yvonne Wood, Friends of Parc Taf Bargoed (YW)

### **1. Introduction and Apologies**

Apologies were received from: Lisa Emerson, MTCBC: Property & Estates  
Joanna Hughes, MTCBC, Heritage & Conservation Officer  
Robert Barnett, MTCBC, Parks & Grounds Maintenance  
Amy Lewis, Cwm Taf Local Health Board

### **2. Working Group Terms of Reference (TOR)**

COB presented the TOR (attached).

TC queried the membership of the LDP steering group. CW advised that membership comprised Chief Officers, Heads of service and senior Councillors.

### **3. Explanation of LDP Process**

COB explained the LDP process, the various stages involved and how it was aspirational but realistic. It was advised there is a 3½ year timetable, compared to the last one which was 4½ years, but took nearer to 6 years.

TC commented that the current LDP has failed on deliverability, and that some allocated sites were included in the current LDP, UDP and previous Local Plan, and has not been delivered.

### **4. Population Scenarios**

CW presented graph projections and a summary.

TC queried if economic activity was taken into account in population projections. CW confirmed that it was not, although a scenario had been prepared following economic forecasts.

TC queried if the amount of new dwellings required would include existing buildings brought back into use, or just newly-constructed dwellings. CW confirmed that only newly constructed dwellings are included, as per Welsh Government requirements.

YW queried what would happen to MTCBC's LDP if local authority boundaries were to change. CW confirmed that, as far as we are aware, the boundaries would not be changing, but that a regional development plan would happen at some point, and that the work undertaken for the LDP could feed into a regional plan.

**INITIAL CONSULTATION REPORT**

**5. Issues arising from Baseline Review**

CW explained the issues and emphasised that if the population is to rise and new dwellings are to be built, this would exacerbate the current situation where there is already a deficit of open space provision in the County Borough.

HJ commented that Rhydyar West is the best, and most visible, example of a post-industrial landscape in the County Borough. TC further highlighted the many claims for Rights of Way on Rhydyar West, and the many Scheduled Ancient Monuments (SAMs) located there.

HJ highlighted that the Cyfarthfa Furnaces are a unique feature of the County Borough and should be maintained and capitalised on. While there have been many proposals to bring the site back into use, this has not happened, and they are deteriorating because of a lack of investment.

GH commented on that fact that an increase in population and the building of houses would result in a loss of greenspace and biodiversity. Who would mitigate and/or compensate for this loss? COB advised that, while the LDP is a tool for facilitating development and protection, it is not a direct implementer of these things. However, viable development sites will produce enough profit so that developers can make a contribution to mitigation/compensation.

TC commented that the Cyfarthfa Heritage Area is too narrow, and that the settlement boundary should remain where it is, i.e. east of the A470 (in relation to Rhydyar West). COB advised that if Rhydyar West was submitted as a candidate site, it would need to be backed up by evidence and assessed alongside other sites submitted.

TB commented, in relation to open spaces, that developers favour undeveloped land, rather than previously developed. The County Borough has a lot of open space, but it is generally of low quality. Management and access to, this space is poor and as such sites have become degraded. Greater resources need to be devoted to the management of existing spaces, in order to get more out of them.

RB commented that Parc Taf Bargoed was a good example of space managed by communities and groups. MTCBC should encourage this and facilitate revenue-generating activities, which would enable the maintenance of these sites.

TB commented that there are few areas of good quality soil in the County Borough and a shortage of allotments. Development should be limited or stopped on undisturbed pre-industrial land. RB commented that most top-soil that is removed from sites is taken out of the County Borough.

TC commented that SSSIs should be protected, and the number of Local Nature Reserves (LNRs) should be increased. COB advised that new LNRs could be suggested through the candidate sites procedure.

**6. Special Landscape Areas (SLAs) & Site of Importance for Nature Conservation (SINCs)**

TB explained what SLAs are, the methodology used to define them and the draft areas within the County Borough.

RB explained what SINCs are.

**7. AOB and date of next meeting**

COB explained the next stages of the LDP and advised that a more detailed discussion of the LDP options will be had following the submission of candidate sites and the sustainability review.

COB advised that the next working group meetings would be in January, and thanked attendees.

## **APPENDIX 14: REPLACEMENT LDP 2016-2031 ECONOMIC DEVELOPMENT & TOURISM WORKING GROUP - MINUTES OF MEETING**

**Date:** Thursday, 17 November 2016  
**Time:** 3.30 p.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Judith Jones, MTCBC, Planning & Countryside (JJ)  
Andrea Jones, MTCBC, Property & Estates (AJ)  
Zoe Thomas, MTCBC, Community Regeneration (ZT)  
Rhian Prosser, MTCBC, Community Regeneration (RP)  
Joanne Davies, MTCBC, Community Regeneration (JD)  
Ryan Barry, MTCBC, Community Regeneration (RB)  
Chris Long, MTCBC, Community Regeneration (CL)  
Antonia Pompa, MTCBC, Community Regeneration (AP)  
Richard Staniforth, Learning, Skills & Innovation Partnership (RS)

### **1. Introduction and Apologies**

No apologies were received.

### **2. Working Group Terms of Reference (TOR)**

COB presented the TOR (attached).

CL queried whether all relevant Council departments had been included in the LDP Working Groups. COB confirmed that they had.

### **3. Explanation of LDP Process**

COB explained the LDP process, the various stages involved and how it was aspirational but realistic. It was advised there is a 3½ year timetable, compared to the last one which was 4½ years, but took nearer to 6 years.

### **4. Population Scenarios**

CW presented graph projections and summary. CW highlighted that there is currently a deficit in the availability of open spaces in the County Borough and that any increase in population and house-building would exacerbate the current situation.

RS queried what the Planning division's opinion was of the population of the County Borough, based on the differing projections. CW responded that it was likely that the 2001 census resulted in an under-count of the population, and that international migration was likely responsible for the majority of the increase in population.

JD queried would more people mean that more open spaces would be provided. COB responded that this was not necessarily the case, and that it was more likely to mean that the access to, and quality of, existing open spaces needs to be improved. A change in the way that open spaces are managed is needed to help to achieve this. CL commented that improving open spaces in the County Borough would complement the Destination Management Plan.

### **5. Issues arising from Baseline Review**

CW explained the issues arising from the review.

CL commented that our vacant employment land had not been marketed aggressively enough. COB commented that we need commercial units that are ready to be used. CL commented that



INITIAL CONSULTATION REPORT

there is a need for medium-sized commercial units, and that much of the existing private stock in need of updating/refurbishing.

JJ queried whether some areas of the County Borough were more popular than others. CL responded that, given the relatively small size of the County Borough, there was not significant variation.

COB queried the importance of skills to attract economic development, and noted that educational attainment was lower than average. RS responded that the County Borough was perceived as being on the edge of the Cardiff hinterland, and had good links with the West Midlands. The perception of communities is generally poor, although this is changing, and the area is attractive for many reasons, not just the skills of the potential work-force.

COB queried as to where the indicators came from, in terms of businesses looking to locate in the Valleys. RS responded that these are related to the movements of people and the job density of an area. The job density figures for the County Borough show potential employers that there is an available work-force. RS explained that GVA of population is also important.

COB queried what the vision was for the future of Merthyr Tydfil town centre. RP responded that maintaining the core and core retail function of the town centre was crucial. RB also commented that many of the office workers who would use the town centre have now been located elsewhere, which has had a negative impact on the vitality of the town centre. CL commented that MTCBC needs to have a role in supporting the town centre.

JJ commented that the town centre had changed in terms of its role and function since the existing LDP was adopted. CW commented that the conversion of vacant offices to flats is an option, and that the town centre is not purely a retail centre. RP commented that while the periphery of the town centre may change its function, the primary shopping area must be maintained. AP commented that the town centre's night-time economy was not performing as well as the day-time economy.

RS commented that the heritage of the town centre is not capitalised upon, and Bike Park Wales is not sufficiently advertised or marketed.

CL commented that the wider active travel networks are not adequately managed or advertised. CW commented that current routes for active travel are not attractive to use, however the routes do exist and need to be improved. CL commented that there is a difficulty in maintaining the trails due to funding, land ownership and access. Due to funding cuts we are not able to create new trails, but need to improve the connectivity to, and between, the existing trails.

CL commented that there is a north-south divide within the County Borough. The south tends to be neglected in terms of funding and investment, and the north does not sufficiently capitalise on its natural environment. ZT commented that candidate sites, located in both the north and south of the County Borough would be submitted.

CL commented that the accommodation offer within the County Borough was lacking a high quality option, e.g. a good hotel. CW advised that we would need clear evidence that there was a demand for such a facility to allocate a site in the LDP.

## **6 AOB and date of next meeting**

COB explained the next stages of the LDP and advised that a more detailed discussion of the LDP options will be had following the submission of candidate sites and the sustainability review. COB advised that the next working group meetings would be in January, and thanked attendees.

## APPENDIX 15: REPLACEMENT LDP 2016-2031 POPULATION AND COMMUNITY FACILITIES WORKING GROUP - MINUTES OF MEETING

**Date:** Wednesday, 25 January 2017  
**Time:** 10.00 a.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Natasha Lade, MTCBC, Planning Policy (NL)  
Craig Flynn, MTCBC, Education (CF)  
Lisa Emerson, MTCBC, Estates (LE)  
Ewan McWilliams, MTCBC, Performance and Scrutiny (EM)  
Ken Long, Communities First South Cluster (KL)

### 1. Introduction and Apologies

Apologies were received from: Alison Harris, Voluntary Action Merthyr Tydfil  
Mark Anderton, MTCBC, Adult Services  
Suzanne Davies, MTCBC, Partnerships  
Samia Saeed-Edmonds, Cwm Taf University Health Board

### 2. Updates: Progress and context

COB outlined the current position of the LDP in more detail and advised that, following public consultation, the Preferred Strategy would be reported to Full Council on 28<sup>th</sup> June 2017.

COB outlined the published documents which have affected the context of the LDP since the previous Steering Group meeting in November 2016 – PPW9 (national level), Cardiff Capital Region City Deal Report and Recommendations (regional level) and the Cwm Taf Well-being Assessment Consultation Report (local level).

COB commented that the report indicates that creating quality environments will attract people to an area and therefore increase the population, which is a key driver of growth.

### 3. Pre-deposit consultation & proposals documents

COB advised that the most important documents that need to be completed, prior to the publication of a deposit replacement LDP, are the Sustainability Appraisal and Preferred Strategy.

COB also advised that a draft deposit plan is programmed to be completed during the summer of 2018.

### 4. Sustainability Appraisal: Growth and Spatial distribution options

CW advised that 2 sets of objectives are crucial to the LDP process – Sustainability objectives and LDP objectives. The growth and spatial options of the LDP will be assessed against the sustainability objectives.

CW outlined the 3 growth options that had been considered – managed population decline, sustainable growth and enhanced growth. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the sustainable growth option had scored highest.

CW outlined the 3 spatial options that had been considered – an urban extension and smaller sites, a strategic brownfield site and smaller sites, and smaller sites. CW advised that, due to the size, topography and settlement pattern of the County Borough, the available options (both spatial and growth) are somewhat limited. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the strategic brownfield site and smaller sites option had scored highest.

**INITIAL CONSULTATION REPORT**

EM queried whether SPGs could be created to mitigate the impacts of the proposed development. CW responded that LDP policies would initially do this, but SPGs are also able to be created.

EM queried whether sufficient land is actually available to build the amount of required housing. CW & COB responded that there is sufficient land available for all the spatial options considered.

EM queried whether the homes that would be built would be suitable to improve the quality of life of the population. COB advised that Homes for Life standards exist and would be promoted via the LDP.

COB advised that following the sustainable growth option does not preclude building at enhanced growth levels if the opportunity should arise, but it would help to defend against unsustainable proposals.

CW advised the urban extension would be problematic due to the issues highlighted in a planning inspectors report relating to a previous planning application for the site (such as the loss of the SSSI), and that such an extension would be difficult and costly to integrate with the existing town.

CW outlined the advantages of the strategic brownfield site option (location, previously developed, size etc). CW also advised that the site could provide a significant proportion of the County Borough's required housing, as well as other infrastructure (such as a metro station and park and ride).

CW advised that consensus is required as to which option to follow.

**5. Preferred Strategy inc. Vision and Objectives**

COB outlined the structure and content of the Preferred Strategy (which would include a vision, objectives and policies).

EM commented that the LDP vision & objectives should link with those of the Local Well-being Plan.

COB advised that the draft LDP objectives are based on the topics included in the Well Being of Future Generations Act (economic, social, environmental and cultural). COB acknowledged that the objectives were high-level and somewhat vague, but advised that the policies that would come under, and relate to, the objectives would provide more specific objectives and details.

**6. Candidate sites**

COB outlined the Candidate Sites procedure and described the Candidate Sites register that will be published.

COB advised that it will be made clear that the sites are suggestions for inclusion in the LDP, not definite allocations.

**7. Other pre-deposit proposals documents and guidance notes**

COB outlined the other documents that would require public consultation, and that some of these documents had already been through a consultation exercise.

**8. AOB & date of next meeting**

COB advised that the next working group meetings would be during summer 2017, and thanked attendees.

## **APPENDIX 16: REPLACEMENT LDP 2016-2031 HERITAGE, LEISURE & COUNTRYSIDE WORKING GROUP - MINUTES OF MEETING**

**Date:** Friday, 27 January 2017  
**Time:** 10.00 a.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
Natasha Lade, MTCBC, Planning Policy (NL)  
Rolf Brown, MTCBC, Countryside (RB)  
Tom Bramley, MTCBC, Landscape (TB)  
Gill Hampson, MTCBC, Biodiversity (GH)  
Joanna Hughes, MTCBC, Policy & Implementation  
Robert Barnett, MTCBC, Parks & Grounds Maintenance  
Andrea Jones, MTCBC, Property & Estates (AJ)  
Tony Chaplin, MTCBC, Ward Councillor, Biodiversity Partnership (TC)  
Hefin Jones, Merthyr Tydfil Heritage Trust (HJ)  
Yvonne Wood, Friends of Parc Taf Bargoed (YW)

### **1. Introduction and Apologies**

Apologies were received from: David James, MTCBC, Planning Policy  
Judith Jones, MTCBC, Head of Planning and Countryside  
Lisa Emerson, MTCBC, Property & Estates  
Amy Lewis, Cwm Taf Local Health Board

### **2. Updates: Progress and context**

COB outlined the current position of the LDP in more detail and advised that, following public consultation, the Preferred Strategy would be reported to Full Council on 28<sup>th</sup> June 2017.

COB outlined the published documents which have affected the context of the LDP since the previous Steering Group meeting in November 2016 – PPW9 (national level), Cardiff Capital Region City Deal Report and Recommendations (regional level) and the Cwm Taf Well-being Assessment Consultation Report (local level).

COB commented that the report indicates that creating quality environments will attract people to an area and therefore increase the population, which is a key driver of growth.

### **3. Pre-deposit consultation & proposals documents**

COB advised that the most important documents that need to be completed, prior to the publication of a deposit replacement LDP, are the Sustainability Appraisal and Preferred Strategy.

COB also advised that a draft deposit plan is programmed to be completed during the summer of 2018.

### **4. Sustainability Appraisal: Growth and Spatial distribution options**

CW advised that 2 sets of objectives are crucial to the LDP process – Sustainability objectives and LDP objectives. The growth and spatial options of the LDP will be assessed against the sustainability objectives.

CW outlined the 3 growth options that had been considered – managed population decline, sustainable growth and enhanced growth. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the sustainable growth option had scored highest.

**INITIAL CONSULTATION REPORT**

TC commented that the sustainable growth option is still ambitious, but also provides scope to protect, for example, green spaces, landscape, heritage.

CW outlined the 3 spatial options that had been considered – an urban extension and smaller sites, a strategic brownfield site and smaller sites, and smaller sites. CW advised that, due to the size, topography and settlement pattern of the County Borough, the available options (both spatial and growth) are somewhat limited. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the strategic brownfield site and smaller sites option had scored highest.

COB advised that following the sustainable growth option does not preclude building at enhanced growth levels if the opportunity should arise, but it would help to defend against unsustainable proposals.

CW advised the urban extension would be problematic due to the issues highlighted in a planning inspectors report relating to a previous planning application for the site (such as the loss of the SSSI), and that such an extension would be difficult and costly to integrate with the existing town.

CW outlined the advantages of the strategic brownfield site option (location, previously developed, size etc). CW also advised that the site could provide a significant proportion of the County Borough's required housing, as well as other infrastructure (such as a metro station and park and ride).

GH commented that brownfield sites may still have a biodiversity value. CW responded that all candidate sites will be assessed, which would include any potential biodiversity issues. GH commented that some of the existing features of the Hoover site, e.g. the gatehouse, are worthy of preservation.

CW advised that consensus is required as to which option to follow.

**5. Preferred Strategy inc. Vision and Objectives**

COB outlined the structure and content of the Preferred Strategy (which would include a vision, objectives and policies).

COB advised that the draft LDP objectives are based on the topics included in the Well Being of Future Generations Act (economic, social, environmental and cultural). COB acknowledged that the objectives were high-level and somewhat vague, but advised that the policies that would come under, and relate to, the objectives would provide more specific objectives and details.

**6. Candidate sites**

COB outlined the Candidate Sites procedure and described the Candidate Sites register that will be published.

COB advised that it will be made clear that the sites are suggestions for inclusion in the LDP, not definite allocations.

**7. Other pre-deposit proposals documents and guidance notes**

COB outlined the other documents that would require public consultation, and that some of these documents had already been through a consultation exercise.

**8. AOB & date of next meeting**

COB advised that the next working group meetings would be during summer 2017, and thanked attendees.

## APPENDIX 17: REPLACEMENT LDP 2016-2031 ECONOMIC DEVELOPMENT & TOURISM WORKING GROUP - MINUTES OF MEETING

**Date:** Monday, 30 January 2017  
**Time:** 2.00 p.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Judith Jones, MTCBC, Town Planning & Countryside (JJ)  
Zoe Thomas, MTCBC, Community Regeneration (ZT)  
Ryan Barry, MTCBC, Community Regeneration (RB)  
Chris Long, MTCBC, Community Regeneration (CL)  
Antonia Pompa, MTCBC, Community Regeneration (AP)

### 1. Introduction and Apologies

Apologies were received from:

Andrea Jones, MTCBC, Property & Estates (AJ)  
Rhian Prosser, MTCBC, Community Regeneration (RP)  
Joanne Davies, MTCBC, Community Regeneration (JD)  
Richard Staniforth, Learning, Skills & Innovation Partnership (RS)

### 2. Updates: Progress and context

COB outlined the current position of the LDP in more detail and advised that, following public consultation, the Preferred Strategy would be reported to Full Council on 28<sup>th</sup> June 2017.

COB outlined the published documents which have affected the context of the LDP since the previous Steering Group meeting in November 2016 – PPW9 (national level), Cardiff Capital Region City Deal Report and Recommendations (regional level) and the Cwm Taf Well-being Assessment Consultation Report (local level). COB commented that the report indicates that creating quality environments will attract people to an area and therefore increase the population, which is a key driver of growth.

CL commented that a report by the Bevan Foundation identifies Merthyr Tydfil as a growth hub.

### 3. Pre-deposit consultation & proposals documents

COB advised that the most important documents that need to be completed, prior to the publication of a deposit replacement LDP, are the Sustainability Appraisal and Preferred Strategy. COB also advised that a draft deposit plan is programmed to be completed during the summer of 2018.

### 4. Sustainability Appraisal: Growth and Spatial distribution options

CW advised that 2 sets of objectives are crucial to the LDP process – Sustainability objectives and LDP objectives. The growth and spatial options of the LDP will be assessed against the sustainability objectives.

CW outlined the 3 growth options that had been considered – managed population decline, sustainable growth and enhanced growth. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the sustainable growth option had scored highest.

CW outlined the 3 spatial options that had been considered – an urban extension and smaller sites, a strategic brownfield site and smaller sites, and smaller sites. CW advised that, due to the size, topography and settlement pattern of the County Borough, the available options (both spatial and growth) are somewhat limited. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the strategic brownfield site and smaller sites option had scored highest.

ZT queried whether other, large sites were also included in the strategic brownfield site option. CW & JJ responded that this was the case as, while the brownfield site could accommodate a significant proportion of the required housing, other sites would be needed to deliver the full requirement.

COB advised that following the sustainable growth option does not preclude building at enhanced growth levels if the opportunity should arise, but it would help to defend against unsustainable proposals.

**INITIAL CONSULTATION REPORT**

CW advised the urban extension would be problematic due to the issues highlighted in a planning inspectors report relating to a previous planning application for the site (such as the loss of the SSSI), and that such an extension would be difficult and costly to integrate with the existing town.

CW outlined the advantages of the strategic brownfield site option (location, previously developed, size etc). CW also advised that the site could provide a significant proportion of the County Borough's required housing, as well as other infrastructure (such as a metro station and park and ride). CW advised that consensus is required as to which option to follow.

CL commented that potential Council-owned development sites need to be marketed more effectively.

**5. Preferred Strategy inc. Vision and Objectives**

COB outlined the structure and content of the Preferred Strategy (which would include a vision, objectives and policies).

COB advised that the draft LDP objectives are based on the topics included in the Well Being of Future Generations Act (economic, social, environmental and cultural). COB acknowledged that the objectives were high-level and somewhat vague, but advised that the policies that would come under, and relate to, the objectives would provide more specific objectives and details.

ZT commented that it would be useful if LDP vision also accorded with the VVP vision.

CL observed that there was no mention of inward investment within the objectives, nor the improvement of the perception of the County Borough.

**6. Candidate sites**

COB outlined the Candidate Sites procedure and described the Candidate Sites register that will be published.

COB advised that it will be made clear that the sites are suggestions for inclusion in the LDP, not definite allocations.

**7. Other pre-deposit proposals documents and guidance notes**

COB outlined the other documents that would require public consultation, and that some of these documents had already been through a consultation exercise.

ZT queried the progress of the Built Heritage Strategy (BHS). JJ & COB responded that a draft of the strategy had been completed. ZT commented that the BHS should include key buildings and a masterplan for the Cyfarthfa Heritage Area.

CL commented that the content of the BHS should be carefully considered given the limited finances available in this respect.

CL commented that the future of the existing bus station site was a key fact in the regeneration of the town centre.

**8. AOB & date of next meeting**

COB advised that the next working group meetings would be during summer 2017, and thanked attendees. CL advised that a representative from Economic Development/Regeneration would attend all LDP working groups.



## **APPENDIX 18- REPLACEMENT LDP 2016-2031 HOUSING/VIABILITY WORKING GROUP - MINUTES OF MEETING**

**Date:** Wednesday, 2 February 2017  
**Time:** 10.00 a.m.  
**Venue:** Unit 5, Pentrebach

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
Natasha Lade, MTCBC, Planning Policy (NL)  
David James, MTCBC, Planning Policy (DJ)  
Matthew Davies, Hafod Housing (MD)  
Matthew Jones, Moxiom (MJ)  
Mark Harris, Home Builders Federation (MH)  
Rob Humphreys, Merthyr Tydfil Housing Association (RH)  
Karen Courts, Merthyr Tydfil Housing Association (KC)  
Nicole Davies, Cwm Taf Local Health Board (ND)  
Julian Pike, MTCBC, Housing & Housing Renewals (JPi)  
Lisa Emerson, MTCBC, Property & Estates (LE)  
Andrea Jones, MTCBC, Property & Estates (AJ)  
James Poole, Redrow Homes (JPo)  
Gary Colston, Merthyr Valleys Homes (GC)  
Paul Allen, Merthyr Valleys Homes (PA)

### **1. Introduction and Apologies**

No apologies were received.

### **2. Updates: Progress and context**

COB outlined the current position of the LDP in more detail and advised that, following public consultation, the Preferred Strategy would be reported to Full Council on 28<sup>th</sup> June 2017. COB outlined the published documents which have affected the context of the LDP since the previous Steering Group meeting in November 2016 – PPW9 (national level), Cardiff Capital Region City Deal Report and Recommendations (regional level) and the Cwm Taf Well-being Assessment Consultation Report (local level).

COB commented that the report indicates that creating quality environments will attract people to an area and therefore increase the population, which is a key driver of growth.

MH commented that the Capital Region report contains a specific section on housing, and that the Welsh Government's Infrastructure report also addresses strategic housing issues.

### **3. Pre-deposit consultation & proposals documents**

COB advised that the most important documents that need to be completed, prior to the publication of a deposit replacement LDP, are the Sustainability Appraisal and Preferred Strategy. COB also advised that a draft deposit plan is programmed to be completed during the summer of 2018.

### **4. Sustainability Appraisal: Growth and Spatial distribution options**

CW advised that 2 sets of objectives are crucial to the LDP process – Sustainability objectives and LDP objectives. The growth and spatial options of the LDP will be assessed against the sustainability objectives.

CW outlined the 3 growth options that had been considered – managed population decline, sustainable growth and enhanced growth. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the sustainable growth option had scored highest.

PA queried whether the options consider the different tenure types of the required housing. CW responded that one of the objectives that the options are assessed against considers this.

MH commented that other options might exist which fall between the 'middle' and 'higher' and 'lower' options.

**INITIAL CONSULTATION REPORT**

CW stressed that the preferred option must be realistic and deliverable. MH commented that Welsh Government have looked into why LDPS are not delivering their anticipated housing requirement and have produced 21 recommendations.

CW outlined the 3 spatial options that had been considered – an urban extension and smaller sites, a strategic brownfield site and smaller sites, and smaller sites. CW advised that, due to the size, topography and settlement pattern of the County Borough, the available options (both spatial and growth) are somewhat limited. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the strategic brownfield site and smaller sites option had scored highest.

COB advised that following the sustainable growth option does not preclude building at enhanced growth levels if the opportunity should arise, but it would help to defend against unsustainable proposals.

CW advised the urban extension would be problematic due to the issues highlighted in a planning inspectors report relating to a previous planning application for the site (such as the loss of the SSSI), and that such an extension would be difficult and costly to integrate with the existing town.

CW outlined the advantages of the strategic brownfield site option (location, previously developed, size etc). CW also advised that the site could provide a significant proportion of the County Borough's required housing, as well as other infrastructure (such as a metro station and park and ride).

MD queried whether following the strategic brownfield site option relies too heavily on one site to deliver the LDPS goals. CW responded that, while the brownfield site has the potential to deliver a significant proportion of the LDPS goals, there is still significant need for other sites throughout the County Borough to deliver the remainder.

CW advised that consensus is required as to which option to follow.

MJ observed that sites should be allocated/made available which are suitable for local-level developers to develop. CW acknowledged that there is a gap in availability of sites which fall between those suitable for self-build and those suitable for volume housebuilders.

**5. Preferred Strategy inc. Vision and Objectives**

COB outlined the structure and content of the Preferred Strategy (which would include a vision, objectives and policies). COB advised that the draft LDP objectives are based on the topics included in the Well Being of Future Generations Act (economic, social, environmental and cultural). COB acknowledged that the objectives were high-level and somewhat vague, but advised that the policies that would come under, and relate to, the objectives would provide more specific objectives and details.

**6. Candidate sites**

COB outlined the Candidate Sites procedure and described the Candidate Sites register that will be published. COB advised that it will be made clear that the sites are suggestions for inclusion in the LDP, not definite allocations.

**7. Other pre-deposit proposals documents and guidance notes**

COB outlined the other documents that would require public consultation, and that some of these documents had already been through a consultation exercise.

**8. AOB & date of next meeting**

COB advised that the next working group meetings would be during summer 2017, and thanked attendees.

## APPENDIX 19: REPLACEMENT LDP 2016-2031 STEERING GROUP TERMS OF REFERENCE

### Purpose of the LDP Steering Group

The purpose of the Group is to agree a strategy for the Merthyr Tydfil Local Development Plan (LDP) 2016-2031.

### Principal Aim of the Group

To consider options for, and agree a sound and sustainable land use plan which:

- Reflects the aspirations of the local community and other stakeholders;
- Provides a basis for rational and consistent development management decisions;
- Guides growth and change whilst protecting local diversity, character and sensitive environments;
- Represents land use elements of the Local Wellbeing objectives.

### Membership Mandate

The following are essential to ensure the success of the Steering Group:

- An understanding of, and a commitment to, the LDP process. Training will be provided at the first meeting;
- A commitment to achieving consensus and working together in a spirit of trust and cooperation;
- A commitment to pragmatism and understanding what can be achieved within the context of relevant legislation and guidance;
- A commitment to raising only legitimate spatial issues;
- A commitment to LDP timetable/meeting deadlines.

### Composition of LDP Steering Group

In order to ensure that the LDP is represent the corporate objectives and cross cutting themes of the Council, the Steering Group will consist of selected Councillors and senior officers of the Local Authority. The Head of Planning and Countryside will chair the group and will be responsible for formulating the final LDP strategy before presenting it to Full Council for approval.

Cllr Brendan Toomey	Leader of the Council
Cllr Chris Barry	Cabinet member - Regeneration, Planning and Countryside
Cllr David Jones	Cabinet member - Neighbourhood Services and Public Protection
Gareth Chapman	Chief Executive
Ellis Cooper	Deputy Chief Executive
Judith Jones	Head of Planning and Countryside (Chair of Group)
Alyn Owen	Chief Officer (Community Regeneration)
Cherylee Evans	Chief Officer (Neighbourhood Services)
Dorothy Haines	Chief Officer (Learning)
Lisa Curtis-Jones	Chief Officer (Social Services)

**NB:** The nominated officers have been chosen because of their position. Should any officer cease to be employed in the stated position, a revised nominated officer will be required as a replacement in his/her place.

## **INITIAL CONSULTATION REPORT**

### **Substitutes**

It is accepted that some members may not be able to make every meeting. However, it is important that representation from all relevant service areas are present at the meetings, therefore, a Substitute for the nominated member can attend any meeting, but the substitute must satisfy the following criteria:-

- The substitute complies with the requirements of the Membership mandate;
- The substitute is fully aware of the outcomes of previous meetings and is in a position to actively participate.

### **Scope of Group and Quorum**

The Steering Group is not a formal decision making body, although it will be responsible for agreeing LDP production, and therefore participation of every nominated member is desirable in all meetings. All formal decision making will be undertaken by Full Council on the basis of reports put forward by the Head of Planning and Countryside. The Steering Group, as quorum limited, should not undertake a meeting unless at least five representatives from the above-mentioned service areas are in attendance.

### **Meeting Chair**

The Steering Group meetings will generally take the form of a facilitated discussion. Whilst it would not normally be the case that such meetings would require a Chair, the meetings will need to have a mechanism for resolving issues that cannot be agreed by mutual compromise (should such occasion arise). Therefore, the Head of Planning and Countryside, will chair the meetings.

### **Relationship to other LDP groups**

Four LDP working groups have been set up on the basis of expressions of interest made through questionnaires circulated by the Planning Policy section. These working groups comprise a wide range of organisations and cover the following topics:

- Housing Viability and Delivery;
- Heritage, Countryside and Leisure;
- Economic Development and Tourism;
- Population and Community Facilities;
- There will also be direct meetings with other stakeholders, e.g. utilities companies.

The Working Groups, which will be chaired by the Group Leader (Policy and Implementation), will be expected to reach a consensus of opinion on priority issues for the LDP, and will assist in the generation of alternative strategies and options. This information will then be relayed to the LDP Steering Group for consideration.

### **Meeting Frequency**

It is envisaged that the Steering Group will meet as and when necessary during the preparation of the LDP up to Deposit stage.

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

**INITIAL CONSULTATION REPORT**

**APPENDIX 20: REPLACEMENT LDP 2016-2031 INAUGURAL STEERING GROUP - BOARDROOM, UNIT 5 - MINUTES OF MEETING –16<sup>TH</sup> NOVEMBER 2016**

**Present:** Chris O'Brien (In the Chair), Councillor Brendan Toomey, Councillor Chris Barry, Councillor David Jones, Ellis Cooper, Alyn Owen, Cheryllee Evans, Dorothy Haines, Lisa Curtis-Jones, Craig Watkins, Judith Jones, David James, Natasha Lade, Maria Price (Minutes).

**Apologies:** N/A

ISSUE	ACTION	BY WHOM	BY WHEN
<b>INTRODUCTIONS</b>			
Introductions were given by the group.		All	
<b>STEERING GROUP TERMS OF REFERENCE</b>			
CO'B went through the Terms of Reference and advised that all decision making will be done by Full Council. The development of the plan should take around 3.5 years. CO'B emphasised that if any member of the group are unable to attend future meetings that a representative attend instead. For the group to be quorate we need at least 5 key officers at each meeting. The LDP group will oversee the following working groups:- <ul style="list-style-type: none"> <li>Housing Viability and Delivery;</li> <li>Heritage, Countryside and Leisure;</li> <li>Economic Development and Tourism;</li> <li>Population and Community Facilities.</li> </ul> AO enquired with regards to the membership of the above groups. CW stated that this can be changed.			
CO'B advised that the next meeting should be in January as the Preferred Strategy will go to Council in June.			
<b>LDP PROCESS</b>			
CO'B gave an overview of the LDP and advised that it is an intervention to bring about change. Due to the level of investment we need to coordinate the service provision.			
EC made reference to the LDP and the RDP. JJ advised that it is a pyramid system and the LDP's feed into the SDP's. AO stated that it is complex but it will fit together.			
CO'B explained the stages of developing an LDP and advised that the 'Strategy' consultation, due next summer will be an important stage for us. Following this we will prepare a full 'Deposit' draft LDP and issue it for consultation in the summer of 2018. We will then submit for independent examination in early 2019 before adopting in Dec 2019. After adopting we will have a plan until 2031 which we will implement and monitor annually.			
AO made reference to a joint LDP and enquired how the timeframes will impact that. JJ stated that some Local Authorities have the same plan end date us (e.g. 2021). We are aware that there are discussions on joint LDP's but no one has agreed to a joint LDP to date.			
BT made reference to potential mandatory joint working and enquired where local authorities merge what impact that will have? CO'B stated that to change the planning area would require primary legislation. If we merged we would have two plans. Welsh Government has agreed to us preparing our own plan. They are supportive of this and we have a letter from the WG to this effect.			

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

**INITIAL CONSULTATION REPORT**

CO'B then went through the changes since the last LDP i.e. no alternative sites stage; soundness test reduced from 10 to 3; massive emphasis on delivery; inclusion of the plan end date and the removal of the requirement to give notice in the local newspaper.			
CO'B stated that the soundness of the plan will be tested at examination i.e. does the plan fit; is the plan appropriate and will the plan deliver.			
<b>POPULATION SCENARIOS</b>			
CW advised that everything is linked to the population i.e. schools, hospital, money from WG. This is a starting point for the plan and is based on past trends. Other factors will also influence i.e. housing, Council Strategies and plans. The level of housing provision proposed over a plan period must be considered in the context of viability and deliverability.			
CW then went through a graph which showed the comparison of population projections for Merthyr Tydfil. In late 2020 the population looks to decline due to international migration. WG projections use a preceding 5 years trend to project forward, the next projection from WG will be 2017 based. The natural change data is robust and the international migration data is based on a small sample of surveys carried out at entry points in the UK. Internal migration is based on GP registration.			
CW then went through 8 scenarios and what they mean. It could mean building a new school and looking after the aging population could be an issue. Improving the quality of open space and the access to open space would also be an issue with an increase in population. A lot will depend on where the housing is located in the county borough. DH stated that other schools in the borough could cater for this. CW stated that we would need a plan and factor this in and check funding is available before we agree the LDP.			
DH enquired if the private developer would be accountable for this? CW stated that if the site warrants a school we could ask for this through the S.106 agreement. BT stated that we would not have to build before the site is developed? CW answered in the negative.			
EC enquired if the aging population is linked into the RSG? CW advised that he was not sure.			
CW stated that it is likely that we will go for fewer dwellings. We are ambitious but realistic.			
DH enquired as to what is the biggest factor in choosing a space. CW stated that more emphasis is on eligibility and sustainability.			
AO made reference to enablement for self-build plots and stated that we are not proactive to commit to this growth strategy. We have the land but we have to be proactive. AO advised that he is looking at loan finance to help with the capital costs.			
CW stated that open spaces will be a key issue in the plan. We need to look at this and ensure it links into the Well Being agenda and the Destination Management Plan.			
CE made reference to service provision and stated that additional unit's means additional waste and recycling. An increase could mean looking for a new recycling site.			

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

**INITIAL CONSULTATION REPORT**

CO'B stated that it is essential to have corporate ownership of the LDP. AO stated that it will form what we want from the County Borough in the regional agenda.			
DJ enquired if developers would be happy with the potential of self-build plots? CW stated that we long as we do not flood the market they would not be concerned. DJ stated that this could still jig developers into wanting to develop in the town.			
<b>REPORT BACK FROM WORKING GROUPS</b>			
CO'B went through the main issues from each group i.e. burial space; scope for community asset transfer; location of elderly accommodation; the future of Rhydycar West; the link between Cyfarthfa Park the furnaces and Rhydycar west needs to be re-established; the need for better access to good quality open space; the need to balance ambition with issues of demand and industry capacity.			
CO'B stated that housing can be seen as a driver for economy.			
EC enquired with regards to the 800-900 vacant properties in the borough. CW stated that we can't count bringing empty properties back into use as an element of the LDP's supply.			
CO'B stated that the MTHA are interested in empty homes. CW stated that we could use the S.106 or CIL monies towards tidying up empty properties.			
<b>ISSUES ARISING FROM BASELINE REVIEW</b>			
n/a			
<b>AOB AND DATE OF NEXT MEETING</b>			
CO'B stated that all papers from today's meeting will be circulated and the next meeting will be arranged for January. We will have the candidate sites in by then.	CO'B circulate papers.	to CO'B	As Approp
BT conveyed his thanks for the way in which today's meeting was set. It has been fascinating and interesting.			



## APPENDIX 21: REPLACEMENT LDP 2016-2031 STEERING GROUP MINUTES OF MEETING

**Date:** Tuesday, 24 January 2017  
**Time:** 2.00 p.m.  
**Venue:** Conference Rooms 3 & 4, Civic Centre

**PRESENT:** Chris O'Brien, MTCBC, Planning Policy (COB)  
Craig Watkins, MTCBC, Planning Policy (CW)  
David James, MTCBC, Planning Policy (DJ)  
Judith Jones, MTCBC, Town Planning & Countryside (JJ)  
Dorothy Haines, Learning for Life (DH)  
Cheryllee Evans, Property and Estates (CE)  
Alyn Owen, Economic Development (AO)  
Brendan Toomey, Leader of the Council, Chair of Cabinet (BT)  
Kate Moran, Ward Councillor (KM)

### 1. Introduction and Apologies

Apologies were received from:

Gareth Chapman, Chief Executive, Ellis Cooper, Deputy Chief Executive (EC), Lisa Curtis-Jones, Social Care for Children (LCJ), Chris Barry, Cabinet Member (CB), David Jones (DJo), Ward Councillor

### 2. Updates: Progress & context

JJ commenced the meeting by outlining the current position of the LDP process (including the candidate sites procedure and Sustainability Appraisal), and stated the purpose of the meeting which was primarily to discuss the strategic options and Preferred Strategy of the replacement LDP.

COB outlined the current position of the LDP in more detail and advised that, following public consultation, the Preferred Strategy would be reported to Full Council on 28<sup>th</sup> June 2017.

COB outlined the published documents which have affected the context of the LDP since the previous Steering Group meeting in November 2016 – PPW9 (national level), Cardiff Capital Region City Deal Report and Recommendations (regional level) and the Cwm Taf Well-being Assessment Consultation Report (local level).

BT outlined the Capital Region City Deal process and key dates.

COB commented that the report indicates that creating quality environments will attract people to an area and therefore increase the population, which is a key driver of growth.

### 3. Pre-deposit consultation & proposals documents

COB advised that the most important documents that need to be completed, prior to the publication of a deposit replacement LDP, are the Sustainability Appraisal and Preferred Strategy. COB also advised that a draft deposit plan is programmed to be completed during the summer of 2018.

### 4. Sustainability Appraisal: Growth & Spatial distribution options

CW advised that 2 sets of objectives are crucial to the LDP process – Sustainability objectives and LDP objectives. The growth and spatial options of the LDP will be assessed against the sustainability objectives.

CW outlined the 3 growth options that had been considered – managed population decline, sustainable growth and enhanced growth. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the sustainable growth option had scored highest.

CW outlined the 3 spatial options that had been considered – an urban extension and smaller sites, a strategic brownfield site and smaller sites, and smaller sites. CW advised that, due to the size, topography and settlement pattern of the County Borough, the available options (both spatial and growth) are somewhat limited. CW gave examples of how each option had been assessed and scored against sustainability objectives and that the strategic brownfield site and smaller sites option had scored highest. CW advised the urban extension would be problematic due to the issues highlighted in a planning inspectors report relating to a previous planning application for the site (such as the loss of the SSSI), and that such an extension would be difficult and costly to integrate with the existing town.

AO queried whether leisure/tourism uses may be acceptable on the site. JJ responded that this was a possibility, but that residential development on the site was highly unlikely.

**INITIAL CONSULTATION REPORT**

CW outlined the advantages of the strategic brownfield site option (location, previously developed, size etc). CW also advised that the site could provide a significant proportion of the County Borough's required housing, as well as other infrastructure (such as a metro station and park and ride).

KM queried whether this option also included other, smaller sites in the County Borough. CW & JJ confirmed that this was the case.

CW advised that consensus is required as to which option to follow.

BT commented that the sustainable growth option appeared best, and queried what the risks were of pursuing the enhanced growth option. CW responded that, if enhanced growth is pursued and not delivered, this would be apparent through the LDP indicators during monitoring, and Welsh Government would require an early review of the plan, with the associated costs that that would entail. The previous (existing) LDP pursued an enhanced growth option and did not deliver it (for example the required amount of annual new housing was not met), hence the need for a replacement LDP. JJ commented that the planning inspector who would examine the replacement LDP would be aware of this, and may not accept the pursuing of the enhance growth option.

KM commented that following the sustainable growth option would not preclude building additional housing (at levels similar to those of the enhanced growth strategy) if the opportunity presented itself.

**5. Preferred Strategy inc. Vision & Objectives**

COB outlined the structure and content of the Preferred Strategy (which would include a vision, objectives and policies).

BT & JJ queried whether a reference to the Cardiff Capital Region should be included in the LDP vision, or replace reference to MT being a regional centre for the HOV, to show commitment to the Capital Region plan. KM & AO commented that both could be included.

COB advised that the draft LDP objectives are based on the topics included in the Well Being of Future Generations Act (economic, social, environmental and cultural). COB acknowledged that the objectives were high-level and somewhat vague, but advised that the policies that would come under, and relate to, the objectives would provide more specific objectives and details.

AO observed that there was no mention of Education within the objectives. DH responded that specific reference to education was not required, as this would come under higher-level topics mentioned in the objectives.

**6. Candidate sites**

COB outlined the Candidate Sites procedure and described the Candidate Sites register that will be published.

DH queried whether any information relating to the pros and cons of each site would be published in the register. COB & JJ responded that such information would be published.

BT commented that it would be helpful if information could be provided on the process of responding to the candidate sites consultation, and other LDP consultations.

COB advised that it will be made clear that the sites are suggestions for inclusion in the LDP, not definite allocations.

AO commented that briefing sessions for Members, regarding the candidate sites, would be useful. BT further commented that this would be useful at Ward and County Borough level.

**7. Other pre-deposit proposals documents & guidance notes**

COB outlined the other documents that would require public consultation, and that some of these documents had already been through a consultation exercise.

**8. AOB & date of next meeting**

COB advised that the next steering group meeting would be in late March, and thanked attendees.

## **APPENDIX 22: – REPLACEMENT LDP 2016-2031 STEERING GROUP CONFERENCE ROOMS 3 & 4, CIVIC CENTRE - MINUTES OF MEETING**

**Present:** Chris O'Brien, Councillor Kate Moran, Ellis Cooper, Alyn Owen, Cheryllee Evans, Dorothy Haines, Craig Watkins, Judith Jones (In the Chair), David James, Maria Price (Minutes).

**Apologies:** N/A

<b>ISSUE</b>
<b>INTRODUCTIONS AND APOLOGIES</b>
Brendan Toomey, Chris Barry, Gareth Chapman, Lisa Curtis Jones, Natasha Lade
<b>FEEDBACK FROM WORKING GROUPS</b>
<p>CW advised that the feedback was positive. Consensus was arrived at by all four groups as to the favoured level of growth and spatial distribution. CW took the steering group through a series of slides highlighting the issues raised at the working groups.</p> <p><b><u>Growth and Distribution</u></b></p> <p>CW addressed issues raised in relation to levels of growth and confirmed that the favoured strategy will not preclude higher levels of development, and that whilst some of the Working Groups questioned whether relying on one site i.e. the Hoovers site was a risk, CW explained that we would anticipate that only a quarter of the overall number of houses would be allocated on this site. AO suggested that it would be useful for the Steering Group to know which sites are proposed. COB advised that the timetable for selecting the sites will be April 2018. We are currently undertaking site assessments. They are all mapped and will have an understanding of site constraints.</p> <p><b><u>Vision and Objectives</u></b></p> <p>CW advised that the Working Groups felt it is important that the LDP ties in with the Wellbeing Statement and the VVP vision. CW then referred to the circulated document and read out the LDP vision.</p> <p>It was agreed to proceed.</p> <p>COB advised that the vision is based on the SIP vision with an added demographic element. COB then went through the vision and enquired if everyone was happy with this? The group agreed they were. EC advised that the Council's overall vision could change post-election, but it is hopefully broad enough to capture any changes.</p>
<b>UPDATE ON PREFERRED STRATEGY PREPARATION</b>
<p><b><u>Preferred Strategy</u></b></p> <p>CW talked through a slide showing an infographic highlighting that the LDP could deliver the following:-  2250 dwellings, £185m economic output, 400 jobs, £5.6m Community Infrastructure Levy, £2.65m Council Tax, £45-50m new resident expenditure.</p> <p>COB advised that policies are being developed in order to deliver this and to integrate with the work that EMc is doing in relation to the Wellbeing plan. COB went through the four policy topics and advised that the primary growth area is the Merthyr Tydfil town. There are different policies applying in different areas.</p> <p><b><u>Links with the Wellbeing Statement</u></b></p> <p>COB made reference to the handout and advised that there is quite a strong correlation between the wellbeing objectives and LDP objectives. DH advised how these could be strengthened further.</p> <p><b><u>Sustainability Report</u></b></p> <p>COB made reference to the circulated list. DH enquired if the School Organisation Code needs to be included. AO enquired if the Economic Growth Strategy could be included. Any further thoughts to be emailed to COB.</p> <p><b><u>Habitats Regulations Assessment Screening Report</u></b></p> <p>COB advised that we are building up experience on this. If you have to undertake assessments we can help. COB went through the example of a sustainability appraisal site assessment and stated</p>

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

**INITIAL CONSULTATION REPORT**

that if we are challenged we can demonstrate that we have looked at all options. We have learnt there is no connection with the Usk Bat Site or the Aberbargoed Grassland Site. The one NATURA 2000 site to be aware of is the Blaen Cynon SAC. We will continue to investigate this site.

**CONSULTATION AND INVOLVEMENT ARRANGEMENTS**

**Candidate Sites Member Sessions**

COB advised that we will be presenting the Candidate Sites to Members tomorrow and before the next Planning Committees.

**Leading up to Full Council Meeting**

We are hoping to take the Preferred Strategy to Full Council on the 28<sup>th</sup> June 2017. I want to gradually raise awareness of this before Council. Cllr KM advised that there is a planning induction in May. We could do something on the LDP at this point. EC advised that we are yet to finalise the agenda for induction. KM advised it could be a separate session.

COB advised that we only need a 30 minutes session. EC advised to hold a session before the first Council.

AO advised that the Cabinet need to be aware first.

**Statutory 6 Week Consultation**

There will be a Statutory 6 week consultation in July/August. Comments have to be made within 6 weeks as we are unable to extend it.

KM enquired if we could be liaising now.

EC advised that we could have a listening and engagement session and this could inform the Council report.

DH advised that she has concerns with it being in July and August.

COB advised that we want to eventually have a full detailed plan, known as the Deposit' plan which will be developed with further involvement by mid 2018.

DH enquired of the milestone that has to be hit.

EC stated that we could be criticised that we are holding public consultation in the summer holidays.

COB advised that we have a delivery agreement with the WG, which sets specific timescales for each stage.

JJ advised that previously we have piggy banked onto other events.

DH stated that whatever the constraints are there is something about future proofing the activity.

COB advised that we have previously held working groups and a big session was held in the Orbit Business Centre last year. It will therefore not be new to people. We could do a press release to raise awareness that it will take place in the summer.

EC stated that we need to remove the risk of challenge. We could list the stakeholders that are key and will not be around in the summer. This will ensure we will not miss any of these groups i.e. the schools and college. We will then be showing we did everything possible to mitigate the risk.

COB advised that we hold separate sessions for these.

AO enquired if there could be a timetable of events.

COB advised that it is difficult to engage people with different levels of growth.

DH advised that the readability and the language of how it is presented in the document are important.

COB advised that we will do a shortened summary for the consultation. EC advised to engage MT BWYF.

EC advised that in terms of opportunities in July and August you need to contact Comms and Rhian Prosser who can provide a forward plan of events.

**AOB AND DATE OF NEXT MEETING**

Early June. This will give the opportunity to present to the new Cabinet member.

## APPENDIX 23: REPLACEMENT LDP 2016-2031 - STEERING GROUP TERMS OF REFERENCE

### Purpose of the LDP Steering Group

The purpose of the Group is to agree a strategy for the Merthyr Tydfil Local Development Plan (LDP) 2016-2031.

### Principal Aim of the Group

To consider options for, and agree a sound and sustainable land use plan which:-

- Reflects the aspirations of the local community and other stakeholders;
- Provides a basis for rational and consistent development management decisions;
- Guides growth and change whilst protecting local diversity, character and sensitive environments;
- Represents land use elements of the Local Wellbeing objectives.

### Membership Mandate

The following are essential to ensure the success of the Steering Group:

- An understanding of, and a commitment to, the LDP process. Training will be provided at the first meeting;
- A commitment to achieving consensus and working together in a spirit of trust and cooperation;
- A commitment to pragmatism and understanding what can be achieved within the context of relevant legislation and guidance;
- A commitment to raising only legitimate spatial issues;
- A commitment to LDP timetable/meeting deadlines.

### Composition of LDP Steering Group

In order to ensure that the LDP is represent the corporate objectives and cross cutting themes of the Council, the Steering Group will consist of selected Councillors and senior officers of the Local Authority. The Head of Planning and Countryside will chair the group and will be responsible for formulating the final LDP strategy before presenting it to Full Council for approval.

Cllr Kevin O'Neill	Leader of the Council
Cllr Geraint Thomas	Cabinet member – Regeneration and Public Protection
Cllr Howard Barrett	Cabinet member - Neighbourhood Services, Planning and Countryside
Gareth Chapman	Chief Executive
Ellis Cooper	Deputy Chief Executive
Judith Jones	Head of Planning and Countryside (Chair of Group)
Alyn Owen	Chief Officer (Community Regeneration)
Cheryllee Evans	Chief Officer (Neighbourhood Services)
Sue Walker	Chief Officer (Learning)
Lisa Curtis-Jones	Chief Officer (Social Services)

\* The nominated officers have been chosen because of their position. Should any officer cease to be employed in the stated position, a revised nominated officer will be required as a replacement in his/her place.

## INITIAL CONSULTATION REPORT

### Substitutes

It is accepted that some members may not be able to make every meeting. However, it is important that representation from all relevant service areas are present at the meetings, therefore, a Substitute for the nominated member can attend any meeting, but the substitute must satisfy the following criteria:-

- The substitute complies with the requirements of the Membership mandate;
- The substitute is fully aware of the outcomes of previous meetings and is in a position to actively participate;

### Scope of Group and Quorum

The Steering Group is not a formal decision making body, although it will be responsible for agreeing LDP production, and therefore participation of every nominated member is desirable in all meetings. All formal decision making will be undertaken by Full Council on the basis of reports put forward by the Head of Planning and Countryside. The Steering Group, as quorum limited, should not undertake a meeting unless at least five representatives from the above-mentioned service areas are in attendance.

### Meeting Chair

The Steering Group meetings will generally take the form of a facilitated discussion. Whilst it would not normally be the case that such meetings would require a Chair, the meetings will need to have a mechanism for resolving issues that cannot be agreed by mutual compromise (should such occasion arise). Therefore, the Head of Planning and Countryside, will chair the meetings.

### Relationship to other LDP groups

Four LDP working groups have been set up on the basis of expressions of interest made through questionnaires circulated by the Planning Policy section. These working groups comprise a wide range of organisations and cover the following topics:

- Housing Viability and Delivery;
- Heritage, Countryside and Leisure;
- Economic Development and Tourism;
- Population and Community Facilities;
- There will also be direct meetings with other stakeholders, e.g. utilities companies.

The Working Groups, which will be chaired by the Group Leader (Policy and Implementation), will be expected to reach a consensus of opinion on priority issues for the LDP, and will assist in the generation of alternative strategies and options. This information will then be relayed to the LDP Steering Group for consideration.

### Meeting Frequency

It is envisaged that the Steering Group will meet as and when necessary during the preparation of the LDP up to Deposit stage

## APPENDIX 24: REPLACEMENT LDP 2016-2031 STEERING GROUP MINUTES OF MEETING

**LDP STEERING GROUP**  
**6th DECEMBER 2017**  
**CONFERENCE ROOM 1, CIVIC CENTRE 10:00 am**  
**MINUTES**

**Present:** Councillor Kevin O'Neill (KO'N), Councillor Geraint Thomas (GT), Councillor Andrew Barry (AB), Councillor David Hughes (DH), Ellis Cooper (EC), Cheryllee Evans (CE), Sue Walker (SW), Lisa Curtis-Jones (LC), Judith Jones (JJ-In the Chair), John Raine (JR), Craig Watkins (CW), David James (DJ) and Natasha Lade (NL).

AGENDA ITEM
<b>INTRODUCTIONS AND APOLOGIES</b>
<p>Introductions were given by the group.</p> <p>Apologies were received from Gareth Chapman, Alyn Owen &amp; Councillor Howard Barrett.</p>
<b>TERMS OF REFERENCE</b>
<p>JJ asked for any questions on the Terms of Reference, previously circulated. As none were forthcoming the Terms of Reference were agreed.</p> <p>JJ informed the group that this meeting had been called to up-date new Members (given that the last meeting was held in March prior to Council elections).</p>
<b>OVERVIEW OF LDP PROCESS</b>
<p>CW gave an overview of the replacement LDP process to date which included a Call for Candidate Sites. KO'N asked how many Candidate Sites had been received. The Planning team informed him that 103 had been received.</p> <p>KO'N stated that people are interested in planning, particularly when it affects them. He estimated that 40% of his discussions with the public were planning related mainly on developments that had already happened.</p> <p>DH stated that the recent budget public consultation exercise held at Supermarket locations had received a good response.</p> <p>DJ informed him that we had a stall at the food festival which also had a good response rate.</p> <p>CW ran through the process used to identify the Preferred Strategy.</p>



INITIAL CONSULTATION REPORT

KO'N asked how this translates on the ground particularly with an aging population does this mean more bungalows are needed? A discussion about housing need in the County Borough was had. CW stated that viability is the main issue in the valleys.

AB asked where is the demand?, is it what we see or what the developers see. CW replied that the housebuilders have access to the same information as the Council and would look to develop the most viable and profitable sites.

AB stated that the concern is that new housing may be more attractive than older housing which could be left in the hands of private landlords where we have no control over who lives in them.

CW & JJ stated that developers have access to evidence of need, and that it is difficult for planning to influence this as it would be for the *Housing Strategy* to address this issue but that we do have a continuous dialogue with housebuilders and can agree over the housing needs assessment and sites to be put forward in the plan.

KO'N stated that planning crossed over all 10 council key issues such as traffic congestion and parking which can be a consequence of development. Concern was raised over congestion and pollution 'hot spots' at the Tesco roundabout and future Trago Mills access.

CE queried whether the LA could require developers to provide more parking on new developments.

EC queried how parking requirements are assessed during the Planning process.

JJ stated that National Planning Policy encourages maximum parking standards in order to reduce car use and thereby pollution etc.. Planning applications are determined on this basis in line with relevant LDP policies.

CW stated that we need to retain the working aged population in order to retain and improve bus and train facilities and support Active travel (walking and cycling for short trips) and the Metro.

KO'N advised that the general feeling was that the Strategy was supported, particularly the need to look after and improve public open space (old and new) but it needed to be future proofed by:

- having more conversations with public transport providers and
- planning and making provision for services such as schools, waste collections and GP surgeries.

EC recommended engagement with the Finance Dept in terms of the impact of population growth on services.

**ISSUES ARISING FROM PUBLIC CONSULTATIONS**

JR ran through the highlights of the responses received from the Preferred Strategy consultation. It was highlighted that Welsh Government and other statutory consultees were supportive of the Preferred Strategy, and that deliverability and viability are crucial.

JJ and JR explained that the plan needed to fit in with the Strategic Development Plan (SDP- a regional plan comprised of 10 South East Wales authorities) and the City Deal. Work on an SDP has not formally commenced however it is understood that discussions are taking place regionally with Chief Executives and further updates will be available in early 2018.

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

**INITIAL CONSULTATION REPORT**

GT queried whether there was a need for a Welsh medium primary school in the County Borough as children living in MTCB attend Ysgol Gyfun Rhydywaun in the Cynon Valley.

It was agreed that further discussion was required with regard to Welsh medium education provision. SW stated that WG want local authorities to create demand.

AB queried whether there would be any allocations included in the new LDP for hotel development.

JJ advised that policies to encourage tourism and leisure will be included in the Deposit Plan but will not necessarily comprise allocated sites.

Councillors consider that there is already provision for bikers and hikers and what is needed is hotels to support tourist attractions such as the National Park. It was noted that Bike Park Wales has permission for camping pods and Rock UK for visitor accommodation (neither of which has yet been implemented) and that Economic Development have looked at hotel provision.

The group questioned whether the Gypsy and Traveller site was at full capacity. CW explained that there was space up until 2021 but that evidence was required for the whole of the plan period up to 2031. This will need to be commissioned separately and if more land is required another site may have to be allocated.

The group asked who owned the Hoover's site. JJ advised that the site is owned by the Candy family (company) but WG are in the process of purchasing it. It is understood that 150 people are still employed at Hoover Candy Ltd and it is hoped that this element of the operation can be retained.

The group asked if the façade was listed. JJ advised that the Local Historic Society had put in a request to Cadw to list it but this was rejected. JJ advised that as part of the masterplan for the site, design elements that acknowledge the previous use of the site would be encouraged

**NEXT STEPS**

Need certainty on school and welsh medium capacity and candidate site selections.

Councillors requested that we be more innovative with future public consultation exercises by involving Councillors, holding events at M&S or Tesco and using infographics more.

**AOB AND DATE OF NEXT MEETING**

TBC

## **APPENDIX 25: REPLACEMENT LDP 2016-2031 STEERING GROUP MINUTES OF MEETING**

**LDP STEERING GROUP**  
**19H MARCH 2017**  
**CONFERENCE ROOM 1, CIVIC CENTRE 14:00 PM**  
**MINUTES**

**Present:** Councillor Kevin O'Neill (KO'N), Councillor Geraint Thomas (GT), Councillor Andrew Barry (AB), Councillor David Hughes (DH), Councillor Howard Barrett (HB), Gareth Chapman (GC), Ellis Cooper (EC), Alyn Owen (AC), Sue Walker (SW), Judith Jones (JJ-In the Chair), John Raine (JR), Craig Watkins (CW), and David James (DJ)

<b>AGENDA ITEM</b>
<b>INTRODUCTIONS AND APOLOGIES</b>
Introductions were given by the group. Apologies were received from Cherylee Evans & Lisa Curtis Jones.
<b>MINUTES OF PREVIOUS MEETING</b>
JJ advised that this would be the last Steering Group meeting before the publication of the draft Deposit Plan. JJ drew attention to the minutes of the previous Steering Group, which were agreed.
<b>CONTENTS OF DEPOSIT PLAN</b>
CW outlined the contents of the Deposit Plan and presented the draft housing allocations table. The Strategy for sustainable population growth & 2250 new dwellings - located mainly at the Hoover site & within the Primary Growth Area was highlighted.
CW advised that there would actually be provision for a higher number of dwellings (approximately 2590 dwellings) to provide sufficient flexibility and contingency allowance in the housing land supply over the Plan period. Allowances for large and small site 'windfall' developments (likely levels of development from unallocated sites) would also be factored into the Plan's housing land supply.
GT queried the location of the housing site south of Castle Park & whether it was within a heritage area. CW confirmed location & advised that it was within the Landscape of Historic Interest which covers the north of the County Borough.
GC requested that the table showing the number of new dwellings be clarified, particularly the numbers of dwellings within the Hoover Strategic Regeneration Area.
EC queried whether the allocation at the Upper Georgetown Plateau site would affect the plans for the Dementia Hub? CW confirmed that it would not.
AB queried if the increased population & dwellings being encouraged by the LDP would have an effect on Councillor numbers. GC confirmed that it would not.

INITIAL CONSULTATION REPORT

DH queried whether the Heartlands site was being allocated. CW confirmed that the site was not included within the proposed housing land supply due to viability issues/potential development costs, but it is allocated as a regeneration site within the Plan where development proposals could come forward..

SW & GC confirmed that the Stormtown site would not be the site of a new school.

HB queried whether the existing Ysgol y Graig site in Cefn Coed was being considered for residential. CW advised that the site was not being allocated as it would only be able to accommodate a small number of new dwellings (less than 10)

**CONTINUATION OF WORK ON EVIDENCE BASE**

JR advised that BE Group had been commissioned & had produced an Employment Land Review report to inform the Deposit LDP. This identified a requirement for 14.5Ha of employment land. It also recommended that EFI & Cyfarthfa Industrial Estates are protected as existing employment sites as they provide a useful contribution to local industrial warehousing accommodation needs. Currently the Cyfarthfa Heritage Area includes both of these sites and the boundaries of existing planning designations in this area would need to be reviewed.

AO advised that the EFI site would be compulsory purchased and utilised as part of the Cyfarthfa Heritage Area if funding became available.

JR advised that 4 employment sites had been shortlisted (approximately 40 hectares of land). This included Goat Mill Road (13.5 ha), Land East of A4060 at Ffos-Y-Fran (18 ha), the Former Hoover Factory car park (1.5 ha) and land at the Hoover Strategic Regeneration Area (7.5 ha).

AO queried if enough employment land would be available if Ffos-y-fran was not restored (as we have received a number of queries looking for employment accommodation). EC queried if enough employment land is being allocated considering the increasing attractiveness of MTBC as a location for industry/employment and the Council's sustainable growth strategy. CW & JR confirmed that we have enough potential development sites to cover both eventualities and the impact for this would need to be considered as we are required to provide a range & choice of employment land in the LDP. A further candidate site (land south of Merthyr Tydfil Industrial Estate) could be considered.

GT queried whether there was scope for any employment land in the south of the County Borough. CW advised that no candidate sites were put forward for such use, & it is unlikely that there would be suitable land of sufficient size.

DH queried if the land behind Old Forge Park was suitable. CW advised that there were ownership & access issues (ransom strip) in relation to that land.

GC queried whether the land south of the College car park was suitable for employment. CW advised that it was, but was not allocated specifically as the land could accommodate a number of potential uses.

INITIAL CONSULTATION REPORT

CW advised that the Affordable Housing/CIL Viability Report found that the proposed housing targets are acceptable, as was general viability in the north of the County Borough.

HB queried whether CIL was discouraging developers. JJ & CW advised that it was not, & that the cost implication of CIL was not a critical factor for developers.

HB queried whether the Hoover site would be liable for CIL. JJ advised that it was.

Options for future education provision were discussed. CW advised that it was unlikely that sites for education development would be allocated in the LDP, as there are various options in relation to this.

KO'N queried whether the County Borough's infrastructure was sufficient to accommodate the new development proposed in the LDP. JJ advised that the Highways Dept have been consulted in this regard and have not highlighted any capacity issues.

JR advised that the current GTAA identified 11 surplus gypsy/traveller pitches available until 2021 at the Glynmil site and under current WG guidance a formal review GTAA is not due until the end of the 5-year assessment period in 2021. We are working with the Housing Dept to assess the requirement up to 2031.

JR advised that the Council had received the draft Strategic Flood Consequence Assessment (SFCA). The study considered the extent and consequences of flooding for 3 sites that are located in flood zone C2 and which are proposed to be allocated in the LDP. This would inform the justification for the land use allocations and would clarify the extent of developable land in these locations.

In particular, parts of the Hoover Strategic Regeneration Site are located within areas of flooding where residential development would be located (the Former Ardagh Site, Dragon Parc). Further modelling would be required to better understand the extent of flooding in this area (emanating from the Nant Graig and Nant Canaid and associated culverts to the River Taf). The flood zone C2 areas on the NRW Development Advice Map would need to be challenged to demonstrate this area is acceptable for residential development under national planning policy. Further modelling work to evidence this is currently being undertaken by the Dragon Parc landowners who have submitted an outline planning application for the site. The results of the updated modelling would be reflected in an updated SFCA.

Other areas affected by flooding at the Hoover Strategic Regeneration site to the north would be allocated for employment uses which would be acceptable in principle. The Hoover Factory site to the east of the River Taf to be allocated for residential and mixed uses is located in flood zone B and would be acceptable in principle.

The existing bus station site would be proposed for future retail development which could be justified in flood zone C2 subject to meeting specific criteria in national policy (Technical Advice Note 15). However existing flood modelling indicates that this area would not be

**INITIAL CONSULTATION REPORT**

justified and further investigation is required. Separate flood modelling work for the River Taff and Nant Morlais convergence affecting the town centre would be required to better understand the extent and consequences of flooding in this area. This would enable the Council to more accurately define the area of C2 flooding in central Merthyr Tydfil and to challenge the NRW Development Advice Maps that may constrain future redevelopment proposals in the town centre.

JR advised that Welsh Government had commissioned the Urbanists to undertake master-planning work for the Hoover site. Work was ongoing and Council officers are providing an input where necessary. A draft masterplan for the Hoover Strategic Regeneration Area was anticipated to be published alongside the Deposit Plan.

GC queried whether it was the intention to develop the whole Hoover site. JJ confirmed that it was.

KO'N queried whether the Hoover building (near the main entrance) would be retained. JJ advised that we will require developers to have regard to the building in any proposals for the site.

GC queried whether any retail uses are intended for the site. JJ & JR advised that a smaller scale retail use is intended (approx. 400 sqm).

KO'N queried whether hotel/tourist accommodation use was intended for the site. JJ advised that it is unlikely that there would be capacity for this.

**NEXT STEPS**

GC queried whether the Deposit Plan would need to be reported back to Council if substantial changes were required & made. JR confirmed that any necessary 'focused changes' would be reported back to Council prior to Submission of the LDP for Examination. This would be alongside a Consultation Report on the Deposit Plan public consultation.

AB queried if there was the possibility of creating a new vehicular access into Abercanaid as part of the development of the Hoover site. JJ advised that a pedestrian access was possible, but a vehicular access would unlikely be viable.

GT queried whether the town centre could be considered for purposes other than retail (A1), for example A3. JJ & CW advised that 83% A1 use was currently required in the Primary Shopping Area. AO advised that a new masterplan was required for the town centre, as many of the projects identified in the previous one had been completed.

GT queried whether there would be provision for tourist accommodation in the LDP. JJ advised that no candidate sites had been put forward & that by not allocating sites specifically for tourist accommodation would allow more scope for such development to come forward. In this respect, future development proposals for hotel accommodation could be considered against the policies of the Plan.

**AOB AND DATE OF NEXT MEETING**

TBC

## APPENDIX 26: NATURAL RESOURCES WALES RESPONSE TO DRAFT SA BASELINE SCOPING REPORT



Ein cyf/Our ref: CAS-28543-K8P4  
Eich cyf/Your ref: -

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St Mellons Business Park  
Fortran Road  
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E-bost/Email:  
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Ffôn/Phone: 03000 653 033

FAO: Chris O'Brien

Merthyr Tydfil County Borough Council  
Unit 5  
Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

25 January 2017

Annwyl Syr/Madam / Dear Sir/Madam,

### CONSULTATION ON THE DRAFT SCOPING REPORT FOR THE SUSTAINABILITY APPRAISAL OF THE 1ST REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN

Thank you for consulting us on your Draft Scoping Report for the Sustainability Appraisal of Merthyr Tydfil Replacement Local Development Plan.

We note the Sustainability Appraisal (SA) will incorporate your Strategic Environmental Assessment (SEA).

Having reviewed your Draft Scoping Report (v02 Draft for Environmental consultees) dated December 2016 and having met with your Authority on 16 January 2017, we are satisfied with your scope for the SA report (i.e. environmental report). As indicated in the scoping report, you have noted that the SA is an iterative and on-going process. We agree and would add that the SA/SEA should be a living document. This is particularly important when you consider that environmental baseline data is evolving and other plans and programmes are emerging as a result of new legislation. The SA/SEA should therefore be kept under review throughout the LDP preparation.

The baseline information to be collected appears to be thorough. We confirm that you have the latest Local Evidence Pack from NRW. In this regard, you should note that NRW have duties under the Environment Act (Wales) 2016 and the Well-being of Future Generations (Wales) Act 2015 which will result in the preparation of further evidence. This evidence should be used in the SA/SEA, if timeframes allow.

Ty Cambria • 29 Heol Casnewydd • Caerdydd • CF24 0TP  
Cambria House • 29 Newport Road • Cardiff • CF24 0TP  
Croeso i'r gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English



The scope and methodologies proposed for the SA seem reasonable. The scope has identified the likely environmental characteristics effected by the LDP and recognises the existing environmental problems within the LDP area.

The SA objectives (within the strategic SA framework (table 5.2)) should provide a robust assessment of environmental impacts from the LDP strategic options. We advise that the SA indicators and targets (table 5.3) seem usable. We do advise that there is a change to SA Objective 14 (to minimise the risk of flooding). It currently states "Total number of properties...at high or medium risk of flooding from rivers" then bullet points the definition of medium and high risk. We suggest you simply use one bullet point which states "Total number of properties...at risk of fluvial flooding up to the 0.1% annual probability flood event". We note these are used in the national indicators for Wales technical document, however the 0.1% event equates to zone C in TAN15 and therefore this change would be consistent with national planning policy.

We will be happy to provide further advice and guidance in the latter stages of the SA/SEA process and look forward to working with you on the replacement LDP.

Yn gywir / Yours faithfully

**James Davies**

Uwch Ymgynghorydd Cynllunio Datblygu/ Senior Development Planning Advisor  
Cyfoeth Naturiol Cymru / Natural Resources Wales

## APPENDIX 27: CADW RESPONSE TO DRAFT SA BASELINE SCOPING REPORT

**O'Brien, Christopher**

**From:** Helen.May2@wales.gsi.gov.uk  
**Sent:** 03 February 2017 15:28  
**To:** O'Brien, Christopher  
**Subject:** RE: Consultation on the Draft Scoping Report for the Sustainability Appraisal of the 1st Replacement Merthyr Tydfil Local Development Plan. [NOT PROTECTIVELY MARKED]

Dear Mr O'Brien,

Thank you for your email inviting comments on the Draft Scoping Report for the Sustainability Appraisal of the 1st Replacement Merthyr Tydfil Local Development Plan. I am sorry for the delay in sending our response.

We have the following comments;

- Section 3.17.2 of the report refers to "2 Historic Landscape Character Areas" and should refer to "2 Registered Historic Landscapes".
- The Cultural Heritage section of Table 5.4 (Sites SA Framework) states that the advice of the Design and Built Heritage Officer will inform the assessment of effects against this SA Objective. We recommend that the Council should also consult Glamorgan Gwent Archaeological Trust as their archaeological advisors.

Yours sincerely,

Helen May  
Arweinydd Tim Gwaith Achosion/ Casework Team Leader  
Amgylchedd Hanesyddol / Historic Environment  
Gwasanaeth Amgylchedd Hanesyddol (Cadw)/ Historic Environment Service (Cadw)  
Llywodraeth Cymru / Welsh Government  
Plas Carew  
Uned/Unit 5/7 Cefn Coed  
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**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL**  
**REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031**

**INITIAL CONSULTATION REPORT**

**APPENDIX 28: SUMMARY OF CONSULTATION REPRESENTATIONS RECEIVED FOR THE INITIAL SUSTAINABILITY APPRAISAL (ISA)**

No.	Rep No.	Organisation Name/ Individual Surname	Document ref.	Date	Summary of Representation Comments	Rep Type	Council's Response
1	101	WG (includes Cadw response)	ISA	02/10/17	Urged to seek own legal advice to ensure that the procedural requirements, including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) have been met all as responsibility for these matters rests with the LPA.	Letter	Noted.
2	103	NRW	ISA	03/10/17	Have no concerns over the ISA and its findings, including the methodology and scoring of sites and policies. Agree that policies and site allocations will largely have an uncertain effect on water quality within a Plan-led system. Consider the Plan should include robust policy or policies which ensure development proposals protect and enhance the water environment; and that site allocations are delivered in a sustainable way when considering the water environment, e.g. the use of SuDS on site; or foul water connecting to the mains foul sewer. Recommend that allocated sites (or specific Plan policies) are assessed against PS/LDP Policy SW9 and section 48 of the Open Space Strategy (OSS).	Letter	Noted.  Reference to flood risk and drainage has been added to the policies of the Plan.  The provision of open space has been considered as part of site level SAs.
3	105	Boyer	ISA	26/09/17	Whilst assessing sites against the SA objectives is a necessary and important consideration it does not assess the viability and deliverability of sites. So although some sites may have good SA it does not mean they are deliverable.	Response Form	Noted. All strategy compliant sites have undergone a detailed site assessment that considers deliverability

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

**INITIAL CONSULTATION REPORT**

							issues as set out in the Site Assessment background paper. In addition, the Plan has been informed by an up-to-date housing viability assessment.
4	115	WYG	ISA	05/10/17	<p>SAO1 - Consider the use of 800m as the upper limit for a reasonable walking distance for <u>all</u> land uses is unsound.</p> <p>SAO2 - includes no objective criteria to be met or measured against leading to subjective judgements.</p> <p>SAO4-The assumption of appropriate and timely provision of necessary supporting infrastructure should also relate to open space provision.</p> <p>SAO8-Use of rigid 100m distance from Active Travel routes is illogical.</p> <p>SA12 - bias towards areas well established to have ecological value against less well studied areas.</p> <p>SAO14 – A consistent approach should be taken for sites outside flood risk zones but affected by surface water flooding,</p> <p>SA16 – potential negative effects could be mitigated.</p>	Letter	<p>Comments noted.</p> <p>Sustainability Appraisal requires value based judgments and as a strategic assessment involves a level of uncertainty. Uncertainties have been acknowledged and where available evidence has been referred to. The use of rigid distances</p>

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

**INITIAL CONSULTATION REPORT**

							in the SA has been reviewed.
5	132	Merthyr Initiative Group	ISA	24/11/17	Await the final Sustainability Appraisal with interest.	Response Form..	Noted.
6	142	C Connolly	ISA	03/10/17	Agree with the Initial Sustainability Appraisal	Response Form & letter	Noted
7	157	Councillor P Brown	ISA	03/10/17	Agrees with the Initial Sustainability Appraisal	Response Form & letter	Noted
8	158	Merthyr Tydfil Anti-Opencast Campaign	ISA	03/10/17	Agrees with the Initial Sustainability Appraisal	Response Form & letter	Noted
9	159	Rhydycar West Regeneration Partnership	ISA	03/10/17	Agrees with the Initial Sustainability Appraisal	Response Form & letter	Noted
10	207	Merthyr Tydfil Heritage Trust Ltd	ISA	04/09/17 06/10/17	The key sustainability issues proposed for the new LDP are all relevant – and some need to be addressed more robustly in the PS. E.G. When and if, embarking on money-led investment schemes there should be a clear programme of community benefits and development features that meet aspirations. The A465 widening is an example of this.	Letter	Sustainability Appraisal considers the likely economic, social and environmental impacts of the Plan as a whole to inform decision making rather than direct it. The Deposit Plan is required

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

**INITIAL CONSULTATION REPORT**

							to provide for local growth needs and includes policies to mitigate potential negative impacts. Potential mitigation has been reflected on in the SA Report.
11	248	Trago Mills Limited	ISA	25/08/17	<p>Do not consider development of CS 14 would:</p> <p>SAO1- adversely affects the community and social infrastructure needs of all residents and communities or</p> <p>SAO2 - adversely affect community and settlement identities or</p> <p>SAO8 - increase the need to travel or discourage sustainable modes of travel</p> <p>SAO11- contribute to climate change or</p> <p>SAO12 - preclude the maintenance or enhancement of biodiversity or ecosystem Connectivity or</p> <p>SAO15 - Site 14- area is not safeguarded for any minerals within the existing adopted LDP and</p> <p>Do not consider a SINC designation as a bar to development.</p>	Response Form & letter	The Sustainability Appraisal Report contains site level SAs of strategy compliant sites recommended for allocation. As there is no further retaining need for the Plan period the site was not considered to fit with the

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

**INITIAL CONSULTATION REPORT**

							strategy or be necessary for its delivery. Consequently a revised site SA has not been prepared. Further details regarding the consideration of this site are provided in the Site Assessment background paper.
12	255	A Cousins	ISA	03/10/17	Agrees with the Initial Sustainability Appraisal	Response Form & letter	Noted
13	258	Elan Homes Ltd	ISA		Support form and findings of the ISA.	Response Form	Noted
143	279	RCTCBC Countryside Team	ISA	05/10/17	The clear findings of the ISA should be reflected or quoted in the PS (paragraph 7.31 on P67) i.e. 'Developing the Cwmglo and Glyndyrys SSSI as the key component of the LDP strategy is completely inappropriate given the suitability of the alternative spatial options.' In relation to alternative strategies.	Response Form	Noted. Details of the alternative options considered are included in the Deposit Plan Sustainability Appraisal report.



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

**INITIAL CONSULTATION REPORT**

15	282	R Thomas	ISA	06/10/17	<p>Revise ISA CS4 SA as follows:</p> <p>LDP Objective 4 – development on the site would be incompatible (red and -2) with the objective of ensuring the provision of infrastructure and open space is the basis for the regeneration of communities.</p> <p>LDP Objective 9 – development on the site would be incompatible (red and -2) with the objective of improving habitats which contribute to ecosystem resilience and connectivity. It would be far better to utilise the space as part of the soft landscape connective with the urban edge, open space and wider countryside.</p> <p>LDP Objective 10 – development on the site would be incompatible (red and -2) with the objective of protecting and enhancing the character and appearance of the landscape and countryside.</p> <p>LDP Objective 12 - development on the site would be incompatible (red and -2) in that it would make no contribution to the strengthening and diversification of the rural economy.</p>	Letter	<p>The Sustainability Appraisal Report contains site level SAs of strategy compliant sites recommended for allocation. A revised SA for this site has not been prepared as the site is not recommended for allocation. Further details of the site assessments are included in the Site Assessment background paper.</p>
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## APPENDIX 29: NATURAL RESOURCES WALES DATA REQUEST FORM



Thank you for your interest in Natural Resources Wales data. To help us process your request, please provide the information requested below. This information will be used to help us identify the data you need and assess whether releasing the requested information for reuse is appropriate. If we release the data or permit its reuse this will normally be through a licence which will detail the terms and conditions under which we agree to release the data/information to you. The information you provide will be held securely in an electronic format, and will be processed fairly under the Data Protection Act (1998) Code of Practice.

Personal Information		
Name	Title: Mr Click and select First name: Chris ← Click and type here Surname O'Brien	
Job Title	Planning Officer	Please give your job title if it is relevant to your information request. If you are requesting the data as a private individual please ignore this field.
Organisation	Merthyr Tydfil County Borough Council	Please detail your organisation or employer if the request is through an organisation. If you are requesting data as an individual please detail any organisations you are a member of which are relevant to your request.
Address	Address Unit 5 line 1: Triangle Busiuness Park Address Pentrebach line 2: Merthyr Tydfil Address CF48 4TQ	Please give us your address or the address of your organisation.
Website	<a href="http://www.merthyr.gov.uk/">http://www.merthyr.gov.uk/</a>	If you or your organisation has a website please give the address here.
Your e-mail address	christopher.obrien@merthyr.gov.uk	
Telephone number	Area 01685 code: 726279	Please give us a number which we can normally contact you on during office hours.
The information you are requesting		
What information are you requesting?	Protected sites: Special Areas of Conservation Protected sites: Special Protection Areas esri shapefiles with attributes data for all sites within or intersecting a 15km radius of MTCBC	Please be as specific and detailed as possible. If the request is too vague we may need to contact you for clarification which may delay your request.

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

**INITIAL CONSULTATION REPORT**

What is the overall purpose of your data request?	LDP - Habitats Regulations Assessment Screening	Please tell us the overall purpose of your request e.g. to inform decision making or policy planning, to assess a development proposal, for an Environmental Impact Assessment, to support conservation planning or land management, commercial re-use, personal study etc.
How will the information be used and what outputs and/or products do you expect to create?	Maps identifying all European Protected Sites within a 15km radius of the planning area.	Please detail the specific use you have planned for the information e.g. what analyses are you going to perform, will the information be incorporated into a commercial product, will you produce maps, is it for a piece of academic work, will it be incorporated into an existing database etc?
Will the information be published?	The information WILL be published Details: As part of the HRA of the LDP.	Will the data, or any derived products or outputs, be published? If so please give details of what will be published, how it will be published (e.g. report or website), where it would be available and at what resolution e.g. 10 km sq.
What geographical location or region are you requesting data for?	Whole area <input checked="" type="checkbox"/> covered: OR  Area of interest:	What is your area of interest i.e. do you need the whole area covered by a dataset or a sub-section? Examples would include; all Wales, North Wales, the Severn Estuary, a specific site like a SSSI etc If possible please provide the Lat / Long or British National Grid coordinates.
What time period is covered by the information you are requesting?	From: 02/11/2015 To: OR All dates covered: <input type="checkbox"/>	Do you want information covering the whole time period covered by the dataset or are you only interested in a specific sub-set? Please use DD/MM/YYYY
Who will have access to the information other than yourself?	GIS and Planning Depts.	Please give names, job titles and department/organisation (if relevant) of others who will have access to the information. Include sub-contractors, clients, team members etc.
How / where will the information be stored?	On corporate GIS server	Please note: If the information you are requesting contains sensitive data and/or data covered by the Data Protection Act (1998) it will need to be stored appropriately.
How long will you require the data for?	From: 02/11/2015 To: OR Long-term/ unspecified: <input checked="" type="checkbox"/>	Please tell us how long you will require the data for. This would normally be the expected period of the work which the data / information will feed into. If you require long term access the data you will need to renew the licence periodically.

## APPENDIX 30: CONSULTATIONS DURING PREPARATION OF THE DRAFT HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING REPORT

**From:** Wistow, Richard [mailto:Richard.J.Wistow@rctcbc.gov.uk]  
**Sent:** 27 July 2016 11:0  
**To:** Lade, Natasha  
**Cc:** Brown, Rolf  
**Subject:** RE: SAC - population of Marsh fritillary butterfly

Natasha,

I think the issue of Blaen Cynon SAC is relevant for Merthyr- especially since you have an occupied marsh fritillary site in your County Borough, which is probably functioning as part a network of sites which help support that SAC site.

In terms of site monitoring of the SAC that responsibility lies with Natural Resources Wales, who work with butterfly Conservation monitoring the butterflies fortunes around the SAC. So, I would suggest that as a first step you contact, Nick Sharp of NRW ([Nick.Sharp@cyfoethnaturiolcymru.gov.uk](mailto:Nick.Sharp@cyfoethnaturiolcymru.gov.uk)).

Hope that helps,

Richard Wistow RCT

**From:** Sharp, Nick [mailto:Nick.Sharp@cyfoethnaturiolcymru.gov.uk]  
**Sent:** 01 September 2016 13:10  
**To:** Lade, Natasha  
**Subject:** Marsh Fritillary SAC info

Hi Natasha,

I've spoken to my colleague who monitors both the SAC's in question and in terms of data we can supply the following - the data is in GIS (Mapinfo) format or Excel tables:

### Blaen Cynon SAC

- Most recent habitat mapping data for the SAC itself
- Marsh fritillary larval web counts for the majority of years since 1999
- Habitat mapping for the wider landscape (mostly undertaken in 2003) - it's likely MTCBC already has a copy of this (would be worth asking Rolf Brown, Richard Smith did the survey work)

### Aberbargoed Grasslands SAC

- Most recent habitat mapping data for the SAC itself
- Marsh fritillary larval web counts for the majority of years since 1996
- Habitat mapping for the wider landscape (mostly undertaken in 2003) - again, it's likely MTCBC already has a copy of this.

In terms of the location of Merthyr's marsh frits in the wider landscape, they are much more closely linked to the Blaen Cynon SAC. This is driven mainly by availability and location of suitable habitat in the landscape and also to a degree by topography. It would also be worth contacting Caerphilly Council to ask about the data they hold on marsh frit habitat for their area.

It'll take a few days to get this information together to send so I wanted to mention briefly first what is available.

Regards,

Nick Sharp

Conservation Officer (Taf Natural Resource Management Team) / Swyddog Cadwraeth (Tîm Rheolaeth Adnoddau Naturiol y Taf)  
Natural Resources Wales / Cyfoeth Naturiol Cymru

**From:** Messenger, John [mailto:John.Messenger@cyfoethnaturiolcymru.gov.uk]  
**Sent:** 06 March 2017 10:28  
**To:** Lade, Natasha  
**Subject:** RE: A465 dualling - Lesser Horseshoe bats

Hi Natasha

I am always a little concerned by the use of 'meta-population' with highly mobile species such as bats, for whom few habitat barriers exist.. It is unlikely in the UK that bat meta-populations exist. That said, the Jacobs team has undertaken work last year that appears to show that no large scale movements of lesser horseshoe bats in or out of the Taf Fechan area that might indicate a strong connection with the Usk Bat Sites SAC. Therefore In answer to your first question, yes a link is almost inevitable but it appears not to be a strong link. By this I mean that it is unlikely that significant numbers of SAC bats are regularly moving between the SAC and the Taf Fechan area as part of normal movement patterns. That is probably the best we can do at the present time. In answer to your second question, I am not familiar with your LDP but in view of the reasoning above I feel it is safe to say that any impact is unlikely.

As I am sure you are aware, we can never be certain about such matters but at least we have some evidence now to support this position.

Best wishes

**John Messenger**  
Senior Species Officer – South Region  
Cyfoeth Naturiol Cymru / Natural Resources Wales  
Ffôn/Tel: 03000 655219 Ffôn symudol

## APPENDIX 31: NATURAL RESOURCES WALES RESPONSE TO THE DRAFT HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING REPORT

**From:** South East Planning [mailto:southeastplanning@cyfoethnaturiolcymru.gov.uk]  
**Sent:** 18 May 2017 14:53  
**To:** O'Brien, Christopher  
**Cc:** Hurst, Andrew; Davies, James  
**Subject:** LDP - habs regs- Merthyr LDP - Habs Regs Assessment - NRW Response NRW: 01140084

Hi Chris

Thank you for sending us the draft HRA screening report for our informal view.

As you'll appreciate, without sight of the Preferred Strategy, we cannot conclude for certain whether or not this stage of the Plan will give rise to likely significant effects on relevant Natura 2000 sites. However we can provide the following observations and comments for you.

We are satisfied that the assessment has identified all relevant Natura 2000 sites within 15km of the area covered by the LDP, as listed in Table 1 of the report.

However we suggest it is premature to conclude, at this stage, that the Preferred Strategy will not affect the marsh fritillary butterfly. The area where the marsh fritillary butterfly has been recorded within Merthyr Tydfil County Borough is considered to form part of the Upper Cynon Functional Landscape Area for the species. Habitat suitable for the marsh fritillary in Merthyr therefore plays an important role in the conservation of marsh fritillary in the wider landscape. It is not clear whether the Strategy or any proposed allocated sites could result in the loss / degradation of marsh fritillary habitat. For example, the Cwm Glo a Glyndrys SSSI is known to contain significant areas of marsh fritillary habitat. A more detailed assessment maybe required.

We note the potential air quality conclusions, but we highlight that impacts arising due to specific LDP proposals will need to be assessed in more detail before being able to conclude that the LDP will not give rise to likely significant effects on the European sites in question.

Finally we note on page 14 that NRW has concluded "that it is unlikely that significant numbers of SAC bats are regularly moving between the SAC and the Taf Fechan area as part of normal movements patterns" and in view of this feel "it is safe to say that any impact [of the LDP on the SAC] is unlikely". It would be useful for you to reference this quote so that we can understand whether this statement can be used in this context.

Hopefully these comments are useful, please call if you wish to discuss further.

Regards Jim

Ffôn / Tel: 03000 653033

Gwefan / Website: [www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk) / [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

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

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

**INITIAL CONSULTATION REPORT**

**APPENDIX 32: SUMMARY OF CONSULTATION REPRESENTATIONS RECEIVED FOR THE HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING REPORT**

No.	Rep No.	Organisation Name/ Individual Surname	Document ref.	Date	Summary of Representation Comments
1	101	WG	HRA	02/10/2017	As always, we would urge the authority to seek legal advice to ensure that all the procedural requirements are met, including Habitats Regulation Assessment (HRA) as responsibility for these matters rests with the Authority.
2	103	NRW	HRA	03/10/2017	<p>We provided comments on the draft screening report in May 2017. We were generally satisfied with the assessment but could not conclude whether the PS or any proposed allocated sites could result in the loss/degradation of marsh fritillary habitat or whether there is potential for proposals to facilitate development which has air quality impacts arising from its use.</p> <p>Having reviewed the PS in conjunction with the HRA screening report, we agree with Table 4 – HRA Screening Summary which concludes there is no requirement to undertake an Appropriate Assessment for the PS stage given the choice of spatial option. We also agree that the screening process is re-run at the deposit plan stage when allocated sites and strategic policies are finalised.</p>
3	207	Merthyr Tydfil Heritage Trust	HRA	06/10/2017	Reference is made again in the Habitat Regulations Assessment to the Cyfarthfa Heritage Area – this area should be widened so as to encompass other Cyfarthfa industrial sites of which there are many. It should be noted that the Heritage Trust's main concern has been to protect the historic and natural heritage of the whole area – any “heritage based visitor attraction” would need to be integrated into proposals for Cyfarthfa Castle and Cyfarthfa Park. Both are part of the Heritage Area and both also have a need of historic and natural heritage protection.



## **APPENDIX 33: NOTICE OF PUBLIC CONSULTATION ON PRE-DEPOSIT PROPOSALS FOR THE REPLACEMENT LDP 2016 -2031.**

**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 Pre-Deposit Proposals for a Local Development Plan**

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

Merthyr Tydfil County Borough Council (MTCBC) has prepared pre-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 pre-deposit proposals documents are as follows:

- Preferred Strategy
- Initial Sustainability Appraisal (including a Non-Technical Summary)
- Habitat Regulations Assessment (HRA) Screening Report

Pre-deposit proposals documents are subject to a formal 6 week public consultation between Friday 14th July 2017 and 12.00pm (midday) Friday 25th August 2017.

Other supporting background documents, including the Candidate Sites Register, will also be issued for consultation during this period.

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](http://www.merthyr.gov.uk) or from the Cwm Taf Hub [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

**Comments on the pre-deposit proposals documents, the Candidate Sites Register and other supporting information must be made in writing and received by the County Borough Council between 14th July 2017 and 12.00pm (midday) on the 25th August 2017.**

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

All comments made by the deadline will be acknowledged and considered, however the Council cannot guarantee that comments received after this date will be considered.

You can either email completed forms to: [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or post them to:

Head of Planning & Countryside  
Planning & 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 @ [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or Telephone 01685 726279

**MISS J JONES**

**Head of Planning and Countryside**

APPENDIX 34: PREFERRED STRATEGY RESPONSE FORM



MERTHYR TYDFIL COUNTY BOROUGH COUNCIL  
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 – 2031  
PRE DEPOSIT PROPOSALS DOCUMENTS – RESPONSE FORM

- Please submit your response to the Pre Deposit Proposals documents on this form.
- Before completing the form, please refer to the soundness tests in the accompanying Annex.
- Please note all comments will be made publically available\*.
- Please use sub-questions to help expand your comments.

Personal Details		Agent's Details (if applicable)
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (Where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone No.	<input type="text"/>	<input type="text"/>
E-Mail Address	<input type="text"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Office Use Only: Representor Number

## 1. THE VISION

Following engagement with stakeholders, a vision for the replacement LDP was agreed.

- Is the Vision relevant and distinct to Merthyr Tydfil County Borough?
- Is the Vision balanced between economic, social, environmental and cultural aims?
- Does the Vision set out what sort of place we want the County Borough to be?

Please provide comments below.

## 2. OBJECTIVES

The Preferred Strategy proposes 17 objectives for the LDP.

- Are the objectives clear?
- Will they deliver the Vision of the LDP?
- Are there any objectives that could be removed? Is there anything that needs to be added?

Please provide comments below and include reference to the relevant objective/s.

## 3. SCALE AND DISTRIBUTION OF FUTURE GROWTH

An option has been developed to sustainably grow the population of the County Borough by approximately 4,500 people by 2031, resulting in a requirement to build approximately 2250 new dwellings (150 per annum). Spatially, the majority of new development will take place in the main Merthyr Tydfil settlement, with a significant proportion of new housing built as part of the Hoover Strategic Regeneration Area. Information on the alternative options for the scale and distribution of growth can be found in Section 4 of the Preferred Strategy document.

- Do you agree with the scale of growth proposed?

Agree ☐

Disagree ☐

Neither Agree or Disagree ☐

Please provide comments below:

BACKGROUND PAPER: INITIAL CONSULTATION REPORT

- Do you agree with the broad spatial distribution of growth proposed?

Agree ☐

Disagree ☐

Neither Agree or Disagree ☐

Please provide comments below.

#### 4. STRATEGIC POLICIES

The Preferred Strategy proposes 28 key policies.

- Are the Strategic Policies clear?
- Will they help to deliver the LDP Vision and Objectives?
- Are there any policies that could be removed? Are there any additional issues that need to be covered?

Please provide comments below and include reference to relevant policy/policies.

#### 5. INITIAL SUSTAINABILITY APPRAISAL

If you have any comments on the Initial Sustainability Appraisal (ISA), please provide below and include reference to the relevant paragraph/page numbers.

## 6. CANDIDATE SITE REGISTER

If you wish to comment on any of the proposed Candidate Sites please do so below. All comments should include the reference number of the particular site they refer to.

If you would like to propose a new site, please include the following information (further information may be required at a later stage):

- An up to date plan of the site (preferably on an Ordnance Survey base at scale of 1:1250 or 1:2500) with the site edged with a red line, and a blue line drawn around any immediately adjoining land in the same ownership.
- The current use of the site and an indication of the suggested future land use of the site.
- The amount of infrastructure and or any mitigation you anticipate providing to facilitate the development.
- An indication of expected land values, marketability and prospects the nomination will be delivered by 2031.
- Any further information you feel will assist in the future assessment of the site.

## 7. FURTHER COMMENTS

If you have any further comments on the Preferred Strategy, or any of the supporting documentation, please comment below:

(All comments should clearly reference the document, page, paragraph and/or policy number where relevant).

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

Thank you for your comments on the Pre Deposit Proposals documents.

If you have any questions about responding, please do not hesitate to contact the Planning & Countryside Department, asking to speak with a member of the LDP team on 01685 726279.

Completed forms should be returned to:-

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

Or e-mailed to [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk)

**Representations must be received by 12 noon on Friday 6<sup>th</sup> October 2017.**

**Representations received after this time may not be considered.**

<b>Annex: Soundness Tests</b>	
Test 1	<b>Does the Plan fit?</b> <ul style="list-style-type: none"> <li>• Does the plan have regard to national policy?</li> <li>• Does the plan have regard to Well-being Goals?</li> <li>• Is the Plan consistent with regional plans, strategies and utility programmes?</li> <li>• Is the Plan compatible with plans of neighbouring authorities?</li> <li>• Is the Plan compatible with other Council strategies and priorities?</li> </ul>
Test 2	<b>Is the Plan appropriate?</b> <ul style="list-style-type: none"> <li>• Is it locally specific?</li> <li>• Does it address the key issues?</li> <li>• Is it supported by robust, proportionate and credible evidence?</li> <li>• Can the rationale behind plan policies be demonstrated?</li> <li>• Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</li> <li>• Are the vision and the strategy positive and sufficiently aspirational?</li> <li>• Have the 'real' alternatives been properly considered?</li> <li>• Is it logical, reasonable and balanced?</li> <li>• Is it coherent and consistent?</li> <li>• Is it clear and focused?</li> </ul>
Test 3	<b>Will the Plan deliver?</b> <ul style="list-style-type: none"> <li>• Will it be effective?</li> <li>• Can it be implemented?</li> <li>• Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?</li> <li>• Will development be viable?</li> <li>• Can the sites allocated be delivered?</li> <li>• Is the plan sufficiently flexible? Are there appropriate contingency provisions?</li> <li>• Is it monitored effectively?</li> </ul>



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

BACKGROUND PAPER: INITIAL CONSULTATION REPORT

APPENDIX 35: -PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION LETTERS

Ellis Cooper BSc. (Hons)

Cyfarwyddwr Corfforaethol Lleodedd a Gweddnewid  
Corporate Director Place and Transformation

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



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

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

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

Dyddiad/Date: 21<sup>st</sup> July 2017

Ein Cyf./Our ref.: PS  
Eich Cyf./Your ref: 128

Gofynnwch am/Please ask for: Chris O'Brien  
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: PUBLIC CONSULTATION ON THE PREFERRED STRATEGY**

I write further to my letter of 12th July 2017. As of Friday 21st July 2017 additional evidence has been added to the 'Preferred Strategy' consultation and therefore the consultation period has been extended to **Monday 4th September 2017**. The additional evidence consists of the following:

- Merthyr Tydfil Retail and Commercial Leisure Study 2017
- Merthyr Tydfil Local Housing Market Assessment 2014-19
- Merthyr Tydfil Gypsy Traveller Accommodation Assessment 2016
- Cwm Taf: Understanding Our Communities - Wellbeing Assessment Consultation Analysis Report
- South Wales Regional Aggregates Working Party - Regional Technical Statement and Annual Report

The consultation documents will be available for public inspection, along with a form for making representations, at the Council's main offices, 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
- 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

They will also be available online at: [www.merthyr.gov.uk](http://www.merthyr.gov.uk) or from the Cwm Taf Hub [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

Comments must be made in writing and received by the County Borough Council at the address below by **12.00pm (midday) on the 4<sup>th</sup> September 2017**. Completed forms may be sent to [devplanning@merthyr.gov.uk](mailto: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](mailto: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

Croesewin ohebu yn Gymraeg a fydd ohebu yn y Gymraeg ddim yn anwain at oedl. Rhodwch 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.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

**PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION EMAILS**

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

Merthyr Tydfil County Borough Council (MTCBC) has approved, for consultation, a 'Preferred Strategy' 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 'Preferred Strategy' and other background papers, including the Candidate Sites Register, between Friday 14th July 2017 and Friday 25th August 2017.

Please see the attached documents for further information.

Yours faithfully

MISS J JONES  
PENNAETH CYNLLUNIO A CHEFN GWLAD

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

I write further to my email of 14<sup>th</sup> July 2017. As of Friday 21st July 2017 additional evidence has been added to the consultation and therefore the consultation period has been extended to Monday 4th September 2017.

The additional evidence consists of the following:

- → Merthyr Tydfil Retail and Commercial Leisure Study 2017
- → Merthyr Tydfil Local Housing Market Assessment 2014-19
- → Merthyr Tydfil Gypsy Traveller Accommodation Assessment 2016
- → Cwm Taf: Understanding Our Communities - Wellbeing Assessment Consultation Analysis Report
- → South Wales Regional Aggregates Working Party - Regional Technical Statement and Annual Report

Please see the attached documents for further information.

Yours faithfully

MISS J JONES  
PENNAETH CYNLLUNIO A CHEFN GWLAD

**APPENDIX 36: - PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION  
DROP-IN PUBLIC EXHIBITIONS / CONSULTATION EVENTS PHOTOGRAPHS**





APPENDIX 37: - PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION POSTER

# **Local Development Plan** **(LDP) 2016-2031**

## **Pre-deposit (Preferred Strategy) Consultation**

**Friday 14th July 2017 to Friday 6th October 2017.**

Having updated the Gypsy Traveller Accommodation Needs Assessment accompanying the consultation to that signed off by the Welsh Ministers, the consultation period has been extended to Friday 6th October 2017.

During the consultation period the documents will be available for inspection at the following locations during their 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

They will also be available online at: [www.merthyr.gov.uk](http://www.merthyr.gov.uk) or [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

All comments on the Preferred Strategy & other consultation documents must be made in writing & received **at the address below by 12.00pm (midday) on 6th October 2017**. Completed forms may be sent to [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or posted to the **Head of Planning and Countryside, 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](mailto:devplanning@merthyr.gov.uk) or call the LDP team on **01685 726279**

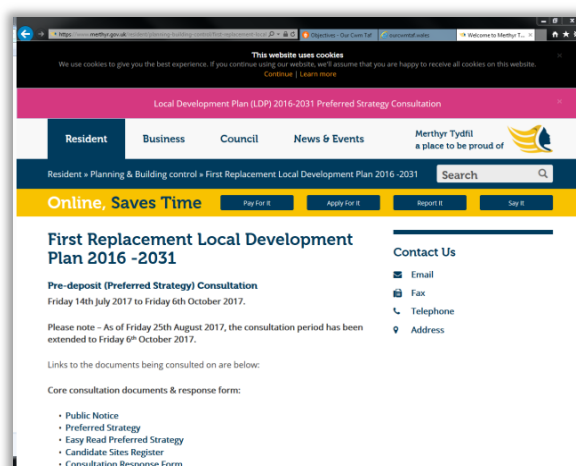
MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031

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

## BACKGROUND PAPER: INITIAL CONSULTATION REPORT

### APPENDIX 38: - PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION MEDIA NOTIFICATIONS

#### Council Website



#### Other pre-deposit proposals documents:

- Initial Sustainability Appraisal Non-Technical Summary
- Initial Sustainability Appraisal
- Habitats Regulations Assessment Screening Report

#### Other background papers:

- Population & Housing Background Paper
- Green Wedges Background Paper
- SLA (Special Landscape Area) Background Paper
- SINC (Site of Importance for Nature Conservation) Background Paper
- Merthyr Tydfil Retail and Commercial Leisure Study
- Merthyr Tydfil Local Housing Market Assessment 2014-19
- Merthyr Tydfil Gypsy Traveller Accommodation Assessment 2016
- Cwm Taf: Understanding Our Communities - Wellbeing Assessment Consultation Analysis Report
- South Wales Regional Aggregates Working Party - Regional Technical Statement and Annual Report

These documents are for information only, as consultation has been undertaken previously:

- LDP Review Report
- Open Space Strategy
- Open Space Strategy Action Plan

During the consultation period the documents will also be available for inspection at the following locations during their 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
- 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 4Q

Consultation events will also be held where members of the LDP team will be in attendance to answer any queries:

- Tuesday 18th July 2017 - Dowlais Library 1 – 6pm
- Wednesday 19th July 2017 - Aberfan Community Library 1 – 6pm
- Saturday 22nd July – Merthyr Food Festival (Penderyn Square) 10 - 3pm
- Monday 24th July 2017 - Bedlinog Inn, 1 – 6pm
- Tuesday 25th July 2017 – Parc Taf Bargoe 12 - 4pm
- Wednesday 26th July 2017 – Cyfarthfa Park Bothy (near the greenhouses) 1 – 6pm

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.

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

## BACKGROUND PAPER: INITIAL CONSULTATION REPORT

### Cwm Taf Hub Website

**THE CWM TAF HUB**  
Community Engagement in Merthyr Tydfil and Rhondda Cynon Taf

Cymraeg | English

WELCOME CONTACT US JOIN US LOG IN

**Welcome to the library of current and planned engagements**

This area gives you access to details of all current and planned engagements. These you can search by topic or by geography. Alternatively, you can select to view all.

Where you find what you are looking for, contact information will direct you so you can find out more details about the engagements we are running.

Search the current and planned engagements

**Search Engagements / Consultations**

Type in here to search Any Words Go

Geography Topic Area

Any Any

[Reset search filters](#)

**Current consultations**

Replacement Merthyr Tydfil Local Development Plan 2016-2031

From: 14 Jul 2017 To: 06 Oct 2017

  
Cynghor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

**Replacement Merthyr Tydfil Local Development Plan 2016-2031**

Why are we doing this? :

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

Merthyr Tydfil County Borough Council (MTCBC) has approved, for consultation, a 'Preferred Strategy' 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 'Preferred Strategy' and other background papers, including the Candidate Sites Register, between Friday 14th July 2017 and Friday 25th August 2017.

For further information, please follow the link below:

<https://www.merthyr.gov.uk/resident/planning-building-control/first-replacement-local-development-plan-2016-2031/>

**What do we want to know?:**  
What the public think of the LDP.

**Consultation start date** 14 July 2017

**Consultation end date** 06 October 2017

**Contact details:**

  
Cynghor Bwrdeistref Sirol  
MERTHYR TYDFIL  
MERTHYR TYDFIL  
County Borough Council

MTCBC  
Consultation

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



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

## BACKGROUND PAPER: INITIAL CONSULTATION REPORT

### Cwm Taf Hub Twitter Feed



# THE CWM TAF HUB

Community Engagement in Merthyr Tydfil and Rhondda Cynon Taf

Cymraeg | English

[WELCOME](#) [CONTACT US](#) [JOIN US](#) [LOG IN](#)



### Your Community, Your Voice

The **Cwm Taf Hub** aims to provide people who work, live or provide services across Merthyr Tydfil and RCT with the chance to have their say about local services, while providing them with information on local engagement events and other areas of interest.

Tell us what you think and help improve services through Community Engagement.



## "HAVE YOUR SAY"

**Understanding Our Communities**  
Cwm Taf Consultation 2016 [Click here](#)

[Tell us what you think – Live surveys](#) [View all »](#)

[Feedback from closed surveys](#) [View all »](#)

[Activities and events coming up](#) [View all »](#)

25  
May

Free Alcohol Awareness Course

### Tweets by @CwmTafConsult



**Merthyr Tydfil CBC**  
@MerthyrCBC

Have your say on #MerthyrTydfil's Local Development Plan. For further details, please visit [bit.ly/2t4IV3](http://bit.ly/2t4IV3)

#### Local Development Plan (LDP) 2016-2031 Pre-deposit (Preferred Strategy) Consultation

**Ends: 15th July 2017 to Friday 25th August 2017.**

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

- Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AH
- MTDC, Unit 5, Triangle Business Park, Penarth, Merthyr Tydfil, CF48 4TQ
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF
- Rhondda Library, Ynys, Merthyr Tydfil, Rhondda Cynon Taf, CF48 3UT
- Trehafod Library, Penarth Street, Merthyr Tydfil, CF48 3BT
- Dowlais Library, Church Street, Dowlais, Merthyr Tydfil, CF48 3BS
- Aberdare Community Library, Penarth Road, Aberdare, Merthyr Tydfil, CF48 4QJ

They will also be available online at: [www.merthyr.gov.uk](http://www.merthyr.gov.uk) or [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

Consultation events where members of the LDP team will be in attendance to answer any queries:

- Tuesday 18th July 2017 - Dowlais Library 1 – 5pm
- Wednesday 19th July 2017 - Aberdare Community Library 1 – 5pm
- Saturday 22nd July 2017 - Merthyr Tydfil Central Library (Dowlais Square) 10 – 3pm
- Monday 24th July 2017 - Dowlais Lib 1 – 4pm
- Tuesday 25th July 2017 - Rose Hill Busstop 12 – 4pm
- Wednesday 26th July 2017 - Cwm Taf Bus Stop (near the greenhouses) 1 – 5pm

All comments or the Preferred Strategy & other consultation documents must be made in writing & received at the address below by 12.00pm (midday) on 25th August 2017. Completed forms may be sent to [development@merthyr.gov.uk](mailto:development@merthyr.gov.uk) or posted to the Head of Planning and Countryside, MTDC, Unit 5, Triangle Business Park, Penarth, Merthyr Tydfil, CF48 4TQ.

If you have any queries about how to submit comments please e-mail [development@merthyr.gov.uk](mailto:development@merthyr.gov.uk) or call the LDP team on 01695 728279.

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



## APPENDIX 39: - PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION MEETING WITH THE MERTHYR TYDFIL BOROUGH WIDE YOUTH FORUM (MTBWYF)

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

**Pre-deposit Proposals Stage Consultation - Merthyr Tydfil Borough Wide Youth Forum (MTBWYF)**  
**5.30pm – 7:00pm Tuesday 1<sup>st</sup> August 2017 - Conference Room 2, Civic Centre**

---

#### Present:

Lauren, Ryan, Jamie, Josh, Nicky, Lowri, Ashleigh, Daniel and Morgan – Cabinet & members of MTBWYF-

*It's your voice, your choice!*

Janice Watkins – Senior Youth Support Participation Officer - Safer Merthyr Tydfil (SMT)

Chris O'Brien and Natasha Lade – Planning & Countryside - Policy & Implementation Team – MTCBC

Beth Melhuish & Ceri Dinham – Improvement Planning - Communications, Consultation & Engagement – MTCBC

#### The Youth Mayor made introductions.

Members of the planning team started the interactive Powerpoint presentation which included a short animation produced by the Welsh Government setting out the planning system in Wales and the role of the National Development Framework (NDF) and Local Development Plans (LDPs) and can be viewed at <http://gov.wales/topics/planning/national-development-framework-for-wales/?lang=en>. The NDF will set out a 20 year land use framework for Wales and will replace the current Wales Spatial Plan, provide direction for Local Development Plans and is out now for consultation.

Following this the team explained that the population of the County Borough has been predicted to decline from 59,139 in 2016 figures to 59,011 by 2031, meaning that there will be fewer children, young adults and people aged between 45 and 60 (working aged people) and more people over the age of 60.

The team asked why members of the forum think this might be the case. The responses included:

- ★ People moving out of the area due to lack of jobs and apprenticeships. In particular there is also a lack of apprenticeship places since the Apprenticeship Levy came into force in April which may be putting employers off taking young people on;
- ★ People moving out of the area due to lack of educational opportunities and support, in particular there is an emphasis in Merthyr on vocational opportunities such as beauty courses. Other higher education opportunities are limited as young people from Merthyr have failed to get places on courses such as nursing despite having adequate qualifications. Many of the young people would prefer to stay here or return to Merthyr after studying away and
- ★ Women waiting until later to have babies to pursue careers.

The team then asked what could be the consequences if the population decreases in the way anticipated. The responses included:

- ★ For communities and young people – even less job and educational opportunities;
- ★ For money available for services fewer working aged people means less money for all services. In particular for arts venues such as the Town Hall, the Zoar Theatre etc for music and dance etc. The team suggested that local venues could be seen as community assets and thereby protected. There are three good bands in Merthyr and more should be done for choirs, dance classes and the Youth Orchestra. The Forum would benefit from training in marketing events and fund-raising to promote their own events over and

# MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

## REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031

### BACKGROUND PAPER: INITIAL CONSULTATION REPORT

above organised events and promotions such as Merthyr Rising and Made in Merthyr to take advantage of organisations such as the Music Venue Trust.

- ★ For the environment-there is not much for young people to do out-door. There are some good parks for younger children but some play equipment in some areas suffers from wear and tear, vandalism and rude graffiti. The team pointed out the Open Space Strategy which includes action plans to improve local spaces and proposals to designate Local Nature Reserves in each ward area, which the forum welcomed. This strategy can be viewed at <https://www.merthyr.gov.uk/media/3060/oss-action-plan-english.pdf>. The team also suggested inviting the author the MTCB's Landscape Architect to a meeting in the future so that they could get involved.
- ★ To investor's perception of the area – the forum thought that currently investors had a negative view of the area of jobless people on the dole. More should be done to improve the perception of the area which is not the real area, which has a rich history, beautiful areas and a rich culture including a great area for music.

We then discussed some of projects proposed in the Preferred Strategy of the LDP which can be viewed at <https://www.merthyr.gov.uk/media/3105/ldp-preferred-strategy.pdf> and commented on via the online comments-form which can be found at <https://www.merthyr.gov.uk/resident/planning-building-control/first-replacement-local-development-plan-2016-2031/>. Copies of the Easy Read guide were also distributed. With regard to existing projects with future developments and environmental protection the forum had this to say:

- ★ South Wales Metro & Bus station – the team explained that this project was part of the *City Deal* and would result in easier and more regular transportation throughout the South Wales region running up until 10:30pm. The Communications Team said they could forward links for the Forum to see. Although welcomed the main issues that concerned the Forum was that transport from the train station to the wider area was difficult late at night as buses stopped running in Merthyr at 6:30pm;
- ★ Strategic Hoover Regeneration Area – identified for major mixed development for new businesses, homes, shops, parkland, metro station, park and ride facilities and links to the Trevithick and Taff Trails. This was welcomed by the group and in particular the proposed park and ride facilities.
- ★ Improving the quality of open spaces – the group thought that there should be more for older children to do and that open spaces could be used for out-door arts and that the council could do better to up-sell spaces by: putting up more information boards about wildlife in areas such Cyfarthfa Park; introducing equipment like squirrel feeders; introducing more play equipment; cleaning up and repairing basketball courts etc. and introducing interactive smart walking routes using bar codes and phone apps. The team mentioned that there was currently a council consultation out regarding Active Travel Routes which can be viewed at <https://www.merthyr.gov.uk/news-events/latest-news/public-opinion-sought-on-merthyr-tydfil-s-active-travel-plans/?lang=en-GB&>.
- ★ Sites of Importance for Nature Conservation and Special Landscape Areas – the group welcomed these designations and would be interested in volunteering on some of the sites planting trees and bulbs etc. The team agreed to refer their details to the Biodiversity Officer so that she can be invited to meeting.
- ★ Renewable Energy – the group were in general favour of wind turbines and solar farms as long as they were not built within SINCS or the proposed SLA's. Everyone agreed that there was a balance to be made but that there was a need for renewable energy as we all have to do our bit. It was however recognised that Merthyr is only a small area in the grand scheme of things and that other areas such as China produced much more green house gas emissions. Additionally it was recognised that such development was controversial with the older generation who have lived with mines and tips. Reclaimed former tip areas would be good areas for solar farms in particular and they are aware of the existing farm near Fros-y-fran.

The team thanked the Forum for their views and promised to attend again once more detail was available.

## **APPENDIX 40: PRE-DEPOSIT CONSULTATION (PREFERRED STRATEGY) – JULY – 14<sup>TH</sup> – OCTOBER 6<sup>TH</sup> 2017 - SUMMARY OF RESPONSES**

### **Executive Summary**

#### **Preferred Strategy General Comments:**

The Preferred Strategy is generally supported and early consultation is welcomed.

#### **Key issues:**

The key issues are generally supported, particularly link well to the Well-being of Future Generations Act and has three credible themes. However it was recommended that:

- More specific reference should be made to the relationship with the Strategic Development Plan (SDP and the Environment (Wales) Act 2016;
- A Strategic Flood Consequences Assessment (SFCA) be carried out;
- Minerals should be safeguarded from inappropriate development as protection of mineral resources is a key issue;
- Employment should include manufacturing and skilled jobs for skilled workers;
- Tertiary education should provide opportunities for engineering;
- Maximise the benefits of Placemaking for major and strategic developments;
- The River Taff is an eyesore in the town centre area and
- There is a lack of Welsh medium education provision within the County Borough.

Council Response: A number of specific topic based and non-planning matters have been raised. Where relevant the Key Issues will be reviewed and up-dated in light of the updated evidence base. Where is it more appropriate the points raised will be addressed in the detailed policies of the Plan. An SFCA has been commissioned and reference will be made to the Environment (Wales) Act 2016 and the SDP in the Deposit Plan.

#### **Preferred Strategy Vision:**

The vision is generally supported, agreed and considered balanced and sustainable where the Strategic Regeneration Area is seen as key to the delivery of the Vision. However, some responders consider that it is perhaps a little too generic and aspirational and not ambitious or specific enough. It is further suggested that reference could be made to:

- Enhanced infrastructure and housing supply to manage [population]this growth;
- Balancing employment allocations and economic aims with housing growth;
- Giving adequate consideration to employment and retail opportunities and
- What sort of a place Merthyr Tydfil is now, was and could be.

Council Response: The Vision has been informed by the Local Wellbeing Plan and is it considered to provide an appropriate visioning statement for the area that balances these objectives. The Plan's more detailed objectives and policies can provide more detail. Further evidence has been prepared to inform the plan, e.g. an Employment Land Review.

### Preferred Strategy Objectives:

The LDP Objectives are generally supported and considered to provide a clear approach in achieving the defined Vision. In particular support was given to home building as a key focus and objectives: 2 to promote the use of the Welsh language; 8 relating to the protection and promotion of cultural assets but should include all assets and 16 ensuring a sustainable supply of minerals. However, some responders felt that the objectives could:

- Promote previously developed land for all uses and not just restricted to housing;
- Specifically identify different types of housing;
- Encourage business development from within the community;
- Include a reference to:
  - Planning for better Health and Well-being in Wales;
  - Explain how the Welsh language has been taken into account in plan preparation (TAN 20, paragraph 3.7.2);
  - Infrastructure being critical to all development sites;
  - affordable housing;
  - green urban spaces;
  - a range of housing sites on a range of sites;
  - long term effects of air quality;
  - obesogenic environments ;
  - dementia-friendly communities;
  - enhancing social inclusion and
- Include provision for:
  - A range of visitor accommodation;
  - Tourism and leisure development;
  - Sports provision (Swimming, skiing, cycling and walking)and
  - New community facilities and
  - Welsh medium Secondary school provision.

Council Response: General support welcomed. Where necessary the Objectives have been reviewed in light of comments received and the evidence base updated however where appropriate specific issues have been addressed in the topic based policies.

### Scale of Growth:

The level of growth is generally supported when considered against the range of issues the plan is seeking to address. However some issues need addressing including:

- An up to date affordable housing viability assessment and housing trajectory, to help demonstrate a 5 year land supply over the plan period, is required;
- The Council needs to demonstrate that that the level of growth proposed can be delivered in line with the necessary timescales;
- Justification is required for the suggested high level i.e. 25% of contingency and phasing over the plan period or increase the number of allocated sites;
- Reference and analysis needs to be made to regional context, with regards to population and housing growth for the Cardiff Capital Region as a whole;
- It is unclear how the growth levels relate to jobs;
- An investment scheme for water and sewage infrastructure may be required within AMP7 – 2020-2025 and AMP8 – 2025-2030 and will be considered for inclusion within these future AMP programmes;

BACKGROUND PAPER: INITIAL CONSULTATION REPORT

- The sustainable supply of minerals aggregate demand will require reviewing in the RTS process;
- Explain how renewable energy and low carbon opportunities have informed the scale and location of growth;
- Consideration should be given to the demand for Welsh medium education and
- More information should be provided on the draft Economic Growth Strategy.

Council Response: General support welcomed. In light of the consultation responses the proposed Scale of Growth will be retained. However, explanation for this option will be fully justified with reference made to the Housing Viability Assessment and an Employment Land Review. In addition, a Housing Supply Paper has been prepared.

**Distribution of Growth:**

There is broad support for the distribution of Growth and to the principle of merging the two growth zones which is considered to be logical, realistic and achievable subject to the sites allocated in the plan being viable and deliverable. Many, in particular NRW consider that the development of the Cwm Glo and Glyndyrys SSSI is completely inappropriate but welcome the regeneration of a former industrial brownfield site, although some raise concerns on the reliance on one large strategic site.

Other issues raised include:

- Since Town, Penydarren and Cyfarthfa wards are where demand for social housing is greatest this should be reflected in the spatial distribution of allocations within the Primary Growth Area;
- The environmental constraints and impacts from this option will need to be fully considered and assessed in the Plan preparation;
- Reference needs to be made to findings of the ISA/SA in regard to the Cwm Glo Glyndyrys SSSI;
- The strategy should ensure that there is a wide choice and range of sites to ensure that the Other Growth Area contributes at least 25% of the housing provision;

Council Response: General support welcomed. The Distribution of Growth will be retained. However, justification for this option will be fully explained and any anomalies addressed in the light of comments received and up-dating of the evidence base.

**Key policies:**

There is general agreement for the policies and link to the LDP objectives, which are considered to be clear and a strong foundation on which to build more detailed policies. In particular aligning designation with neighbouring authority designation is welcome. However, there is some concern about balancing between Environmental/Cultural/Heritage concerns with Economic ones. With regard to the Deposit LDP issues to be addressed include:

**Social policies:**

- **Housing:**
  - Clarify No. of dwellings on HSRA -800 or up to 1000;
  - Clarify composition of contingency allowance;
  - Robust and realistic justification for large windfall assumptions is required;

- Explain how the level of affordable housing need in the Local Housing Market Assessment (LHMA) has influenced the scale and location of growth, particularly in the south of the County Borough;
- Prepare a housing trajectory for the Deposit plan to help demonstrate a 5 year land supply over the plan period;
- Need to demonstrate in the Deposit Plan that all sites are financially viable and deliverable over the plan period, ensuring there is sufficient range and choice;
- No broad level affordable housing viability assessment has been submitted;
- There could be encouragement for SME and self-build house-builders and
- Consider rewording policies SW1-3.
- ➔ **Welsh language:**
  - Identify Welsh Language Sensitive Areas for example - around top of Castle Car Park where the river runs close to the rear of Theatre Zoar and
  - Include in policy a requirement for Language Impact Assessments to be undertaken on 'unanticipated' windfall sites.
- ➔ **Hoover Regeneration Area and Ivor Steel Works Regeneration Site:**
  - Establish full environmental characteristics for HSRA including flood risk and
  - Hydraulic Modelling Assessments (HMA) on clean water and sewerage networks may be required for HSRA and Ivor Steel Works Regeneration Site and
  - Early consultation with GGAT archaeological advisors to devise a strategy to mitigate the archaeological remains on the Ivor works site;
- ➔ **Planning Obligations:**
  - Planning obligations need to be realistic for the area, Policy SW 8 is vague;
  - Planning Obligations or CIL (regulations 123 prioritisation list) should include a financial contribution to Welsh Medium education and Welsh language considerations and
  - Need to be certain that pooling S106 agreements and a zero CIL charge in the OGA will be sufficient to fund projects.
- ➔ **Open Space:**
  - Should include policies for the provision, protection and enhancement of open space and set standards to meet deficiencies and
  - It would help to look at community/citizen boundaries.
- ➔ **Design and Placemaking:**
  - All new builds should have solar power and energy sustainability options e.g. incorporating rainwater harvesting solutions;
  - Dwellings must implement some energy efficient measures to keep running costs low;
  - Include policies on flooding, Sustainable Drainage Systems (SUDS)/Green Infrastructure and
  - Site developments should have full access to fibre optic broadband, Wifi capabilities and a review of mobile signal availability coverage.
- ➔ **Transport:**
  - Suggest revising wording of policy SW11;
  - Evidence delivery of Bus Station site;
  - The impact of traffic flows around the main roundabouts on the A470 between Abercynon and Cefn Coed needs to be considered;

BACKGROUND PAPER: INITIAL CONSULTATION REPORT

- Active travel routes and proposed Active travel Routes should be included in the LDP including along the A465 widening and A470 improvements
- The potential of the line to Cwmbargoed for freight or passenger use and
- Public transport should be available particularly in rural communities night and day.
- **Community facilities:**
  - A distinction should be made between cultural heritage and cultural assets and
  - Include policies to protect cultural assets such as churches, theatres, music venues, pubs, etc. therefore add cultural to the list in SW14 and
  - Include a criterion regarding the loss of facilities.

Council Response: The Social Policies have been reviewed and justified. Any anomalies or omissions will be addressed in the light of comments received and up-dating of the evidence base including taking into account the findings of the Housing Viability Assessment and Housing Supply Paper (factoring in levels of affordable housing).

**Cultural policies:**

- Consult with GGAT to devise a strategy to mitigate archaeological remains;
- The Cyfarthfa Heritage Area should be widened to encompass other Cyfarthfa industrial sites and any heritage based visitor attractions such as the Cyfarthfa Finger Tip, Tai Mawr Leat and Cefn Coed Viaduct, Chapel Row, Ynysfach Engine House and Furnaces;
- Any "heritage based visitor attraction" would need to be integrated into proposals for Cyfarthfa Castle and Cyfarthfa Park which need historic and natural heritage protection.
- The setting of a heritage asset cannot really be 'conserved or enhanced;'
- Include specific criteria in Policy CW15 to assess proposals for the re-use or new development affecting historic areas and buildings;
- Include historic assets of local importance and policies for their conservation and protection and
- Identify the location of Urban Character Areas and Archaeologically Sensitive Areas.

Council Response: The Cultural Policies have been reviewed and justified. Any anomalies or omissions will be addressed in the light of comments received and up-dating of the evidence base.

**Environment Policies:**

- Provide criteria against which development affecting different types of designated sites, will be assessed;
- Clearly identify on the Proposals or Constraints Map areas to which policies for the conservation and enhancement of the natural environment will apply;
- Include the aspiration for re-opening the Abernant Tunnel in order to link Merthyr Tydfil and Aberdare;
- Suggest revising wording and explain the practicalities and implementation of policy EnW17;
- Include West Merthyr / Rhydyar West as an LNR;



- Justify how policy EnW18 delivers the 'access to greenspace' principles and targets for all residents in all wards and does not downgrade other spaces such as green wedges;
- Consider redrafting policy EnW19 to separate SSSI from habitats of principle importance in Wales.

Council Response: The Environmental Policies have been reviewed and justified. Any anomalies or omissions will be addressed in the light of comments received and up-dating of the evidence base including the SA and HRA.

### **Economic Policies:**

#### ➤ **Employment:**

- Evidence the employment target of 'up to 30ha' of B-Class land the level appears to be similar to the amount allocated in the adopted LDP, which focused on an enhanced level of growth rather than a mid growth level;
- Consider a new policy to support alternative uses on existing employment sites and
- Hydraulic modelling of the water supply and/or sewerage networks may be required;

#### ➤ **Retail:**

- Consider policy for developing existing out-of-town retail outlet;
- Include edge-of-centre sites such as Cyfarthfa Retail Park as part of any expected sequential site assessment and
- Consider rephrasing Policy EcW23.

#### ➤ **Tourism:**

- There is no clear strategy for developing tourism related activities and facilities;
- Is there is a need to develop visitor accommodation or support the expansion of existing tourism related businesses?

#### ➤ **Energy:**

- Explain how the renewable energy policies in the Deposit plan have been developed in line with Planning Policy Wales (PPW);
- Include the contribution of the plan area towards developing and facilitating renewable and low carbon energy;
- Identify and include preferred RE sites in the LDP proposals Map;
- Include specific thresholds for development in plan policy to align with national policy;
- Include a policy framework that encourages sub-local Authority scale renewable energy projects;
- Explore opportunities to co-locate major developments to optimise renewable energy potential and promote district heating schemes and
- Take into account issues associated with grid connection and the transportation network.

#### ➤ **Waste:**

- Detailed policies should support and meet requirements of sustainable waste management.

#### ➤ **Minerals:**

- The safeguarding of coal should be in accordance with the advice contained in The National Planning Policy Minerals Planning Policy Wales and MTAN2 in Wales;
- The planning processes in coalfield areas need to take account of coal mining legacy issues and thereby reduce the future liability on the tax payer in accordance



with the advice in The National Planning Policy Framework and Planning Policy Wales and MTAN2 in Wales;

- o The establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework Minerals Planning Policy Wales and MTAN2 in Wales is required;
- o The safeguarding of mineral resources and minerals infrastructure is critical to meet the demands within the plan is required and
- o Include reference to Cwmbargoed railhead as a freight transfer/distribution facility and extension of the freight line through to Dowlais Top.

Council Response: The Economic Policies have been reviewed and justified. Any anomalies or omissions will be addressed in the light of comments received and up-dating of the evidence base including the Employment Land Review.

**Monitoring framework:**

- ➡ Should include appropriate targets and key triggers so that action can be taken in advance of the statutory 4-year review.
- ➡ Developing and facilitating renewable and low carbon energy contribution should be included in the Monitoring Framework.

Council Response: A Monitoring framework will be prepared as part of the Deposit Plan.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>PRE-DEPOSIT CONSULTATION (PREFERRED STRATEGY) SUMMARY OF RESPONSES AND HOW THEY HAVE INFLUENCED THE PREPARATION OF THE DEPOSIT LDP.</b>		
<b>Preferred Strategy: General</b>		
Responder	Summary Comment	LPA Response
<b>Welsh Government (WG):</b>	Broadly supports the Preferred Strategy and the proposed level of housing growth.	Noted.
<b>The Coal Authority (TCA):</b>	TCA welcomes early consultation also wishes to continue to be consulted both informally if required and formally on future stages.	Noted.
<b>Public Health Wales (PHW) and Cwm Taf University Health Board (CTHB):</b>	Acknowledge the strategic context of the Well-being of Future Generations Act.	Noted.
<b>Preferred Strategy: Evidence Gathering, Context and Key Issues</b>		
Responder	Summary Comment	LPA Response
<b>Natural Resources Wales (NRW):</b>	Support Key issues including linking green spaces, improvement to water bodies & identifying flood risks. Can provide information on Water quality and quantity data (and interpretation).	Noted.  Noted.
<b>Home Builders Federation (HBF):</b>	Recommend including a section on the relationship of the LDP to the potential for a Strategic Development Plan. Reference needed to the Strategic Development Plan (SDP).	Comments noted. The position regarding the NDF and SDP has been clarified in the Deposit Plan.
<b>The Coal Authority:</b>	Supports the Key Issue that requires the protection of mineral resources.	Noted.
<b>Caerphilly County Borough Council (CCBC)</b>	Reference needed to SDP.	Noted. Reference has been made to the SDP in the Deposit Plan.
<b>Preferred Strategy: Vision</b>		
Responder	Summary Comment	LPA Response
<b>Glamorgan-Gwent Archaeological Trust Ltd (GGAT):</b>	Support the Vision which includes the protection, and promotion, of heritage and cultural assets.	Noted.
<b>HBF:</b>	The vision should articulate Merthyr Tydfil as one of the 'Primary Key Settlements' in the Heads of the Valleys sub-region by matching housing growth with it.	The Vision has attracted general support amongst consultees and includes reference to Merthyr Tydfil's position as a regional centre and has had regard to Local Wellbeing Plans. The importance of Merthyr Tydfil as a Primary Key Settlement in the Heads of the Valleys sub region has also been recognised within the Strategy section of the LDP. Therefore amendments to the vision have not been

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		proposed.
<b>A Rees:</b>	The Vision has three credible themes underpinning the ideals of how the future status as a regional centre of the Heads of the valleys could materialise and Also welcome insight into what the County Borough will aspire to over the next 16 years although contingencies will need to be made for unforeseen obstacles.	Noted.  Noted.
<b>C Connolly:</b>	Agrees with the Vision.	Noted.
<b>Rhondda Cynon Taf County Borough Council-Planning (RCTCBC-P):</b>	Recommends that the Vision should include reference to Welsh education medium provision.	The vision is an overarching statement of intent and the LDP Issues and Objectives that sit under the vision are more specific. Therefore, it is not considered necessary to include reference to Welsh medium education specifically in the vision.
<b>Councillor Brown:</b>	Agrees with the Vision.	Noted.
<b>Merthyr Tydfil Anti-opencast Campaign (MTAOC):</b>	Agrees with the Vision.	Noted.
<b>Rhydyar West Regeneration Partnership (RWRP):</b>	Agrees with the Vision.	Noted.
<b>L Lewis:</b>	Agrees with the Vision.	Noted.
<b>Rural Action Cwm Taf (RACT):</b>	Supports the Vision although considers that it is very generic and should be more aspirational.	The vision provides an overarching vision statement for the area. This is supplemented the LDP Objectives and policies which can be more specific.
<b>CPR Consultancy:</b>	Supports the Vision.	Noted.
<b>Merthyr Tydfil Heritage Trust (MHT):</b>	Supports the Vision but thinks it's not particularly distinctive.	Noted.
<b>Trago Mills Limited:</b>	Considers that the Vision should ensure employment and retail opportunities are given adequate consideration and support through the plan.	The vision provides an overarching vision statement for the area. This is supplemented the LDP Objectives and policies which can be more specific. These include reference to employment and Town and Local Centres. In addition, the vision contains reference to living, working and enjoying/visiting. Therefore, it is not considered necessary

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		to amend the vision.
<b>A Cousins:</b>	Supports the Vision.	Noted.
<b>Elan Homes Ltd:</b>	Supports the Vision.	Noted.
<b>Cyfarthfa Branch Labour Party (CBLP):</b>	Supports the Vision but considers it to be generic and aspirational.	Noted. The aim of the vision provides an overarching vision statement for the area. This is supplemented by the LDP Objectives and policies which can be more specific.
Merthyr Initiative Group	Supports the Vision which is both relevant and distinct.	Noted.
<b>Preferred Strategy: Objectives</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	<p>Objective 2 and aims to promote the use of the Welsh language, the deposit Plan should include Welsh language impact assessments and sensitive areas, planning obligations and needs.</p> <p>Supports LDP Objective 14 but considers that the plan contains no clear strategy for developing tourism related activities and facilities.</p> <p>It is unclear why the prioritisation of affordable housing through planning obligations does not form an Objective in the plan.</p>	<p>Noted. Potential Welsh language impacts have been considered as part of the Plan preparation and Sustainability Appraisal. There are not sufficient concentrations of Welsh speakers in the MTCBC area to enable the identification of sensitive areas and this has been clarified in the Deposit Plan.</p> <p>Tourism policies have been introduced in the Deposit Plan.</p> <p>Objective 3 has been amended to include reference to affordable housing in the Deposit Plan.</p>
<b>Theatres Trust (TT):</b>	Supports LDP Objective 8.	Noted.
<b>GGAT:</b>	Supports LDP Objective 8 and note that this is interlinked with other parts of the Vision, and Objectives, and will be affected by development of infrastructure and buildings, landscape and economy.	Noted.
<b>Marvel Ltd.:</b>	Objects to LDP Objective 14 as it has a lack of provision for visitor accommodation and attractions which could generate jobs. Considers that not recognising the place leisure pursuits can play in creating a healthier Wales fails soundness test 1 and short sightedness as to potential role in job creation.	The objective provides an overarching aim that is considered appropriate for the County Borough. Tourism, recreation and leisure policies have been added to the Deposit Plan through which proposals for new tourism and leisure facilities, including for visitor accommodation, could be considered.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>HBf:</b>	<p>Objective 1 should be amended to reflect recommendations to amendments to the Vision.</p> <p>Objects to LDP Objective 3 as it limits housing development to 'previously developed land' and not to a range of sites and It is recommended that a 'diverse supply of housing' should be amended to specifically identify different types of housing.</p>	<p>No amendments to the Vision have been made to the Deposit Plan.</p> <p>Reference to 'previously developed land' has been deleted from this objective which now focuses on the provision of housing.</p> <p>A new objective regarding regeneration and the suitable reuse of previously developed land has also been included.</p>
<b>Dwr Cymru Welsh Water (DCWW):</b>	Supports LDP objectives and welcome early engagement.	Noted.
<b>Mineral Products Association (MPA):</b>	Supports LDP Objective 16 but recognises that it has wider social and environmental benefits over and above just the economy.	Noted. 'Sustainable' includes links to social and environmental considerations.
<b>CCBC:</b>	Supports LDP Objective 6.	Noted.
<b>C Connolly:</b>	Agrees with the LDP Objectives.	Noted.
<b>RCTCBC-P:</b>	Welcomes LDP Objective 2 to promote the use of Welsh language.	Noted.
<b>Councillor Brown:</b>	Agrees with the LDP Objectives.	Noted.
<b>MTAOC:</b>	Agrees with the LDP Objectives.	Noted.
<b>RWRP:</b>	Agrees with the LDP Objectives.	Noted.
<b>L Lewis:</b>	Agrees with the LDP Objectives.	Noted.
<b>RACT:</b>	<p>Employment sites should be allocated in balance with housing allocation.</p> <p>We should be encouraging business development from within the community. LDP objectives 11-17 therefore need to be stronger.</p>	<p>The LDP objectives provide overarching aims that are considered appropriate for the County Borough.</p> <p>Detailed policies and allocations have been included. In particular, a range and choice of employment sites have been allocated with policies included to protect existing land. Plan housing growth has also been considered alongside the identified employment needs as part of the Employment Land Review that has informed these policies.</p>
<b>CPR Consultancy:</b>	Supports the LDP Objectives.	Noted.
<b>MTHT:</b>	Supports the LDP Objectives but consider that the economic ambitions will conflict with social, cultural and environmental aims.	To address local growth needs and wellbeing objectives the Plan strikes a balance between

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	<p>LDP objective 8 should be revised to read <i>"to protect, enhance and promote ALL cultural, HISTORICAL and cultural assets."</i></p>	<p>economic, social, cultural and environmental aims. Detailed policies have been included in the Deposit Plan to ensure the protection and enhancement of important historical and cultural assets. Objective 8 has been amended to include reference to historic assets.</p>
<p><b>Public Health Wales (PHW) &amp; Cwm Taf University Health Board (CTUHB):</b></p>	<p>LDP Objective 2 should be a Cultural objective.</p> <p>LDP Objective 3 should include reference to Affordable housing.</p> <p>A social objective to implement measures to reduce obesogenic environments e.g. the density of fast food takeaways in areas of deprivation/near schools should be included.</p> <p>Objectives should include specific references to significant increase in the population aged 65 and dementia-friendly communities.</p> <p>Consideration should be made to the potential impact new development may have on local facilities including schools and GP practices.</p> <p>Reference should be made to 'Local air quality management in Wales' (June 2017) which states that development plans should ensure consideration is given to the long-term air quality effects of proposed development.</p> <p>10 should include reference to 'green urban spaces.'</p>	<p>Objective 2 is a social as well as cultural objective. The LDP objectives are cross cutting in nature. To clarify this headings have been removed from the objective table. However, Objective 2 refers to Welsh Language only but is considered to be an overarching cultural Objective. This has been amended accordingly. Objective 3 has been amended to include reference to affordable housing in the Deposit Plan. The issue of fast food takeaways in very specific matter for inclusion in the objectives. Retail policies have been included in the Deposit Plan. These are required to be in line with national policy and cannot be overly restrictive. Encouraging the development of health active environments could be added to the design policies of the Plan. Provision of community infrastructure is included as part of Objective 4 which has been clarified. The Transport policy in the Deposit Plan includes reference to air borne pollution.</p> <p>With regards to green infrastructure, this has been included in the design</p>

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		policies of the Plan.
<b>A Cousins:</b>	Supports the LDP Objectives.	Noted.
<b>Elan Homes Ltd:</b>	Supports the LDP Objectives.	Noted.
<b>P Corke:</b>	Recommends linking the Castle Car Park to the Theatre Zoar area to create a Welsh language Hub.	Noted. Where planning permission is required, specific development proposals can be assessed against the Plan's policies.
Merthyr Initiative Group	Supports all the Objectives which should be retained (although delivery is dependent on buy in by private developers.	Noted.
<b>Cyfarthfa Branch Labour Party:</b>	Supports the LDP Objectives.	Noted.
<b>Preferred Strategy: Scale and Distribution off Growth</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	<p>Is broadly supportive to the Preferred Strategy and Level of Housing growth when considered against the range of issues the plan is seeking to address.</p> <p>Has no objection to in principle to the level of flexibility in the plan.</p> <p>Does not object to the principle of merging the two growth zones and supports the ethos of the wider strategy in line with the principles of sustainable development as set out in national policy subject to the Deposit plan clearly explaining how the level of affordable housing need in the Local Housing Market Assessment (LHMA) has influenced the scale and location of growth, particularly in the south of the County Borough.</p> <p>Since no broad level affordable housing viability assessment has been submitted it is also unclear how the viability levels have informed the plans spatial distribution, density assumptions and scale of housing sites.</p> <p>An update to the Council's affordable housing viability assessment will need to be undertaken for the Deposit plan and Prepare a housing trajectory for the Deposit plan to help demonstrate a 5 year land supply over the plan period.</p>	<p>Noted.</p> <p>Noted.</p> <p>Further justification regarding the level of growth proposed across the two growth areas and how this links with housing evidence has been included in the housing supply background paper.</p> <p>A broad level affordable housing viability assessment has been prepared to inform the Deposit Plan.</p> <p>A draft housing trajectory has also been included in the housing supply background paper.</p>
<b>NRW:</b>	<p>Objects to the Urban extension option - developing the Cwm Glo and Glyndyrys SSSI as the key component of this strategy is completely inappropriate given the suitability of the alternative spatial options.</p> <p>Could support the Mid Growth Option in principle subject to the environmental constraints and impacts from this option</p>	<p>Noted. The urban extension option has not been taken forward.</p> <p>Support welcomed. The Deposit Plan has been informed by a Sustainability</p>



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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	<p>being fully considered and assessed in the Plan preparation.</p> <p>Could support the Low growth Option in principle.</p>	<p>Appraisal and the HRA has been rerun following site allocations in the Deposit Plan.</p> <p>Comments regarding the low growth option are also noted.</p>
<b>Boyer:</b>	<p>The scale of growth proposed is realistic and achievable, the LDP Review should seek to maintain the existing build rate but it will be essential to ensure that the sites allocated in the plan are viable and deliverable particularly as the Preferred Strategy is over-reliant on the Primary Growth Area and Policy SW3.</p>	<p>Noted. A housing viability assessment has been prepared to inform the Deposit Plan. The Plan makes provision for 70% of allocations in the primary growth area and 30% in the other growth area. This is considered an appropriate split given housing needs and development viability. This has been clarified in the housing supply background paper.</p>
<b>HBF:</b>	<p>Support chosen spatial distribution but object to heavy reliance on one regeneration site.</p> <p>Recommend aligning smaller sites allocations with need to encourage SME and self-build house-builders. Although we accept in principle that the mid growth option is the most sustainable and realistic of the three option considered The LDP could be more aspirational and look to identify a higher housing figure justified by the City Deal and the role Merthyr identifies for itself as 'regional centre for the Heads of the Valleys and is further concerned about the ability of the Council to justify the suggested high level of contingency, increasing the number of sites could reduce the level of contingency.</p>	<p>Support for the spatial distribution welcomed. Following the preparation of additional evidence and framework master plan the HSRA is allocated for 440 dwellings. The HSRA therefore accounts for 20% of the total housing requirement.</p> <p>The remainder of the housing provision in the Deposit Plan comprises a range of sites of various sizes. In total 2220 dwellings are allocated compared to the dwelling requirement of 2250. This allows for a flexibility allowance of 25% when windfall development allowances are factored in. This level of allocation and contingency are considered appropriate in meeting the identified requirement.</p> <p>The Plan provides 70% of allocations in the primary growth area and 30% in the other growth area. This is considered an appropriate split given housing needs</p>



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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		and development viability. Further details are provided in the housing supply background paper.
<b>DCWW:</b>	Support Preferred Level of growth although an investment scheme may be required within AMP7 – 2020-2025 and AMP8 – 2025-2030 programmes and the provision of 2,825 new dwellings over the plan period (1,625 dwellings of which will be delivered on allocated sites).	Comments noted. The Council has consulted with DCWW in as part of the Candidate Site assessments. It is understood that the delivery of sites would not unduly restrict and any DCWW requirements have been referenced in site assessments. It is understood that projects can only be considered for inclusion in the AMPs once their allocation is confirmed in an adopted Plan and therefore limited details of the AMP7/8 will be available.
<b>MPA (Wales):</b>	The preferred growth option will necessitate the sustainable supply of minerals aggregate demand will require reviewing as demand on mineral products increases and whichever spatial strategy is pursued, the safeguarding of mineral resources and minerals infrastructure is critical.	Comments noted. The Deposit Plan supports the sustainable supply of minerals and contains a policy on minerals which safeguards mineral resources and minerals infrastructure.
<b>CCBC:</b>	<p>Supports the preferred spatial option. Make reference to regional context with regards to population and housing growth for the Cardiff Capital Region as a whole.</p> <p>Clarify how the level of population growth relates to jobs. Provide more information on draft Economic Growth Strategy and why level of economic growth is the same as the adopted LDP.</p>	<p>Noted. The LDP provides above the needs identified for the principle population projections and has had regard to the opportunities improved transport infrastructure will provide. Where appropriate the Deposit Plan contains references to the regional context.</p> <p>An Employment Land Review has been prepared to inform the Deposit Plan. This has included reviewing minimum quantitative land needs. This has also included a review of sites (property market review and site audit). Recommendations in providing a range and choice of employment sites</p>

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		have been included in the Plan. The level of provision is considered appropriate to meet local employment needs, to account of the loss of productive employment land in the Plan period, the regeneration of sites and the provision of employment land to support potential waste management facilities.
<b>C Connolly:</b>	Agrees with the Scale and Distribution of Growth.	Noted.
<b>RCTCBC:</b>	The preferred Mid Growth/Sustainable Population growth option would have a direct, quantifiable effect on Welsh medium education demand in MTCBC. The MTCBC Replacement LDP would need to be suitably considered and addressed within it.	Noted. Where necessary CIL contributions could be considered.
<b>Councillor Brown:</b>	Agrees with the Scale and Distribution of Growth.	Noted.
<b>MTAOC:</b>	Agrees with the Scale and Distribution of Growth.	Noted.
<b>RWRP:</b>	Agrees with the Scale and Distribution of Growth.	Noted.
<b>I Lewis:</b>	Agrees with the Scale and Distribution of Growth.	Noted.
<b>Rural Action Cwm Taf:</b>	<p>Scale of growth identified is aspirational and will bring other problems.</p> <p>Strongly objects to the urban extension spatial option which would cause harm the SSSI but considers the preferred Scale of growth is too aspirational.</p> <p>Site developments should have full access to fibre optic broadband and Wifi capabilities &amp; review of mobile signal availability as coverage.</p>	<p>The preferred mid growth option is based on past build trends and is considered to represent a deliverable level of growth for the County Borough. This would result in a modest and sustainable population increase of 8% when compared with a projected population decline indicated by Welsh Government principle population projections. Comments regarding the urban extension spatial option and potential impact on the SSSI are noted. This spatial option has been considered but is not been taken forward.</p> <p>Telecommunications providers and mobile operators have been consulted as part of the site</p>

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	All new builds should have solar power and energy sustainability options.	assessments and have not raised any infrastructure capacity issues. Furthermore, there is widespread access to superfast broadband capabilities within the area. Appropriate renewable energy and design policies have been included in the Deposit Plan.
<b>A Marsh:</b>	Agrees with the Growth & Spatial Options.	Noted.
<b>George Design Consultants (GDC):</b>	Support Growth & Spatial Options.	Noted.
<b>CPR Consultancy:</b>	Supports the Spatial & Growth Options.	Noted.
<b>MTHT:</b>	Supports the Spatial Options and Growth Options and considers that the new dwellings target is in the right range but should take account of 2016 Welsh Government population projections.  Supports the New Metro hub at Hoover Brandy Bridge if it's developed to the right design and that should be developed forthwith.	Support welcomed. The population and household projections utilises the latest available official Welsh Government projections however where new projections are published these will be considered. Support for new metro welcomed. Detailed proposals have yet to be finalised but land will be safeguarded.
<b>PHW:</b>	Supports the HRSA option.	Noted.
<b>PHW &amp; CTUHB:</b>	Considers that consideration should be made to the potential impact new development may have on local facilities including schools and GP practices.	The Deposit Plan includes a development contributions policy to consider the provision or contribution towards community infrastructure where this cannot be covered by contributions from the Community Infrastructure levy. In addition, a criteria based community's facilities policy has been included in the Deposit Plan that will offer protection for such facilities.
<b>Llancaiach Fawr Manor:</b>	Object to the development of greenfield sites and removal of green wedges designed to protect the amenity value of specific areas.	A background paper regarding the removal of green wedge designations has been prepared. The settlement boundary policy included in the Deposit Plan is considered sufficient in protecting the

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

		countryside beyond identified settlement limits from inappropriate development.
<b>A Cousins:</b>	Supports the Growth & Spatial Strategy.	Noted.
<b>Elan Homes Ltd:</b>	Supports the Preferred Growth & Spatial Options & Hoover Site Regeneration Area (HRSA) which they have begun drafting proposals for its development.	Support welcomed.
<b>CBLP:</b>	Supports the scale of growth as long as investment is made by private developers working with Welsh Government, the SE Wales Metro and Cardiff Bay Regional plans and it supports the development of HSRA.	The Deposit Plan also clarifies specific policies and any site requirements. The Council will work alongside land owners in the regeneration of sites. In particular, the Council is working with Welsh Government and Transport for Wales who are preparing a masterplan for the HSRA.
<b>Rhondda Cynon Taf County Borough Council-Countryside Team (RCTCBC-CT):</b>	Recommend quoting findings of the ISA in relation to development of Cwmglo and Glyndyrys SSSI, as being completely inappropriate, given the suitability of the alternative spatial options.	Noted. Details of the alternative options considered are included in the Deposit Plan Sustainability Appraisal report and Initial Consultation Report where necessary.
<b>Merthyr initiative Group</b>	Supports the Mid growth option. The "Hoover Strategic Regeneration Area" has the potential to bring back into beneficial use a dormant brownfield site at a gateway location to the main town of Merthyr Tydfil. Agrees with the proposed spatial option Rejects any urban extension involving "built developments" on the Cwmglo/Glyndyrys SSSI which is an integral part of the West Merthyr Flank Special Landscape Area.	Noted. Noted.  Noted. Noted.
<b>Preferred Strategy: Key policies</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>C Connolly:</b>	Agrees with the Strategic policies.	Noted.
<b>Councillor Brown:</b>	Agrees with the Strategic policies.	Noted.
<b>MHT:</b>	Supports the Policy link to LDP objectives that key environmental issues seem to be addressed in the policies but is concerned that caveats clauses could make it possible to over-rule policies.	Noted. Policies are required to take account of national planning policy and relevant planning considerations.
<b>MTAOC:</b>	Agrees with the Strategic policies.	Noted.
<b>RWRP:</b>	Agrees with the Strategic policies.	Noted.
<b>L Lewis:</b>	Agrees with the Strategic policies.	Noted.
<b>CPR Consultancy:</b>	Supports the Strategic policies.	Noted.
<b>A Cousins:</b>	Supports the Strategic policies.	Noted.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>Elan Homes Ltd:</b>	Supports the Strategic policies which are considered to be clear and represent a strong foundation on which build more detailed policies of the Deposit LDP.	Noted.
<b>CBLP:</b>	Supports the Key policies. Considers that immediate action is needed to deal with issues at Cyfarthfa Retail Park roundabout and the additional impacted of the opening of Trago Mills.	Support welcomed. It is understood that WG are assessing the capacity of A470. Future detailed development proposals will be required to consider their likely impacts though a Transport Assessment and identify any improvement works necessary.
<b>DCWW:</b>	Ensure a variety of 'mitigation measures' in relation to the water environment regarding physical barriers and rural diffuse and mine water discharges.	Design and Environmental Protection policies in the Deposit Plan include criteria for regarding drainage and flooding.
<b>MTHT:</b>	Is concerned about balancing Environmental and Cultural/Heritage concerns with economic ones, unless the policies are followed rigorously in spirit and word they will fall short of achieving balance in delivery.	The Deposit Plan includes specific policies regarding heritage assets that are considered appropriate and robust. Whilst economic development is an important consideration, new development will be required to satisfy all the plans policies.
<b>Merthyr Initiative Group</b>	Considers the Strategic policies to be clear and should help to deliver the vision.	Noted.
<b>Preferred Strategy: Social Policies</b>		
<b>Policy SW1: Provision of new homes</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	If appropriate, identify Welsh language sensitive areas and include in policy a requirement for Language Impact Assessments to be undertaken on 'unanticipated' windfall sites.	Noted. The Council has considered the evidence base regarding welsh language skills in the County Borough and the designation of Welsh Language Sensitive areas is not considered necessary.
<b>Boyer:</b>	Allocations within the Primary Growth Area are viable and deliverable and the strategy should ensure that the Other Growth Area contributes at least 25% of the housing provision (147 dwellings).	Noted. The other growth area provides 30% of the total allocations in the Deposit Plan. A housing supply background paper has been prepared which deals with this issue.
<b>Marvel Ltd (WYG):</b>	CS Nos. 20, 21, 23& 62 can provide a useful contribution towards meeting the 981+ required homes in the PGA & site 62 towards	A site assessment background paper has been prepared that sets out the

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	the 800 in the HSRA.  Clarify composition of contingency allowance.	consideration of candidate sites against the strategy and detailed site assessments. In addition, a housing supply background paper has been prepared that sets out additional justification.
<b>HBF:</b>	Clarify composition of contingency allowance.	A housing supply background paper has been prepared to inform the Deposit Plan.
<b>DCWW:</b>	Support the provision of 2,825 new dwellings over the plan period in line with the preferred growth option.	Noted.
<b>Policy SW2: Provision of affordable housing</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	Up-date to affordable housing viability assessment required.  The Council should ensure the large windfall assumptions in the Deposit plan are robust and realistic	The Council has undertaken a broad level affordable housing viability assessment to inform the Deposit Plan. A housing supply background paper has also been prepared that clarifies the windfall assumptions.
<b>HBF:</b>	The words 'aim to' should be inserted in front of the words <i>contribute (x number)...</i> in Policy SW2.  Policy SW4 would be more appropriate to include 'Affordable.... settlement boundary'.	This Policy has been up-dated to include specific targets. This is explained in the reasoned justification to the policy. A new Affordable housing policy has been included in the Deposit plan.
<b>Policy SW3: Sustainably distributing new homes</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>Boyer:</b>	Ensure allocations within the Primary Growth Area are viable and deliverable.	A broad level affordable housing viability assessment has been prepared to inform the Deposit plan. In addition other deliverability matters have been considered within the site assessments.
<b>HBF:</b>	The HBF does not consider that this is the right policy in which to include the wording, 'Affordable housing developments of x homes or fewer will be supported on sites no greater than x Ha. outside but adjoining the settlement boundary.' The HBF suggests policy SW4 would be more appropriate.	Noted. This text has been removed and included in the development outside settlement limits policy.
<b>Table 1: Components and distribution of housing supply 1<sup>st</sup> April 2017</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	Robust and realistic justification for large windfall assumptions in the Deposit Plan is	Noted. A broad level affordable housing viability

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	required. The Authority will need to demonstrate in the Deposit Plan that all sites are financially viable and deliverable over the plan period, ensuring there is sufficient range and choice. Prepare a housing trajectory for the Deposit plan. Demonstrate a 5 year land supply.	assessment has informed the Deposit Plan.  In addition, a housing supply background paper has been prepared which clarifies these issues and provides a housing land supply trajectory.
<b>Boyer:</b>	The strategy should ensure that the Other Growth Area contributes at least 25% of the housing provision (147 dwellings).	Noted. The other growth area provides 30% of the total allocations in the Deposit Plan. A housing supply background paper has been prepared which deals with this issue.
<b>CCBC:</b>	There is a need to clarify No. of dwellings on HSRA (800 or up to 1000).	Noted. The summary description for the Spatial Option indicated "up to 1000 dwellings" however the remainder of the Preferred Strategy document made reference to circa 800 dwellings. Master planning for the Hoover Strategic Regeneration Area (HSRA) has refined this allocation to 440 dwellings at the Hoover Factory site. Future development opportunity sites are located west of the river Taff at Dragon Parc, the Lowes and Gethin Tip however existing flood risks will need to be mitigated prior to residential being acceptable here. The HSRA remains by far the largest site allocation in the County Borough.
<b>Policy SW4: Settlement Boundaries</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>HBf:</b>	This is a more appropriate place to mention affordable homes outside of the settlement boundary.	Agree. The housing policy has been amended and this issue included in the Settlement Boundary policy in the Deposit Plan.
<b>Marvel Ltd (WYG):</b>	SW4 is more appropriate place to mention affordable homes outside of the settlement	Noted The housing policy has been amended and this



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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	boundary.  Reword policy to read <i>"The development supports the expansion of an existing MTCBC based business."</i>	issue included in the Settlement Boundary policy in the Deposit Plan. The proposed policies would achieve this.
<b>MPA:</b>	Support criteria <i>"The development is associated with rural enterprises or the winning and working of minerals"</i> but Object to description of minerals being exploitation for short term gains and consider that the long-term value of minerals is rarely acknowledged.	Support welcomed.  The Deposit Plan contains more detailed policies, and in particular policies that safeguards mineral resources for future use.
<b>A James:</b>	Request that the settlement boundary is revised to include CS19.	Settlement boundaries have been reviewed for the Deposit Plan to include existing development and allocated development sites. Details of the site assessments can be found in the Site Assessment background paper. The allocation of this site is not accordance with the strategy of the Plan.
<b>CPR Consultancy:</b>	Request that the settlement boundary is revised to include CS 100.	The settlement boundary has been amended and now includes this site.
<b>Caerphilly CBC</b>	Caerphilly CBC strongly resist the de-designation of the green wedge between Trelewis and Nelson as it also prevents coalescence with and protects the integrity of a grade I listed building, Llancaiach Fawr in Nelson.	Noted. A background paper regarding the removal of green wedge designations has been prepared. It is considered that the Plan's policies including the settlement boundary and landscape policies, together with ensuring that there is sufficient land for development, are sufficient to provide the necessary protection to prevent coalescence.
<b>Policy SW5: Hoover Strategic Regeneration Area</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>NRW:</b>	It will be important to examine opportunities for ecological enhancements to maximise the positive aspects as there will be a need to understand what environmental opportunities are available early in the development of the HSRA. Establish full environmental characteristics for HSRA including flood risk and consider the water	Noted. A Strategic Flood Consequence Assessment has been undertaken to inform the Deposit Plan and additional hydraulic modelling considered. In addition, the Council is working with Welsh



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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	environment in the early stages of master planning.	Government and Transport for Wales to prepare a masterplan for the HSRA that identifies green infrastructure opportunities.
<b>Marvel Ltd (WYG):</b>	<p>Question HSRA's ability to deliver all proposed level of development and thereby relying on the site as a key regeneration area is unsound. Unclear what degree of land-owner agreement and engagement exists outside of the Candidate Sites 30, 67-75. The number of listed buildings and their settings presents a significant constraint to the delivery and capacity of the site for development.</p> <p>Failure to justify omission of land to the east of the A470 from the candidate SLA Merthyr West Flank.</p>	<p>The Council has worked with Welsh Government and Transport for Wales to prepare additional evidence for the site. This has included a framework master plan for the Hoover Strategic Regeneration Area (HSRA) which has refined this allocation to 440 dwellings at the Hoover Factory site. Future development opportunity sites are located west of the river Taff at Dragon Parc, the Lowes and Gethin Tip however existing flood risks will need to be mitigated prior to residential being acceptable here. The HSRA remains by far the largest site allocation in the County Borough, representing 20% of the total housing allocations. The appropriateness and deliverability of the remaining strategy compliant candidate sites has also been considered. This has resulted with 70% of allocations within the Primary Growth Area and 30% in the Other Growth Area. The extent of listed buildings and their settings is not considered to represent a significant constraint to future development. The SLA background paper has been up-dated to fully justify the methodology used in line with NRW guidance.</p>
<b>DCWW:</b>	Support the Preferred spatial option and focus on the HSRA, but Hydraulic Modelling Assessments (HMA) on clean water and sewerage networks may be required.	Noted. Suggested requirements have been included in the site allocations details section of the Plan.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>A J Rees</b>	The site offers a straightforward connection to the Valleys Metro loop.	Noted.
<b>Policy SW6: The former Ivor Steel Works Regeneration Site</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>GGAT:</b>	Require early consultation with GGAT to devise a strategy to mitigate the archaeological remains.	Noted.
<b>HBf:</b>	Support Policy approach.	Noted.
<b>DCWW:</b>	Support the former Ivor Steel Works Regeneration Site but Hydraulic Modelling Assessments (HMA) on clean water and sewerage networks may be required.	Noted.
<b>Policy SW7: Gypsy, Traveller and Showpeople sites</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>NRW:</b>	We can provide advice on this policy when it is developed.	Noted.
<b>Policy SW8: Planning Obligations</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	<p>Approach to update its viability work to take account of the CIL.</p> <p>Policy SW8 needs to provide certainty re obligations to be sought by the council. Consider the appropriateness of Welsh language considerations with the planning obligations policy, and explain how the needs and interests of the Welsh language have been taken into account in plan preparation (TAN 20-3.7.2).</p>	<p>A viability assessment that includes development contributions and CIL has been prepared to inform the Deposit Plan.</p> <p>PS LDP Policy SW8 has been up-dated. Welsh language considerations have been clarified within the Plan. Due to low levels / concentration of Welsh language use within the area it is not considered necessary to include this within the policy.</p>
<b>HBf:</b>	Request that words referencing the need for planning obligations to be ' <i>subject to viability testing</i> ' be inserted into the policy. The HBf support the approach identified in paragraphs 7.5.48 - 7.5.50.	Noted. Policy SW8 and supporting text has been up-dated to clarify this.
<b>Marvel Ltd (WYG):</b>	Insert ' <i>subject to viability testing</i> ' in relation to planning obligations. Support approach identified in paragraphs 7.5.48 - 7.5.50.	Noted. Policy SW8 and supporting text has been up-dated to clarify this.
<b>DCWW:</b>	Support the provisions of criteria 4 which will allow for other relevant obligations to be sought.	Noted. Policy SW8 and supporting text has been up-dated to clarify this.
<b>RACT:</b>	Planning obligations need to be realistic for our area.	Noted.
<b>RCTCBC – P:</b>	Planning obligations should include a financial contribution to Welsh Medium education.	Noted.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>Policy SW9: Protecting and improving our open spaces</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Plan should contain policies for the provision, protection and enhancement of open space and set standards to meet deficiencies. Amend accordingly with open space planning obligations (set out in Policy SW8) factored into the viability assessment and financial contribution assumptions.	Noted. Policy SW8 and supporting text has been up-dated to clarify this.
<b>NRW:</b>	Allocated sites should be assessed against PS/LDP Policy SW9 and OSS section 48.	Open space has been considered as part of site assessments. In addition, allocated sites have been subject to SA site assessments.
<b>RACT:</b>	Will village communities use other open spaces? It would help to look at community/citizen boundaries.	Noted. This has been considered as part of the Open Space Strategy.
<b>Policy SW10 Sustainable design and Placemaking</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Include Flood Risk Strategy	Consideration of flood risks has been added to a new Environmental Protection policy. A Strategic Flood Consequence Assessment has also been undertaken.
<b>CCBC:</b>	Should reference to how the major investment in the Metro could be exploited to maximise any benefits from a place making perspective.	Noted. The Council has worked with Welsh Government and Transport for Wales to prepare a framework master plan for the site. Transport Policies in the Deposit Plan also include reference to this.
<b>RACT:</b>	Dwellings must implement some energy efficient measures to keep running costs low.	Energy efficient criteria included as part of design policies. Renewable energy policies are also included.
<b>DCWW:</b>	We would encourage the criteria list of this policy to include Sustainable Drainage Systems (SUDS)/Green Infrastructure. We welcome the requirement of SUDS schemes in new development.	Noted. SuDs criteria included as part of Deposit Plan design policies.
<b>Policy SW11: Improving our local transport network</b>		
Responder	Summary Comment	LPA Response
<b>Marvel Ltd (WYG):</b>	Specifically mention the re-opening Abernant Tunnel in Policy SW11 or 12.	Noted. The supporting text to LDP Policy SW11 has been up-dated to reflect this.
<b>HBF:</b>	Clarify that not only development that enhances transport provision will be supported, <i>'improvements where required</i>	Transport and design policies have been updated.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	as a direct result of the proposed development will be sought' would be more appropriate.	
<b>DCWW:</b>	Criteria should include Sustainable Drainage Systems (SUDS)/Green Infrastructure.	SuDs criteria included as part of design policies.
<b>CCBC:</b>	Recommend referring to potential of the line to Cwmbargoed for limited freight use and passenger use by reinstating the line to Trelewis as part of the Metro scheme.	Policy SW11 has been updated to include this.
<b>AJ. Rees:</b>	<p>Supports the: possible opening of the Abernant tunnel for cyclists and HRSA and metro loop, but a lot of site investigations will be required.</p> <p>Recommends that: Ample and trouble free parking for visitors and tourists.</p> <p>Air quality and traffic congestion, particularly around Cyfarthfa Retail Park are given due weight and input of the highways department is acknowledged as new development is likely to exacerbate this; acknowledgment is given to the fact that the Trago Mills development will exacerbate traffic congestion at the Swansea road roundabout.</p> <p>The Cwm Bargoed line at Ffos-y-Fran is extended to rejoin the Brecon Mountain railway line with a terminus at Pant.</p>	<p>Policy SW11 has been updated.</p> <p>Parking criteria is included as part of Deposit Plan design policies.</p> <p>WG are currently assessing the capacity of A470 at this junction. In addition, future detailed development proposals will be required to consider their likely impacts through a Transport Assessment and identify any improvement works necessary.</p> <p>Policy SW11 has been updated.</p>
<b>RACT:</b>	This is particularly important to us. Public transport should be available, particularly in our rural communities, day and night.	Noted however, this is outside the remit of the planning system. The transport and design policies of the Plan have been updated.
<b>Policy SW12: Improving our strategic transport network</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>Marvel Ltd (WYG):</b>	Specifically mention the re-opening Abernant Tunnel in Policy SW11 or 12.	Policy SW11 has been updated.
<b>RCTCBC-P:</b>	Planning obligations should include a financial contribution to Welsh Medium education (based on 8 additional Welsh medium education secondary pupils per annum and an overall pupil population by 56 during the plan period (with additional places for the contingency allowance).	Where required education contributions could be provided by CIL contributions.
<b>CCBC:</b>	Support measures to safeguard land for Metro related schemes and the dualling of the A465.	Noted.
<b>MHT:</b>	Include Active Travel routes on LDP Map and as part of A465 Section 5 improvements and Preparation of a Metro	Policy SW11 has been updated to include these.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	plan.	
<b>P Corke:</b>	<p>Recommends: Road improvement to the A470 at entrance to Retail Park.</p> <p>Recommends: Directing out-of-town visitors to town centre via 'monorail' or free bus.</p>	<p>WG are currently assessing the capacity of A470 at this junction. In addition, future detailed development proposals will be required to consider their likely impacts through a Transport Assessment and identify any improvement works necessary.</p> <p>Any allocated infrastructure should be realistic and deliverable and the transport policies of the Plan have been updated.</p>
<b>Policy SW13: Central Bus Station</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>NRW:</b>	Justify bus station allocation in DAM C2 flood zone in accordance with TAN 15. The FCA that was submitted as part of the permission could be used as evidence to support the site if it were to be included as an allocation in the Plan.	Noted. The FCA will be submitted as evidence.
<b>Policy SW14: Protecting and improving our local community facilities</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>Theatres Trust:</b>	Recommends that the distinction between cultural heritage and cultural assets be made and policies to promote the protection of cultural assets be included e.g. replacement facilities should be provided on site or within the vicinity/there is no longer a community need or demand for another community use on site/ temporary use of vacant buildings and sites by creative, cultural and community organisations.	Reference to cultural assets included as part of Deposit Plan Community Facilities policy.
<b>Cultural Policies</b>		
<b>Policy C15: Historic Environment</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	<p>The setting of a heritage asset cannot really be 'conserved or enhanced' as currently referred to in Policy CW15. We consider this renders the policy unsound and consider that reference to setting should be removed. The management of the individual historic assets and landscapes both outside and within the development process will require consultation with GGAT Archaeological Advisors.</p> <p>Recommends: Including policies in the Deposit plan for the conservation and enhancement of identified assets Including</p>	<p>Noted. The Deposit Plan Heritage policies have been up-dated.</p> <p>Noted. The Deposit Plan Heritage policies have been up-dated.</p>

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	criteria for the redevelopment or re-use of historic assets and Identifying the location of Urban Character Areas and Archaeologically Sensitive Areas.	
<b>GGAT:</b>	Consultation with GGAT Archaeological Advisors regarding the management of all historic assets and landscapes within the development process is required.	Noted.
<b>Marvel Ltd (WYG):</b>	Disagree that the setting of a heritage asset can be 'conserved or enhanced' and therefore consider the policy unsound.	Noted. The Deposit Plan Heritage polices have been up-dated.
<b>Policy CW16: Cyfarthfa Heritage Area</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>GGAT:</b>	Propose the adoption of a Draft Merthyr Tydfil Supplementary Planning Guidance (SPG) - Archaeologically Sensitive Areas (ASA) 2017. Consultation with GGAT Archaeological Advisors regarding the management of all historic assets and landscapes within the development process is required.	Noted. The Deposit Plan Heritage polices have been up-dated.  Noted.
<b>MTHT:</b>	The CHA be extended to include Cyfarthfa Finger Tip, Tai Mawr Leat and Cefn Coed Viaduct. Chapel Row, Ynysfach Engine House and Furnaces. This area should be widened so as to encompass other Cyfarthfa industrial sites and any "heritage based visitor attraction (see HRA)."	Noted. The CHA has been amended.
<b>Environmental Policies:</b>		
<b>PolicyEnW17: Environment</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	Provide criteria against which development affecting different types of designated sites will be assessed, reflecting their relative significance. Clearly identify on the Proposals or Constraints Map areas to which policies for the conservation and enhancement of the natural environment will apply, and Explain the practicalities and implementation i.e. is it reasonable for all development to prevent loss of soil unless mitigation and compensatory measures are provided?	Noted. The Deposit Plan Environment polices have been up-dated.  These have been shown on the LDP Constraints or Proposals Maps as appropriate. Noted. The Deposit Plan Environment polices have been up-dated.
<b>NRW:</b>	Support the policy approach to appropriately protect local environment and seek enhancement.	Noted.
<b>HBF:</b>	Request that the words 'either on or off site' be added at the end of point 1 with regard to mitigation.	The Deposit Plan Environment polices have been up-dated.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>PolicyEnW18: Local Nature Reserves</b>		
Responder	Summary Comment	LPA Response
<b>NRW:</b>	Support the policy approach to appropriately protect local environment and seek enhancement.	Noted.
<b>MTHT:</b>	The Heritage Trust is concerned that the aim to "seek to control rather than direct" development is weak. This policy could lead to other local green spaces becoming vulnerable. Green wedges are being replaced with green pockets.	The Deposit Plan Environment policies have been up-dated.  No green wedge type policies are proposed as the development in the countryside/outside settlement boundary policy is considered sufficient.
<b>Marvel Ltd (WYG).</b>	It is unclear as to what extent this is 'new' provision as against mere formalisation of existing access to/use of green land.	The Deposit Plan Environment policies have been up-dated. The areas are identified to recognise their role and ability to improve access to nature and possible future improvement.
<b>PolicyEnW19: Protected sites and species</b>		
Responder	Summary Comment	LPA Response
<b>NRW:</b>	Support the protection of SSSI's and species of principle importance in Wales.	Noted.
<b>Marvel Ltd (WYG).</b>	Policy offers no solutions to delivery of enhancement measures and does not give appropriate weight to differing values of ecological sources.	The Deposit Plan Environment policies have been up-dated.
<b>MTHT:</b>	The Heritage Trust is concerned that the aim to "seek to control rather than direct" development is weak.	The Deposit Plan Environment policies have been up-dated.
<b>PolicyEnW20: Special Landscape Areas</b>		
Responder	Summary Comment	LPA Response
<b>Marvel Ltd (WYG).</b>	Support the policy as it does not restrict development but have serious concerns regarding the methodology used to define the SLA. Prepare a management plan for SLA3 to assist management issues and support tourism offer.	Noted.  A Landscape SPG will be prepared.
<b>CCBC:</b>	Support the designation of SLAs at Gelligaer and Taf Bargoed and at Nant Morlais and Cwm Taf Fechan which are broadly consistent with SLA designations in the Caerphilly County Borough adopted LDP.	Noted.



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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>Economic Policies</b>		
<b>PolicyEcW21: Provision of employment land</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Evidence the employment target of 'up to 30ha' of B-Class land and explain the spatial distribution and delivery of allocated sites. The scale of each employment allocation and its appropriate B-Class use should be clear.	The Employment policies have been up-dated in the Deposit Plan. This has been informed by an updated Employment Land Review.
<b>DCWW:</b>	The provision of employment allocations based in the three specific locations but HM of the water supply and/or sewerage networks may be required. Consent is required for proposal to discharge trade effluent into the public sewer.	Noted.  Noted.
<b>CCBC:</b>	Support reference to the provision of employment land at Ffos y Fran which could include reference to extension of the freight line through Cwmbargoed to Dowlais Top.	The Transport policies have been up-dated in the Deposit Plan to include this.
<b>PolicyEcW22: Protecting employment sites</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Consider a new policy to support alternative uses on existing employment sites.	The Deposit Plan policies on protecting employment sites includes reference to this.
<b>PolicyEcW23: Retail Hierarchy – supporting retailing provision</b>		
<b>WG:</b>	Consider policy for developing existing out-of-town retail outlets.	The Deposit Plan Retail policies include reference to this.
<b>Hammerson (Merthyr) Ltd.:</b>	Include out-of-centres in retail hierarchy policy and particular reference should be made to Cyfarthfa Park and change wording to " <i>Normally be permitted</i> " rather than " <i>only be permitted</i> " and refer to " <i>significant harm</i> " rather than " <i>any harm</i> ".	The Retail policies have been up-dated in the Deposit Plan.
<b>PolicyEcW24: retail allocation</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Evidence delivery of Bus Station site taking account of findings in the Retail and Commercial Leisure Study.	The Deposit Plan Retail policy justification includes reference to this.
<b>CCBC:</b>	No objection to the level of retail growth proposed for the town centre as it is not considered that it will the harm to the vitality and viability of Caerphilly's Principal Town's including Bargoed and Ystrad Mynach.	Noted.
<b>Trago Mills Limited:</b>	Policy support should be given to a low density, low impact development on Candidate Site 14.	As no new retailing provision is required for the LDP this site has not been taken forward in the Deposit Plan.
<b>Hammerson (Merthyr) Ltd.:</b>	Should be about retail element of the Bus Station development and require impact	The Retail policies have been up-dated in the Deposit

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	assessments. The Policy should be specific about when impact assessments are required within the development management process.	Plan. Retail impact assessment guidance is set in national policy under TAN4.
<b>Tourism</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	No clear strategy for developing tourism related activities and facilities over the plan period.	The Deposit Plan includes leisure and tourism policies.
<b>PolicyEcW26: Renewable Energy</b>		
<b>Responder</b>	<b>Summary Comment</b>	
<b>WG:</b>	<p>Demonstrate how the REA has been embedded in the CS process.</p> <p>Identify and include preferred RE sites in the LDP proposals Map. Include specific thresholds.</p> <p>Include policies to support sub-local Authority scale RE projects with criteria. Try to co-locate Re and district heating.</p> <p>Explore potential increases in grid capacity over plan period.</p>	<p>The SA includes questions about renewable energy. Heat priority and RE sites have been included in the Deposit Plan as considered in the Renewable Energy Assessment and shown on the Proposals Map.</p> <p>RE policies regarding district heating have been included in the Deposit Plan.</p> <p>Western Power Distribution and National grid were consulted on all Candidate sites.</p>
<b>PolicyEcW27: Sustainably supplying minerals</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG:</b>	Consider what criteria should be included in the detail minerals policy including: broad strategy for mineral working; safeguarding mineral resources; a ten-year crushed rock landbank; buffer zones around permitted and proposed mineral workings; a local minerals working policy; likelihood of any dormant sites being worked; Indicate of past, present future coal working areas; safeguarding existing and potential new railheads; promote the use of recycled, secondary aggregates or waste materials and demonstrate the rationale for employment sites and allocated housing within mineral safeguarding areas.	Noted. The Deposit Plan includes criteria based Minerals policies.
<b>MPA:</b>	This is vague any policy must take into account that the RTS will be reviewed over the plan period.	Noted.
<b>TCA:</b>	Support notification that the deposit Plan will include a policy on minerals.	Noted.
<b>CCBC:</b>	Note that the deposit plan will develop the points 1 to 4 in paragraph 7.8.37 and a second review of the RTS has commenced.	Noted.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

	Recommend: Including reference to Cwmbargoed railhead as a freight transfer/distribution facility and the Welsh Government Circular Economy (CE) approach to, the development of specialist reprocessing for certain "waste" materials; Paragraph 7.8.42 reference to document should read "for mineral planning conditions.." and Rename Merthyr East Land Reclamation Scheme as Ffoŷ Yr Fran LRS.	Reference included in Deposit Plan transport policies.  Noted.
<b>PolicyEcW28: Waste facilities</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG</b>	Detailed polices should support and meet requirements of sustainable waste management including submission of Waste Planning Assessments for applications for new waste management facilities (TAN21). Assess the suitability of established employment sites or sites proposed for allocation in the plan to meet waste requirements and future demand.	The Deposit Plan includes a policy on the assessment of Waste Management facilities in line with TAN 21. The suitability of employment sites for B2/B8 uses has been considered as part of the site assessment process.
<b>Monitoring framework</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>WG</b>	The monitoring framework should include appropriate targets and key triggers so that action can be taken in advance of the statutory 4-year review.	A Monitoring Framework has been included in the Deposit Plan.
<b>Easy Read Document</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>A Rees:</b>	Easily explains multiple strands that in combination form the MTCBC LDP 2006 - 2013.	Noted.
<b>Special Landscape Areas</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>NRW:</b>	We provided comments to your Authority on the draft of this background paper in May 2017 which stated - Really clear and excellently written, readable too maintaining interest, sets context thoroughly leading from earlier years to present circumstances and how 'need' for an SLA has changed within the policy context – well justified.	Noted.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>Marvel Ltd (WYG):</b>	Consider too liberal use of outstanding, high and moderate and contradicting the adage of SLAs designation being of high landscape importance which may be unique, exceptional or distinctive within their administrative boundary. Disagree that the proposed SLA has a single homogenous or unique character and designation is flawed since and no suggestions are put forward as to how management of the site can be achieved which would require the co-operation of the land owned; Management mechanism can only be met through co-operation of the landowners and via redevelopment and Further level of analysis is required and no mechanisms to achieve good management practices are suggested. Failure to justify omission of land to the east of the A470 from the candidate SLA Merthyr West Flank.	Moderate scores were incorporated to reflect local landscapes with a unique significance to the County Borough Area. The SLA background paper has been up-dated to reflect this.
<b>Review of Green Wedges</b>		
<b>Responder</b>	<b>Summary Comment</b>	<b>LPA Response</b>
<b>CCBC:</b>	Objection - Resist the de-designation of the green wedge between Trelewis and Nelson as it may result in coalescence between settlements, harm the setting of the urban area, and irreparably damage and compromise the setting and historic integrity of a Grade I listed building.	It is considered that other plan policies including settlement boundaries and landscape policies provide the necessary protection.
<b>CPR Consultancy:</b>	Support the De-designation of Green Wedges.	Noted.
<b>MTHT:</b>	Some nominations on the Candidate Sites Register may infringe on the existing Green wedges, Object to proposing Local Nature Reserves (LNRs) or 'pockets' to replace Green Wedges.	Noted.
<b>Llancaiach Fawr Manor:</b>	Object to development on greenfield sites and designated green wedges, the de-designation of the Trelewis/Nelson Green Wedge and the proposed modern development of the western bank of the river. Regard should be had for the setting of the grade 1 listed building in Caerphilly CBC area moreover the loss of the remaining western portion of the original 16th and 17th century estate land will have a material and detrimental effect of the interpretation of the manor and its operation as a leading 'Living History Museum'.	Noted.  Noted.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>Review of Sites of Importance for Nature Conservation</b>		
Responder	Summary Comment	LPA Response
<b>RCTCBC:</b>	Support the SINC Review and in particular inclusion of new SINCs No. 61 & 62.	Noted.
<b>Population and Housing Requirements</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	A robust and realistic justification for large windfall assumptions in the Deposit Plan is required.	Windfall assumption justifications and clarifications have been included in the housing supply background paper.
<b>WG:</b>	<p>Submit an affordable housing viability assessment (the allocation of sites for 100% affordable housing and a policy supporting rural exception sites (paragraph 7.5.14). Clearly explain how the level of affordable housing need in the LHMA has influenced the scale and location of growth, particularly in the south of the County Borough; It is unclear on how the viability levels have informed the plans spatial distribution, density assumptions and scale of housing sites;</p> <p>Include an indication of the overall level of affordable housing need (based on an up-to-date LHMA) including any backlog; Include a target for the provision of affordable housing, and Indicate how the plan target will be achieved which will include site specific targets and thresholds.</p>	<p>Noted. A housing viability assessment has been prepared to inform the Deposit Plan.</p> <p>A Housing Supply background paper has been prepared to demonstrate how the Plan has taken account of evidenced local housing needs identified in the LHMA. This clarifies other matters such as the spatial distribution of allocations take account of development viability, density assumptions. The document also provided the draft Housing Land Supply Trajectory.</p> <p>The Deposit Plan has clarified affordable housing provision and includes an overall contribution target.</p>
<b>Boyer:</b>	The Strategy should ensure that the Other Growth Area contributes at least 25% of the housing provision (147 dwellings).	The other growth area provides 30% of the total allocations in the Deposit Plan. A housing supply background paper has been prepared which deals with this issue. A housing supply background paper has been prepared to inform the Deposit Plan.
<b>Marvel Ltd (WYG):</b>	Candidate Sites Nos. 20, 21, 23 & 62 can provide a useful contribution towards meeting the 981+ required homes in the Primary Growth Area (PGA) & site 62 towards the 800 in the HSRA.	Noted. The site assessment background paper provides further details.

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>HBFC:</b>	Clarify composition of contingency allowance.	A housing supply background paper has been prepared to inform the Deposit Plan which includes reference to this.
<b>CCBC:</b>	<p>Clarify no of dwellings on Hoover Site Regeneration Area (HSRA) (800 or up to 1000).</p> <p>Make reference to the regional context with regards to population and housing growth for the Cardiff Capital Region as a whole.</p>	<p>Noted. The summary description for the Spatial Option indicated "up to 1000 dwellings" however the remainder of the Preferred Strategy document made reference to circa 800 dwellings. Master planning for the Hoover Strategic Regeneration Area (HSRA) has refined this allocation to 440 dwellings at the Hoover Factory site. Future development opportunity sites are located west of the river Taff at Dragon Parc, the Lowes and Gethin Tip however existing flood risks will need to be mitigated prior to residential being acceptable here. The HSRA remains by far the largest site allocation in the County Borough.</p> <p>With regards growth in the Cardiff Capital Region the Plan has had regard to regional growth aspirations and projects. The Plan demonstrates how local needs can be met and seeks a sustainable population growth of approximately 8% when compared to a population decline based on principal population projections alone. The County Borough would therefore contribute towards regional growth aspirations. Furthermore, employment and housing allocations have been made that take advantage of planned transport improvements which can build on links to the Cardiff Capital wider region.</p>

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

**BACKGROUND PAPER: INITIAL CONSULTATION REPORT**

<b>PHW &amp; CTUHB:</b>	Objective 3 should include reference to Affordable housing and include specific references to significant increase in the population aged 65 and dementia-friendly communities. The Well-being Assessment prepared and approved by the Public Services Board shows 2039 population projections for Merthyr Tydfil as 58,062.	Objective 3 has been amended to include reference to affordable housing in the Deposit Plan.  This is based on a trend based scenario.
<b>Tydfil Gypsy Traveller Accommodation Needs Assessment</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Ensure that Gypsy and Traveller provision has been assessed over the entire plan period in advance of the Deposit Plan.	Noted. An update to the GTAA has been prepared to provide evidence that covers the entire Plan period.
<b>Merthyr Tydfil Retail and Commercial Leisure Study</b>		
Responder	Summary Comment	LPA Response
<b>Marvel Ltd (WYG):</b>	The provision of a hotel/spa/gym/well-being facility would increase provision of fitness stations in the CB area.	Leisure and recreation policies have been included in the Deposit Plan.
<b>South Wales Regional Aggregates Working Party Annual Report</b>		
Responder	Summary Comment	LPA Response
<b>MPA Wales:</b>	Note that the Regional Technical Statement (RTS) will be reviewed over the plan period.	Noted.
<b>Review Report (April 2016)</b>		
Responder	Summary Comment	LPA Response
<b>WG:</b>	Supports requirement for a replacement LDP.	Noted.



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

## BACKGROUND PAPER: INITIAL CONSULTATION REPORT

### APPENDIX 41: - PRE-DEPOSIT CANDIDATES SITES REGISTER AND ASSOCIATED SUSTAINABILITY APPRAISALS CONSULTATION

#### Letters



Ellis Cooper BSc. (Hons)  
Cyfarwyddwr Corfforaethol Lleodedd a Gweddnewid  
Corporate Director Place and Transformation

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www.merthyr.gov.uk

Dyddiad/Date: 13<sup>th</sup> October 2017

Ein Cyf./Our ref.: CS SA  
Eich Cyf./Your ref: 128

Gofynnwch am/Please ask for:  
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: PUBLIC CONSULTATION ON THE CANDIDATES SITES REGISTER AND ASSOCIATED CANDIDATE SITE SUSTAINABILITY APPRAISALS

Merthyr Tydfil County Borough Council (MTCBC) invited the submission of Candidate Sites for potential inclusion in the Replacement Merthyr Tydfil Local Development Plan (LDP) 2016-2031 between 30<sup>th</sup> August 2016 and 2<sup>nd</sup> December 2016. 98 sites were submitted for consideration, either for development or protection, at that time.

The consultation process for the 'Preferred Strategy' of the LDP, which ran between 14<sup>th</sup> July 2017 and 6<sup>th</sup> October 2017, afforded an additional opportunity to nominate sites. A further 5 sites were submitted and are included in the Candidates Sites Register.

Each Candidate Site has been subject to a Sustainability Appraisal (SA), which also forms part of the Candidates Sites Register. The main purpose of the SA is to identify the potential sustainability implications of the sites submitted. The sites have been assessed on the basis of the criteria contained in the SA Framework, attached at Appendix 1 of the Candidates Sites Register. Appendix 2 shows whether or not each site accords with the 'Preferred Strategy'.

A six week public consultation will take place on the 'Candidates Sites Register' and associated Sustainability Appraisals, between Friday 13th October 2017 and Friday 24th November 2017.

The document will be available for public inspection, along with a form for making representations, at the locations listed below during their normal opening hours:

- Council's main offices, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN;
- Council Offices, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ;
- Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF;
- Rhydyccar 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 and
- Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE.

The register will also be available online, together with the comments form, which can be downloaded from:  
[www.merthyr.gov.uk](http://www.merthyr.gov.uk) and or [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

Comments must be made in writing and received by the County Borough Council by 5:00pm on the 24<sup>th</sup> November 2017. Completed forms may be:

- E-mailed to [devplanning@merthyr.gov.uk](mailto: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](mailto: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. Rhowch 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 42: - PRE-DEPOSIT CANDIDATES SITES REGISTER AND ASSOCIATED SUSTAINABILITY APPRAISALS CONSULTATION – MEDIA NOTIFICATIONS**

### **Internal Emails**

REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031: PUBLIC CONSULTATION ON THE CANDIDATES SITES REGISTER AND ASSOCIATED CANDIDATE SITE SUSTAINABILITY APPRAISALS

As you are aware, the Council invited the submission of Candidate Sites for potential inclusion in the Replacement Merthyr Tydfil Local Development Plan (LDP) 2016-2031 between 30<sup>th</sup> August 2016 and 2<sup>nd</sup> December 2016 and 14<sup>th</sup> July 2017 and 6<sup>th</sup> October 2017. Altogether 103 sites were nominated and are included in the Candidates Sites Register.

Each Candidate Site has been subject to a Sustainability Appraisal (SA), which also forms part of the Candidates Sites Register. . The main purpose of the SA is to identify the potential sustainability implications of the sites submitted. The sites have been assessed on the basis of the criteria contained in the SA Framework, attached at Appendix 1 of the Candidates Sites Register.

A six week public consultation will take place on the 'Candidates Sites Register' and associated Sustainability Appraisals, between Friday 13th October 2017 and Friday 24th November 2017. Comments must be made in writing and received by 5.00pm on the 24<sup>th</sup> November 2017 by:

- E-mail to [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or
- Post to the Head of Planning and Countryside, Merthyr Tydfil County Borough Council, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil CF48 4TQ.

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[www.merthyr.gov.uk](http://www.merthyr.gov.uk) and or [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)

If you would like to discuss any issues with regard to the Candidates Sites Register or associated SA, please contact the Planning Policy Team on 01685 726279 or [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk)

Yours faithfully

**MISS J JONES**  
**HEAD OF PLANNING & COUNTRYSIDE**

### **External Emails**

REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031: PUBLIC CONSULTATION ON THE CANDIDATES SITES REGISTER AND ASSOCIATED CANDIDATE SITE SUSTAINABILITY APPRAISALS

As you may be aware, Merthyr Tydfil County Borough Council (MTCBC) invited the submission of Candidate Sites for potential inclusion in the Replacement Merthyr Tydfil Local Development Plan (LDP) 2016-2031 between 30<sup>th</sup> August 2016 and 2<sup>nd</sup> December 2016 and 14<sup>th</sup> July 2017 and 6<sup>th</sup> October 2017. Altogether 103 sites were nominated and are included in the Candidates Sites Register.

Each Candidate Site has been subject to a Sustainability Appraisal (SA), which also forms part of the Candidates Sites Register. The main purpose of the SA is to identify the potential sustainability implications of the sites submitted. The sites have been assessed on the basis of the criteria contained in the SA Framework, attached at Appendix 1 of the Candidates Sites Register.

A six week public consultation will take place on the 'Candidates Sites Register' and associated Sustainability Appraisals, between Friday 13th October 2017 and Friday 24th November 2017. Comments must be made in writing and received by the County Borough Council by 5:00pm on the 24<sup>th</sup> November 2017 by:

- E-mail to [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or
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If you have any queries about how to submit your comments please e-mail the LDP team at [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or call 01685 726279 and ask to speak to a member of the LDP team.

Yours faithfully

**MISS J JONES**  
**HEAD OF PLANNING & COUNTRYSIDE**

## APPENDIX 43: - PRE-DEPOSIT CANDIDATES SITES REGISTER AND ASSOCIATED SUSTAINABILITY APPRAISALS CONSULTATION – MEDIA NOTIFICATIONS

### MTCBC Website

Replacement Local Development Plan Candidate Site Consultation  
Friday, 13th October - Friday, 24th November, 2017

Resident

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Resident » Planning & Building control » First Replacement Local Development Plan 2016 -2031

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## First Replacement Local Development Plan 2016 -2031

Candidate Sites Register

During 2016 Merthyr Tydfil County Borough Council (MTCBC) invited the submission of Candidate Sites to be included in the replacement Local Development Plan (LDP) 2016 -2031.

The Candidate Sites Register contains a list of the 103 sites submitted for consideration, either for development or protection, in the emerging replacement LDP.

To view the register click on the link below, a Ward Map shows all the sites submitted in that ward. Scroll-down to see the individual maps arranged by site reference number. Each site map is followed by a Sustainability Appraisal (SA).

The main purpose of the SA is to identify the potential sustainability implications of the sites included on the Register. The sites were assessed on the basis of the criteria contained in the SA Framework attached as Appendix 1.

[Candidate Site Register](#)

### Contact Us

- Email
- Fax
- Telephone
- Address

### Comments and feedback

Comments are invited on the Candidate Site Register and sites SA up until 5pm 24<sup>th</sup> November 2017. Click on the link below to complete a comments form.

[Comments Form](#)

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

During the consultation period the documents will also be available for inspection at the following locations during their 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
- Rhydyrcar 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 4Q

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

## BACKGROUND PAPER: INITIAL CONSULTATION REPORT

### MTCBC Twitter & the Cwm Taf Hub Website

