

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



COFRESTR CYNRYCHIOLIADAU'R NEWIDIADAU CANOLBWYNTIEDIG
FOCUSED CHANGES REPRESENTATIONS REGISTER

Mawrth 2019 | March 2019

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

Merthyr Tydfil Replacement Local Development Plan 2016 - 2031

Focused Changes Representations Register

March 2019

Introduction

This Representations Register provides a copy of the duly made representations that were received by the Council during the Replacement LDP Focused Changes public consultation that took place from **21st January to 4th March 2019**.

The representations are ordered by representor ID number which would have been referenced in previous correspondence with the Council regarding the LDP.

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

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

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

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

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

devplanning@merthyr.gov.uk

Representor ID Number	Name and Organisation (where applicable)	Page
101	Welsh Government - Plans Branch	4
103	Natural Resources Wales	12
116	Home Builders Federation	14
119	Dŵr Cymru Welsh Water	32
122	Nick Horsley MPA	37
124	Coal Authority	48
188	A Collins	49
207	Rob Thomson - Merthyr Tydfil Heritage Trust	50
219	Trago c/o Christopher Tofts - Stephens Scown LLP	80
271	Amy Lewis - Cwm Taf UHB	88
287	James Davies	91
288	Edward Dawson, Friends of Nant Llwynog Park	95
289	Shirley Price	99



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

28 February 2019

Dear Judith,

**Merthyr Tydfil County Borough Council – Replacement Local Development Plan –
Focussed Changes Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government regarding Merthyr Tydfil County Borough Council's Replacement Local Development Plan's proposed Focussed Changes.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in light of the representations made to the Deposit Plan on 21 August 2018, in accordance with the tests of soundness. The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations. The annex sets out where and why our objections are maintained and, if the Inspector considers it appropriate, they can be addressed through the hearing sessions.

Following the Deposit Plan consultation, Planning Policy Wales (PPW) Edition 10 has been published. The authority will need to consider if there are any implications for the plan. As set out in the attached Annex the majority of our Deposit objections have been addressed. Only minor points of clarification relating to renewable energy, coal safeguarding and the strategic site allocation remain. Welsh Government officials will continue to work with Council officers to resolve any outstanding issues prior to the examination.

Without prejudice to the Minister's powers to intervene in the process and the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process.

Yours sincerely,



Mark Newey
Head of Plans Branch
Planning Directorate

Annex

Annex to Welsh Government's Letter (28 February 2019) in response to Merthyr Tydfil County Borough Council's proposed Schedule of Focussed Changes.

FC No.	Welsh Government comment
Affordable Housing	
FC3 Objection addressed	<p>Policy SW2: Provision of Affordable Housing</p> <p>Our Deposit representation required the authority to identify the total need for affordable housing, as identified in the LHMA, in order to ensure the LPA has sufficient evidence to secure affordable housing. FC3 inserts the affordable housing need as 5,490 units over the plan period into the reasoned justification to Policy SW2 'Provision of Affordable Housing'. Our Deposit representation has been addressed.</p>
FC4 Objection addressed	<p>Our Deposit representation sought to establish the affordable housing target set out in Policy SW2: Provision of Affordable Housing and how it was derived, to ensure it is based on the housing requirement, not the provision. FC4 amends the affordable housing target in Policy SW2 from 261 units to 251 to align with the housing requirement. This change satisfies our Deposit representation in this respect. FC4 also introduced a new table setting out the components of the affordable housing target which adds clarity to the plan and will ensure effective monitoring as advocated in the LDP Manual (Edition 3). The proposed FC is supported.</p>
FC8 Objection addressed	<p>Our Deposit representation required the LPA to identify the timing and phasing of housing allocations in Policy SW3: Sustainably Distributing New Homes. The proposed FC now includes indicative delivery timescales for allocated sites. Our Deposit representation has been addressed.</p>
Housing	
FC9 Objection addressed	<p>Table 2 - Components of housing supply</p> <p>Our Deposit representation required clarification on the spatial distribution of housing by component of supply, in order to add clarity to the plan and aid effective monitoring. FC9 inserts an updated table in this respect which follows the template set out in the LDP Manual (Edition 3). Our Deposit representation has been addressed.</p>
FC11 Partially addressed	<p>Policy SW6: Hoover Strategic Regeneration Area</p> <p>Our Deposit representation stated that to ensure the comprehensive development of key sites the authority should embed the key principles from the framework masterplan into the plan. This is essential to deliver the placemaking approach required by PPW and ensure the effective implementation and delivery of the key site in the plan.</p> <p>The proposed FC is now more explicit and includes placemaking and key design requirements which are supported. However, WG considers that as the key principles (e.g. land use areas, key access points, park and ride, green corridors) have been identified in the text, it is logical to identify these key parameters and locational requirements spatially on a schematic/concept plan. This would not involve additional work as the detail is already set out in the framework. The plan should also set out the area that is currently unsuitable for highly vulnerable development due to flood risk. The emerging LDP Manual (Edition 3) sets out the master planning approach and explains how placemaking tools such as concept plans should be used for key sites in the plan.</p>

FC9	<p>Appendix 2 – Housing Trajectory and Land Supply Information</p> <p>The proposed FC introduces the housing trajectory and land supply information within the plan which is supported. Our Deposit representation has been addressed.</p>
Renewable Energy	
<p>FC30</p> <p>Partially addressed</p>	<p>Policy EcW8: Renewable Energy</p> <p>Our Deposit representation stated the summary tables from the REA (Figures 12 and 13) regarding the potential for heat and electricity should be inserted into the reasoned justification to Policy ECW8 and included in the monitoring framework. The proposed FC addresses our objection in this respect.</p> <p>We note the Council has produced an additional background paper which is a detailed Landscape Sensitivity Study for the Solar Search Areas (SD53). This work has resulted in the proposed deletion of the search area at Merthyr Vale. The WG does not have any comments in this respect. The assumptions made will be for the LPA to justify.</p> <p>The Council has provided no explanation regarding our Deposit representation which sought clarification on some of the assumptions with the REA, particularly why a 2km accessible grid connection has been applied instead of the standard 10km used by WG and other LPAs in Wales. The Council need to explain why they have chosen a lower distance than the standard 10km.</p>
Minerals	
<p>FC32</p> <p>FCM2</p> <p>Partially addressed</p>	<p>Safeguarding of secondary coal resources deleted</p> <p>Our Deposit representation (August 2019) made reference to <u>Draft</u> Planning Policy Wales (PPW) edition 10, which required authorities to safeguard primary coal resources only. PPW edition 10 (published December 2018) and the policy relating to the safeguarding of coal has been amended further. There is no requirement to safeguard primary coal resources now; this is for the LPA to determine.</p> <p>FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources. We do not object to FC32.</p> <p>If the LPA safeguards primary coal resources they need to include appropriate policies, including those relating to pre-extraction, in their development plan. There is no need to indicate areas where coal operations would not be acceptable.</p> <p>This is a matter for the LPA to determine. This approach is not contrary to PPW Edition 10.</p>



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

28 Chwefror 2019

Annwyl Judith,

Cyngor Bwrdeistref Sirol Merthyr Tudful – Cynllun Datblygu Lleol Newydd – Ymgynghoriad Newidiadau Ffocws: Ymateb Llywodraeth Cymru

Diolch am ymgynghori â Llywodraeth Cymru ar y Newidiadau Ffocws a gynigiwyd i Gynllun Datblygu Lleol Newydd Cyngor Bwrdeistref Sirol Merthyr Tudful.

Mater i'r Arolygydd Cynllunio a benodir fydd penderfynu a yw'r cynllun yn 'gadarn' neu beidio. Mae'r Newidiadau Ffocws arfaethedig wedi'u hystyried yng ngoleuni'r sylwadau a wnaed mewn cysylltiad â'r Cynllun Adneuo ar 21 Awst 2018 ac yn unol â'r profion cadernid. Mae'r **Atodiad** amgaeedig yn cynnig ymateb manwl ynghylch a yw'r Rhestr o Newidiadau Ffocws Arfaethedig yn bodloni'r hyn a godwyd yn ein sylwadau ar y ddogfen adneuo. Mae'r atodiad yn dangos pa rai o'n gwrthwynebiadau sy'n sefyll a pham, ac os yw'r Arolygydd o'r farn bod hynny'n briodol, gellir mynd i'r afael â nhw drwy'r gwrandawliadau.

Ers ymgynghori ar y Cynllun Adneuo, mae Argraffiad 10 o Bolisi Cynllunio Cymru wedi'i gyhoeddi. Bydd angen i'r awdurdod ystyried a oes unrhyw oblygiadau i'r cynllun. Fel y nodwyd yn yr Atodiad sydd ynghlwm, aethpwyd i'r afael â'r rhan fwyaf o'n gwrthwynebiadau. Dim ond mân bwyntiau o esboniad ynghylch ynni adnewyddol, diogelu glo a dyrannu safleoedd strategol sydd ar ôl. Bydd swyddogion Llywodraeth Cymru yn parhau i weithio gyda swyddogion y Cyngor i geisio mynd i'r afael â'r materion sy'n dal i fodoli cyn yr archwiliad.

Heb ragfarnu'r archwiliad annibynnol na chwaith pwerau'r Gweinidog i ymyrryd yn y broses, mae Llywodraeth Cymru wedi ymrwymo i helpu Awdurdodau Cynllunio Lleol gydol proses y Cynllun Datblygu Lleol.



Yn gywir,



Mark Newey
Pennaeth y Gangen Cynlluniau
Y Gyfarwyddiaeth Gynllunio

Atodiad

Atodiad i Lythyr Llywodraeth Cymru (28 Chwefror 2019) mewn ymateb i Atodlen Newidiadau Ffocws Arfaethedig Cyngor Bwrdeistref Sirol Merthyr Tudful.

Rhif y Newid	Sylwadau Llywodraeth Cymru
Tai fforddiadwy	
FC3 Wedi mynd i'r afael â'r gwrthwynebiad	<p>Polisi SW2: Darparu Tai Fforddiadwy</p> <p>Roedd ein sylwadau ar y Cynllun Adneuo yn mynnu bod yr awdurdod yn nodi'r holl angen am dai fforddiadwy, fel y nodwyd yn yr Asesiadau o'r Farchnad Dai Leol (LHMA), er mwyn sicrhau bod gan yr ACLI ddigon o dystiolaeth i sicrhau tai fforddiadwy. Mae FC3 yn mewnosod yr angen am dai fforddiadwy fel 5,490 o unedau dros gyfnod y cynllun i'r cyflawnhad rhesymegol i Bolisi SW2 'Darparu Tai Fforddiadwy'. Aethpwyd i'r afael â'n sylwadau ar y Cynllun Adneuo.</p>
FC4 Wedi mynd i'r afael â'r gwrthwynebiad	<p>Ceisiodd ein sylwadau ar y Cynllun Adneuo sefydlu'r targed tai fforddiadwy a nodir ym Mholisi SW2: Darparu Tai Fforddiadwy a sut y'i gosodwyd, er mwyn sicrhau ei fod yn seiliedig ar yr angen am dai, nid ar y ddarpariaeth. Mae FC4 yn diwygio'r targed tai fforddiadwy ym Mholisi SW2 o 261 o unedau i 251 i gyd-fynd â'r gofyniad tai. Mae'r newid hwn yn bodloni ein cynrychiolaeth Adneuo yn hyn o beth. Yn ogystal, cyflwynodd FC4 dabl newydd yn nodi cydrannau'r targed tai fforddiadwy, sy'n ychwanegu eglurder i'r cynllun, a bydd yn sicrhau monitro effeithiol fel yr argymhellir yn Llawlyfr y CDLI (Argraffiad 3). Cefnogir y Newid Ffocws arfaethedig.</p>
FC8 Wedi mynd i'r afael â'r gwrthwynebiad d	<p>Roedd ein sylwadau ar y Cynllun Adneuo'n ei gwneud yn ofynnol i'r ACLI nodi amseriad a graddfa dyraniadau tai ym Mholisi SW3: Dosbarthu Cartrefi Newydd yn Gynaliadwy. Mae'r Newid Ffocws arfaethedig nawr yn cynnwys amserlenni dangosol ar gyfer safleoedd a ddyrannwyd. Aethpwyd i'r afael â'n sylwadau ar y Cynllun Adneuo.</p>
Tai	
FC9 Wedi mynd i'r afael â'r gwrthwynebiad	<p>Tabl 2 – Cydrannau'r cyflenwad tai</p> <p>Galwodd ein sylwadau ar y Cynllun Adneuo am eglurder ynghylch dosbarthiad gofodol tai trwy gydran cyflenwi, er mwyn ychwanegu eglurder i'r cynllun a chynorthwyo monitro effeithiol. Mae FC9 yn cynnwys tabl wedi'i ddiweddarau yn y cyswllt hwn sy'n dilyn y templed a nodir yn Llawlyfr y CDLI (Argraffiad 3). Aethpwyd i'r afael â'n sylwadau ar y Cynllun Adneuo.</p>
FC11 Yn dal i wrthwynebu'n rhannol	<p>Polisi SW6: Ardal Adfywio Strategol Hoover</p> <p>Roedd ein sylwadau ar y Cynllun Adneuo yn datgan y dylai'r awdurdod fewnosod yr egwyddorion allweddol o'r prif gynllun fframwaith i'r cynllun hwn, er mwyn sicrhau datblygiad cynhwysfawr o safleoedd allweddol. Mae hyn yn hanfodol er mwyn cyflawni'r dull o greu lleoedd sy'n ofynnol gan PCC a sicrhau bod y safle allweddol yn cael ei weithredu a'i gyflwyno'n effeithiol yn y cynllun.</p> <p>Mae'r Newid Ffocws arfaethedig bellach yn fwy eglur ac mae'n cynnwys creu lleoedd a gofynion dylunio allweddol sy'n cael eu cefnogi. Fodd bynnag, gan i'r egwyddorion allweddol (e.e. ardaloedd defnydd tir, pwyntiau mynediad allweddol, parcio a theithio, coridorau gwyrdd) gael eu nodi yn y testun, mae LIC o'r farn ei bod yn rhesymegol i nodi'r paramedrau allweddol a'r gofynion lleol yn ofodol ar gynllun cysyniad neu gynllun sgematig. Ni fyddai hyn yn golygu gwaith ychwanegol gan fod y manylion eisoes wedi'u nodi yn y fframwaith. Dylai'r cynllun hefyd nodi'r ardal sydd ar hyn o bryd yn anaddas ar gyfer datblygiad hynod o agored i niwed oherwydd risg llifogydd. Mae'r Llawlyfr CDLI (Argraffiad 3) sy'n dod i'r fei yn nodi'r dull uwchgynllunio ac yn esbonio sut dylid defnyddio offer creu lleoedd megis cynlluniau cysyniad ar gyfer</p>

	safleoedd allweddol yn y cynllun.
FC9	<p>Atodiad 2 – Gwybodaeth Trywydd Tai a Chyflenwad Tir</p> <p>Mae'r Newid Ffocws arfaethedig yn cyflwyno'r wybodaeth trywydd tai a chyflenwad tir oddi mewn i'r cynllun, sy'n cael ei gefnogi. Aethpwyd i'r afael â'n sylwadau ar y Cynllun Adneuo.</p>
Ynni Adnewyddol	
FC30	Polisi EcW8: Ynni Adnewyddol
Yn dal i wrthwyneb u'n rhannol	<p>Roedd ein sylwadau ar y Cynllun Adneuo yn datgan y dylid nodi'r tablau cryno gan REA (Ffigurau 12 a 13) ynghylch y potensial ar gyfer gwres a thrydan yn y cyfiawnhad rhesymegol i Bolisi ECW8 ac a gynhwysir yn y fframwaith monitro. Mae'r Newid Ffocws arfaethedig yn mynd i'r afael â'n gwrthwynebiad yn hyn o beth.</p> <p>Nodwn fod y Cyngor wedi cynhyrchu papur cefndir ychwanegol, sy'n Astudiaeth Sensitifrwydd Tirwedd manwl ar gyfer yr Ardaloedd Chwilio Solar (SD53). Mae'r gwaith hwn wedi arwain at ddileu'r ardal chwilio yn Ynysowen. Nid oes gan LIC unrhyw sylwadau yn hyn o beth. Lle'r ACLI yw cyfiawnhau'r rhagdybiaethau a wneir.</p> <p>Nid yw'r Cyngor wedi darparu unrhyw esboniad ynglŷn â'n sylwadau ar y Cynllun Adneuo oedd yn ceisio eglurder ar rai o'r rhagdybiaethau gyda'r REA, yn enwedig pam bod cysylltiad grid hygyrch 2 cilometr wedi'i ddefnyddio yn lle'r 10 cilometr safonol a ddefnyddir gan LIC ac ACLlau eraill yng Nghymru. Mae angen i'r Cyngor esbonio pam eu bod wedi dewis pellter llai na'r 10 cilometr safonol.</p>
Mwynau	
FC32 FCM2	Dileu diogelu adnoddau glo eilaidd
Yn dal i wrthwyneb u'n rhannol	<p>Cyfeiriodd ein sylwadau ar y Cynllun Adneuo (Awst 2019) at Bolisi Cynllunio Cymru <u>Drafft</u> (PCC) argraffiad 10, oedd yn mynnu bod awdurdodau yn diogelu adnoddau glo sylfaenol yn unig. Mae PCC argraffiad 10 (a gyhoeddwyd ym mis Rhagfyr 2018) a'r polisi'n ymwneud â diogelu glo wedi ei newid ymhellach. Nid oes angen diogelu adnoddau glo sylfaenol bellach; mae'n benderfyniad i'r ACLI.</p> <p>Mae FC32 yn dileu'r angen i ddiogelu adnoddau glo eilaidd, ond yn cadw'r angen i ddiogelu adnoddau glo sylfaenol. Nid ydym yn gwrthwynebu FC32.</p> <p>Os yw'r ACLI yn diogelu adnoddau glo sylfaenol, mae angen iddynt gynnwys polisiâu priodol, gan gynnwys y rhai sy'n ymwneud â chyn-echedynnu, yn eu cynllun datblygu. Nid oes angen nodi ardaloedd lle na fyddai gweithrediadau glo yn dderbyniol.</p> <p>Penderfyniad i'r ACLI yw hwn. Nid yw'r dull hwn yn mynd yn groes i PCC Argraffiad 10.</p>



Head of Planning and Countryside
Merthyr Tydfil CBC
Unit 5
Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

FAO: Judith Jones

21 February 2019

Annwyl Syr/Madam / Dear Sir/Madam

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

Thank you for consulting Cyfoeth Naturiol Cymru/ Natural Resources Wales on the above, which was received on 21 January 2019.

We welcome the opportunity to provide comments on your focused changes.

We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan as indicated below:

FC Ref	Policy	Relevant Representation No.
FC22	Policy EnW2: Nationally Protected Sites and Species	103.D5//EnW2 103.D12//EnW2
FC24	Policy EnW4: Environmental Protection	103.D7//EnW4
FC25	Policy EnW4: Environmental Protection	103.D6//EnW4 103.D14//EnW4
FC26	Policy EcW1: Provision of employment land	103.D3
FC30	Policy EcW8: Renewable Energy and Monitoring Framework	103.D4

With regards to FC 30 cited above, we welcome the submission of the Landscape Sensitivity Study, dated December 2018, which provides further supporting evidence for the local search areas. We agree that based on this evidence now provided, the search



area at Merthyr Road should be discounted and removed from the Plan. The remaining 3 areas should be retained as local search areas.

We wish to make further comments on the Study. Please note, these comments do not affect our representation of support, but we suggest that some amendments are required for accuracy. These are set out below;

- Section 12.2 and table 12.3 indicate 5 categories of susceptibility and 6 categories of overall sensitivity. The tables indicate that Medium susceptibility + Medium Value = Medium-Low sensitivity. It is unclear why this is the case, rather than Medium sensitivity resulting from these combinations. Site 2 NE of Trelewis is stated to have Medium value & Medium susceptibility and Medium-Low sensitivity. It is unclear from the conclusions why this area is not considered of Medium sensitivity.
- Site 8 N of Cefn Coed is considered to be of Very High Landscape Sensitivity, however the concluding text states 'some of the key characteristics of the landscape may be vulnerable to the type of change being assessed'. This text should accompany a Medium sensitivity classification and the concluding text should state 'Landscape highly vulnerable to change from the development type'.
- Site 10 W of Heolgerrig is stated to be of overall Medium-High landscape sensitivity. The text is from the Medium-High description but the title states 'Medium'.

We also note and support the changes proposed to the plan as a result of our comments relating to matters clarity, i.e. FC Refs: .FC11, F12, FC14, FC16, FC18, FC19, FC21, FC22, FC23, FC25, FC44, FC45.

If you have any further queries, please don't hesitate to contact us.

Yn gywir / Yours faithfully

Helen Griffiths

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

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy. | Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. | Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Home Builders Federation"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

The HBF objects to the proposed new wording and in particular the word 'expected'. This is considered contradictory to the proposed change to para. 6.5.15 which the HBF support where the word 'requirement' has been changed to 'target'.

The HBF would suggests that the newly inserted wording should be changed to:
'development proposals will deliver up to..'

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--


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

--

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

--

Once completed please sign and date your representation form:

Signed:		Dated:	20/02/19
----------------	-------------------------------------------------------------------------------------	---------------	----------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value=""/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC8	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

The HBF are concerned with the reference to 'phasing' and a table which puts start and finish dates against individual sites. In the past this has often resulted in objection at application stage to developments which objectors claim are coming forward to early in the plan. There is no explanation in the plan to explain why sites need to be phased to later in the plan to justify introducing phasing.

The HBF suggests removing the words 'phasing' in brackets to avoid any confusion.

Part 3: What happens next?

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

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

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



I want to speak at a public hearing.



3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

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

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

Once completed please sign and date your representation form:

Signed:



Dated:

20/02/19

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Home Builders Federation"/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

The HBF supports the changes to the Housing supply table. However, we would suggest clarification is provide as to whether or not the allocations figure in row D of the table is minus those identifies as already being built by an * at the bottom of the table.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

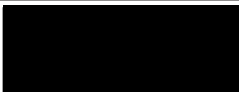
3c. If this representation represents a petition, please indicate how many people it represents:

--

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

--

Once completed please sign and date your representation form:

Signed:		Dated:	19/02/19
----------------	-------------------------------------------------------------------------------------	---------------	----------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Home Builders Federation"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC25	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC25 The HBF objects to the additional wording which 'requires' that development should improve water quality. Although it is reasonable to expect development to not cause any harm to or make water quality any worse, but it is not considered reasonable to require housing development to result in an improvement. Further wording in the supporting text para. 6.7.25 'expects' improvement water quality.

The HBF suggests that this should be reworded to 'encourage' instead.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:		Dated:	20/02/19
----------------	-------------------------------------------------------------------------------------	---------------	----------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Home Builders Federation"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC40	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

The HBF notes the standard Welsh Water wording which has been inserted to cover for the lack of actual detailed information. Effectively the work required to establish if a site can be drained has been passed to the developer, which is likely to delay delivery and could affect viability of the site if issues are identified at the application stage. It is disappointing, particularly with regard to the plans main allocation at the former Hoover site that further work could not have been done at this stage to establish the extend of any water or drainage requirements for the site.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

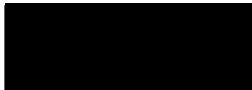
3c. If this representation represents a petition, please indicate how many people it represents:

--

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

--

Once completed please sign and date your representation form:

Signed:		Dated:	20/02/19
----------------	-------------------------------------------------------------------------------------	---------------	----------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Mark"/>	<input type="text"/>
Last Name <input type="text" value="Harris"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Planning & Policy Advisor Wales"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Home Builders Federation"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC49	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

The HBF notes that the land supply table includes figures for 2016/17 of 4.9 yrs when in fact the actual land supply as calculated by the agreed JHLAS was 1.6 yrs and for 2017/18 the actual land supply as calculated by the agreed JHLAS was 1.1 yrs.

The HBF suggests that the table should be amended to show the actual agreed figures.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:			Dated:	20/02/19
----------------	--	--	---------------	----------

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

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

Our Ref: **MTCBC/FC/28022019**
Enquiries: Ryan Norman/Rhys Evans

[REDACTED] [REDACTED] [REDACTED]

28th February 2019

Dear Sir / Madam,

**PUBLIC CONSULTATION ON THE REPLACEMENT MERTHYR TYDFIL LOCAL DEVELOPMENT
PLAN FOCUSED CHANGES**

I refer to your e-mail dated 21st January 2019 with regard to the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

We are pleased to see that the Council have taken into consideration our representation on the Deposit Plan along with subsequent further discussions. As such, we are supportive of the proposed focused changes as set out.

We are particularly welcoming of the following proposed focused changes as they ensure that our infrastructure and the water environment are adequately protected, as well as safeguarding that there is sufficient capacity available to serve the proposed level of development as set out in the LDP:

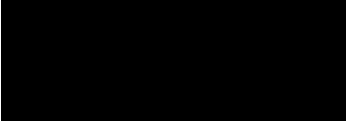
- **FC11; FC14; FC15; FC16; FC25; FC38; FC40; FC41; FC42.**

We hope that the above will assist you as you continue to progress the LDP, and would be happy to continue to work with you as you progress. If you require any further information then please do not hesitate to contact us on [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Yours faithfully,



Ryan Norman
Forward Plans Officer
Developer Services

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Ryan"/>	<input type="text"/>
Last Name <input type="text" value="Norman"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Forward Planning Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Welsh Water"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 4 <input type="text"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

119

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
Numerous	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

Please see attached sheet.

Part 3: What happens next?

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

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

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

☐

I want to speak at a public hearing.

☒

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

We would be happy to attend the Public Examination if our attendance is requested in our role as a specific consultee in the LDP process, and to support the LPA.

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

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

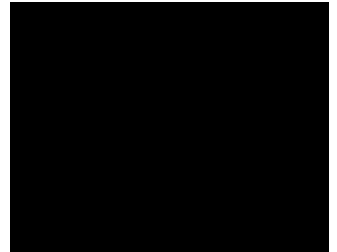
One.

Once completed please sign and date your representation form:

Signed:	Ryan Norman	Dated:	28th February 2019
----------------	-------------	---------------	--------------------

1st March 2019

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



Email: devplanning@merthyr.gov.uk

Dear Sir/Madam

MERTHYR TYDFIL REPLACEMENT LOCAL DEVELOPMENT PLAN 2016-2013
SCHEDULE OF FOCUSED CHANGES

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

Further to the consultation on the above document and with reference to our previous representations from August 2017 and September 2018, we note the focussed changes document addresses proposed major changes to the text in the local plan. We acknowledge these below, however, we must highlight our previous comments which should be addressed to ensure the soundness of the plan and provide clarity where necessary.



Page/Pol/Para	Current Wording	MPA Comment	Required amendment	Focussed changes document	Comments on focussed changes
1.4	Footnote 5	This footnote should be updated to recognise the consultation on PPW V10	Update footnote 5	No change made to text	Previous representation maintained.
1.12	Reference is made to PPW and TANs	The plan should also be considered in combination with the Regional Technical Statement (RTS) and MTANs	Include reference to RTS and MTANs.	Change made	We support proposed change to include MTAN, but remain of the opinion that the RTS should also be included.
1.13	The Plan identifies the need for a further 2,250 residential properties but seeks provision for 2,825 properties.	No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements.	Consider the implications of additional housing and infrastructure on mineral supply.	No changes made to text	Previous representation maintained.
2.8	Figure 1 refers to the “protection” of mineral resources	Our previous comments from August 2017 referred to the Sustainable Supply of Minerals. The Council’s Initial Consultation report, acknowledges this approach. The sustainable management of mineral resources, is not solely about protection (minerals safeguarding) of resources but also about the safeguarding of infrastructure and sustainable supply of minerals to meet society’s needs.	Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives (Figure 2).	No changes made to text	Previous representation maintained.

Page 17 Footnote 27	Footnote 27 refers to a document entitled Merthyr Tydfil: Understanding Urban Character Cadw: 2015	The report referred to, highlights the sources of building stone within the borough. These building stones are important and necessary in order to meet the requirements of Policy CW1: The Historic Environment. These resources are not safeguarded and the provision of such stone not catered for in the minerals policies. It is therefore unclear how the requirements of Policy CW1 can be met.	Amend Policies EcW10 and EcW13 to address the need for the provision and safeguarding of building stone resources and reserves in order to meet the requirements of other policies in the plan.	No changes made to text	Previous representation maintained.
Policy SW12	Improving the Transport Network	The plan safeguards the route for the dualling of the A465(T) Heads of the Valleys Road and proposes various other transport requirements. However, no assessment is made of the aggregate requirements for the scheme in the plan or in the sustainability report. In order to full consider the implications and requirements of the plan a resources assessment and supply chain considerations should be considered in the plan.	Consider the implications of the proposed transport network improvements on mineral supply.	No changes made to text	Previous representation maintained.
Policy EcW1	Provision of Employment Land	The development of 36.65ha of employment land will	Consider the implications of	No changes made to text	Previous representation maintained.

		inevitably have a demand on raw materials. No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements	additional 36.65ha of employment land on mineral supply.		
6.8.89	The Role of the Plan	This paragraph sets out four key point in terms of the role of the plan, but does not truly follow the requirements of the current PPW which are outlined in paragraph 14.7.1 of PPW. <i>“Development plans should set out the broad strategy for mineral working and related development taking into account the Welsh Government’s policies. They should provide a clear guide to where mineral extraction is likely to be acceptable and include policies which protect sensitive environmental features and provide environmental and resource protection. Policies and proposals should relate to identifiable areas of land unless there is a good reason why this is not possible and should cover mineral resources which are currently used or which may need to be used in the foreseeable future.”</i> This	Adapt paragraph 6.8.89 to reflect PPW and reflect the requirements of the RTS and MTAN.	No changes made to text	Previous representation maintained. This should also acknowledge the review of RTS currently taking place.

		<p>should be the recognised role of the plan.</p> <p>Further, and as reflected in the RTS, the planning authority should not rely solely on the annual apportionment, but should consider all factors that may be material to ensuring an adequate supply of aggregates, including</p> <ul style="list-style-type: none"> • <i>The technical capability of one type of aggregate to interchange for another</i> • <i>The relative environmental cost of substitution of one type of aggregate by another</i> • <i>The relative environmental effects of changing patterns of supply; and</i> • <i>Whether adequate production capacity can be maintained to meet the required level of supply.</i> <p>Finally, a review of the RTS is expected to be completed by the end of 2019 and the plan must therefore include flexibility to address any arising supply issues.</p>			
6.8.92	This paragraph states that there is	The purpose of this paragraph is not clear. It is the size of an	Amend text accordingly	No changes made to text	Previous representation maintained. This should also

	no need for further allocations as the two sites indicated have significant crushed rock reserves	authority's landbank which is relevant in relation to the need for any allocations in its development plan, not the size of the permitted reserve or end date of the mineral permission at any individual site. The paragraph should be re-written to state that the current RTS (2014) did not require any minimum allocation for the Brecon Beacons National Park and Merthyr.			acknowledge the review of RTS currently taking place.
Policy EcW10	Sustainably Supplying Minerals 2 nd bullet point states <i>"Maintaining a minimum 10-year landbank of permitted aggregate reserves"</i>	It should be made clear that this bullet point requires the maintenance of a minimum 10-year landbank, throughout the period of the development plan	<i>"Maintaining a minimum 10-year landbank of permitted aggregate reserves throughout the life of the development plan"</i>	Change made	We acknowledge the proposed changes, but feel these should also acknowledge the review of RTS currently taking place.
Policy EcW10	Sustainably Supplying Minerals	As mentioned above, no reference is made to the supply of building stone to meet the needs of Policy CW1.	Amend Policy accordingly.	No changes made to text	Previous representation maintained.
6.8.98	This paragraph states that <i>"Merthyr Tydfil has a sufficient landbank to last</i>	The requirement in Para. 49 of MTAN 1 is that <i>'a minimum 10-year landbank of crushed rock shall be required during the entire plan period of each</i>	Amend text accordingly.	Change made	No additional comment

	<i>beyond the plan period”</i>	development plan’. The supporting text should reflect that.			
Policy EcW11	This policy states that “Proposals for mineral extraction and associated development will only be allowed:....”	The is a general acceptance that Local Planning Authorities should plan positively for developments which is echoed in the consultation version of PPW. The word “only” indicates a negative approach to the policy and is unnecessary. Its deletion would infer a positive approach within the policy but would not in fact change the overall policy requirements	Delete the word “only” .	Change made.	Support the proposed change.
Policy EcW11	The proposed Policy includes a number of Bullet Points referencing Environmental considerations	A strong criticism of many Local Development Plans is that they are often too long and repetitive. A number of the “Environmental Criteria” indicated in the bullet points simply repeat the requirements of other Policies in the plan. The second bullet point repeats the considerations of Policy CW1 (Historic Environment) and EnW1 (Nature Conservation), whilst Bullet Point 3 by EnW5 (landscape). The remaining bullet points are largely	Review the bullet points and delete matters which are more appropriately addressed in the other identified policies in the plan.	Change made.	Support the proposed change.

		addressed through Policy EnW4 (Environmental Protection)			
6.8.103	This paragraph states that “Mineral extraction can have significant consequences for the environment and <u>on the health and amenity of local communities</u> . (Our underlining)	We are aware that historic research by Newcastle University in to open cast coal extraction, linked airborne emissions, to potential health impacts. We are not aware of any evidence that other forms of mineral extraction (non-energy) are linked to health effects on local communities. The Council should clarify this statement with supporting evidence.	If no evidence linking non-energy extraction to health impacts on local communities can be provided, this paragraph should be amended.	No changes made to text	Previous representation maintained.
Policy EcW12 :	Mineral Buffer Zones	MTAN 1, para. 70 requires and MPPW make it clear that Buffer Zones are to be established <i>“around permitted and allocated mineral extraction sites”</i> . Policy EcW12 should be amended to accord with that policy requirement.	Amend text accordingly	Change made.	Support the proposed change.
Policy EcW13	Minerals Safeguarding	The proposed policy seeks only to safeguard aggregate mineral resources and not building stone resources and infrastructure associated with minerals extraction, processing and delivery as referred to in the proposed PPW.	Amend text and proposals map to include minerals infrastructure and building stone.	No changes made to text	Previous representation maintained.

6.8.113	This paragraph states distances around settlement limits within which minerals development will not be acceptable: - 200 metres in the case of hard rock and 100 metres in the case of sand and gravel.	Stand-off distances for mineral extraction are normally determined through the process of Environmental Impact Assessment. It is unclear whether or not this paragraph seeks to impose a buffer zone around settlements. PPW, supported by subsequent Mineral Plan Inquiries Inspector's reports , is clear in that buffer zones are applicable to mineral extraction operations	Review this paragraph as it is contrary to national policy in PPW.	No changes made to text	Previous representation maintained.
Page 129	Monitoring Target: -Maintain a 10-year bank of permitted aggregate reserves	This does not accord with MTAN1 which requires a <u>minimum</u> landbank of 10 years during the entire period of the plan.	Amend wording to read <i>"Maintain a minimum 10-year landbank of permitted aggregate reserves during the entire period of the development plan"</i>	Change made.	Support the proposed change.
Page 129	Trigger Point: - Less than 10 years.	We are concerned that a trigger point which only comes in to effect once the landbank falls below 10 years will not meet the requirement of PPW, MTAN1 and the RTS. The Mineral Products Association surveys its members annually over the time taken to find, secure and release a mineral	The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.	No changes made to text	Previous representation maintained.

		reserve. Typically, it takes between 5 and 15 years to convert sites from exploration in to active operational sites, almost three years of which is in the planning process.			
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--

Proposals Map

Further to the above, we also continue to express our concerns over the quality of the graphics for the Proposals Map is poor and unclear and also that Vaynor Quarry (limestone) and Gelligaer Quarry (sandstone) are both indicated as coal resources.

The quality of the proposals map needs to be improved.

Summary

We **welcome the Council's changes to address some of our concerns but feel that there** are some key areas where our comments continue to be overlooked and we must therefore reiterate these and maintain our objection.

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

Yours faithfully

A large black rectangular box redacting the signature of Nick Horsley.

Nick Horsley
Director of Planning

A black rectangular box redacting contact information, likely a phone number or email address.



The Coal
Authority

Replacement Merthyr Tydfil Local Development Plan 2016-2031 (Notice of submission to Welsh Government (LDP Regulation 22) and consultation of proposed focussed changes)

Contact Details

[Redacted contact details]

Planning Email:
Planning Enquiries:

[Redacted email address]

Date

4 March 2019

Replacement Merthyr Tydfil Local Development Plan 2016-2031 (Notice of submission to Welsh Government (LDP Regulation 22) and consultation of proposed focussed changes)

Thank you for your consultation received on the 21 January 2019 in respect of the above consultation.

I have reviewed the focussed changes proposed and can confirm that we have no specific comments to make.

Regards

[Redacted signature]

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

PLANS DRAWN

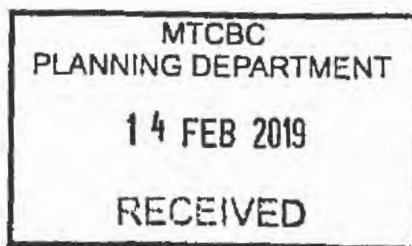
Ref 188



Mr. A. Collins

13th Feb 201

YOUR REF : SUB/FC
MY REF : 188



NRL

Dear Sir/Madam,

Replacement Merthyr Tydfil Local Development Plan 2016-2031: Notice of Submission of a Local Development Plan to Welsh Government (LDP Regulation 22) and Consultation on Proposed Focused Changes

With reference to your letter of the 21st Jan. 2019 I have read the Proposed Focused Changes and have no further comments to make. I would just like to say thanks for writing to myself regarding the Replacement Merthyr Tydfil Local Development Plan 2016-2031 in this instance and previously on the matter; giving myself the opportunity to express my views.

Yours Faithfully

TELEPHONE:

EMAIL:

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC3 and FC4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC3 Policy SW2: Provision of affordable housing

"Provision of affordable housing

"6.5.12 The delivery of affordable housing is a key issue both locally and nationally. The most recent Local Housing Market Assessment (LHMA) for Merthyr Tydfil identifies a need for 366 additional affordable homes per annum up until 2019, comprising of 338 social rented, 17 low cost home ownership units and 11 intermediate rented units.

"This translates to an affordable housing need of 5,490 units over the Plan period."

The Heritage Trust objects to this amendment. We understand that a figure of 5,490 units of affordable housing has been obtained by multiplying the LHMA figure of 366 units needed annually by 15 (the years of the revised LDP).

However, that Local Housing Market Assessment appears to date from 2014 - five years ago - and there is no figure for the affordable housing delivered over that 5 years.

Regardless of that the total figure of 5,490 units substantially exceeds the number of house builds proposed under the revised LDP - that total is ,2840.

10 per cent of that is 284 - and 10 per cent is the quota proposed for affordable housing in new housing development in sites in the so-called 'growth area' of the town of Merthyr Tydfil. The quota is half that for the southern part of the county borough.

This does not make much sense.

The Heritage Trust's view is that the local housing need - in particular the local social housing and affordable housing need - should have priority over new private sector 'for profit' speculative housing developed to be marketed and sold, allegedly, to in-comers or immigrants of working age.

A new LHMA is urgently needed and should be developed in partnership with local social housing providers / housing charities in the voluntary sector.

Part 3: What happens next?

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

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

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

☐

I want to speak at a public hearing.

☒

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

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

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

Once completed please sign and date your representation form:

Signed:

Rob Thomson

Dated:

4 March 2019

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rob"/>	<input type="text"/>
Last Name	<input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No.	<input type="text" value="REDACTED"/>	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC9 Policy SW1: Provision of New Homes

The Heritage Trust objects to the adjusted target of 2,820 new homes.

This is a figure based entirely on an ambition to allow as much housing development as possible while allowing token commitments - or at least the minimum thought necessary - to sustainability of the environment and the requirements set out under the Well-being of Future Generations (Wales) Act.

The over-provision is a clear admission that some or many of the designated housing development sites will not be viable.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

As indicated in the Heritage Trust's previous submission on FC11 Hoover SRA

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC11	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC9 Hoover SRA - comment sheet 1

Merthyr Tydfil Heritage Trust objects to the changes made here - we have already lodged a strong objection to the Hoover SRA proposals that were included in the deposit LDP and the consultants Hoover SRA masterplan (June 2018).

The Heritage Trust has objected to proposals to turn the Hoover Sports Ground (a green, open space used mainly as a cricket ground and wrongly - in our view - excluded from MTCBC's open space register when another nearby privately owned and fenced cricket ground is included) into a car park, shop and community space (all unnecessary in the Heritage Trust's view). The Heritage Trust has also campaigned for the historic and heritage Hoover 1948 gateway development - that is the iconic south-eastern factory façade, the gatehouse and the office/canteen building - to be preserved and incorporated into any redevelopment of the Hoover factory site extending from the 1948 original factory northwards into the later extension and the 1970s further extensions up to Brandy Bridge.

The Heritage Trust also objects to the designation of Pentrebach station as a Metro 'hub' - we have previously proposed that a new Metro station and transport interchange ('hub' if you like) be developed at Brandy Bridge where there would be potential for two platforms and a bus interchange as well as a convenience store and a footpath, cycle route to active travel standards (direct, safe, attractive) on one or other of the river banks for the much shorter active travel journeys to Rhydyar and the town centre. This would also serve new housing just as well as Pentrebach station.

Although the protection of land for a new Metro stop at Brandy Bridge is welcome it falls far short of the 'strategic regeneration' plan that was needed. Adopting some only of the HSRA masterplan proposals by incorporating some of them into the LDP as part of FC9 is a wrong approach - it is simply 'cherry-picking' what suits this potentially damaging and unsustainable third version of the Hoover SRA (the first two being the unpublished masterplan framework that included the wider and larger HSRA area and its successor a cut-back area with a masterplan (the published one) that totally fails to deal with the issues on the west bank on the excuse that they are at flood risk.

The Heritage Trust is of the view that FC9 is simply an attempt to add in some of the masterplan proposals (relegating some of the suggestions for the standard and quality of housing design) which anyway have long been based on offering private sector developers the 'low-hanging fruit' of building over a flat, green open expanse and the Cardiff City Region board and Welsh Government the 'plum' of a Metro 'hub' (which in practice will not meet the inflated claims for increasing Metro use).

Further comments and objections on the detailed amendments in FC9 will follow on further sheets.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

On behalf of Merthyr Tydfil Heritage Trust I would like to speak on the points that I have made in the present 'focused change' consultation and also the previous 'deposit plan consultation'.
I would also like to ask questions about the 'evidence' said to support the case that the Deposit Plan is fit, sound, appropriate or likely to deliver.

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

--

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

I am providing additional sheets numbered 1 - 5 in respect of the comments/objections made to FC11 Hoover SRA.

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	04-03-2019
----------------	-------------	---------------	------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rob"/>	<input type="text"/>
Last Name	<input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No.	<input type="text" value="REDACTED"/>	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC12	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC13 Police SW10 Protecting and Improving Open Spaces

The amendment is to include a new stipulation that "development proposals that improve the quality, quantity or access to open space will generally be supported"

The Heritage Trust objects to this - it can be read as meaning that, for example, a proposal for 440 houses (as at the Hoover SRA) will generally be supported as long as it includes a children's playground, or allotment site, or landscaped green space. An example might be that if a developer submits a planning application that allows public access (say by a footpath) across the site to an open space (possibly a park or a candidate Local Nature Reserve) that will be supported.

We are not sure if this was intended but it seems to leave the barn door wide open for the horse to bolt.

The sustainability principle should apply here - so that development does not take away open space, potential open space, access to open space or potential access to open space and also must provide new, additional quality open space proportionate to the size of the development as well as (if it is a housing proposal) proportionate to the needs of the existing and proposed development.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 2 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 3 <input type="text" value="REDACTED"/>	<input type="text"/>
Line 4 <input type="text" value="REDACTED"/>	<input type="text"/>
Post Code <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone No. <input type="text" value="REDACTED"/>	<input type="text"/>
Email Address <input type="text" value="REDACTED"/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC13	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC13 Policy SW10: Protecting and Improving Open Spaces

The Heritage Trust objects to the amendment to FC13 that includes new wording "to conserve and enhance biodiversity and improve access to nature, the following Local Nature Reserves are proposed:"

This does strengthen the proposal for LNRs slightly but, in our view, does not go nearly far enough to ensure that the proposed Local Nature Reserves do all improve biodiversity, improve public access and improve the provision of open space across each of the 11 electoral wards.

Declaring a LNR is just a paper exercise and will not achieve anything unless there is a well-planned programme of investment and maintenance - a plan drawn up by a nature or wildlife trust and based on a proven LNR model - put in place by the local authority.

The only proposal that we can see is one for community involvement - and that could just be another local authority off-load of management responsibility.

Of course, there may actually be worse public access to nature and to open space. LNRs probably require vegetation to grow freely and dense brambles, bushes or bracken will exclude rambling and play. A good environment for wildlife probably does not often include the public roaming around.

An addition should be made to FC11 to add in a requirement for a fully-tested and consulted management programme for a minimum of 10 years to be drawn up and agreed between the local authority (who should take the lead) and users in the community. The local wildlife trust should be commissioned urgently to draw up practical proposals.

The Heritage Trust is also of the view that the declaration of LNRs will not go towards addressing the massive deficit in open space of all types in most if not all electoral wards and so also across the county borough. Additional open spaces - allotments, sports pitches, children's playgrounds, to name but a few - are required as is made clear in the Open Spaces Strategy. More sites and more land is needed for open space - not just a re-brand of existing ones.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC17 Policy: SW11: Sustainable Design and Placemaking

Amendment to Paragraph 6.5.73 on page 38 as follows: "In order to reduce the need to travel, in particular by private motor vehicles, we will locate development in accessible locations with good connections to sustainable transport, including bus, and train and active travel routes".

The Heritage Trust is of the view that this amendment - including 'active travel' routes along with bus and train - will not be in the least effective in reducing the 'need to travel'.

This is partly because bus, train, walking and cycling all count as travel anyway - the way to reduce travel through planning is to ensure that amenities, shopping, community facilities, open space etc are all nearby.

MTCBC does not - in the Heritage Trust's view - promote active travel at all - in spite of a legal obligation to do so.

In addition, MTCBC has proposed a series of active travel routes that do not meet the Welsh Government's standards at all well. Our experience is that they fall well below the threshold.

This is actually a disincentive to local people to walk or cycle.

It is regrettable that a claimed active travel of the standard of that along Swansea Road and through the Gellideg Estate to Cefn Coed should be used as a reason to allow housing development at Clwydyfagwr.

Much more rigour is going to be needed on the part of MTCBC in promoting and delivering active travel, of Welsh Government in monitoring and reviewing local authority progress in continual year-on-year improvement (another legal requirement) and in the Planning Department in checking the reality of what is out there on site.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rob"/>	<input type="text"/>
Last Name	<input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone No.	<input type="text" value=""/>	<input type="text"/>
Email Address	<input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC18	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC18 Policy CW1:- The Historic Environment

"Addition of text regarding inclusion of 'landscape character assessments'.

"Amend the last sentence of paragraph 6.6.10 as follows: "In addition, green infrastructure, historic, cultural and landscape character assessments should be used where available to identify and better understand historic landscape to ensure their qualities are protected and enhanced"."

Clearly, the inclusion of "where available" is a significant weakening of this important proposal on the Historic Environment and in particular the historic landscape of Merthyr Tydfil - a very special heritage asset of national and international significance which is continually overlooked and ignored when it comes to development proposals.

These character assessments are a 'must' - in the Heritage Trust's view. This should be laid down in the LDP.

Our understanding is that heritage assessments are now required under Welsh Government heritage legislation - and no opportunity of a loophole should be allowed.

The recent proposal to build a huge flyover just to the north of the historic asset of Cefn Coed Viaduct is a huge potential blot on our historic landscape. Our experience of that is that Cadw's assessment tool is misunderstood by Welsh Government, its consultants and even by Cadw itself - all on their own admission at last year's A465 public inquiry.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

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

--

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

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rob"/>	<input type="text"/>
Last Name	<input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone No.	<input type="text" value=""/>	<input type="text"/>
Email Address	<input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC26	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC26 Policy EcW1: Provision of Employment Land

"To support economic development, 35.65 30.65 hectares of employment land (for B1, B2, B8 uses) is allocated at the following locations:"

The Heritage Trust objects to the general principle of reserving an over-supply of employment land sites through the LDP - and, in particular, to the allocation under the Hoover SRA. See the Heritage Trust's comments on FC11 Hoover SRA.

There are several overarching points.

Reserving sites for employment may just mean preventing better alternative development such as housing or even conversion to public open space - an example of this potential sterilisation of a derelict site is Project Heartland at the Dowlais Ivor Works.

At Abercanaid Industrial Estate/the Willows a possible (probable) flood risk could mean that land is allocated to low level employment use - i.e. sporadic and uncontrolled development (more of what is already there) that does not supply a large number of employment opportunities or even well-paid sustainable jobs.

Merthyr Tydfil's record on employment is poor not because of a high number of jobless - but because the county borough is -according to the ONS reports - the local authority area with the lowest median level of earnings in Wales.

The Heritage Trust understands and accepts there is a case for reserving a site and possibly even building high quality 'advance' units while waiting for a golden goose to come and lay a golden egg but 'waiting for Godot' when the Metro will be offering many the opportunity to speed to potentially much better remuneration through jobs in Cardiff shows a lack of any realistic plans and proposals.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text"/>
First Name <input type="text" value="Rob"/>	<input type="text"/>
Last Name <input type="text" value="Thomson"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Voluntary Projects Officer"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value="Merthyr Tydfil Heritage Trust"/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC28 out of town retail

"6.8.52 Proposals will also be required to demonstrate that the proposal would not have an unacceptable impact on the trade, turnover, vitality and viability of the town and local centres. Such justification could be provided through a retail impact assessment where the proposal is for 2,500 sqm or more of gross floor space. Retail impact assessments that are proportionate to the potential impacts may also be required for smaller retailing proposals. Further guidance regarding the tests of retail need, the sequential test and retail impact assessments is provided in Technical Advice Note 4: Retail and Commercial Development."

While the Heritage Trust is concerned about the spate of out-of-town retail development in recent years - in particular because of its hugely negative impact on sites like the DIY store and associated units on the extension to Cyfarthfa Retail Park - we don't feel well equipped to lodge an objection.

We would like re-assurance that this proposal in relation to retail impact assessments does actually work in protecting or supporting the town centre when potentially many times the retail floor space is now out-of-town or on the edge-of-town.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

--

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

--

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

--

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Rob	
Last Name	Thomson	
Job Title (where relevant)	Voluntary Projects Officer	
Organisation (where relevant)	Merthyr Tydfil Heritage Trust	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone No.		
Email Address		

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FCM - strategic footpaths/cycle routes and active travel routes

Merthyr Tydfil Heritage Trust wishes to object to both the strategic footpaths/cycle routes map and the active travel routes map - they appear to be inaccurate.

The proposals for strategic routes would appear on the layered map to include important prospects like the Morlais Tunnel - and also the EFI Astex Estate - but exclude others that are on the supposed designated active travel network.

Frankly attention to detail as to what is on the ground and the standards is essential if any workable plans for year on year improvement are to be drawn up and delivered.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

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

--

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

Once completed please sign and date your representation form:

Signed:	Rob Thomson	Dated:	4 March 2019
----------------	-------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

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

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
FC27	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

FC27 seeks to elevate the Cyfarthfa Retail Centre to an "edge of centre retail park in close to the Town Centre" (sic) whilst retaining Trago Mills as an "out-of-town centre". This is contrary to TAN 4 and irrational. No evidence or justification has been provided for such a change and the change will be challenged.

FC27 explicitly relies on the Merthyr Tydfil Retail and Commercial Leisure Study (2017). Two points arise from this: i) the 2017 study refers to the Cyfarthfa Retail Park as "out-of-centre" (para 5.20 and 'Threats' on p84) and that "Future growth should be concentrated in the town centre to address [the Cyfarthfa imbalance]" (para 6.10); and ii) the 2017 study states (e.g.) that Trago Mills "has the potential to further reduce the visitor numbers to the town centre" and "Concerns were also raised that Trago Mills could divert trade from the town centre when it opens" (etc). However, MTCBC Officers reported the opposite (at the Regeneration and Public Protection Scrutiny Committee meeting on Tuesday, 27th November, 2018 2.30 pm (e.g. as reported by <https://www.bbc.co.uk/news/uk-wales-46430876>). E.g. "Officers said footfall was up by more than a quarter in the 10 weeks after Trago Mills opened on Swansea Road, compared to the 10 weeks before." It is noted that Figures A9 and A10 of the 2017 study paint a different picture for the Cyfarthfa Retail Park.

To the extent that it is considered acceptable by MTCBC in promoting FC27 to disregard: i) the 2017 study; and ii) the advice in TAN 4; and include of the Cyfarthfa Retail Park as "edge-of-centre", then consideration should be given to the inclusion of the Trago Mills site as "edge-of-centre" also, particularly given the findings of MTCBC Officers which were contrary to the 2017 study.

Absent reasoned, evidenced, justification, including Cyfarthfa Retail Park as "edge-of-centre" (contrary to the position in the 2017 study) whilst retaining the Trago Mills site as "out-of-centre" makes the plan unsound under tests 1, 2 and 3.

We have not seen any SEA of the proposed change of Cyfarthfa Retail Park as "edge-of-centre" (contrary to the position in the 2017 study) from "out-of-centre".

Either: i) Trago Mills should be included together with Cyfarthfa Park as an edge-of-centre facility; or ii) the first tracked change in FC27 should be omitted and the deleted "*and Cyfarthfa Park*" reinstated.

The addition of reference to the Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) should be deleted.

Part 3: What happens next?

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

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

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

☐

I want to speak at a public hearing.

☒

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

FC27 and FC28

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

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

Copy of BBC article on Regeneration and Public Protection Scrutiny Committee meeting on Tuesday, 27th November, 2018 2.30 pm. Copy of minutes of Public Protection Scrutiny Committee meeting on Tuesday, 27th November, 2018 2.30 pm.

Once completed please sign and date your representation form:

Signed:	C.TOFTS (for Stephens Scown LLP)	Dated:	27 February 2019
----------------	----------------------------------	---------------	------------------



MINUTES OF MEETING

SCRUTINY : REGENERATION AND PUBLIC PROTECTION MEETING

TUESDAY, 27TH NOVEMBER, 2018

PRESENT: Councillors J Amos (Chair)
C J Barry (Vice-Chair)

Councillors M Colbran, G Lewis and S Thomas

L Davies (Substitute Member)

Coopteers:

M Ellis (Youth Forum Representative)

Other Councillors in Attendance:

G Thomas (Cabinet Member)

Officers:

A Owen (Chief Officer (Regeneration and Public Protection)),
M Purnell (Performance and Scrutiny Officer), C Long
(Economic Development & Strategic Tourism Manager),
D Ryan-Newton (Community Services Officer), J Green
(Economic Development), L Whitely (Manager Orbit Business
Centre) and R Prosser (Town Centre Manager)

M Morgan (Democratic Services Officer)

ITEM NO.	AGENDA MATTER	DECISION
556	Apologies for Absence	Apologies for absence were received from Councillor P Brown and H Hopkins and H Jackson Co-opted Members.

557	Declarations of Interest (including whipping declarations)	No Declarations of Interest were made.
558	Economic Strategy Partnership Growth and	<p>The Chair welcomed Alyn Owen, Chris Long, Jared Green and Deb Ryan-Newton to the Meeting.</p> <p>Alyn Owen referred the Committee to the 'Economic Growth Strategy and Partnership' report and together with the other Officers responded in detail to the following questions that were raised:</p> <ul style="list-style-type: none"> • Paragraph 1.2 – Who is the point of contact – Who forms the Strategic and Operational groups – Is there a criteria list that residents can access – What does each group do – Who do they feed back to – What is the involvement of Partners • How are Outcomes measured – Are there targets to see how well the Council is doing • Further explanation requested in relation to 'Visual Modular' • Is there a shortfall of skills in a particular area – Training for this shortfall • Staff Retention • Working families living in poverty – Is enough being done to bring wages into the County Borough • What scope is there to offer training facilities within Companies • The impact of Brexit • Request for a diagram illustrating how the groups are linked together <p>Resolved that:</p> <p>The progress made to date on the production of an Economic Growth Strategy be noted.</p> <p>The Chair then thanked the Officers for the update to the Committee.</p>
559	Introduction to the Geosense Intelligence System	<p>The Chair welcomed Rhian Prosser and Lance Whiteley to the Meeting.</p> <p>Chris Long outlined to the Committee the function of the Geosense Intelligence System in that it was a digital footfall system to show economic activity in the Town Centre.</p> <p>Lance Whiteley then made a Presentation to the Committee giving details of the System and how it works.</p> <p>The following questions were then raised by the Committee on the System and were responded to in detail by the Officers:</p> <ul style="list-style-type: none"> • GDPR Implications • Difference between those working and those shopping in the Town Centre • Expansion Costs

		<ul style="list-style-type: none"> • What are the trends that can be seen • Percentage of vacant properties – Position of the County Borough against the Welsh average • Can there be benchmarking against a similar Town <p>The Chair then thanked the Officers for attending and the Presentation to the Committee.</p>
560	Welsh National Library Standards	<p>Resolved that:</p> <p>This item be deferred.</p>
561	Work Programme 2018/19	The Chair referred the Committee to the 'Work Programme' report and the Committee agreed the Programme.
562	Scrutiny Referrals, Feedback and Follow Up Actions	The Chair advised that there was no update for this item.
563	Reflection and Evaluation of Meeting	The Chair and the Committee reflected in detail on the issues that had been considered at the Meeting.
564	Any Other Business deemed urgent by the Chair	The Chair advised that there was no business deemed urgent.

Trago Mills boost to Merthyr Tydfil town centre trade

- 3 December 2018



A £65m store overlooking Merthyr Tydfil has brought more people into the town centre, councillors have been told.

Officers said footfall was up by more than a quarter in the 10 weeks after Trago Mills opened on Swansea Road, compared to the 10 weeks before.

Councillors heard there had been concerns that shoppers would desert town centre traders for the new store.

Enterprise manager Lance Whiteley said demand in Merthyr was at "an all-time high".

Merthyr council's regeneration and public protection scrutiny committee heard that 320,000 people visited the town centre in the 10 weeks up to Trago Mills's opening in April and 411,000 in the 10 weeks after.

Chris Long, the council's economic development manager, said the figures had "taken us by surprise", according to the **Local Democracy Reporting Service**.

"There was a lot of nerves and jitters about Trago coming," he told the meeting on Tuesday.

"There was a fear the town would close but it is not - it is kicking on."

- **'Landmark' £65m store opens at last**
- **Trago Mills' 'anti-Welsh rant' slated**

Mr Whiteley explained that footfall data for the town centre was recorded using Geosense, a technology which counts everyone's mobile phone as they enter or leave an area.

He added that the system could tell whether people were visiting Merthyr town centre for the first time or returning, but did not reveal anything else about them.

Councillor Malcolm Colbran welcomed the insights, saying: "There is a high percentage of people who haven't visited before - hopefully they are coming back again."

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

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

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

We have recently reviewed the Health Board's Primary & Community Estates Strategy to outlining the infrastructure required to support the delivery of good quality primary care and community services across Merthyr Tydfil. The sharing of the LDP has informed this process. We are aware of the additional housing pressures in the Merthyr Vale community and have identified the need for replacement primary care premises. We are actively working with the local councillors, assembly member and Council officers to explore a suitable site for a new health and well-being centre in Merthyr Vale. It is envisaged that this centre will accommodate integrated primary care and community services which will meet the needs of the community going forward.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

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

--

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

Once completed please sign and date your representation form:

Signed:	A Lewis	Dated:	4 th March 2019
----------------	---------	---------------	----------------------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. Your representations must be received by the Council by Monday 4th March 2019.

PART 1: CONTACT DETAILS

Personal Details	Agent's Details (if applicable)
Title <input type="text" value="Mr"/>	<input type="text" value="-"/>
First Names <input type="text" value="James Noel"/>	<input type="text"/>
Last Name <input type="text" value="Davies"/>	<input type="text"/>
Job Title (where relevant) <input type="text" value="Resident naturalist"/>	<input type="text"/>
Organisation (where relevant) <input type="text" value=""/>	<input type="text"/>
Address Line 1 <input type="text" value=""/>	<input type="text"/>
Line 2 <input type="text" value=""/>	<input type="text"/>
Line 3 <input type="text" value=""/>	<input type="text"/>
Line 4 <input type="text" value=""/>	<input type="text"/>
Post Code <input type="text" value=""/>	<input type="text"/>
Telephone No. <input type="text" value=""/>	<input type="text"/>
Email Address <input type="text" value=""/>	<input type="text"/>

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

287

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
Housing site at Cwmfelin, Bedlinog	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

1. The apparent reduction of the proposed housing number from 50 to 30 houses is an acceptance of the impracticability of attaining the higher total and is not a concession to objectors to the scheme, as the extent of the site remains unchanged.

2. The site should be deleted from the LDP, as this is a designated Site of Importance for Nature Conservation (SINC). The plan period is not the time to destroy any part of a SINC, the planet can no longer sustain its living fabric; erosion of its biodiversity threatens our very being:

‘Every breath of air we take, every mouthful of food we take, comes from the natural world. And if we damage the natural world we damage ourselves.’

Sir David Attenborough to HRH Prince William at the World Economic Forum, Davos 2019

3. The proposed housing area occupies the core of a multi armed SINC; extirpate that and isolated fragments will result. Such fragments, surrounded in this case by intensively grazed pasture, will lose their characteristic species suite when customary feeding and reproductive connections are severed.

4. The proposed housing area would hinder the south-north movement of wildlife up the Nant Llwynog Brook to the proposed Nature Reserve and Park 500m to the north. This corridor is used, for example, by Bats (3 species), Otter, Cormorant, Goosander, Dipper, Kingfisher, and Grey Wagtail.

5. An ancient south-north public Right of Way from Lower to Upper Bedlinog traverses the proposed site. As a popular nature walk this would be seriously devalued.

6. Loss of the core, insect-rich, Barn Owl haunted, anthill grasslands of the proposed site would terminate the feeding grounds of the House Martins which currently nest in the east village. Nature should be brought into our housing areas and not the reverse.

Part 3: What happens next?

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


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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').
Housing

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

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

Once completed please sign and date your representation form:

Signed:		Dated:	3 March 2019
----------------	-------------------------------------------------------------------------------------	---------------	--------------

REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031

FOCUSED CHANGES RESPONSE FORM

We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details		Agent's Details (if applicable)
Title	Mr	-
First Name	Edward	
Last Name	Dawson	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Friends of Nant Llwynog Park	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone No.		
Email Address		

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

288

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

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

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

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number: FCM7	Support	Object	Comment
	<input type="checkbox"/>	√ <input type="checkbox"/>	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

Protecting and Improving Open Spaces

Old Colliery Site, Coed-y-Hendre & Nant Llwynog, Bedlinog

Policy: SW10 Amend proposed Local Nature Reserve boundary on the Proposals Map

Overall significance

There have been changes to boundaries of the proposed nature reserve area for Nant Llwynog, Bedlinog following consultation on the Deposit Draft LDP. These new boundaries need to be justified in nature conservation terms, as well as relating to other factors.

Better and wider recognition of the importance of promoting nature conservation via the local plan system is commendable. Policy SW10 seeks to provide more nature reserves in the borough and is of value. Conservation involves the restoration and enhancement of nature, not just the declaration of sites, though this is an important part of the process.

In relation to the Bedlinog former colliery site, it is important that the policy is clear and easy to understand. In land use terms, this should benefit all parties, visitors and local residents alike. It would help ensure clarity on the aims of the plan, and also avoid possible uncertainties and conflicts as to the meaning of policy on the ground.

Site boundaries

This is classed as a multi-purpose site, and the logic of a nature reserve covering the whole site thus seems reasonable. The open space site in Bedlinog contains a number of uses. These are long-standing and include children's playgrounds and two sports fields. The redrawn boundaries exclude some areas of interest to nature conservation and certain habitats of importance. While exclusions should cover the sports fields and play areas, the boundaries need to be revised and drawn with some sensitivity to the value of the site. The history of the park is significant, as a semi-natural and reclaimed site bordering more natural and undisturbed wooded areas. The Inspector is recommended to visit the site and pay close attention to its overall value. This would reassure the public, while also having the benefit of showing that the LDP is more than just a housing plan.

Part 3: What happens next?

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

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

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

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

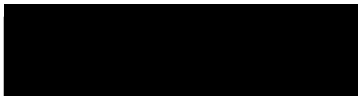
Protecting and Improving Open Spaces

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

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

--

Once completed please sign and date your representation form:

Signed:		Dated:	2 March 2019
----------------	-------------------------------------------------------------------------------------	---------------	--------------



Cyngor Bwrdeistref Sirol
MERTHYR TYDFIL
County Borough Council

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL
REPLACEMENT DEPOSIT LOCAL DEVELOPMENT PLAN 2016 – 2031
FOCUSED CHANGES RESPONSE FORM



We would like your views on the Focused Changes proposed to the Replacement Local Development Plan (LDP) and amended documents which support these (for example the amended Sustainability Appraisal or Habitats Regulations Assessment). This form should be used for all representations (i.e. comments or objections). Guidance notes for completion are provided overleaf. Electronic versions of this form are available at www.merthyr.gov.uk/ReplacementLDP. **Your representations must be received by the Council by Monday 4th March 2019.**

PART 1: CONTACT DETAILS

Personal Details

Agent's Details (if applicable)

Title	MRS
First Name	SHIRLEY
Last Name	PRICE
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone No.	
Email Address	

Please tick if you would prefer correspondence in Welsh ☐

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

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

Representor ID Number* (if relevant)

289

*You will have a Representor number if you have made representations at previous stages of the Replacement LDP process or if you have requested to be included on the Council's LDP database. The Representor Number will be

PRIVACY NOTICE STATEMENT

Merthyr Tydfil County Borough Council is committed to upholding your privacy rights. We will only use your personal information for lawful purposes. If you would like to find out more about how we use your personal information please read our privacy notices which are available on our website (www.merthyr.gov.uk/council/data-protection-and-freedom-of-information/privacy-notices/). If you have any concerns or would like to know more about data protection compliance please contact our Data Protection Officer on 01485 725328 or data.protection@merthyr.gov.uk.

indicated on previous correspondence from the Council. Please quote this number, if possible, to assist the Council

PART 2: Your Comments on the Focussed Changes (Please use one Part 2 section for each comment that you wish to make)

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

Test 1 ✓	Test 2 ✓	Test 3 ✓
----------	----------	----------

2b. Which Focused Change are you supporting or objecting to? (Please use a separate Part 2 for each Focussed Change being commented on)

Focussed Change (FC) reference number:	Support	Object	Comment
SW3 – 31 INC SINC 33		✓	<input type="checkbox"/>

2c. Please set out your comments in the space below, using additional sheets if required, clearly indicating which Focused Changes your comments relate to. If you consider that the proposed Focused Changes will not make the Plan sound, please clearly explain your reasons why and what further changes are required. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information. Please indicate in the space provided below if you are submitting additional material to support your comments.

We do not agree that the proposed development on the Cwmfelin Slope meets the soundness tests in the following areas;

Test 1

It flies in the face of the Localism Act 2011 and a community led planning system where sites in small settlements should be identified through neighbourhood planning.

Well-being issues are being over ridden completely, as identified in the following submission.

Test 2

Evidence demonstrates that it is not an appropriate area for development for a number of key reasons outlined in the attached response.

It is not supported by robust evidence as there are a number of requirements that any developer would have to meet and these cannot be proved possible until an attempt to address them has been made. A previous plan for this site has been given planning permission but has never been followed through, almost certainly because of the extreme technical difficulties and the costs that these would entail to make compliant.

It cannot be considered aspirational as it ignores the importance of the current landscape and the advantages that this already brings to the quality of life in this area. It is also out of keeping with the small village centre which houses the War Memorial.

It is not clear or coherent as the attempt to address the difficulties of an access road to any new site does not take account of safety issues for traffic or pedestrians and has complete disregard for current residents by removing their access road, along with their small community identity and probably their current addresses - and subsuming them to being at the back end of an estate, where access to their homes will be severely adversely affected. This is a clear breach of one of the council's markers for sustainability. What would be aspirational would be to offer some larger homes, like those already built in this area. Nearly all the residents here are Bedlinog families, who wanted to move to larger properties without having to leave the area that they were brought up in and love. This would free up smaller homes in the village. All the houses up here have received notes asking for individuals to be notified if we ever wished to sell. One estate agent has

also shown interest because of the nature of the village and the desire from people to move into the area, given all the new developments going on in and around Merthyr

Test 3

Given the past experience of the very long delay in developers being keen to take up the planning permission that was already laid on this site, why should it be likely that this would be different in the future. With all the known difficulties and safety issues it is doubtful that any large development could take place on this site and be cost effective. Given all the concerns and difficulties, there is no indication of how these would be safely and assuredly monitored and guaranteed.

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

The Cwmfelin Slopes need to be protected, as does the village centre. Any development on this site should be small enough to keep the SINC protected and maintain the advantages that such a site brings to the area.

Any such development would also have to be guaranteed to protect the safety of the homes and residents in the area and ensure that the current quality of life is maintained. Public safety could be at risk from coal mining issues and certainly from the additional traffic in the tiny village centre.

We note that the Craig y Hendre site has been removed from the LDP even though this would seem to be an ideal site for homes. There is already an access road and an estate built on this land and it would seem a quiet and safe area for children, with a park immediately across the road. It appears that the planners do not deem it to be a large enough site, but as they cannot enlighten us to the actual size for development on the Cwmfelin Slopes we think this is a doubtful argument for not building there. We are told there could be flooding issues, but this is only one of the many problems that will be faced on the Cwmfelin Slopes, which hopefully the attached response will demonstrate.

Part 3: What happens next?

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

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

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

☐

I want to speak at a public hearing.

✓

3b. If you want to participate in a hearing, indicate below what you want to speak about at the public hearing (e.g. Focused Change X in relation to 'Housing' or 'Transport').

Focussed change in relation to Cwmfelin Slope. SW3-31 incorporating SINC 33.
Damage to the environment for both wildlife and local inhabitants.

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

12

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

APP.1. Coal mining Report CON29M
APP.2 Photographic evidence re the benefits of the SINC
APP.3 Pipe being used to direct flood water away from a lower property on the slopes.
APP.4 Site of possible sink hole/shaft and its position in relation to the Nant Wen Shaft.

Once completed please sign and date your representation form:

Signed:



Dated:

18/2/19

**RESPONSE TO THE MERTHYR TYDFIL FOCUSSED CHANGES TO THE REPLACEMENT
LOCAL DEVELOPMENT PLAN**

2016-2031. FOCUSSED CHANGES TO DEPOSIT PLAN PUBLIC CONSULTATION.

This response relates to the proposals for The Cwmfelin Slopes in Bedlinog .

Site ref: 118. SW3 – 31

Incorporating SINC Site 33

The changes to this part of the LDP are a mere reduction of the proposed number of dwellings on this site from 50 to 30. This means that none of our concerns in our original response have been taken seriously and we therefore feel the need to reiterate those, to ensure that the Independent Inspector still has access to them. It is not clear whether this response to the Focussed Changes is the only one that will go in front of the Inspector so we apologise for the repetition, but do not wish to take any chances that the vital points we raise may not be considered.

Having been advised at the consultation meeting of the 16/8/18 that a joint response from a group would save time and duplication, especially for the Inspector, the following residents have agreed to submit this combined document. Based on information currently available (including local knowledge) and the fact that the various issues highlighted throughout the document may have more significance for some households than others, all residents are essentially in agreement with the content. We are a small community and would be directly affected by any future development, as the area concerned almost completely surrounds our dwellings.

All the Residents of Cwrt Nant Llwynog have contributed to this submission ;

No. 4 - Judith & Clwyd Jones

No. 3 - Anne & Alan Powell

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

No. 1 - Steve & Sian Bevan

No. 5 - Shirley & Paul Price

We are not totally against any development in this area, but share genuine concerns about a number of issues, which we feel need to be acknowledged and taken into account in any future building plans that could be presented, following an LDP approval. Outline planning permission has been granted on this site for many years, but we suspect has never been taken up due to the complex and high degree of developmental difficulty this operation would entail. This site is a very steep slope with significant geological problems in the shallow mining area and these facts need to be borne in mind when understanding the foundation for our concerns. We also note that the total area is said to be 3.57 hectares in size, but that only 1.7 hectares are deemed to be developable. Given that the total site was thought to be able to provide 50 dwellings, we do not understand how the figure of 30 homes can still be applied to what is now less than half of the original area.

A. Mining Report CON29M (attached as App.1.)

- 1) This states that in view of the mining circumstances, a developer would need to seek appropriate advice before undertaking any work, due to public safety concerns.
- 2) The site is in a surface area that could be affected by previous underground mining at a shallow depth. In order to build on this land a great deal of land displacement will be necessary to combat the slopes and flatten terraces. The report states that there is the possibility of disturbance leading to the escape of underground gases either during or after development and these must be assessed and properly addressed before any proposals are developed. This would indicate the need to examine these issues before the land is included in the FCLDP.
- 3) The LDP does refer to the need to safety check the site in question, but has not been specific in relation to shallow mining safety issues raised in the Mining Report CON 29M. As residents, we would want absolute assurance that this has been done to the required standard and a guarantee that we and our homes will be protected against any damages incurred, both during and after building work is done. Such precautionary work needs to be undertaken by independent and qualified

engineers who can give an unbiased view of the condition of the land with regard to public safety and not just left to builders to verify.

B. Ecology.

World experts now confirm that we are the last generation that can halt the devastating damage that has been done to our planet if we act now.

1) This site now has SINC status and this is underpinned by the report that has been done, highlighting the significance of the ancient landscape here and its importance in relation to supporting various forms of flora and fauna. Although there are other designated SINC areas, this particular site remains in pristine condition and has not been degraded by invasive non-indigenous plants. It brings a variety of birds and forms of wildlife into the area. Many old anthills also survive here, forming the basis of a very important food chain. The SINC report highlights the differing types of habitat to be found on the slopes. A previous report has been done regarding the wildlife in this area, but was not done at the correct time of year to get a true picture. A full evaluation needs to take place at the appropriate time i.e. spring / summer.

2) The Slopes also play host to regular walking groups.

C. Birds and Wildlife Present in the Local Area.

1) Many of the species witnessed here are those requiring support and protection and photographic evidence is available for many of them. (App.2.)

Martins and swallows are regular summer visitors and can be seen most evenings swooping over the grassland to feed. The swallows also return each year to their nesting site and successfully rear their chicks here. Barn Owls are regular visitors to the SINC site and Tawny Owls have also be seen perching on the rooftops of our homes. Due to the large number of moths, bats (mammals) are nightly visitors. Other birds include Mistle & Song Thrushes, which are on the Red List due to destruction of habitat; Green & Greater Spotted Woodpeckers; Bullfinches (Amber List); Red Kites.

Young Goshawks have been seen in the gardens in 2017 and 2018 and they,

like the Barn Owl, are Protected Species. The Tawny Owl and the House Martin are also placed on the Amber List.

2) Hedgehogs thrive up here, with a group of 8 being seen at one time, suggesting they too are breeding successfully. Foxes are regular visitors.

3) Adders are known to be here, as on 2 separate occasions, (one human, one canine) there have been bites, which were identified when medical/veterinary attention was required.

4) From February onwards, the evidence of amphibians is hard to miss with hundreds of frogs visiting the water courses and using the quiet garden ponds to lay their spawn. Toads can be found up here all year round.

5) Water courses also support water voles, which are again an important food source for many of these special birds.

D. Water Courses and Flooding.

1) This is a real source of concern for residents. Following any heavy rain, water pours down the slopes, bringing with it leaves and debris. Ground stays waterlogged for many weeks. Any new buildings and concrete barriers created on the way down these slopes will seriously worsen this condition, leaving the water even less room to naturally drain away. One of the houses below seems to be mitigating this by the use of an old gas pipe, presumably to re-direct the water away from the property.

(App.3.) Another resident at the base of the slope has made so many claims for flooding that she can no longer get insurance.

2) The two water courses that flow down the slopes can reach a waterfall status in heavy rains. Where they are situated would be problematic for building development and so a solution would need to be found. This is likely to involve sinking them underground, if a sufficient depth can be created to do this through the rock.

This remains of high concern as to how freely the water could escape through such a channel and where it would eventually be evacuated. The sinking of the water courses would also have a major negative impact on the wildlife environment.

Should these courses be sunk beneath a new roadway, then who would be responsible for repair after any future subsidence and how would any residents access their homes whilst it was under repair ?

3)The flow down the slopes, which will still continue above the ground, will also cross the likely path of the roadway that would serve any new site, creating a potential hazard, particularly in the cold weather.

E. Stability of the Site.

1)Due to the rocky nature of this site and the steep incline, which would need to be turned into terraces for building, there is a serious concern for the stability of the properties already here. Major, heavy equipment would be required to make the land suitable for building, which could destabilise an area where there are old, exploratory mining shafts and where there is a large depression, which is likely to have been a substantial sink hole or possibly a mining shaft ?

2)Huge retaining walls would be required at various stages, where terraces are being created, with some current properties being directly affected with the very real prospect of landslip. House No.1 is already perched perilously close above a retaining wall and any development below this, whether houses, roadway or utilities, would be a real concern.

3) A map of the adjoining field is shown to contain a mine shaft which is close to the boundary of this proposed site. (App.4).

F. Services.

1)All the services to our homes – water/electric/gas/telephony/sewerage/rain water are buried underground from High Street and routed directly across the area marked for development - specifically, at the point that is highly likely to be a future roadway at the entrance to any new site. Water meters are situated here and so will all have to be moved. A lot of these services are just below the surface of the ground and indeed, some are exposed.

2)Building contractors would presumably have the responsibility to ensure the safe

redirection of these amenities, bearing the cost and without interruption to our current supplies. They must remain accessible at all times for maintenance and repair.

G. Water Pressure

1) Some properties at the height of the slopes already have a lower water pressure than would be desirable. A new development would therefore require new water services as the current supply would not be sufficiently powerful to support it.

H. The Access to a New Housing Development.

1) It is apparent that the issue of an access road to and from any new housing development is one of the main factors that have deterred building on this site. Following new additions to the old plan and discussions that took place at the consultation meeting, it becomes clear that plans have already been outlined to resolve this issue. It is unacceptable that our current right of way to access our homes, which we have all used since the houses were built, is now to be demolished and abandoned. We must object in the strongest terms to this change in our established use of this road. We maintain this area, keeping verges and vegetation under control and constantly litter-picking to keep it to a good standard.

2) The road is referred to in our contracts when we purchased the homes, so this may need to be addressed legally. We will particularly object to contributing to any maintenance, if developers try to use this road for access in the early stages, so any potential exploring of the site will need to be done via another access point.

3) Work is seemingly now going on behind the scenes in the council to find a solution to the siting of a new road and it is clear that the Rugby Club is being engineered towards a new site and the garage will merely be demolished. The Salem Church is also thrown into the pot now that it has a new owner, although we would hope that the historical importance and the conservation of this building will be sufficient to save it from demolition.

4) The removal of our lane means we will get tagged on to the back end of an estate,

completely lose the character of our small community and our identity as such.

We will have to drive through the whole estate each time we wish to enter or leave our properties. Our existing homes are likely to be at the turnaround point for vehicles at the end of the estate, which means headlights will be directly shining into them all evening and during hours of darkness.

5) Any new access road will also have to take account of the number of cars per household. The outline development proposal shows that 30 units are being considered on the new site. Not all properties are likely to have a garage, so the norm of 2 cars per household will result in roadway parking, which will likely impair the free movement of traffic and obstruction to emergency vehicles.

6) Given we could be left as a small part of the original lane, at the end of a new road, emergency access is a real issue. We also wonder if the council will adopt what is left of this, as we would also be concerned about winter safety and access.

7) Our privacy is also at threat as the height of new properties on the slope could lead to them directly overlooking us and being able to see directly into bedrooms etc.

I. Road Safety.

1) Bedlinog has a narrow road through the village and parking on both sides often reduces it to single track in places. Congestion already occurs at rush hours and on match days and events. An additional 60 cars directly into the village centre would have a major impact.

2) With 2 sharp, right angled bends on either side of the proposed new access road, it will be extremely dangerous, as vision is impaired to the left and to the right, with the ability for the traffic situation to change in an instant. Vehicles coming round the corner from Oakland Street, past the Bedlinog Inn on the left, into the High Street, will not be able to see whether any vehicles are queuing to enter the new access road, on their right. At busy periods, this could easily cause an accident.

3) Equally, traffic pulling out of the new access road, onto the main road, will have a brief amount of time to take in the traffic coming in both directions. We could be

talking of an additional 60 cars in this small village centre.

4)It would appear that the plan is to build more houses on the corner, once the garage has been demolished and our existing road has been sacrificed. These will be situated at the base of the very steep slope that is High Street. Over the years, there have been two serious accidents here. One a lorry which experienced brake failure and one a coach which slid on the ice. Both of these came to a stop when they hit the obstacles at the bottom, which under the new plan will be people's homes.

Apparently, the coach demolished a safety barrier that was strategically placed there. This has never been replaced, but at some point there must have been a decision taken that such an event could occur, given the steep gradient of the road.

J. The Respect for the Ethos of The Village Centre.

1)This is a conservation area due to the original old cottages that have been subject to the regeneration project in the area. The village centre also boasts the well kept War Memorial. The changes proposed and their implications seem disrespectful and out of keeping for this area, which at present is peaceful and quiet. This should remain a culturally sensitive area. Large, heavy, noisy vehicles will impact on all of this for many years, if the village centre is used as the entrance/exit for a new site.

2)Homes in the village centre will also have the problems of headlights being directed straight into their windows.

3)If the plan to extend this vision by building 10 houses per year, goes ahead, then this noise, pollution and disruption will carry on over 3 years, which is totally unacceptable to current residents.

K. The Future Bedlinog.

1)We would want new people moving into the area to enjoy the quality of life that we currently experience here. Sensitive and sympathetic development could maintain that. We want to achieve an outcome that is beneficial to all.

Taking away all the benefits of the SINC sites would be irreversible and none of the effects of this could be satisfactorily mitigated.

We are responsible citizens and we do acknowledge the need for more homes and the pressures upon councils to meet this need. The focus should be on building homes in an area that is safe and enjoyable to live in and enhance quality of life, rather than just ticking boxes.

L. Pollution

1) Bedlinog is at the bottom of a very steep sided valley, which naturally poses problems of air pollution. The work required for a large development of this nature has the potential to greatly increase this, adding dust and vehicle/machinery fumes into the atmosphere. This is an area where many residents have already had the impact of working years in the unhealthy atmosphere of the mines. Add to this the possibility of displaced underground gases and the result could be regrettable.

M. Archeological Finds

1) There have been finds nearby and there is a possibility of a burial site. Grid Ref: 17710 00818. This would require some careful consideration. There could also be a round house, from Bronze Age times. Grid Ref: 09700 00799

2) The area is also likely to contain industrial archaeological finds, which may need exploration. An historical mill stone has already been found 100 metres from the proposed site.

3) G GAT should be involved before any development begins.

N. The Sustainability Report in relation to Cwmfelin

This currently shows areas of neutrality, uncertainty and conflict for this site. How this proposal can be seen as sustainable when no builder to date has made a planning application that could be realised we fail to understand. This has been in the LDP for many years and is just an easy, repetitive inclusion to the plan, rather than finding good, sustainable real solutions. Previous defective allocation makes this site unlikely to become viable in the Plan period.

We would also raise the following areas where we disagree with the assessment of the meeting of objectives.

No.2. This does not maintain and certainly does not enhance our community or settlement identity. It completely subsumes it.

No.4. This does not improve health & well – being as it encourages noise, pollution and the destruction of the pleasures that the slopes and wildlife bring to the area.

Concerns about gases from previous mining activities are a great concern.

No.9. The addition of essential utilities and infrastructure cannot be assumed until the natural difficulties of the site are proven to be able to be overcome and the protection for current residents is guaranteed.

No.14. We do not see the issue of flooding as being neutral when problems of this type already exist and could be made worse.

No.18. How this can be assessed as uncertain is highly questionable. There is no doubt the destruction of the SINC means that an area that is currently beautiful and contributes so much to the local area can in no way be described as 'protection and enhancement of the area landscape'. The loss of openness would be damaging and completely change the character of Bedlinog's village centre, with an impact on heritage.

Resident signatures to this submission :

NAME

SIGNATURE

ADDRESS

DATE

Judith Jones

20/2/19

Clwyd Jones

Anne Powell

20/2/19.

Alan Powell

20/02/2019

Rob Smart

20/2/2019

Karen Smart

20/2/2019

Lauren Smart

20/02/2019

James Sheen

20/2/19

Steve Bevan

20/2/19

Sian Bevan

20/2/19

Paul Price

20/2/19.

Shirley Price

20/2/19

CON29M Residential Mining Report

This report is based on, and limited to, the records held by the Coal Authority and the Cheshire Brine Subsidence Compensation Board's records, at the time we answer the search.

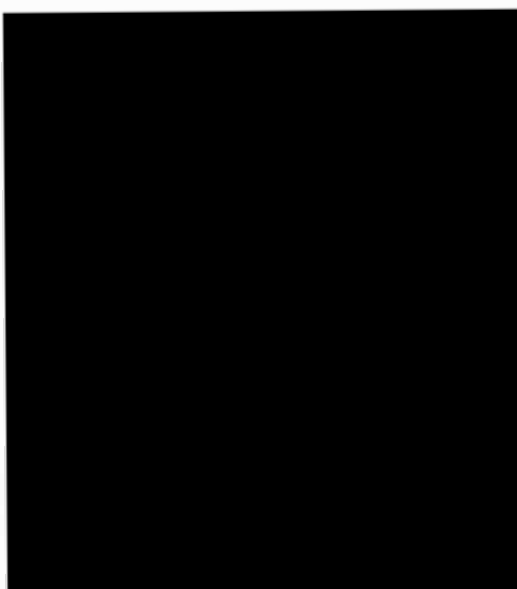
Client name

KUNDERT & CO SOLICITORS

Enquiry address



How to contact us



Approximate position of property



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2016. All rights reserved.

Ordnance Survey Licence number: 100020315

Comments on the Coal Authority information

The Coal Authority own the copyright in this report and the information used is protected by our database right.

In view of the mining circumstances a prudent developer would seek appropriate technical advice before any works are undertaken.

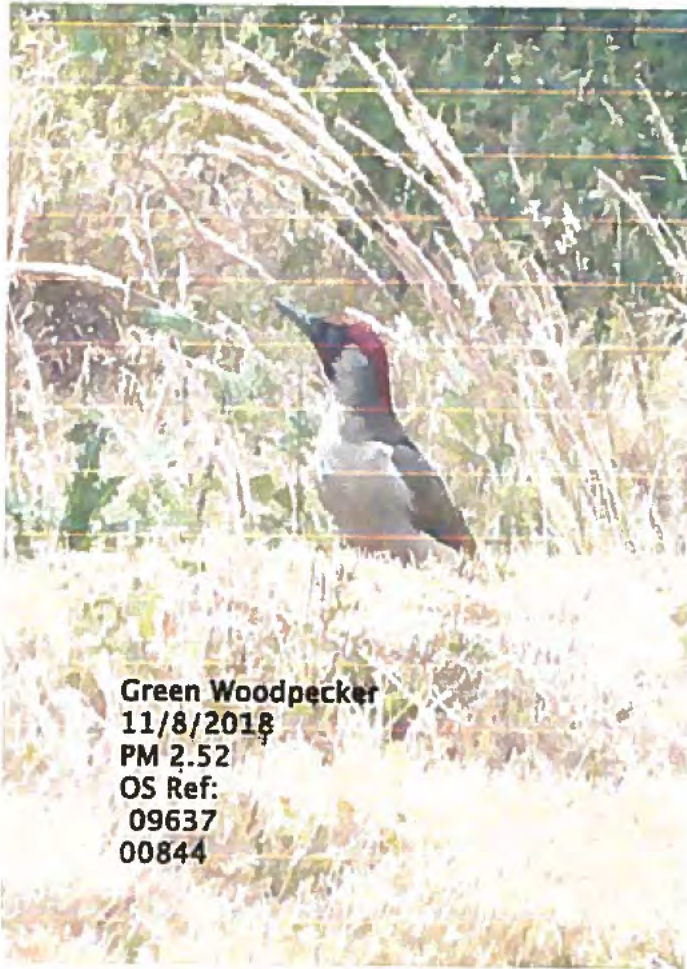
Therefore if development proposals are being considered, technical advice relating to both the investigation of coal and former coal mines and their treatment should be obtained before beginning work on site. All proposals should apply good engineering practice developed for mining areas. No development should be undertaken that intersects, disturbs or interferes with any coal or mines of coal without the permission of the Coal Authority. Developers should be aware that the investigation of coal seams/former mines of coal may have the potential to generate and/or displace underground gases and these risks both under and adjacent to the development should be fully considered in developing any proposals. The need for effective measures to prevent gases entering into public properties either during investigation or after development also needs to be assessed and properly addressed. This is necessary due to the public safety implications of any development in these circumstances.

Additional remarks

Information provided by the Coal Authority in this report is compiled in response to the Law Society's Con29M Coal Mining and Brine Subsidence Claim enquiries. The said enquiries are protected by copyright owned by the Law Society of 113 Chancery Lane, London WC2A 1PL. Please note that Brine Subsidence Claim enquiries are only relevant for England and Wales. This report is prepared in accordance with the Law Society's Guidance Notes 2006, the User Guide 2006 and the Coal Authority and Cheshire Brine Board's Terms and Conditions applicable at the time the report was produced.

APPENDIX 2.1 1 of 4







Song Thrush – Red List

17/6/2018 4.14pm

OS ref

09629

00859



APPENDIX 2.2 1 of 1



APPENDIX 2.3 i c f l

Birds seen on and immediately around Cwmfelin Slopes, with varying degrees of regularity. Area outlined on following map.

Common / regularly seen;

Duncock	Jackdaw	Crow	Collared Dove
Goldfinch	Heron	Kestrel	Nuthatch
Buzzard	Great Tit	Blue Tit	Coal Tit
Red Kite	Pied Wagtail	Warbler	Gull
Wood Pigeon	Brambling	Starling	Magpie
Chaffinch	Large Bats	Small Bats	Barn Owl
Tawny Owl	Blackcap	Goldcrest	

Commonly seen and nesting in the area

Swallow	Song Thrush	Wren	Greater Spotted Woodpecker
Lesser Spotted Woodpecker		Green Woodpecker	
House Sparrow	Hedge Sparrow	Robin	

Seen with Young (nest site not known, but local)

Sparrow Hawk

Annual Migratory Visitors

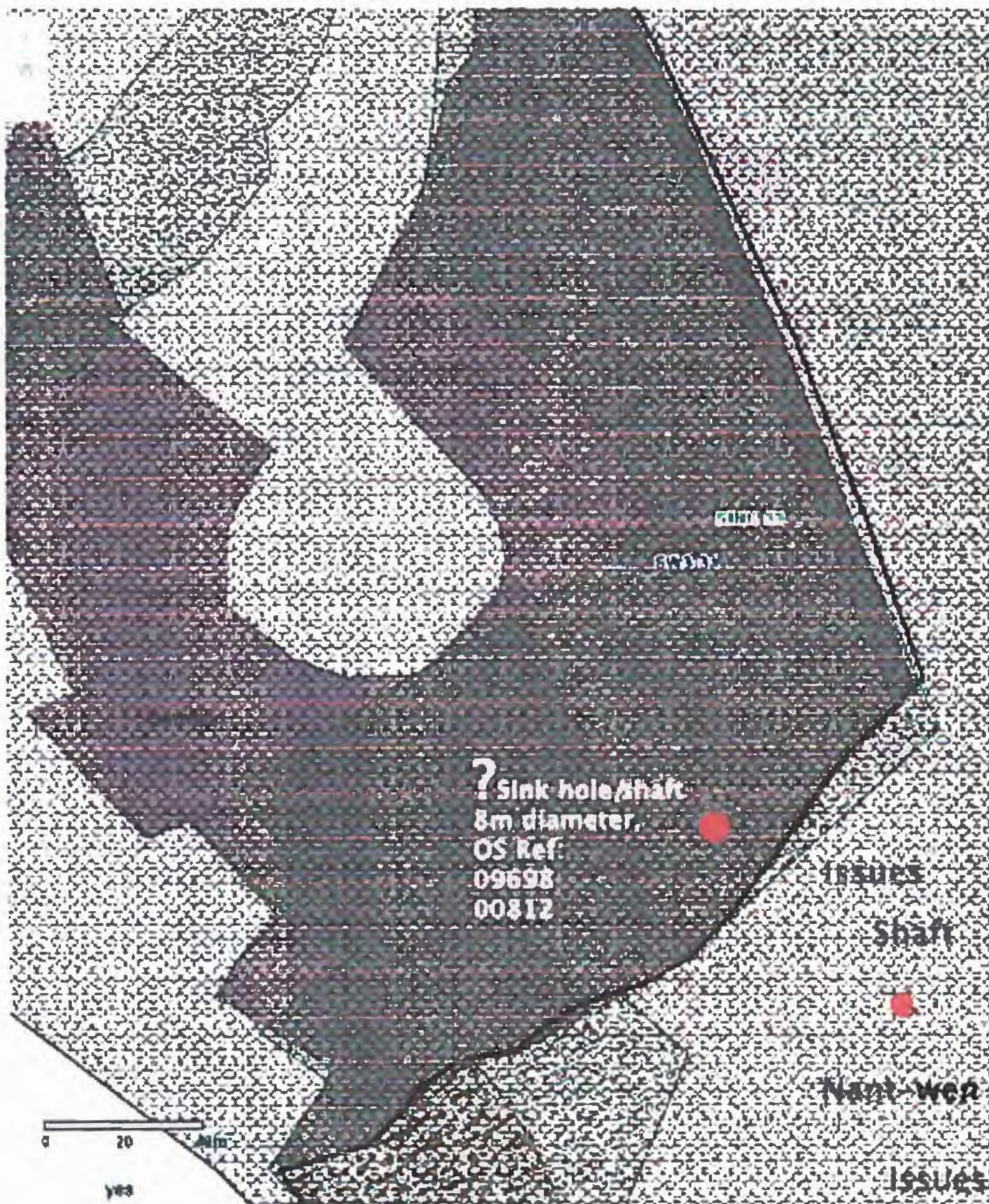
Martin	Cuckoo	Redwing	(Swallow above)
--------	--------	---------	-----------------

Seen Occasionally

Kingfisher	Tree Creeper	Swift	Jay
Mistle Thrush	Goshawk		

APPENDIX 3 1061





● = mining shaft