

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



ADRODDIAD YMGYNGHORIAD NEWIDIADAU CANOLBWYNTIEDIG

FOCUSED CHANGES CONSULTATION REPORT

Mawrth 2019 | March 2019

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FOCUSED CHANGES CONSULTATION REPORT

CONTENTS	PAGE
Executive Summary	3
1. Introduction	4
2. Focused Changes Replacement LDP Consultation (January – March 2019)	6
3. Replacement LDP Focused Changes consultation – Schedule of Main Issues	10
Main Issue 1 – Affordable Housing	10
Main Issue 2 – Community Facilities	11
Main Issue 3 - Employment	11
Main Issue 4 - General Comments	12
Main Issue 5 – Historic Environment	13
Main Issue 6 - Hoover Strategic Regeneration Area	14
Main issue 7 - Housing Allocations	15
Main Issue 8 – Housing Supply	16
Main Issue 9 – Infrastructure and Delivery	19
Main Issue 10 – Local Nature Reserves	19
Main Issue 11 – Minerals	20
Main Issue 12 – Miscellaneous Policy Matters	24
Main Issue 13 – Monitoring Framework	25
Main Issue 14 – Natural Environment	25
Main Issue 15 – Open Spaces	27
Main Issue 16 – Renewable Energy	28
Main Issue 17 – Retail	30
Main Issue 18 – Transport	31
4. Deposit Plan Sustainability Appraisal (SA) Report Addendum	34
5. Habitats Regulation Assessment (HRA) Appropriate Assessment (AA) and additional background papers.	35
APPENDICES	
Appendix 1: Replacement Deposit LDP Statutory Public Notice -Bilingual	36
Appendix 2: Replacement Deposit LDP Consultation Email Bilingual	38
Appendix 3: Replacement Deposit LDP Consultation Letter Bilingual	39
Appendix 4: Replacement Deposit LDP Consultation Poster Bilingual	41
Appendix 5: Replacement Deposit LDP Website	42
Appendix 6: Replacement LDP Focused Changes Consultation Comment Form	45
Appendix 7: Replacement LDP Focused Changes Consultation Comment Form – English	50
Appendix 8: Replacement LDP Focused Changes Representations and Council Response Reports by Issue	56

Executive Summary

- 0.1 Up-to-date Local Development Plans (LDPs) are an essential part of a plan-led planning system; as such the Council adopted the Merthyr Tydfil LDP 2006-2021 on 25th May 2011. Following adoption the Council is required to monitor the Plan annually and undertake a full review at intervals of at least four years.
- 0.2 In accordance with these statutory requirements, the adopted LDP has been regularly monitored and the results of the findings published in Annual Monitoring Reports (AMRs). A review of the Plan commenced in May 2015, which indicated that a replacement LDP should be prepared, following a 'full revision' procedure, as outlined in the Review Report, dated April 2016. Consequently, the preparation of the 1st Replacement LDP was approved by Merthyr Tydfil County Borough Council (MTCBC), on 20th April 2016.
- 0.3 A Delivery Agreement (DA) for its preparation was then agreed by Welsh Government (WG) on 10th August 2016. This comprised a timetable for preparation together with a Community Involvement Scheme (CIS).
- 0.4 An 'Initial Consultation Report' covering the pre-deposit replacement plan preparation stage was published in June 2018. This identified the steps taken to publicise plan preparation; how it complied with the CIS contained in the DA; all bodies engaged or consulted at that stage; the main issues raised and how they influenced the preparation of the Deposit LDP.
- 0.5 A 'Deposit Plan Consultation Report', was published in December 2018, covering the Deposit LDP public consultation. This summarised the representations received and the Council's responses to the matters raised during this stage. To ensure the soundness of the Replacement LDP, the report also indicated where 'Focused Changes' were to be proposed to the Deposit LDP.
- 0.6 This document provides an update to the Deposit Plan Consultation Report required under LDP Regulation 22(2). It summarises the representations received during the Focused Changes public consultation, held between 21st January 2019 and 4th March 2019. These will be considered as part of the Examination into the soundness of the Replacement LDP, alongside all other LDP documents prepared for preceding Plan stages, submitted to the Welsh Government and Planning Inspectorate, on Monday 21st January 2019.

1. Introduction

- 1.1 As part of the preparation process for the Replacement LDP, the Council is required to publish and consult on a Deposit Plan (LDP Regulation 17 and 18). As outlined in Appendix 3 of the *DA Potential Involvement Methods and Decisions at Key Stages in Plan preparation* a Statutory 6-week 'Deposit' consultation took place from Monday 30th July 2018 until Monday 10th September 2018.
- 1.2 At the end of the consultation period the responses were collated, analysed and presented in the 'Deposit Plan Consultation Report', dated December 2018. Following consideration of the representations received it was considered that a limited number of changes would be appropriate to ensure that the replacement LDP is 'sound'. These changes were focused to reflect matters of soundness and key pieces of evidence that affected only limited parts of the Plan.
- 1.3 Council approval was then sought in order to submit the Replacement LDP (as amended by the 'Focused Changes') to Welsh Government and the Planning Inspectorate so that an Examination in Public could take place, in accordance with Replacement LDP DA (August 2016), The Planning and Compulsory Purchase Act 2004 (Section 70), and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) Regulation 22.
- 1.4 At the meeting of Full Council held on 16th January 2019 to consider the Report of the Deposit Plan Consultation and Submission for Examination, the Council resolved that:
 - (a) The responses to the Replacement Deposit LDP representations [as contained in the Deposit Plan Consultation Report] be approved;
 - (b) The Schedule of Focused Changes for Statutory Public Consultation purposes, the results of which will be considered by an independent Inspector in due course, be approved;
 - (c) The Submission of the Replacement LDP and accompanying documentation to Welsh Government and the Planning Inspectorate for Examination in accordance with the approved LDP Delivery Agreement and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) be approved;
 - (d) Delegated powers be vested with the Head of Planning and Countryside in consultation with the Cabinet Member for Neighbourhood Services and

FOCUSED CHANGES CONSULTATION REPORT

Planning to negotiate issues, agree amendments and respond to requests for further information, as required by the Inspector during the examination process and

- (e) The Head of Planning and Countryside in consultation with the Cabinet Member for Neighbourhood Services and Planning be authorised to make any necessary typographical and minor changes to the LDP, Consultation Report, Proposed Focused Changes and associated submission documents.

2. Focused Changes Replacement LDP Consultation (January – March 2019)

- 2.1 The Replacement LDP documents were 'submitted' to Welsh Government and the Planning Inspectorate on Monday 21st January 2019. At the same time a public consultation commenced on the proposed Focused Changes to the Replacement Deposit Plan and the amended Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). The Focused Changes consultation period ran for 6 weeks, starting on Monday 21st January 2019 and ending on Monday 4th March 2019.
- 2.2 The purpose of the consultation was to enable the general public and interested parties to submit comments on the proposed Focused Changes; and to enable the Inspector to be confident that everyone affected has had the opportunity to make representations on the Plan that has been submitted for Examination.
- 2.3 In accordance with the approved Delivery Agreement (*Appendix 3 – Potential involvement Methods and Decisions at Key Stages in Plan Preparation – page 25*) the following methods were employed to publicise the Focused Changes consultation:
 - Awareness raising via -
 - Legal Notice of Advertisement of Proposed Focused Changes (copy attached at Appendix 1);
 - Direct mailing (letters and Email, wording attached at Appendices 2 & 3);
 - Posters distributed throughout the County Borough Area (copy attached at Appendix 4); and
 - The Merthyr Tydfil County Borough Council website (image attached at Appendix 5).

FOCUSED CHANGES CONSULTATION REPORT

- All relevant Documentation were made available at -
 - Merthyr Tydfil Council Civic Centre;
 - Council Offices in Pentrebach;
 - Local libraries; and
 - On the Merthyr Tydfil County Borough Council website.

2.4 Focused Changes documentation comprised:

- Schedule of Focused Changes to the Replacement Deposit Plan December 2018;
- Sustainability Appraisal Report Addendum December 2018;
- Replacement LDP - Habitats Regulations Assessment (Appropriate Assessment) Report December 2018; and
- Replacement LDP Focused Changes consultation Comment Forms (attached at Appendices 6 & 7).

2.5 As a departure from the DA, the Cwm Taf Engagement Hub website was not used, given that the Council no longer supports the website.

2.6 This consultation report summarises the main issues raised in representations received during the Focused Changes public consultation which will be considered as part of the Replacement LDP Examination in Public.

2.7 A total of 13 individuals and organisations made representations during the Focused Changes public consultation, with a total of 82 individual representations relating to the Focused Changes. Of these 36 (44%) provided support, 18 (22%) objected and 28 (34%) provided general comments.

2.8 Table 2.1 provides a breakdown of representations by proposed Focused Change number and whether support, objection or comment was received.

2.9 Table 2.2 provides a breakdown of representations by policy and whether support, objection or comment was received.

2.10 Finally, Table 2.3 provides a breakdown of representations by policy issue and whether support, objection or comment was received. This also indicates which representors have asked to speak at a hearing session.

FOCUSED CHANGES CONSULTATION REPORT

TABLE 2.1: Focused Change Consultation - Breakdown of Representations by Focused Change

Focused Change ref	Support	Object	Comment	Total Representations
FC1	1	0	0	1
FC2	0	0	0	0
FC3	1	1	0	2
FC4	1	1	0	2
FC5	0	0	0	0
FC6	0	2	0	2
FC7	0	0	0	0
FC8	0	0	2	2
FC9	2	1	0	3
FC10	0	0	0	0
FC11	2	3	0	5
FC12	1	1	0	2
FC13	0	1	0	1
FC14	2	0	0	2
FC15	1	0	0	1
FC16	2	0	0	2
FC17	0	1	0	1
FC18	1	1	0	2
FC19	1	0	0	1
FC20	0	0	0	0
FC21	1	0	0	1
FC22	2	0	0	2
FC23	1	0	0	1
FC24	1	0	0	1
FC25	3	1	0	4
FC26	1	1	0	2
FC27	0	1	0	1
FC28	0	0	1	1
FC29	0	0	0	0
FC30	2	1	3	6
FC31	0	0	1	1
FC32	0	0	1	1
FC33	0	0	1	1
FC34	1	0	0	1
FC35	0	0	1	1
FC36	1	0	0	1
FC37	0	0	0	0
FC38	1	0	0	1
FC39	0	0	0	0
FC40	1	0	1	2
FC41	1	0	0	1
FC42	1	0	0	1
FC43	0	0	0	0
FC44	0	0	0	0
FC45	1	0	0	1
FC46	0	0	0	0
FC47	0	0	0	0
FC48	1	0	0	1
FC49	1	0	1	2
FC50	0	0	0	0
FC51	0	0	1	1
FC52	0	0	0	0
FCM7	0	1	0	1
FCM8	0	1	0	1
Non-FC	1	0	15	16
Total	36	18	28	82

FOCUSED CHANGES CONSULTATION REPORT

TABLE 2.2: Focused Change Consultation - Breakdown of Representations by Policy

Policy	Support	Object	Comment	Total Representations
Policy SW1 Provision of New Homes	1	1	0	2
Policy SW2 Provision of Affordable Housing	2	2	0	4
Policy SW3 Sustainably Distributing New Homes	5	2	4	11
Policy SW4 Settlement Boundaries	0	0	0	0
Policy SW5 Affordable Housing Exception Sites	0	0	0	0
Policy SW6 Hoover Strategic Regeneration Area	2	3	0	5
Policy SW7 The Former Ivor Steel Works Regeneration Site	0	0	0	0
Policy SW8 Gypsy, Traveller & Show-people Accommodation	0	0	0	0
Policy SW9 Planning Obligations	0	0	0	0
Policy SW10 Protecting & Improving Open Spaces	1	3	0	4
Policy SW11 Sustainable Design & Placemaking	6	1	0	7
Policy SW12 Improving the Transport Network	0	1	0	1
Policy SW13 Protecting & Improving Local Community Facilities	0	0	1	1
Policy CW1 Historic Environment	2	1	0	3
Policy CW2 Cyfarthfa Heritage Area	0	0	0	0
Policy EnW1 Nature Conservation & Ecosystem Resilience	2	0	0	2
Policy EnW2 Nationally Protected Sites & Species	2	0	0	2
Policy EnW3 Regionally Important Geological Sites, SINC's & Priority Habitats & Species	1	0	0	1
Policy EnW4 Environmental Protection	3	1	0	4
Policy EnW5 Landscape Protection	0	0	0	0
Policy EcW1 Provision of Employment Land	2	1	0	3
Policy EcW2 Protecting Employment Sites	0	0	0	0
Policy EcW3 Retail Hierarchy – Supporting Retailing Provision	0	1	0	1

FOCUSED CHANGES CONSULTATION REPORT

Policy EcW4 Retail Allocation	0	0	0	0
Policy EcW5 Town & Local Centre Development	0	0	0	0
Policy EcW6 Out-of-Town Retailing Areas	0	0	1	1
Policy EcW7 Tourism, Leisure & Recreation Development	0	0	0	0
Policy EcW8 Renewable Energy	2	1	3	6
Policy EcW9 District Heating	0	0	0	0
Policy EcW10 Sustainably Supplying Minerals	1	0	11	12
Policy EcW11 Minerals Development	1	0	2	3
Policy EcW12 Minerals Buffer Zones	1	0	0	1
Policy EcW13 Minerals Safeguarding	0	0	3	3
Policy EcW14 Waste Facilities	0	0	0	0
Non-policy specific	2	0	3	5
Total	36	18	28	82

TABLE 2.3: Focused Change Consultation - Breakdown of Representations by Issue

Policy Topic / Theme	Support	Object	Comment	Total	Indicated to speak at Hearing Session
Affordable Housing	2	2	0	4	Merthyr Tydfil Heritage Trust
Community Facilities	0	0	1	1	N/A
Economy & Employment	2	1	0	3	Merthyr Tydfil Heritage Trust
General Comments	1	0	3	4	Welsh Water
Historic Environment	2	1	0	3	Merthyr Tydfil Heritage Trust
Hoover Strategic Regeneration Area	3	3	0	6	Merthyr Tydfil Heritage Trust
Housing Allocation SW3.31	0	2	0	2	Jim Davies, Paul Price
Housing Supply	6	1	4	11	Merthyr Tydfil Heritage Trust
Infrastructure & Delivery	0	0	1	1	N/A
Local Nature Reserves	0	1	0	1	Friends of Nant Llwynog Park (Edward Dawson)
Minerals	4	0	14	18	N/A
Miscellaneous Policy Matters	4	1	0	5	Merthyr Tydfil Heritage Trust
Monitoring Framework	1	0	0	1	N/A
Natural Environment	8	1	0	9	N/A
Open Spaces	1	2	0	3	Merthyr Tydfil Heritage Trust
Renewable Energy	2	1	3	6	N/A
Retail	0	1	1	2	Merthyr Tydfil Heritage Trust, Trago Mills
Transport	0	1	1	2	Merthyr Tydfil Heritage Trust
Total	36	18	28	82	

FOCUSED CHANGES CONSULTATION REPORT

3. LDP Focused Change Consultation – Schedule of Main Issues

- 3.1 This section summarises the main issues raised in representations on the Focused Changes to the Deposit Plan. The full representation text is set out by issue attached at, Appendix 8.
- 3.2 Where an individual policy or site allocation is subject to one representation, this is shown in a distinct main issue table. Where multiple Focused Change representations are made on one policy, these are grouped under one main issue. Where representations relate to one distinct issue these have been grouped together where appropriate.
- 3.3 Where a representation has been made which does not clearly relate to a policy topic 'main issue' or site allocation, these are listed under the 'miscellaneous policy matters' issue.
- 3.4 Each main issue box lists the applicable representation numbers and representor names. Where representors have indicated they wish to speak at a public hearing session the relevant representation numbers and main issue text appears in **bold**.
- 3.5 The Focused Changes Consultation Report and schedule of main issues should be read alongside the 'Schedule of Focused Changes to the Replacement Deposit Plan' (December 2018) which provides a comprehensive list of all Focused Changes that were considered necessary for 'soundness'.

Main Issue 1 – Affordable Housing

Provision of Affordable Housing	
LDP section references:	Written Statement: Policy SW2 Provision of affordable housing – p.23, para.6.5.12/ 6.5.15/p.23, para.6.5.15/ p.23, para.6.5.12
Representation number:	Representor name:
101.F1/6.5.12/	Welsh Government
Main Issue:	Council Response:
FC3 - Objection addressed - .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.-	Support welcomed and comments noted.
Representation number:	Representor name:
101.F2/6.5.15/	Welsh Government
Main Issue:	Council Response
FC4 - FC supported and objection addressed - establish the affordable housing target set out in Policy SW2: Provision of Affordable Housing and how it was derived.	Support welcomed and comments noted.

FOCUSED CHANGES CONSULTATION REPORT

Representation number:	Representor name:
116.F1/6.5.15/	Home Builders Federation
Main Issue:	Council Response
FC4 - Objection - The newly inserted wording should be changed to: 'development proposals will deliver up to..'	The Council considers that the wording proposed in FC4 is sufficiently clear and does not consider the proposed change to be necessary.
Representation number:	Representor name:
207.F1/6.5.12/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response
FC3 & FC4 - A new LHMA is urgently needed and should be developed in partnership with local social housing providers / housing charities in the voluntary sector. <u>Subject at Public Examination Hearing</u> Affordable housing	The current Local Housing Market Assessment (LHMA) has been produced in accordance with the latest Welsh Government guidance and identifies the level and type of affordable housing need across the County Borough. The LHMA covers the time period of 2014-2019. Accordingly, the Replacement LDP has been informed by the latest available study. The Council intends to produce an updated LHMA once the new Common Housing Register has had sufficient time to bed in and provide the required base data.

Main Issue 2 – Community Facilities

Community Facilities	
LDP section references:	Written Statement: Policy SW13: Protecting and Improving Community Facilities, page 45
Representation number:	Representor name:
271.F1	Cwm Taf Local Health Board
Main Issue:	Council Response:
Non FC - We are aware of the additional housing pressures in the Merthyr Vale community and have identified the need for replacement primary care premises.	The Council welcomes the response from the Local Health Board, and will be happy to assist in identifying an appropriate site for the premises in the future. In this respect, LDP Policy SW13 supports proposals for new or enhanced community facilities subject to satisfying other relevant LDP Policies.

Main Issue 3 – Economy and Employment

Economy and Employment	
LDP section references:	Written Statement: Policy EcW1: Provision of Employment Land - p.65, para.6.8.9, Appendix 1, p.140, p.65
Representation number:	Representor name:
103.F4/6.8.9/	Natural Resources Wales
Main Issue:	Council Response:
FC26 - We support the focused changes	Support welcomed and comments noted.

FOCUSED CHANGES CONSULTATION REPORT

and are satisfied that they address the representations we made on the Deposit Plan.	
Representation number:	Representor name:
119.10	Dwr Cymru Welsh Water
Main Issues:	Council Response:
FC42 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected.	Support welcomed and comments noted.
Representation number:	Representor name:
207.F9	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response:
FC26 - 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 HSRA. <u>Subject at Public Examination Hearing</u> Economy and Employment	In order to facilitate the delivery of the employment land requirement of the LDP strategy (14.46ha), the Council has allocated 30.65ha of employment land across 4 sites, which will provide a sufficient range and choice of sites to the employment market. The Council considers this approach to be appropriate and does not consider any changes to be necessary.

Main Issue 4 – General Comments

General Comments	
LDP section references:	Written Statement: Footnote 5, p 1.
Representation number:	Representor name:
119.F1	Dwr Cymru Welsh Water
Main Issue:	Council Response:
Non FC - Pleased to see that the Council have taken into consideration our representation on the Deposit Plan and are supportive of the proposed focused changes as set out. <u>Subject at Public Examination Hearing:</u> 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.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F1/1.4/	Mineral Products Association Wales
Main Issue:	Council Response:
FC51 - Footnote 5 should be updated recognise the consultation on PPW V10.	Council will up-date to acknowledge publication of Edition 10.
Representation number:	Representor name:
124.F1	The Coal Authority
Main Issue:	Council Response:
Representation acknowledges	Response is noted.

FOCUSED CHANGES CONSULTATION REPORT

consultation. No specific comments to make.	
Representation number:	Representor name:
188.F1	Collins, Mr A
Main Issue:	Council Response:
Representation acknowledges consultation. No further comments to make.	Response is noted.

Main Issue 5 – Historic Environment

Historic Environment	
LDP section references:	Written Statement: FC18: Policy CW1: The Historic Environment – p.48, para.6.6.10, p.48, para.6.6.12, p.46, para.6.6.10
Representation number:	Representor name:
103.F11/6.6.10/	Natural Resources Wales
Main Issue:	Council Response:
FC18 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F12/6.6.12/	Natural Resources Wales
Main Issue:	Council Response:
FC19 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
207.F8/6.6.10/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response
FC18 - The inclusion of "where available" [to paragraph 6.6.10] is a significant weakening of this important proposal on the Historic Environment and in particular the historic landscape of Merthyr Tydfil - these character assessments are a 'must'.	The paragraph sets out the range of assessments that could be referred to when considering development proposals against Policy CW1. It may not be appropriate to prepare assessments for all development proposals depending on the scale, type and location of the proposal.
<u>Subject at Public Examination Hearing</u> Historic Environment.	The Council considers that changing the wording to "where appropriate" would clarify the issue, as this will enable such assessments to be sought where they are not currently available but are considered necessary.

FOCUSED CHANGES CONSULTATION REPORT

Main Issue 6 – Hoover Strategic Regeneration Area

Hoover Strategic Regeneration Area	
LDP section references:	Written Statement: Policy SW6 Hoover Regeneration Area - p.32, para.6.5.44, para.6.5.40 p.32, para.6.5.40p.32, para.6.5.40, p.32, para.6.5.40
Representation number:	Representor name:
101.F5/6.5.44/	Welsh Government
Main Issue:	Council Response:
FC 11 - Objection partially addressed - embed the key principles from the framework masterplan into the plan.	Comments noted. The Council will work with Welsh Government and Transport for Wales in order to produce an indicative 'concept plan' for inclusion in the LDP Written Statement that clearly illustrates the key principles from the framework masterplan.
Representation number:	Representor name:
103.F7/6.5.40/	Natural Resources Wales
Main Issue:	Council Response:
FC11 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
119.F2/6.5.40/	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC11 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected.	Support welcomed and comments noted.
Representation number:	Representor name:
207.F3/6.5.40/ 207.F4/6.5.40/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response:
<p>FC11 - Objection to turning the Hoover Sports Ground into a car park, shop and community space and to the designation of Pentrebach station as a Metro 'hub'.</p> <p>FC11 - Various objections to changes made as part of the focussed change relating to the sustainable design principles.</p> <p><u>Subject at Public Examination Hearing</u></p> <p>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.</p>	<p>The masterplan for the Hoover Strategic Regeneration Area, published alongside the Deposit LDP, indicates that development will take place on the sports field and that a variety of new open spaces will be provided throughout the development. This type of mitigation will be required to ensure that the new development is carried out in accordance with <i>Policy SW9: Planning Obligations</i> and <i>Policy SW10: Protecting and Improving Open Spaces</i> of the Replacement LDP.</p> <p>The Council believes that Policy SW6 clearly sets out key principles from the framework masterplan in order to explain how the LDP envisages the site coming forward. The Focused Changes to the policy are considered necessary to guide future redevelopment proposals and to</p>

FOCUSED CHANGES CONSULTATION REPORT

	<p>demonstrate how the redevelopment of the strategic site and level of growth will be achieved.</p> <p>In accordance with comments from Welsh Government, the policy text will be complemented in the LDP Written Statement by an indicative 'concept plan' that will be prepared to further clarify how the site is expected to come forward.</p>
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Main issue 7 - Housing Allocation SW3.31 Cwmfelin, Bedlinog

Housing Allocations SW3.31	
LDP section references:	Written Statement Policy: Policy SW3: Sustainably Supplying New Homes - Housing Allocation SW3.31
Representation number:	Representor name:
287.F1	Davies, Mr Jim
289.F1	Price, Mr Paul
Main Issue:	Council Response:
<p>FC6 – representation 287.F1 – Objection to housing allocation SW3.31 – Cwmfelin. The site should be deleted from the LDP, as this is a designated Site of Importance for Nature Conservation (SINC).</p> <p>FC6 – representation 289.F1 – The proposed development on Cwmfelin (SW3.31) does not meet the Soundness Tests.</p> <p><u>Subject at Public Examination Hearing</u> Housing - FC6 in relation to Cwmfelin SW3.31, incorporating SINC 33. Wishes to discuss the allocation and damage to the environment for wildlife and local inhabitants.</p>	<p>The principle of residential development on this site has been established for some time as the site has been granted outline planning permission several times over the past 15 years, and has been a housing allocation in the current LDP since adoption in 2011.</p> <p>Given comments received as part of the consultation on the Replacement Deposit LDP, the Council considered that it would be appropriate to reduce the number of dwellings proposed on the allocation from 50 to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout which took account of the sites topography. The Council maintains the site is a logical and deliverable allocation to meet local housing needs and therefore no changes are proposed.</p>

FOCUSED CHANGES CONSULTATION REPORT
Main Issue 8 – Housing Supply

Housing supply	
LDP section references:	Written Statement: Policy SW3 Sustainably Supplying New Homes – p.25, para.6.5.19 p.22, para.6.5.9, p.23, para.6.5.23, p.22, para.6.5.7, p.22, para.6.5.9 Written Statement: Policy SW1: Provision of New Homes
Representation number:	Representor name:
101.F3/6.5.19/ 101.F4/6.5.9/ 101.F6	Welsh Government
Main Issue:	Council Response:
FC8 - Objection addressed - identify the timing and phasing of housing allocations in Policy SW3. FC 9 - Objection addressed - clarification on the spatial distribution of housing by component of supply. FC49 - Objection addressed - The proposed FC introduces the housing trajectory and land supply information within the plan which is supported.	Support welcomed and comments noted.
Representation number:	Representor name:
116.F2	Home Builders Federation
Main Issue:	Council Response:
FC8 - The HBF are concerned with the reference to 'phasing' and a table which puts start and finish dates against individual sites.	Although the term 'phasing' is used in the description of FC8 in the schedule of focused changes, the terminology used in the change itself, in the LDP Written Statement, is 'Indicative Delivery Timescale'. There is no formal phasing policy in the Replacement Plan and therefore the supply of sites would not be restricted. With regard to the timescales contained in Policy SW3, this information reflects the dates included within the LDP housing trajectory and are included as 'indicative' timescales based on the best available information including timescale information from landowners and developers. This approach is supported by Welsh Government.
Representation number:	Representor name:
116.F3/6.5.23/	Home Builders Federation
Main Issue:	Council Response:
FC9 - The changes to the housing supply table are supported, but clarification should be provided as to whether the allocations figure takes into account the	The Council considers that Table 2 contained in FC9 provides clarity in terms of the components of housing supply.

FOCUSED CHANGES CONSULTATION REPORT

sites already built.	The figures in row D outline the number of units remaining on housing allocations excluding completions on allocated sites; units under construction on allocated sites; and units contained in row C of the table (all of which are on allocated sites). These components are shown as separate rows in Table 2 to avoid double counting.
Representation number:	Representor name:
116.F6	Home Builders Federation
Main Issue:	Council Response:
FC49 – Appendix 2 – Housing Trajectory and Housing Supply Information - The table should be amended to show the agreed housing land supply figures in the 2017 / 2018 JHLAS.	The housing land supply figures contained in the 2017 and 2018 JHLAS have been calculated against the housing requirement of the current adopted LDP. The purpose of the table contained in FC49 is to indicate the housing land supply based on the housing requirement of the Replacement LDP. Therefore, no change to the trajectory table is considered necessary.
Representation number:	Representor name:
119.F7	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC38 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected	Support welcomed and comments noted.
Representation number:	Representor name:
119.F8	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC40 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected	Support welcomed and comments noted.
119.F9	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC41 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected	Support welcomed and comments noted.
Representation number:	Council Response:
122.F3/6.5.7/	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC - 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.	<p>The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D3 and page 22 of the Deposit Plan Consultation report, document SD14).</p> <p>Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS</p>

FOCUSED CHANGES CONSULTATION REPORT

	<p>1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period.</p> <p>That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.</p> <p>The Council maintains its position that there are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and that appropriate policies have been included in the Plan in accordance with national policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.</p>
Representation number:	Representor name:
207.F2/6.5.9/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response
<p>FC9 - The Heritage Trust objects to the adjusted target of 2,820 new homes.</p> <p><u>Subject at Public Examination Hearing</u></p> <p>Housing supply</p>	<p>A housing requirement of 2250 dwellings was considered amongst a range of other scenarios, and was considered to be an appropriate level of growth by key stakeholders and statutory consultees.</p> <p>The overall housing provision of 2820 dwellings (which provides a 25% flexibility allowance) is also considered to be an appropriate level of flexibility, and has also been supported by key stakeholders and statutory consultees.</p> <p>The Council therefore considers the overall level of housing provision contained in the LDP to be appropriate.</p>

FOCUSED CHANGES CONSULTATION REPORT

Main Issue 9 – Infrastructure and Delivery

Infrastructure and Delivery	
LDP section references:	Written Statement Appendix 1 p.116 - Section 8 – Site Allocation Details
Representation number:	Representor name:
116.F5	Home Builders Federation
Main Issues:	Council Response:
FC40 - 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.	<p>The wording included has been agreed with DCWW and clearly sets out expectations in terms of delivering water infrastructure on sites.</p> <p>DCWW have also indicated that they are broadly satisfied with the indicative delivery timescales of the LDP's housing allocations, and that there are unlikely to be any insurmountable constraints in relation to the strategy of the Replacement LDP being delivered.</p>

Main Issue 10 – Local Nature Reserves

Local Nature Reserves	
LDP section references:	Proposals Map North East.
Representation number:	Representor name:
288.F1	Friends of Nant Llwynog Park
Main Issue:	Council Response:
<p>FCM7 - The new boundaries of the proposed nature reserve area for Nant Llwynog, Bedlinog need to be justified in nature conservation terms, as well as relating to other factors.</p> <p><u>Subject at Public Examination Hearing</u> Protecting and Improving Open Spaces.</p>	<p>The change to the boundary of the Nant Llwynog LNR corresponds with the amendments to Policy SW10, which clarifies the purpose of LNRs in relation to conserving and enhancing biodiversity, and improving access to nature.</p> <p>The amended boundary excludes two playing fields and the playground to the South West of the site that were previously included in the 'multifunctional' open space boundary that the proposed LNR is based on. This was to avoid conflict between users and to provide a logical and workable site boundary for the LNR.</p> <p>The excluded areas do not have significant biodiversity value and the changes would not compromise access to the wider LNR or have a significant impact on the function of the designation.</p>

FOCUSED CHANGES CONSULTATION REPORT

	Therefore, the Council considers that the amendment provides an appropriate boundary for the Nant Llwynog & Coed yr Hendre LNR that balances the benefits of the designation and avoids conflict with more formal leisure and recreational uses.
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Main Issue 11 – Minerals

Minerals	
LDP section references:	Written Statement: Policy EcW13 Minerals Safeguarding - p.90, para.6.8.111, p.90 Context & Key Issue - p.7, para.2.11 Written Statement: P.86 p.85, para.6.8.91, p.86 p.88, para.6.8.102 Written Statement: Policy EcW12 Minerals Buffer Zones - p.90 Proposals Map
Representation number:	Representor name:
101.F8/6.8.111/	Welsh Government
Main Issue:	Council Response:
FC32 - Objection partially addressed - FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources.	<p>It is noted that the final published version of PPW edition 10 does not require safeguarding of coal resources.</p> <p>Paragraph 5.10.17 of PPW edition 10 advises that: <i>"the safeguarding of primary coal resources is not required. However, planning authorities, with the exception of National Parks, may wish to safeguard primary coal resources depending on their individual circumstances. Should this be the case, then they would need to include appropriate policies, including those relating to pre-extraction, in their development plans"</i>.</p> <p>PPW edition 10 paragraph 5.14.32 recognises that coal, which has been predominantly used for energy production (now ruled out under paragraph 5.10.14 except in wholly exceptional circumstances), has other specific uses. These include use for industrial purposes in the steel industry, in speciality carbon markets, in the making of concrete and domestic use. As an example, the coal extracted from Ffos-y-fran is currently used in industry in steel manufacture. Therefore, the Council consider it appropriate to retain the safeguarding of primary coal</p>

FOCUSED CHANGES CONSULTATION REPORT

	resources in order to protect the finite the nature resource. LDP Policy EcW13 (Minerals Safeguarding) would be applied to consider development proposals in coal safeguarding areas. No changes to the LDP are therefore considered necessary for soundness.
Representation number:	Council Response:
122.F2/1.12/	Mineral Products Association Wales
Main Issue:	Council Response:
FC1 - We support proposed change to include MTAN, but remain of the opinion that the RTS should also be included.	The paragraph is an introductory paragraph which refers to the national policy context the plan is prepared under. It is not considered necessary for soundness to refer to the Regional Technical Statement in this section. The RTS is not national policy but a regional technical statement on aggregates which is referred to under the minerals section of the LDP Written Statement (see page 85 onwards).
Representation number:	Council Response:
122.F4/2.11/	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC — Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives (Figure 2).	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D4 and page 32 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F5	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC - 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.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D5 and page 119 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F7	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC – Ecw10 - Consider the implications of additional 36.65ha of	The representation does not relate to a focused change but reiterates a

FOCUSED CHANGES CONSULTATION REPORT

employment land on mineral supply.	representation made during the Deposit Plan consultation (see representation 122.D9 and page 127 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F8/6.8.88/	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC - The LPA should not rely solely on the annual apportionment, but should consider all factors that may be material to ensuring an adequate supply of aggregates. Adapt paragraph 6.8.89 (now 6.8.88) to reflect PPW and reflect the requirements of the RTS and MTAN.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D10 and page 120 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F9/6.8.91/	Mineral Products Association Wales
Main Issue:	Council Response:
FC31 – the purpose of Para.6.8.91 is not clear. It 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.	The paragraph is one of a number of introductory paragraphs to the minerals planning policies. Paragraph 6.8.91 seeks to clarify the landbank position and need for new allocations in the LDP in relation to national policy requirements. No further changes to this paragraph are considered necessary for soundness.
Representation number:	Representor name:
122.F10/6.8.91/	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC – EcW10- Amendments made to clarify the land bank position. We acknowledge the proposed changes, but feel these should also acknowledge the review of RTS currently taking place.	The representation does not relate to a focused change. Whilst the RTS is under review a draft has not been received and it is not anticipated to be finalised until early 2020. An update to this will be provided by the Council as part of the Examination. No further changes to this paragraph are considered necessary for soundness.
Representation number:	Representor name:
122.F11	Mineral Products Association Wales
Main Issue:	Council Response:
EcW10 - No reference is made to the supply of building stone to meet the needs of Policy CW1.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D6 and page 124 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

FOCUSED CHANGES CONSULTATION REPORT

Representation number:	Representor name:
122.F12/6.8398/	Mineral Products Association Wales
Main Issue:	Council Response:
FC33 - Clarification of crushed rock landbank requirement - Change made, no additional comment	Support welcomed and comments noted.
Representation number:	Representor name:
122.F13	Mineral Products Association Wales
Main Issue:	Council Response:
FC34 - Removal of word 'only' from policy text - Change made and supported.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F14	Mineral Products Association Wales
Main Issue:	Council Response:
FC35 - Amendments made to criteria to avoid repetition throughout the written statement - Change made & supported.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F15/6.8.102/	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC – EcW11- If no evidence linking non-energy extraction to health impacts on local communities can be provided, paragraph 6.8.103 (now 6.8.102) should be amended.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D16 and page 123 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F16	Mineral Products Association Wales
Main Issue:	Council Response:
FC36 - EcW12 - Policy amended to provide clarity in regard to mineral buffer zones - Change made and supported.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F17	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC - Amend text and Proposals Map to include minerals infrastructure and building stone.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D18 and page 125 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
Representation number:	Representor name:
122.F18/6.8.112/	Mineral Products Association Wales
Main Issues:	Council Response:
Non FC – EcW13 - Review paragraph 6.8.113 (now 6.8.112) as it is contrary to national policy in PPW.	The representation does not relate to a focused change but reiterates a representation made during the Deposit

FOCUSED CHANGES CONSULTATION REPORT

	Plan consultation (see representation 122.D19 and page 125 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.
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Main Issue 12 – Miscellaneous Policy Matters

Miscellaneous Policy Matters	
LDP section references:	Written Statement, Policy SW11: Sustainable Design & Placemaking - p.40, para.6.5.69, p.41, para.6.5.69 p.40, para.6.5.69p.43,para.6.5.79
Representation number:	Representor name:
103.F9/6.5.69/	Natural Resources Wales
Main Issue:	Council Response:
FC14 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F10/6.5.69/	Natural Resources Wales
Main Issue:	Council Response:
FC16 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
119.F3/6.5.69/	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC14 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected.	Support welcomed and comments noted.
Representation number:	Representor name:
119.F4/6.5.69/	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC15 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected	Support welcomed and comments noted.
Representation number:	Representor name:
119.F5/6.5.69/	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC16 - The proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected	Support welcomed and comments noted.
Representation number:	Representor name:
207.F7/6.5.79/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response:
FC16 & FC17 -The amendments - including	The Council considers the changes made

FOCUSED CHANGES CONSULTATION REPORT

'active travel' routes along with bus and train – will not be in the least effective in reducing the 'need to travel'.	under FC16 and FC17 to be appropriate as they reinforce the importance of green infrastructure and active travel within the LDP. These changes are in accordance with updated national planning policy.
Subject at Public Examination Hearing Active Travel	

Main Issue 13 – Monitoring Framework

Monitoring Framework	
LDP section references:	Written Statement Monitoring Framework, p.106, Section 9 – Monitoring Framework, LDP Obj. 10, Indicator 16 (now 17), p 86.
Representation number:	Representor name:
103.F17	Natural Resources Wales
Main Issue:	Council Response:
FC45 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F19	Mineral Products Association Wales
Main Issues:	Council Response:
FC48 - Amendment of Indicator 16.1 (now 17.1) to align with MTAN requirements - Change made and supported.	Support welcomed and comments noted.
Representation number:	Representor name:
122.F20	Mineral Products Association Wales
Main Issue:	Council Response:
Non FC - 16.1 now 17.1 - The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.	The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D21 and page 127 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the proposed change is unnecessary for soundness.

Main Issue 14 – Natural Environment

Natural Environment	
LDP section references:	Written Statement Policy EnW2: Nationally Protected Sites & Species - p.55, para.6.7.16 Written Statement Policy EnW4: Environmental Protection - p.59, para.6.7.27, p.59, para.6.7.31, p.59, para.6.7.25, p.59, para.6.7.31 Policy EnW1: Nature Conservation & Ecosystem Resilience - p.53, para.6.7.27, Policy EnW3: Regionally Important Geological Sites

FOCUSED CHANGES CONSULTATION REPORT

Representation number:	Representor name:
103.F1/6.7.16/	Natural Resources Wales
Main Issue:	Council Response:
FC22 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F2/6.7.27/	Natural Resources Wales
Main Issue:	Council Response:
FC24 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F13/6.7.27/	Natural Resources Wales
Main Issue:	Council Response:
FC21 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F14/6.7.16/	Natural Resources Wales
Main Issue:	Council Response:
FC22 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F15/6.7.25/	Natural Resources Wales
Main Issue:	Council Response:
FC23 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F16/6.7.31/	Natural Resources Wales
Main Issue:	Council Response:
FC25 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan.	Support welcomed and comments noted.
Representation number:	Representor name:
116.F4/6.7.25/	Home Builders Federation
Main Issue:	Council Response:
FC25 - The HBF objects to the additional wording which 'requires' that development should improve water quality.	The Council considers the proposed changes to be appropriate, as any improvements to water quality will only be required 'where opportunities exist.'
Representation number:	Representor name:
119.F6/6.7.31/	Dwr Cymru Welsh Water
Main Issue:	Council Response:
FC25 - The proposed focused changes are	Support welcomed and comments noted.

FOCUSED CHANGES CONSULTATION REPORT

particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected.	
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Main Issue 15 – Open Spaces

Open Spaces	
LDP section references:	Written Statement Policy SW10: Protecting & Improving Open Spaces – p.38, para.6.5.62, p.39
Representation number:	Representor name:
103.F8/6.5.62/	Natural Resources Wales
Main Issue:	Council Response:
FC12 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity.	Support welcomed and comments noted.
Representation number:	Representor name:
207.F5	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response:
FC12 - Objection to the stipulation that "development proposals that improve the quality, quantity or access to open space will generally be supported". <u>Subject at Public Examination Hearing</u> Open Spaces	The wording of Policy SW10 proposed by FC12 enables the Council to both improve and protect open spaces. The first part of the policy actively supports improvements to open space, whereas the second part of the policy aims to protect open spaces by ensuring that any loss of open space can only take place after satisfying the criteria contained in the policy.
Representation number:	Representor name:
207.F6	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response:
FC13 - Objection to the amendment that includes new wording "to conserve and enhance biodiversity and improve access to nature, the following Local Nature Reserves are proposed:" 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. <u>Subject at Public Examination Hearing</u> Local Nature Reserves	The Council considers that FC13 is appropriate as it clarifies the purpose of Local Nature Reserves. The Council does however accept that designating the LNRs is a starting point, and the success of the LNRs will be dependent on a number of other factors.

FOCUSED CHANGES CONSULTATION REPORT

Main Issue 16 – Renewable Energy

Renewable Energy	
LDP section references:	Written Statement Policy EcW8: Renewable Energy & Monitoring Framework , p.78, para.6.8.68, para.6.8.69, Landscape Sensitivity Study
Representation number:	Representor name:
101.F7/6.8.68/	Welsh Government
Main Issue:	Council Response:
FC30 - Objection partially addressed - no explanation has been provided as to why a 2km accessible grid connection has been applied instead of the standard 10km used by WG and other LPAs in Wales.	<p>The Council has prepared an updated Renewable Energy Assessment (REA) addendum dated December 2018 (document SD22). This compares the constraints and assumptions used in the solar and wind energy assessments to those suggested in the Welsh Government REA toolkit guidance and has provided additional justification or clarification where required (see pages 11-19 of document SD22).</p> <p>Whilst the REA addendum provided further details, it is noted that further justification has been requested by Welsh Government to justify the 2km accessible grid connection utilised. The grid connection distance has not been applied to the large scale wind energy assessment. The constraint has been utilised in the smaller scale wind energy and solar energy assessments as specialist renewable energy consultant Regen has advised it is an appropriate constraint based on feedback from developers, evidence of approved solar energy developments and the viability of solar energy developments.</p> <p>The Council will work with Welsh Government and Regen to provide the required clarification and additional evidence to address the outstanding objection.</p>
Representation number:	Representor name:
103.F5/6.8.69/	Natural Resources Wales
Main Issue:	Council Response:
FC30 - We support the focused changes and are satisfied that they address the representations we made on the Deposit Plan	Support welcomed and comments noted.
Representation number:	Representor name:
103.F6	Natural Resources Wales
Main Issue:	Council Response:

FOCUSED CHANGES CONSULTATION REPORT

FC30 - The [Landscape Sensitivity] study is welcomed, and it is agreed that the search area at Merthyr Road should be removed. The remaining areas should be retained.	Support welcomed and comments noted.
Representation number:	Representor name:
103.F18 103.F19 103.F20	Natural Resources Wales
Main Issue:	Council Response:
<p>NRW requested a number of clarifications regarding Landscape Sensitivity study. The representation advised that the comments do not affect their representation of support for the study or identification of the solar search areas, but queried whether some minor amendments and clarifications are required for accuracy.</p> <p>FC30 – Landscape Sensitivity Study - 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. It is unclear from the conclusions why Site 2 (NE of Trelewis) is not considered of Medium sensitivity.</p> <p>FC30 – 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'.</p> <p>FC30 – 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'.</p>	<p>The Council welcomes the support for the additional evidence prepared in response to NRW's Deposit Plan representation. The following response is provided to the queries and request for clarification on elements of the Landscape Sensitivity study.</p> <p>In response to Representation 103.F18 regarding Section 12.2 and table 12.3 (the use of medium low sensitivity category), the Council would advise that the assessment of landscape sensitivity matrix makes provision for a medium-low sensitivity category as well as medium, medium-high, high and very high. In the absence of definitive guidance from NRW on Landscape Sensitivity to Solar Farm development, our methodology was modelled on previous work carried out for assessing high level landscape sensitivities in other areas (such as the Landscape Sensitivity Study prepared for the Powys REA that has recently been accepted at Examination).</p> <p>The matrix methodology has been developed to provide an overall sensitivity score which balances both medium landscape susceptibility and landscape value scores. In the absence of detailed site development proposals that can be assessed, there may remain capacity in the assessed area and therefore a medium-low sensitivity category provides a cautious approach that prevents prejudice against detailed development that may come forward. In the North East Trelewis case this reflects the fact that parts of the search area to the north are of lower landscape value as illustrated in the LANDMAP Evaluation Criteria map on page 30 of the study. The approach is therefore considered to be sufficiently</p>

FOCUSED CHANGES CONSULTATION REPORT

	<p>robust for a high level landscape sensitivity assessment.</p> <p>In response to Representation 103.F19, regarding the landscape sensitivity assessment text for Site 8 North of Cefn Coed, the Council accept that the wording should state "Landscape highly vulnerable to change from the development type" to reflect the "very high" score. Importantly however, this incorrect statement has not affected the conclusion for the site which correctly states that "the landscape is highly vulnerable to change from the development type. No potential for locating the development type".</p> <p>In response to Representation 103.F20 regarding the Landscape Sensitivity score text for Site 10 West of Heolgerrig, this is a typographical error and the Council agrees that the title should read "Medium-High" to reflect the correct description that follows.</p>
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Main Issue 17 – Retail

Retail	
LDP section references:	<p>Written Statement: Policy EcW3 Retail Hierarchy: Supporting Retailing - p.69, para.6.8.27,</p> <p>Written Statement: Policy EcW6: Out-of-Town Retailing Areas p.74, para.6.8.51</p>
Representation number:	Representor name:
248.F1/6.8.27/	Trago Mills Ltd
Main Issue:	Council Response:
<p>FC27 - Trago Mills should be included together with Cyfarthfa Park as an edge-of-centre facility, or both should be categorised as out-of-town centre. The addition of reference to the Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) should be deleted.</p> <p><u>Subject at Public Examination Hearing:</u> FC27 and FC28</p>	<p>The term 'edge of centre' under policy EcW3 has been used to physically describe Cyfarthfa Retail Park, as its location and relationship with Merthyr Tydfil Town Centre does differ from the other out-of-centre retail areas given its proximity to the Town Centre. Trago is further separated by the strategic highway network (A470) and it is not considered appropriate to describe the Trago site as edge of centre.</p> <p>In terms of how the LDP policies will be applied, Policy EcW6 clearly identifies the four out-of-centre retail areas (i.e.</p>

FOCUSED CHANGES CONSULTATION REPORT

	<p>retail areas outside the town and local centres), and Policy EcW3 clearly sets out that any retail proposals outside the defined centres will be subject to the same assessments and tests (assessment of retail need and sequential test). Advice on these assessments is provided at paragraphs 6.8.51 and 6.8.52.</p> <p>Reference to the Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) is considered to remain appropriate as it sets out the hierarchy and policy approach in Policy EcW3. It also provides a useful reference for future users of the LDP.</p>
Representation number:	Representor name:
207.F10/6.8.51/	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response
<p>FC28 - Re-assurance is sought that this proposal in relation to retail impact assessments does actually work in protecting or supporting the town centre.</p> <p><u>Subject at Public Examination Hearing</u> <u>Out-of-Town Retail</u></p>	<p>The changes made to Policy EcW6 under FC28 have been made in order to clarify when retail impact assessments will be required. The changes made are consistent with national policy and are considered appropriate by the Council.</p>

Main Issue 18 – Transport

Transport	
LDP section reference:	
Representation number:	Representor name:
122.F6	Mineral Products Association Wales
Main Issues:	Council Response:
<p>Non Fc - Consider the implications of the proposed transport network improvements on mineral supply.</p>	<p>The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D8 and page 70 of the Deposit Plan Consultation report, document SD14).</p> <p>The LDP includes the heads of the Valleys Road improvement scheme, a Welsh Government proposal, and a range of other minor local transport schemes consistent with the Local Transport Plan. With the exception of these, and new access/estate roads to be provided as part of development</p>

FOCUSED CHANGES CONSULTATION REPORT

	<p>sites, there are no other new road building proposals.</p> <p>Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period. That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.</p> <p>Paragraph 3.15.8 of the Sustainability Appraisal Baseline Scoping Report also notes the recommendations of the RTS 1st Review to encourage "the use of construction, demolition and excavation waste as an alternative to primary land-won aggregates; safeguarding resources of both crushed rock aggregates and land-based sand and gravel; and safeguarding existing railheads in order to provide a full range of sustainable transport options".</p> <p>Whilst specific reference to the potential impact of transport network improvements on the minerals supply chain has not been made, it is considered that the level of growth would not have a significant impact on the minerals supply of the area. The level of growth in the Replacement LDP has been identified with reference to historic past build rates and there are sufficient reserves to ensure an adequate supply of aggregates throughout the Plan period. Accordingly, appropriate minerals policies have been included in the Plan to satisfy national planning policy. Given the level of planned</p>
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FOCUSED CHANGES CONSULTATION REPORT

	growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves. It is therefore considered that the implications and requirements of planned growth have been considered.
Representation number:	Representor name:
207.F11	Merthyr Tydfil Heritage Trust
Main Issue:	Council Response
<p>FCM8: Objection to both the strategic footpaths/cycle routes map and the active travel routes map - they appear to be inaccurate.</p> <p><u>Subject at Public Examination Hearing</u> Strategic footpaths/cycle routes and active travel routes</p>	<p>FCM8 has been proposed in order to clarify the strategic footpath/cycleway routes that are shown on the LDP Constraints Map. The layer now includes designated routes only.</p> <p>FCM10 has been proposed in order to update the LDP Proposals Map to accurately reflect the approved proposals from the Council's Active Travel Integrated Network Map.</p> <p>The two layers do not necessarily correspond as they display different information.</p>

4. Deposit Plan Sustainability Appraisal (SA) Report Addendum

- 4.1 The Deposit Plan Sustainability Appraisal (SA) Report Addendum (December 2018) comprises an Addendum to the Deposit Plan SA Report (June 2018), which built upon the SA Baseline Scoping Report (January 2017) and the Initial Sustainability Appraisal (ISA - June 2017). The Addendum assessed the proposed Focused Changes to the Deposit Plan by the Council by:
- Screening all the proposed changes to identify whether an SA was required and
 - Undertaking an SA of the changes that were not screened out.
- 4.2 The findings were set out in accompanying Tables 1 and 2 of the Report, which highlighted the effects that the proposed focused changes would have with regard to the SA of the Deposit Plan. New assessments for the additional site allocation at Clwydyfagwr, Swansea Road; an amended assessment for the Cwmfelin, Bedlinog site allocation; and amended assessments for Policies SW10, SW11, EnW2, EnW4, EcW8 and EcW11 were carried out. In addition, the report made a comparison for compliance with the requirements of the Future Generations and Well-being Act (FGA) 2015 and in particular the five Ways of Working prescribed by the Act.
- 4.3 Following consideration of the updated appraisals no implications on the overall SA of the Deposit Plan were identified, although there were some minor improvements to the performance of the policies against some Sustainability Objectives. The addendum also demonstrated that the Replacement LDP is compliant with The Well-being of Future Generations Act and integrates successfully with the Well-Being goals and the ways of working.
- 4.4 No representations were received in relation to the Deposit Plan Sustainability Appraisal (SA) Report Addendum during the Focused Changes Consultation.
- 4.5 On adoption of the Replacement LDP, the Council will publish a statement explaining how the SA has influenced the LDP.

5. Habitats Regulation Assessment (HRA) Appropriate Assessment (AA) and Additional background papers.

- 5.1 The Revised Habitats Regulations Assessment (HRA) Screening Report, incorporating Appropriate Assessment (AA) updates the earlier HRA screening report undertaken for the Replacement Deposit LDP, required by the Habitats Directive (92/43/ECC) and the Conservation of Habitats and Species Regulations 2017.
- 5.2 It up-dated and revised the Deposit Plan HRA Screening Report in the light of the decision of the European Court of Justice in People Over Wind and Sweetman v Coillte Teoranta (c322/17). It reviewed the HRA screening and included an AA of the potential for the LDP to adversely affect the matters below either alone or 'in-combination'. It took account of the most recent available information for other plans and projects, as well as mitigation measures proposed in the Deposit Plan, to avoid adverse effects on the integrity of European protected sites. The update also corrected a number of minor factual errors.
- 5.3 The AA concluded that all likely significant effects had been discounted and that it was not necessary to examine alternative options for mitigation. No stage 3 detailed assessments were identified. No representations were received on the HRA AA during the Focused Changes Consultation.
- 5.4 In relation to the additional background papers, one comment was received from Natural Resources Wales (NRW) which welcomed the submission of the Landscape Sensitivity Study, dated December 2018. This document provides further supporting evidence for the 'local search areas' (LSA) for solar energy identified in Policy EcW8. NRW agreed with the Council's proposed focused change to remove the Merthyr Road LSA and requested clarification on a number of points regarding the assessment and findings of the Landscape Sensitivity Study.

APPENDIX 1: REPLACEMENT DEPOSIT LDP STATUTORY PUBLIC NOTICE - BILINGUAL

CYNGOR BWRDEISTREF SIROL MERTHYR TUDFUL

Deddf Cynllunio a Phrynu Gorfodol 2004
Deddf Cynllunio (Cymru) 2015
Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol) (Cymru) 2005 (fel y'i diwygiwyd) (Rheoliad 22)
Rheoliadau Asesiadau Amgylcheddol o Gynlluniau a Rhaglenni 2004
Rheoliadau Gwarchod Cynefinoedd a Rhywogaethau 2010 (fel y'i diwygiwyd)

Hysbysiad o Gyflwyno Cynllun Datblygu Lleol i Lywodraeth Cymru a Hysbysebu Newidiadau Canolbwyntiedig Arfaethedig

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

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful wedi paratoi dogfennaeth ar gyfer y CDLI Amnewid ac wedi cyflwyno'r cynigion i Lywodraeth Cymru ar gyfer Archwiliad. Bydd y CDLI Amnewid, o'i fabwysiadu, yn disodli'r CDLI cyfredol a gafodd ei fabwysiadu yn 2011 a bydd yn ffurfio sail ar gyfer penderfyniadau ar faterion cynllunio defnydd o dir ym Mwrdeistref Sirol Merthyr Tudful (ac eithrio'r ardal ym Mharc Cenedlaethol Bannau Brycheiniog).

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful wedi ystyried yr holl sylwadau a dderbyniwyd mewn perthynas ag ymgynghoriad CDLI Adnau Amnewid ac y mae bellach yn cynnig newidiadau canolbwyntiedig i'r Cynllun Adnau i sicrhau fod y Cynllun yn gadarn. Caiff y newidiadau hyn eu hamlinellu yn y ddogfen 'Amserlen o Newidiadau Canolbwyntiedig'. Mae'r Newidiadau Canolbwyntiedig yn amodol ar ymgynghoriad ffurfiol 6 wythnos o hyd rhwng 21 Ionawr a 4 Mawrth 2019.

Caiff dogfennau cefnogol eraill eu cyflwyno hefyd i'w hymgyngori yn ystod y cyfnod hwn.

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

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

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

MERTHYR TYDFIL COUNTY BOROUGH COUNCIL

Planning and Compulsory Purchase Act 2004
Planning (Wales) Act 2015
The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) (Regulation 22)
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004
The Conservation of Habitats and Species Regulations 2010 (as amended)

Notice of Submission of a Local Development Plan to the Welsh Government and Advertisement of Proposed Focused Changes

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

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

Merthyr Tydfil County Borough Council has considered all representations received in relation to the Replacement Deposit LDP consultation and is now proposing focused changes to the Deposit Plan to ensure the Plan is sound. These changes are outlined in the 'Schedule of Focused Changes' document. The Focused Changes are subject to a formal 6 week consultation between 21st January 2019 and midnight on 4th March 2019.

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

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

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

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

FOCUSED CHANGES CONSULTATION REPORT

Rhaid i'r sylwadau a gyflwynir am y Newidiadau Canolbwyntiedig fod yn ysgrifenedig a'u derbyn gan y Cyngor Bwrdeistref Sirol yn y cyfeiriad a nodir isod rhwng 21 Ionawr 2019 a chanol nos 4 Mawrth 2019.

Dylai sylwadau yn ystod y cam hwn fod yn benodol ynghylch y materion maen nhw'n berthnasol iddynt a'r sail y maent yn berthnasol iddynt, a bod mewn perthynas â'r Newidiadau Canolbwyntiedig yn unig. Dylai cynrychiolwyr sy'n ystyried nad yw'r Newidiadau Canolbwyntiedig yn gwneud y Cynllun yn gadarn, esbonio'n glir y rhesymau pam a pha newidiadau sy'n ofynnol. Dylai cynrychiolwyr sy'n cynnig newidiadau i Newid Canolbwyntiedig ystyried y goblygiadau ar yr Arfarniad o Gynaliadwyedd. Pan fo gan y newidiadau arfaethedig effeithiau cynaliadwyedd sylweddol, dylai'r sylwadau gynnwys gwybodaeth berthnasol yr Arfarniad o Gynaliadwyedd.

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

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

Mae'r Dogfennau Cyflwyno yn cynnwys y CDLI Adnau Amnewid (fel y'i diwygiwyd gan y Newidiadau Canolbwyntiedig), Adroddiad Ymgynghori, Adroddiad Arfarniad o Gynaliadwyedd, Asesiad Rheoliadau Cynefinoedd a nifer o ddogfennau perthnasol eraill.

Bydd archwiliwr annibynnol yn arwain yr archwiliad i bennu a yw'r Cynllun yn gadarn. Dim ond y rheini sy'n gwneud sylwadau sy'n ceisio newid y CDLI Adnau (hynny yw gwrthwynebwyr) y cafodd eu sylwadau eu 'cyflwyno'r briodol' (hynny yw yn unol â hyn a hysbysiadau cynharach o Ddeddf 2004) sydd â'r hawl i ymddangos o flaen a chael gwrandawriad gan yr Archwiliwr yn yr Archwiliad (Adran 64 (6) Deddf 2004).

Hysbysir o leiaf 6 wythnos cyn agor yr Archwiliad. Bydd fformat ac amseroedd y gwrandawrid yn fater i'r Archwiliwr.

Caiff Swyddog Rhaglen Annibynnol ei benodi a fydd yn atebol i'r Archwiliwr ac a fydd yn cynorthwyo â gweinyddu'r Archwiliad.

Os oes unrhyw ymholiadau gennych am sut i gyflwyno eich sylwadau, neu os ydych am wybodaeth bellach, e-bostiwch y Tîm CDLI devplanning@merthyr.gov.uk neu ffonio 01685 726279.

MISS J JONES
Pennaeth Cynllunio a Chefn Gwlad

Representations on the Focused Changes must be made in writing and received by the County Borough Council at the address specified below between 21st January 2019 and midnight on 4th March 2019.

Representations at this stage should specify the matters and grounds to which they relate and must only relate to the Focused Changes. Representors who consider that the proposed Focused Changes will not make the Plan sound, should clearly explain the reasons why and what changes are required. Representors proposing changes to a Focused Change should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information.

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

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

The Submission documents include the Replacement Deposit LDP (as amended by the Focused Changes), a Consultation Report, a Sustainability Appraisal Report, a Habitats Regulation Assessment and a number of other relevant documents.

An independent Inspector will conduct the examination to determine whether the Plan is sound. Only those making representations seeking to change the deposit LDP (i.e. objectors) whose representations were 'duly made' (i.e. in accordance with this and earlier notices), have the right to appear before and be heard by the Inspector at the Examination (Section 64 (6) of the 2004 Act.)

Notice will be given at least 6 weeks before the opening of the Examination. The format and timings of the hearing will be a matter for the Inspector.

An independent Programme Officer will be appointed who will be responsible to the Inspector and who will assist with the administration of the Examination.

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

MISS J JONES
Head of Planning and Countryside

APPENDIX 2: REPLACEMENT LDP FOCUS CHANGE CONSULTATION EMAIL – BILINGUAL

Annwyl Syr / Madam;

CYNLLUN DATBLYGU LLEOL MERTHYR TUDFUL AMNEWID 2016-2031: HYSBYSIAD O GYFLWYNO CYNLLUN DATBLYGU LLEOL I LYWODRAETH CYMRU (CDLI RHEOLIAD 22) AC YMGYNGHORIAD AR Y NEWIDIADAU CANOLBWYNTIEDIG ARFAETHEDIG

Yn dilyn ymgynghoriad cyhoeddus ar 'Gynllun Adnau' y CDLI Amnewid yn ystod haf 2018, mae'r Cyngor bellach wedi ystyried yr holl sylwadau a dderbyniwyd mewn perthynas ag ymgynghoriad y CDLI Adnau ac y mae yn awr yn cynnig newidiadau canolbwytiedig i'r CDLI Adnau i sicrhau fod y Cynllun yn gadarn. Caiff y newidiadau hyn eu hamlinellu yn nogfen 'Amserlen Newidiadau Canolbwytiedig'.

Caiff ymgynghoriad cyhoeddus ei gynnal am chwe wythnos ar y 'Newidiadau Canolbwytiedig' a'r papurau perthnasol eraill, o ddydd Llun 21 Ionawr 2019 tan ddydd Llun 4 Mawrth 2019.

Gweler y dogfennau atodedig am wybodaeth bellach.

Yn gywir;

MISS J JONES

PENNAETH CYNLLUNIO A CHEFN GWLAD

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**

Following public consultation on the Replacement LDP 'Deposit Plan' during Summer 2018, the Council has now considered all representations received in relation to the Deposit LDP consultation and is proposing a number of 'Focused Changes' to the Deposit LDP to ensure the Plan is sound. These changes are outlined in the 'Schedule of Focused Changes' consultation document.

A six week public consultation will take place on the 'Focused Changes' and relevant supporting papers (such as the Habitats Regulations Assessment and Sustainability Appraisal Addendums), from Monday 21st January 2019 until Monday 4th March 2019.

Please see the attached documents for further information.

Yours faithfully;

MISS J JONES

HEAD OF PLANNING AND COUNTRYSIDE

APPENDIX 3: REPLACEMENT LDP FOCUS CHANGE CONSULTATION LETTER – BILINGUAL

Annwyl Syr / Madam;

CYNLLUN DATBLYGU LLEOL AMNEWID MERTHYR TUDFUL 2016-2031: HYSBYSIAD O GYFLWYNO CYNLLUN DATBLYGU LLEOL I LYWODRAETH CYMRU (CDLI RHEOLIAD 22) AC YMNGYNGHORIAD AR Y NEWIDIADAU CANOLBWYNTIEDIG ARFAETHEDIG

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful (CBSMT) wedi paratoi dogfennaeth i'r CDLI Amnewid a chyflwyno'r cynigion i Lywodraeth Cymru eu harchwilio. Mae'r Cyngor bellach wedi ystyried yr holl sylwadau a dderbyniwyd mewn perthynas ag ymgyngoriad y CDLI Adnau ac yn awr yn cynnig newidiadau canolbwyntiedig i'r CDLI Adnau i sicrhau fod y Cynllun yn gadarn.

Caiff y newidiadau hyn eu hamlinellu yn nogfen 'Amserlen Newidiadau Canolbwyntiedig'. Mae'r Newidiadau Canolbwyntiedig yn amodol ar ymgyngoriad ffurfiol 6 wythnos rhwng 21 Ionawr 2019 a chanol nos 4 Mawrth 2019.

Bydd yr holl ddogfennau cyflwyno, dogfennau ymgyngoriad; a ffurflen i gyflwyno sylwadau ar gael i'r cyhoedd eu harchwilio ym mhrrif swyddfeydd y Cyngor, Canolfan Ddinesig, Stryd y Castell, Merthyr Tudful, CF47 8AN a'r lleoliadau eraill a restrir isod yn ystod eu horiau agor arferol:

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

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

Rhaid i sylwadau am y Newidiadau Canolbwyntiedig gael eu gwneud yn ysgrifenedig a'u derbyn gan y Cyngor erbyn canol nos ddydd Llun 4 Mawrth 2019. Gellir anfon ffurflenni wedi eu cwblhau drwy e-bost i devplanning@merthyr.gov.uk neu bostio i: Pennaeth Cynllunio a Chefn Gwlad, Cyngor Bwrdeistref Sirol Merthyr Tudful, Uned 5, Parc Busnes Triongl, Pentrebach, Merthyr Tudful, CF48 4TQ.

Dylai sylwadau yn ystod y cam hwn fod yn benodol am y materion a'r sail maen nhw'n berthnasol iddynt a rhaid iddynt fod yn berthnasol i'r Newidiadau Canolbwyntiedig yn unig. Dylai cynrychiolwyr sy'n cynnig newidiadau pellach i'r CDLI Adnau ystyried a yw'n angenrheidiol i Arfarniad o Gynaliadwyedd gyd-fynd â'u sylwadau. Pan fo gan y newidiadau arfaethedig effaith cynaliadwyedd sylweddol dylai'r sylwadau gynnwys gwybodaeth Arfarniad o Gynaliadwyedd perthnasol.

Mae'r dogfennau Cyflwyno yn cynnwys CDLI Adnau (fel y'i diwygiwyd gan y Newidiadau Canolbwyntiedig), Adroddiad Ymgyngoriad, Adroddiad Arfarniad o Gynaliadwyedd, Asesiad Rheoleiddio Cynefinoedd a nifer o ddogfennau eraill perthnasol.

Bydd yr Archwiliwr annibynnol yn cynnal archwiliad i bennu a yw'r Cynllun yn gadarn. Dim ond y rheini sy'n gwneud sylwadau sy'n ceisio newid y CDLI Adnau (hynny yw gwrthwynebwyr) y mae eu sylwadau wedi eu 'gwneud yn briodol', sydd â'r hawl i ymddangos a'u cael wedi eu clywed gan yr Archwiliwr yn yr Archwiliad (Adran 64 (6) Deddf 2004)

Rhoddir hysbysiad o 6 wythnos o leiaf, cyn bod yr Archwiliad yn agor. Bydd fformat ac amseru'r gwrandawriad yn fater i'r Archwiliwr.

Cafodd Swyddog Rhaglen annibynnol ei benodi a fydd yn atebol i'r Archwiliwr ac yn cynorthwyo â gweinyddu'r Archwiliad. Y Swyddog Rhaglen a benodwyd yw Tracey Smith.

Os oes unrhyw gwestiynau gennych am sut i gyflwyno eich sylwadau, neu unrhyw ymholiadau eraill, e-bostiwch y Tîm CDLI yn devplanning@merthyr.gov.uk <<mailto:devplanning@merthyr.gov.uk>> neu ffonio 01685 726279 a gofyn i siarad ag aelod o'r Tîm CDLI.

Yn gywir

MISS J JONES

PENNAETH CYNLLUNIO A CHEFN GWLAD/HEAD OF PLANNING AND COUNTRYSIDE

FOCUSED CHANGES CONSULTATION REPORT

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

Merthyr Tydfil County Borough Council (MTCBC) has prepared documentation for the Replacement LDP and submitted the proposals to the Welsh Government for Examination. The Council has now considered all representations received in relation to the Deposit LDP consultation and is proposing a number of 'Focused Changes' to the Deposit LDP to ensure the Plan is sound.

These changes are outlined in the 'Schedule of Focused Changes' (December 2018) consultation document. The Focused Changes are subject to a formal 6 week consultation between 21st January 2019 and midnight on 4th March 2019.

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

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

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

Comments on the Focused Changes must be made in writing and received by the Council **by midnight Monday 4th March 2019**. Completed forms may be sent electronically to devplanning@merthyr.gov.uk or posted to: The Head of Planning and Countryside, Merthyr Tydfil County Borough Council, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ.

Representations at this stage should specify the matters and grounds to which they relate and must only relate to the Focused Changes. Representors who consider that the proposed Focused Changes will not make the Plan sound, should clearly explain the reasons why and what further changes are required. Representors proposing changes to a Focused Change should consider the implications on the Sustainability Appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information.

The Submission documents include the Replacement Deposit LDP (as amended by the Focused Changes), the LDP Consultation Report, a Sustainability Appraisal Report, a Habitats Regulation Assessment and a number of other relevant documents.

An independent Inspector will conduct the Examination to determine whether the Plan is sound. Only those making representations seeking to change the Deposit LDP (i.e. objectors) whose representations were 'duly made', have the right to appear before and be heard by the Inspector at the Examination (Section 64 (6) of the 2004 Act.)

Notice will be given at least 6 weeks before the opening of the Examination. The format and timings of the hearing will be a matter for the Inspector.

An independent Programme Officer will be appointed who will be responsible to the Inspector and who will assist with the administration of the Examination.

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

Yours faithfully;

MISS J JONES
PENNAETH CYNLLUNIO A CHEFN GWLAD/HEAD OF PLANNING AND COUNTRYSIDE

FOCUSED CHANGES CONSULTATION REPORT

APPENDIX 4: REPLACEMENT LDP FOCUS CHANGE CONSULTATION POSTER – BILINGUAL

Cyngor Bwrdeistref Sirol Merthyr Tudful Cynllun Datblygu Lleol Amnewid 2016 – 2031 Ymgynghoriad Cyhoeddus am Newidiadau Canolbwyntiedig

Dydd Llun 21 Ionawr – Dydd Llun 4 Mawrth 2019

Beth yw'r Cynllun Datblygu Lleol Amnewid?
Bydd Cynllun Datblygu Lleol Amnewid (CDL) Cyngor Bwrdeistref Sirol Merthyr Tudful yn darparu'r fframwaith i arwain faint o adeiladu newydd neu 'datblygiad', a ble y dylai ddigwydd, dros y 15 mlynedd nesaf (y cyfnod cynllunio) hyd at 2031.

Ar gyfer beth y mae'r Ymgynghoriad Cyhoeddus?
Yn dilyn ystyried sylwadau a dderbyniwyd am y CDL Adnau (yn ystod ymgynghoriad cyhoeddus 30 Gorffennaf – 10 Medi 2018), mae'r Cyngor yn awgysu rifer cyfyngedig o newidiadau i'r Cynllun Adnau, a elwir yn 'Newidiadau Canolbwyntiedig'. Mae'r newidiadau hyn yn ceisio sicrhau fod y Cynllun yn 'gadam' ac yn unol â pholisi cenedlaethol a phroffon cadernid a osodwyd gan Lywodraeth Cymru. Bydd 'Cadernid' y Cynllun yn cael ei benderfynu yn y pen draw gan Archwiliwr annibynnol a fydd yn cynnal 'Archwiliad yn Gyhoeddus'.

Cyn dechrau'r Archwiliad, bydd y Cyngor yn ymgynghori â'r cyhoedd am y Newidiadau Canolbwyntiedig. Caiff y thain eu cyflwyno yn yr Amserlen Newidiadau Canolbwyntiedig i'r Cynllun Adnau Amnewid (Rhagfyr 2018). Yn dilyn cau'r ymgynghoriad ar 4 Mawrth, caiff sylwadau am y Newidiadau Canolbwyntiedig eu hanian at yr Archwiliwr Cynllunio Annibynnol a fydd yn eu hystyried ochr yn ochr â'r holl ddogfennau CDL eraill a gyflwynwyd fel rhan o'r Archwiliad (yn cynnwys, er enghraifft, sail y dystiolaeth a dogfennau'r ymgynghoriad o'r camau Strategaeth a Ffaiir a Chynllun Adnau).

Ble gallaf i weld Dogfennau'r CDL?
Gellir gweld manylion llawn am yr ymgynghoriad a'r holl ddogfennau cyflwyno yma:
www.merthyr.gov.uk/replacementLDP

Mae copiau papur o'r Dogfennau Cyflwyno ac Amserlen y Newidiadau Canolbwyntiedig ar gael i'w gweld yn ystod oriau swyddfa arferol yma:

- Swyddfa Cyngor, Uned 5, Parc Busnes Triangl, Pentrebach, Merthyr Tudful, CF48 4TQ
- Llyfrgell Ganolog Merthyr Tudful, Stryd Fawr, Merthyr Tudful, CF47 8AF
- Hyb Llyfrgell Rhydyar, Canolfan Hamdden Merthyr Tudful, CF48 1UT
- Llyfrgell Treharis, Stryd Perrott, Treharis, Merthyr Tudful, CF46 5ET
- Llyfrgell Dowlais, Stryd yr Eglwys, Dowlais, Merthyr Tudful, CF48 3HS
- Llyfrgell Gymunedol Aberfan, Heol Pantglas, Aberfan, Merthyr Tudful, CF48 4QE

Sut gallaf i wneud sylwadau i'r Newidiadau Canolbwyntiedig?
Rhaid i sylwadau am y Newidiadau Canolbwyntiedig fod yn ysgrifenedig a gellir eu cyflwyno ar ffurflen sylwadau sydd ar gael yma www.merthyr.gov.uk/replacementLDP neu yn unrhyw un o leoliadau'r ymgynghoriad.

Cyflwynwch y ffurflen sylwadau erbyn:

- E-bost: devplanning@merthyr.gov.uk or
- Post: Tim CDL, CBSMT, Uned 5, Parc Busnes Triangl, Pentrebach, Merthyr Tudful, CF48 4TQ

Rhaid i'r holl sylwadau gael eu derbyn erbyn canol nos ddydd Llun 4 Mawrth 2019.

Os ydych am unrhyw wybodaeth neu gymorth pellach, bydd y Tim CDL ar gael yn y cyfeiriad uchod neu drwy ffonio 01685 726279 yn ystod oriau gwaith arferol.

The Merthyr Tydfil County Borough Council Replacement Local Development Plan 2016 – 2031 Focused Changes Public Consultation

Monday 21st January – Monday 4th March 2019

What is the Replacement Local Development Plan?
The Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) will provide the planning policy framework to guide how much new building, or 'development', should take place and where it should go over the next 15 years (the plan period) up to 2031.

What is the Public Consultation for?
Following consideration of comments received on the Deposit LDP (during the public consultation from 30th July – 10th September 2018), the Council is suggesting a limited number of changes to the Deposit Plan, known as 'Focused Changes'. These changes seek to ensure that the Plan is 'sound' and is in line with national policy and the tests of soundness set by Welsh Government. The 'Soundness' of the Plan will ultimately be determined by an independent Inspector who will hold an 'Examination in Public'.

Prior to the commencement of the Examination, the Council is consulting the public on the Focused Changes. These are set out in the Schedule of Focused Changes to the Replacement Deposit Plan (December 2018). Following the close of the consultation on 4th March, representations on the Focused Changes will be forwarded to the independent Planning Inspector who will consider them alongside all other submitted LDP documents as part of the Examination (including, for example, the evidence base and consultation documents from the Preferred Strategy and Deposit Plan stages).

Where can I view the LDP Documents?
Full details of the consultation and all the submission documents can be viewed at:
www.merthyr.gov.uk/replacementLDP

Paper copies of the Submission Documents and the Schedule of Focused Changes are available to view during normal opening hours at:

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

How can I comment on the Focused Changes?
Representations on the Focused Changes must be made in writing can be made on a comment form available at www.merthyr.gov.uk/replacementLDP or at any of the consultation locations.

Please submit the completed comment form by:

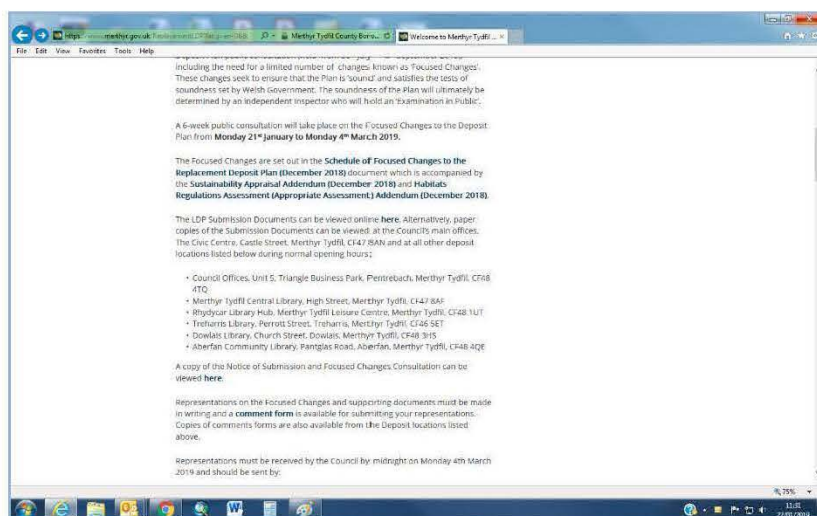
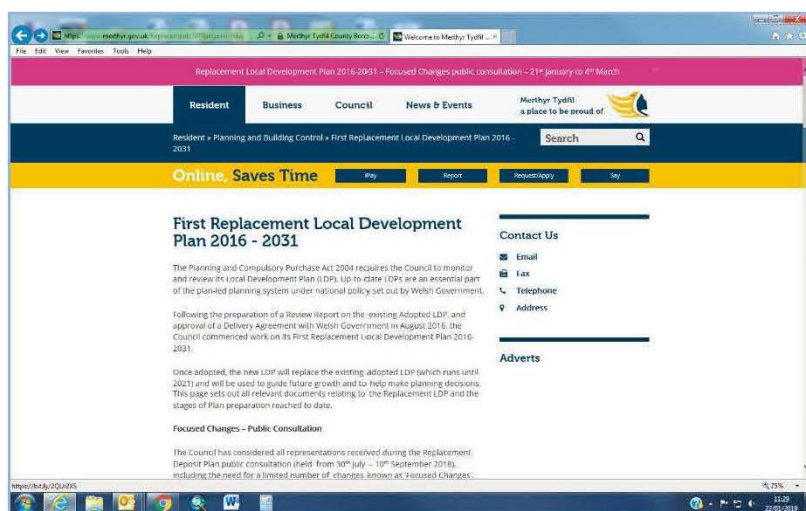
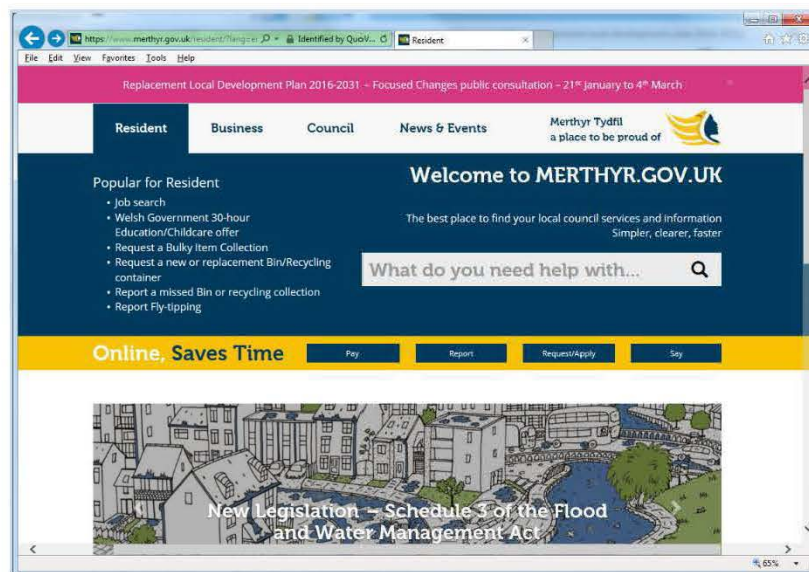
- Email to: devplanning@merthyr.gov.uk or
- post to: The LDP Team, MTCBC, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ

All representations must be received by midnight on Monday 4th March 2019.

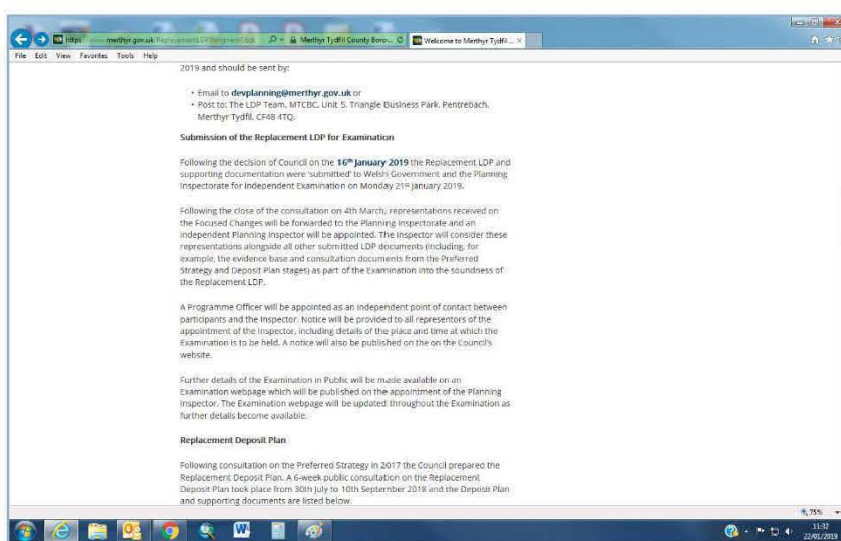
If you require any further information or assistance, the LDP Team will be available at the address above or by telephone on 01685 726279 during normal working hours.

FOCUSED CHANGES CONSULTATION REPORT

APPENDIX 5: REPLACEMENT LDP FOCUSED CHANGE CONSULTATION WEBSITE



FOCUSED CHANGES CONSULTATION REPORT



Replacement Local Development Plan 2016-2031 – Focused Changes public consultation – 21st January to 4th March

Resident
Business
Council
News & Events
Merthyr Tydfil
a place to be proud of

Resident » Planning and Building Control » Replacement LDP Submission Documents

Online, Saves Time
Pay
Report
Request/Apply
Say

Ad closed by Google
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Replacement LDP Submission Documents

The Submission Documents listed below are the LDP documents that have been submitted by the Council to Welsh Government and the Planning Inspectorate. Following the close of the Focused Changes public consultation on 4th March 2019 an independent Planning Inspector will be appointed to consider the soundness of the Replacement LDP. Notice will then be provided on the Council's website and to all representatives of the person appointed on behalf of the Welsh Government Ministers to conduct the Examination, including details of the place and time at which the Examination is to be held.

Further details of the Examination into the Replacement LDP will be published on an Examination webpage which will be established following the appointment of the Planning Inspector. The Examination webpage will be updated throughout the Examination as further details of proceedings become available.

Contact Us
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Fax
Telephone
Address

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Local Plan Documents

SD01 – Replacement LDP 2016-2031 Deposit Plan – Written Statement as amended by the Focused Changes December 2018

SD02 – Schedule of Focused Changes to the Replacement Deposit Plan December 2018

SD03 – Replacement LDP 2016-2031 Deposit Plan – Written Statement June 2018

SD04 – Replacement LDP 2016-2031 – Proposals Map July 2018

SD05 – Replacement LDP 2016-2031 – Constraints Map July 2018

SD06 – Deposit Plan – Sustainability Appraisal Report June 2018

SD07 – Deposit Plan – Sustainability Appraisal Report non-technical summary June 2018

SD08 – Sustainability Appraisal Report Addendum December 2018

SD09 – Initial Sustainability Appraisal Report June 2017

SD10 – Sustainability Appraisal Baseline Scoping Report January 2017

SD11 – Replacement LDP – Habitats Regulations Assessment (Appropriate Assessment) Report December 2018

SD12 – Deposit Plan Habitats Regulations Assessment Screening Report June 2018

SD13 – Preferred Strategy Habitats Regulations Assessment Screening Report June 2017

SD14 – Replacement LDP Deposit Plan Consultation Report December 2018

SD15 – Replacement LDP Initial Consultation Report June 2018

SD16 – Replacement LDP Deposit Plan Representations Register November 2018

SD17 – Replacement LDP Preferred Strategy June 2017

SD18 – Candidate Sites Register October 2017

SD19 – Replacement LDP Delivery Agreement August 2016

SD20 – Local Development Plan 2006-2021 – Review Report April 2016

Evidence Base Documents

SD21 – Merthyr Tydfil Renewable Energy Assessment (REA) Report June 2017

SD22 – Renewable Energy Assessment Addendum December 2018

FOCUSED CHANGES CONSULTATION REPORT

SD23 – Heads of the Valley Smaller Scale Wind Turbine Development Landscape Sensitivity and Capacity Study April 2015

SD24 – Gypsy and Traveller Accommodation Assessment (GTAA) Update June 2018

SD25 – GTAA Update – Welsh Government Ministerial Letter October 2018

SD26 – Special Landscape Areas background paper June 2018

SD27 – Sites of Importance for Nature Conservation background paper June 2018

SD28 – Merthyr Tydfil Local Housing Market Assessment 2014

SD29 – Housing Land Supply and Trajectory background paper update December 2018

SD30 – Merthyr Tydfil Retail Study and Commercial Leisure Study June 2017

SD31 – South Wales Regionally Important Geological Sites Audit March 2012

SD32 – Population and Housing Requirements background paper June 2017

SD33 – Review of Green Wedges background paper June 2018

SD34 – Viability Assessment: Local Development Plan / Community Infrastructure Levy March 2018

SD34 – Viability Assessment: Local Development Plan / Community Infrastructure Levy March 2018

SD35 – Merthyr Tydfil Employment Land Review June 2018

SD36 – Merthyr Tydfil Archaeology and Archaeologically Sensitive Areas background paper July 2017

SD37 – Merthyr Tydfil Strategic Flood Consequence Assessment (SFCA) June 2018

SD38 – Merthyr Tydfil Proposed New Bus Station Flood Consequence Assessment May 2016

SD39 – Merthyr Tydfil: Understanding Urban Character, Cadw 2015

SD40 – South East Wales Valleys Local Transport Plan January 2015

SD41 – Minerals Planning background paper June 2018

SD42 – Waste Planning background paper June 2018

SD43 – Affordable Housing background paper update December 2018

SD44 – South Wales Regional Aggregates Working Party - Regional Technical Statement 1st Review August 2014

SD44 – South Wales Regional Aggregates Working Party - Regional Technical Statement 1st Review August 2014

SD45 – South Wales Regional Aggregates Working Party - Annual Report 2016 published March 2018

SD46 – Site Assessment background paper June 2018

SD47 – Merthyr Tydfil Open Space Strategy June 2016

SD48 – Merthyr Tydfil Open Space Strategy Action Plan June 2016

SD49 – Hoover Strategic Regeneration Area - Framework Masterplan June 2018

SD50 – Hoover SRA Geotechnical Desk Study July 2018

SD51 – Hoover SRA Strategic Transport Assessment October 2018

SD52 – Local Nature Reserves background paper December 2018

SD53 – Landscape Sensitivity Study for Solar Energy Search Areas December 2018

SD54 – Cwm Taf Wellbeing Assessment Consultation Analysis Report by Netherwood Sustainable Futures & PwC - December 2016

SD51 – Hoover SRA Strategic Transport Assessment October 2018

SD52 – Local Nature Reserves background paper December 2018

SD53 – Landscape Sensitivity Study for Solar Energy Search Areas December 2018

SD54 – Cwm Taf Wellbeing Assessment Consultation Analysis Report by Netherwood Sustainable Futures & PwC - December 2016

SD55 – Rhydycar West Survey and SINC Assessment (David Clements Ecology, May 2006)

SD56 – Merthyr Tydfil County Borough Council Joint Housing Land Availability Study September 2018

SD57 – Merthyr Tydfil County Borough Council Local Development Plan 2006-2021 Written Statement (Adopted May 2011)

FOCUSED CHANGES CONSULTATION REPORT**APPENDIX 6: REPLACEMENT LDP FOCUS CHANGE CONSULTATION COMMENT FORM – WELSH**

CYNGOR BWRDEISTREF SIROL MERTHYR TUDFUL
CYNLLUN DATBLYGU LLEOL ADNAU AMNEWID 2016 – 2031

FFURFLEN YMATEB I'R NEWIDIADAU CANOLBWYNTIEDIG

Hoffem glywed eich barn am y Newidiadau Canolbwytiedig arfaethedig i'r Cynllun Datblygu Lleol Adnau Amnewid (CDU) a'r dogfennau diwygiedig sy'n eu cefnogi (er enghraifft yr Arfarniad o Gynaliadwyedd diwygiedig neu'r Aseiad Rheoleiddio Cynefinoedd). Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (hynny yw sylwadau neu wrthwynebiadau). Caiff nodiadau canllaw ar gyfer cwblhau dros y dudalen. Mae fersiynau electronig o'r ffurflen hon ar gael o www.merthyr.gov.uk/ReplacementLDP. Rhaid i'r sylwadau gael eu derbyn gan y Cyngor erbyn dydd Llun 4 Mawrth 2019.

RHAN 1: MANYLION CYSWLLT

Manylion Personol

Manylion yr Asiant (os yw'n gymwys)

Teitl

Enw cyntaf

Enw olaf

Teitl y Swydd

(ble y bo'n berthnasol)

Sefydliad

(ble y bo'n berthnasol)

Cyfeiriad:linell 1

Llinell 2

Llinell 3

Llinell 4

Cod Post

Rhif Ffôn

Cyfeiriad e-bost

Ticiwch os byddai'n well gennych dderbyn gohebiaeth yn Gymraeg ☐

Mae'n well gennym ohebu drwy e-bost. Ticiwch os byddai'n well gennych gael y diweddarafr drwy'r post ☐

Nodwch y bydd yr holl sylwadau ar gael i'r cyhoedd ac ni ellir eu tin fel mai cyfinaethol. Caiff eich gwybodaeth ei chodw ar Gronfa Ddata CDU y Cyngor a chaiff ei defnyddio mewn perthynas â pharatoi'r Cynllun Datblygu Lleol yn unig.

Rhif Cynrychiolydd ID* (os yw'n

berthnasol)

*Bydd rhif Cynrychiolydd gennych os ydych wedi gwneud sylwadau ar adedau blaenorol yn y broses Cynllun Datblygu Lleol Adnau Amnewid neu os ydych wedi golygu i gael eich cynnwys ar gronfa ddata CDU y Cyngor. Caiff y Rhif Cynrychiolydd ei ddynodi ar ohebiaeth flaenorol oddi wrth y Cyngor. Dyfynnwch y rhif hwn os yw'n bosibl i gynorthwyo'r Cyngor i'ch adnabod a chofnodi eich sylwadau.

FOCUSED CHANGES CONSULTATION REPORT**DATGANIAD HYSBYSIAD PREIFATRWYDD**

Mae Cyngor Bwrdeistref Sirol Merthyr Tudful yn ymroddedig i gynnal eich hawliau preifatrwydd. Byddwn yn defnyddio eich gwybodaeth personol at ddibenion cyfreithiol yn unig. Os hoffech ddarganfod rhagor am sut yr ydym yn defnyddio eich gwybodaeth personol darllenwch ein hysbysiadau preifatrwydd sydd ar gael ar ein gwefan (www.merthyr.gov.uk/council/data-protection-and-freedom-of-information/privacy-notice/). Os oes unrhyw bryderon gennych neu os hoffech wybod rhagor am gydymffurfio â diogelwch data cysylltwch â'n Swyddog Diogelu Data ar 01685 725329 neu data.protection@merthyr.gov.uk.

Nodiadau Canllaw:

- Cyflwynwch eich ymateb i Newidiadau Canolbwytiedig y Cynllun Datblygu Lleol Adnau Amnewid a'r dogfennau sy'n cefnogi'r Newidiadau Canolbwytiedig, ar y ffurflen hon.
- Os ydych yn gwrthwynebu i Newid Canolbwytiedig dylech ddweud pam eich bod yn meddwl ei fod yn gwneud y Cynllun yn simsan, a sut y dylai Newid Canolbwytiedig gael ei newid i wneud y Cynllun yn gadarn. Dylai cynrychiolwyr sy'n cynnig newidiadau i Newid Canolbwytiedig ystyried y goblygiadau ar yr Arfarniad o Gynaliadwyedd. Pan fo gan y newidiadau arfaethedig effeithiau cynaliadwyedd sylweddol, dylai'r sylwadau gynnwys gwybodaeth berthnasol yr Arfarniad o Gynaliadwyedd.
- Wrth wrthwynebu neu gynnig newid i Newid Canolbwytiedig. Byddai'n ddefnyddiol i wneud yn glir pa brawf/broffion o gadernid sy'n methu yn eich barn chi. Os na fyddwch yn dynodi prawf, ni fydd hyn yn golygu na fydd eich sylwadau yn cael eu hystyried, ar yr amod ei fod yn berthnasol i'r Newidiadau Canolbwytiedig. Cyn cwblhau'r ffurflen, cyfeiriwch at y nodiadau canllaw profion cadernid yn yr Atodlen ynghlwm ar ddiwedd y ffurflen hon. Cafodd rhestr o gwestiynau cefnogol eu darparu i helpu i ddynodi pa broffion cadernid allai fod y mwyaf perthnasol i'r sylwadau. Canllaw yn unig yw hwn ac nid o anghenraid i ateb yr holl gwestiynau ychwanegol ar yr amod fel y profion cadernid mwyaf perthnasol wedi eu dynodi.
- Byddai'n ddefnyddiol ond ddim yn hanfodol, pe byddai ffurflenni ar wahân yn cael eu cwblhau ar gyfer pob sylw yr ydych am ei wneud (e.e. am bob Newid Canolbwytiedig). Neu gellir cwblhau Rhan 2 ar wahân am bob sylw, a'i atodi'n ddiogel at y briff ffurflen.
- Wrth wneud sylwadau, defnyddiwch daflenni ychwanegol yn ôl y gofyn, gan rifo pob taflen ychwanegol.
- Nodwch y bydd yr holl sylwadau ar gael i'r cyhoedd eu gweld.
- Wrth fynegi eich sylw, a wnewch chi gynnwys yr holl wybodaeth a thystiolaeth gefnogol angenrheidiol i gefnogi eich sylw. Dom ond os yw'r Archwiliwr penodedig yn eich gwahodd i fynd i'r afael â materion y gallai ef neu hi eu codi y byddwch yn gallu cyflwyno gwybodaeth bellach i'r archwiliad.
- Pan fo grŵp yn rhannu'r un safbwynt am sut y mae am i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen sengl â'i sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ar ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp ddynodi faint o bobl y mae'n eu cynrychioli a sut y cafodd y ddeiseb ei hawdurdodi. Dylai cynrychiolydd y grŵp (neu'r prif ddeisebydd) gael ei ddynodi'n glir.
- Gellir cael ffurflenni ychwanegol ar gyfer sylwadau oddi wrth y Tîm CDU ar 01685 726277, 726279, 726220 neu 727053, neu lawrlwytho o wefan y Cyngor ar www.merthyr.gov.uk/ReplacementLDP neu gallwch lungopio'r ffurflen hon.
- Os oes unrhyw gwestiynau gennych am ymateb, mae croeso i chi gysylltu â'r Adran Cynllunio a Chefn Gwlad, a gofyn i siarad ag aelod o'r Tîm CDU ar y rhifau ffôn uchod neu e-bostio devplanning@merthyr.gov.uk.

FOCUSED CHANGES CONSULTATION REPORT

RHAN 2: Eich sylwadau ar y Newidiadau Canolbwytiedig (Defnyddiwch un adran Rhan 2 am bob sylw yr ydych am ei wneud)

2a. Cyn manylu ar eich sylwadau, byddai'n ddefnyddiol gwybod a ydych o'r farn o ganlyniad i'r Newidiadau Canolbwytiedig arfaethedig gan y Cyngor, fod y Cynllun yn gadarn ac yn diwallu'r gofynion gweithdrefnol. Os ydych o'r farn fod y Cynllun yn simsan, pa brawf cadernid ydy e'n ei fethu yn eich barn chi? (Ticiwch) Ceir manylion pellach am y profion cadernid yn yr Atodiad ar ddiwedd y ffurflen hon.

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

2b. Pa Newid Canolbwytiedig ydych chi'n ei gefnogi neu yn ei wrthwynebu?
(Defnyddiwch Ran 2 ar wahân ar gyfer pob Newid Canolbwytiedig â sylwadau arno)

Newid Canolbwytiedig (NC) Rhif cyfeirnod:	Cefnogi	Gwrthwynebu	Sylw
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2c. Nodwch eich sylwadau yn y gwagle isod, defnyddiwch fwy o dudalennau os yw'n angenrheidiol, dynodwch yn glir i ba Newidiadau Canolbwytiedig y mae eich sylwadau yn berthnasol iddynt. Os ydych yn ystyried na fydd y Newidiadau Canolbwytiedig arfaethedig yn gwneud y Cynllun yn gadarn, esboniwch eich rhesymau pam yn glir a pha newidiadau pellach sy'n ofynnol. Os ydych yn cynnig newid i'r Newid Canolbwytiedig dylech ystyried yr oblygiadau ar yr Arfarniad o Gynaliadwyedd ac a fyddai unrhyw newidiadau yn ofynnol i'r asesiad. Dynodwch yn y gwagle isod a ydych yn cyflwyno deunydd ychwanegol i gefnogi eich sylwadau.

**Diolch am eich sylwadau am Newidiadau Canolbwyntiedig y Cynllun Datblygu
Lleol Adnau Amnewid.**

**Cofiwch amgáu unrhyw ddogfennaeth berthnasol gyda'r ffurflen hon ac atodi
unrhyw dudalennau ychwanegol yn ddiogel.**

Dylid anfon ffurflenni wedi eu cwblhau i:

**Tîm CDU
Cynllunio a Chefn Gwlad
Cyngor Bwrdeistref Sirol Merthyr Tudful
Uned 5
Parc Busnes Triangl
Pentrebach
Merthyr Tudful
CF48 4TQ**

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

Rhaid derbyn sylwadau erbyn canol nos dydd Llun 4 Mawrth 2019.

Ni chaiff sylwadau a dderbynnir ar ôl hynny eu hystyried.

FOCUSED CHANGES CONSULTATION REPORT**A – Profion Cadernid**

Caiff Cynllun Datblygu Lleol Adnau Amnewid Cyngor Bwrdeistref Sirol Merthyr Tudful 2016-2031 ei archwilio gan Archwiliwr annibynnol a benodir gan Lywodraeth Cymru. Swydd yr Archwiliwr yw ystyried a yw'r cynllun yn bodloni gofynion gweithdrefnol ac a yw'n gadarn.

Yn y cyd-destun hwn, gelir ystyried 'cadarn' o fewn ei ystyr arferol sef 'dangos barn dda' a 'gallu ymddiried yn dda'. Caiff y cwestiynau neu 'brofion' y bydd yr Archwiliwr yn eu hystyried wrth bennu a yw'r Cynllun yn gadarn yn cael eu hesbonio yn y tabl isod. Caiff mwy o wybodaeth am brofion a gofynion gweithdrefnol ei darparu yng Nghaniellawiau Gweithdrefnau Archwiliadau Cynllun Datblygu Lleol yr Arlyogaeth Gynllunio (2015).

Os ydych yn gwrthwynebu, dylech ddweud pam eich bod yn credu bod y Cynllun yn simsan a sut y dylai'r Cynllun gael ei newid i'w wneud yn gadarn. Wrth gynnig newid i'r Cynllun byddai'n ddefnyddiol ei wneud yn glir pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu a pham. Bydd hyn yn helpu'r Awdurdod a'r Archwiliwr i ddeall y problemau a godwch. Os yw eich sylw yn berthnasol i'r ffordd y cafodd y Cynllun ei baratoi neu ymgynghori arno, y mae'n debygol y bydd eich sylwadau'n berthnasol i'r 'gofynion gweithdrefnol'.

Wrth fethu â dynodi prawf, ni fydd hyn yn golygu na chaiff eich sylwadau eu hystyried, ar yr amod ei fod yn berthnasol i'r Cynllun neu ei ddogfennau cefnogol. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio'r dogfennau cysylltiedig a thystiolaeth gefnogol ble y bo'n angenrheidiol.

Profion Cyfanrwydd	
Prawf 1	Ydy'r Cynllun yn ffitio? <ul style="list-style-type: none"> • Ydy'r Cynllun yn talu sylw i bolisi cenedlaethol? • Ydy'r Cynllun yn talu sylw i Nodau Llesiant? • Ydy'r Cynllun yn gyson â chynlluniau lleol, strategaethau a rhaglenni gwasanaeth? • Ydy'r Cynllun yn cydymffurfio ag awdurdodau cymdogol? • Ydy'r Cynllun yn cydymffurfio â strategaethau a blaenoriaethau eraill y Cyngor?
Prawf 2	Ydy'r Cynllun yn briodol? <ul style="list-style-type: none"> • A yw'n briodol i'r ardal yng ngoleuni'r dystiolaeth? • A yw'r benodol leol? • A yw'n mynd i'r afael â phroblemau allweddol? • A gefnogir ef gan dystiolaeth gadarn, gymesur a chredadwy? • All y seiliau resymegol y tu ôl i'r polisiâu gael eu harddangos? • A yw'n ceisio diwallu anghenion aseswyd a chyfrannu at gyflawni datblygiad cynaliadwy? • A yw'r weledigaeth a'r strategaeth yn gadarnhaol ac yn ddigon uchelgeisiol? • A gafodd y dewisiadau amgen 'go iawn' eu hystyried yn drylwyr? • A yw'n ddilys, rhesymol a chytbwys? • A yw'n gydlynol a chyson? • A yw'n glir a chanolbwyntiedig?
Prawf 3	A fydd y Cynllun yn darparu? <ul style="list-style-type: none"> • A yw'n debygol o fod yn effeithiol? • A ellir ei weithredu? • A oes cefnogaeth oddi wrth y darparwyr seilwaith perthnasol yn ariannol ac o ran bodloni graddfeydd amser perthnasol? • A fydd y datblygiad yn ddichonadwy? • A ellir cyflenwi'r safleoedd a ddynodwyd? • Ydy'r Cynllun yn ddigon hyblyg? • A oes darpariaethau priodol o ran cynllun wrth gefn? • A yw'n cael ei fonitro'n effeithiol?

FOCUSED CHANGES CONSULTATION REPORT**APPENDIX 7: REPLACEMENT LDP FOCUS CHANGE CONSULTATION COMMENT FORM – ENGLISH**

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

Please tick if you would prefer correspondence in Welsh ☐

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

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

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.

FOCUSED CHANGES CONSULTATION REPORT**PRIVACY NOTICE STATEMENT**

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

Guidance notes:

- Please submit your response to the Focussed Changes to the Replacement Deposit LDP, and documents which support the Focused Changes, on this form.
- If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be changed to make the Plan sound. If you propose a change to a Focussed Change you should consider the implications on the Sustainability Appraisal (SA) and whether any changes would be required to the appraisal. Where proposed changes have significant sustainability effects the representation should include relevant Sustainability Appraisal information.
- Where you are objecting or propose a change to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Focussed Changes. Before completing the form, please refer to the soundness tests guidance notes in the accompanying Annex at the end of this form. A list of supporting questions has been provided to help identify which tests of soundness may be the most relevant to your representation. These are a guide only and it is not necessary to answer all supplementary questions provided the most relevant tests of soundness are indicated.
- It would be helpful, but not essential, if separate forms were completed for each comment that you wish to make (for example, for each Focussed Change). Alternatively, a separate Part 2 could be completed for each comment, and securely attached to the main form.
- When making comments please use additional sheets as required, clearly numbering each additional sheet.
- Please note all comments will be made publically available.
- When setting out your representation please include all the information and supporting evidence necessary to support your representation. You will only be able to submit further information to the examination if the appointed Inspector invites you to address matters that he or she may raise.
- Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the petition has been authorised. The group's representative (or chief petitioner) should be clearly identified.
- Additional representation forms can be obtained from the LDP Team on 01685 726277, 726279, 726220 or 727053, or may be downloaded from the Council's website at www.merthyr.gov.uk/ReplacementLDP or you may photocopy this form.
- If you have any questions about responding, please do not hesitate to contact the Planning and Countryside Department, asking to speak with a member of the LDP Team on the above telephone numbers or by emailing devplanning@merthyr.gov.uk.

FOCUSED CHANGES CONSULTATION REPORT

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.

FOCUSED CHANGES CONSULTATION REPORT**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:		Dated:	
----------------	--	---------------	--

FOCUSED CHANGES CONSULTATION REPORT

Thank you for your comments on the Focussed Changes to the Replacement LDP.

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

Completed forms should be returned to:

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

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

**Representations must be received by
12 midnight on Monday 4th March 2019.**

Representations received after this time will not be considered.

FOCUSED CHANGES CONSULTATION REPORT**Annex – Soundness Tests**

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) 2016-2031 will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

In this context 'sound' may be considered within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are explained in the table below. More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance (2015).

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound. Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails and why. This will help the Authority and the Inspector to understand the issues you raise. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

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

**APPENDIX 8: REPLACEMENT LDP FOCUSED CHANGES REPRESENTATIONS AND
COUNCIL RESPONSE REPORTS - BY ISSUE**

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

101 Stevens, Ms Rebekah

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F1/6.5.12/SW2		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC3 - Objection addressed - 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.

Document: FC Written Statement Policies & Proposals, p.23, para.6.5.12

Policy: SW2 Map: FC3: Policy SW2: Provision of affordable housing Issue: FC Affordable Housing-FC Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . Policy SW2: Provision of Affordable Housing

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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F2/6.5.15/SW2		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC4 - Objection addressed, FC supported - establish the affordable housing target set out in Policy SW2: Provision of Affordable Housing and how it was derived.

Document: FC Written Statement Policies & Proposals, p.23, para.6.5.15

Policy: SW2 Map: FC4: Policy SW2: Provision of affordable housing Issue: FC Affordable Housing-FC Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . Policy SW2: Provision of Affordable Housing

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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F2/6.5.15/SW2		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC4 - Objection addressed, FC supported - establish the affordable housing target set out in Policy SW2: Provision of Affordable Housing and how it was derived.
monitoring as advocated in the LDP Manual (Edition 3). The proposed FC is supported.									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F3/6.5.19/SW3		28/12/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC8 - Objection addressed - identify the timing and phasing of housing allocations in Policy SW3.

Document:FC Written Statement Policies & Proposals, p.25,
para.6.5.19

Policy: SW3

Map: FC8: Policy SW3: Sustainably Supplying
New Homes

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F4/6.5.9/SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC9 - Objection addressed - clarification on the spatial distribution of housing by component of supply

Document:FC Written Statement Policies & Proposals, p.25,
para.6.5.9

Policy: SW3

Map: FC9: Policy SW3 & SW1

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . Table 2 - Components of housing supply

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F4/6.5.9/SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC9 - Objection addressed - clarification on the spatial distribution of housing by component of supply

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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F5/6.5.44/SW6		28/02/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC11 - Objection partially addressed - embed the key principles from the framework masterplan into the plan.

Document:FC Written Statement Policies & Proposals, p.32,
para.6.5.44

Policy: SW6

Map: FC11: Policy SW6: Hoover Regeneration
Area

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Comments noted. The Council will work with Welsh Government and Transport for Wales in order to produce an indicative 'concept plan' for inclusion in the LDP Written Statement that clearly illustrates the key principles from the framework masterplan.

Question: 2c **Representation Text**

Representation Text: . Policy SW6: Hoover Strategic Regeneration Area

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.

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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F6//SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC49 - Objection addressed - The proposed FC introduces the housing trajectory and land supply information within the plan which is supported.

Document:FC Written Statement Appendix 2, p.14522

Policy: SW1

Map: FC49: Appendix 2 – Housing Trajectory &
Land Supply Info

Issue: FC Housing Supply-FC Housing Supply

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F6//SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC49 - Objection addressed - The proposed FC introduces the housing trajectory and land supply information within the plan which is supported.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . Appendix 2 – Housing Trajectory and Land Supply Information

The proposed FC introduces the housing trajectory and land supply information within the plan which is supported. Our Deposit representation has been addressed.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F7/6.8.68/EcW		28/12/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC30 - Objection partially addressed - no explanation has been provided as to why a 2km accessible grid connection has been applied instead of the standard 10km used by WG and other LPAs in Wales.

Document: FC Written Statement Policies & Proposals, p.78,
para.6.8.68

Policy: EcW8

Map: FC30: EcW8: Renewable Energy &
Monitoring Framework

Issue: FC Renewable Energy-FC Renewable Energy

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council has prepared an updated Renewable Energy Assessment (REA) addendum dated December 2018 (document SD22). This compares the constraints and assumptions used in the solar and wind energy assessments to those suggested in the Welsh Government REA toolkit guidance and has provided additional justification or clarification where required (see pages 11-19 of document SD22).

Whilst the REA addendum provided further details, it is noted that further justification has been requested by Welsh Government to justify the 2km accessible grid connection utilised. The grid connection distance has not been applied to the large scale wind energy assessment. The constraint has been utilised in the smaller scale wind energy and solar energy assessments as specialist renewable energy consultant Regen has advised it is an appropriate constraint based on feedback from developers, evidence of approved solar energy developments and the viability of solar energy developments.

The Council will work with Welsh Government and Regen to provide the required clarification and additional evidence to address the outstanding objection.

Question: 2c **Representation Text**

Representation Text: . Policy EcW8: Renewable Energy

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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F7/6.8.68/EcW		28/12/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC30 - Objection partially addressed - no explanation has been provided as to why a 2km accessible grid connection has been applied instead of the standard 10km used by WG and other LPAs in Wales.

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.

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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
101.F8/6.8.111/Ec		28/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC32 - Objection partially addressed - FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources.

Document:FC Written Statement Policies & Proposals, p.90,
para.6.8.111

Policy: EcW13

Map: FC32: EcW13: Minerals Safeguarding

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: It is noted that the final published version of PPW edition 10 does not require safeguarding of coal resources.

Paragraph 5.10.17 of PPW edition 10 advises that: "the safeguarding of primary coal resources is not required. However, planning authorities, with the exception of National Parks, may wish to safeguard primary coal resources depending on their individual circumstances. Should this be the case, then they would need to include appropriate policies, including those relating to pre-extraction, in their development plans".

PPW edition 10 paragraph 5.14.32 recognises that coal, which has been predominantly used for energy production (now ruled out under paragraph 5.10.14 except in wholly exceptional circumstances), has other specific uses. These include use for industrial purposes in the steel industry, in speciality carbon markets, in the making of concrete and domestic use. As an example, the coal extracted from Ffos-y-fran is currently used in industry in steel manufacture. Therefore, the Council consider it appropriate to retain the safeguarding of primary coal resources in order to protect the finite the nature resource. LDP Policy EcW13 (Minerals Safeguarding) would be applied to consider development proposals in coal safeguarding areas. No changes to the LDP are therefore considered necessary for soundness.

Question: 2c **Representation Text**

Representation Text: . Safeguarding of secondary coal resources deleted

Our Deposit representation (August 2019) made reference to Draft 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.

FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources. We do not object to FC32.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
101.F8/6.8.111/Ec		28/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC32 - Objection partially addressed - FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources.

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.

This is a matter for the LPA to determine. This approach is not contrary to PPW Edition 10.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

103 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F1/6.7.16/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC22 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.55,
para.6.7.16

Policy: EnW2

Map: FC22: Policy EnW2 : Nationally Protected
Sites & Species

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC22

Policy EnW2: Nationally Protected Sites and Species

103.D5//EnW2

103.D12//EnW2

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F2/6.7.27/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC24 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.59,
para.6.7.27

Policy: EnW4

Map: FC24: Policy EnW4: Environmental
Protection

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F2/6.7.27/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC24 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan
FC24									
Policy EnW4: Environmental Protection									
103.D7//EnW4									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F3/6.7.27/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC25 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.59,
para.6.7.27

Policy: EnW4

Map: FC25: Policy EnW4: Environmental
Protection

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC25

Policy EnW4: Environmental Protection

103.D6//EnW4

103.D14//EnW4

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F4/6.8.9/EcW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC26 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.65,
para.6.8.9

Policy: EcW1

Map: FC26: EcW1: Provision of Employment
Land

Issue: FC Economy and Employment-FC Economy and Employment

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F4/6.8.9/EcW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC26 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan:

FC26

Policy EcW1: Provision of employment land

103.D3

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F5/6.8.69/EcW		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC30 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.78,
para.6.8.69

Policy: EcW8

Map: FC30: EcW8: Renewable Energy &
Monitoring Framework

Issue: FC Renewable Energy-FC Renewable Energy

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan:

FC30

Policy EcW8: Renewable Energy and Monitoring Framework

103.D4

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F6//EcW8		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC30 - The study is welcomed, & it is agreed that the search area at Merthyr Rd should be removed. The remaining areas should be retained.

Document:FC Landscape Sensitivity Study, p.78

Policy: EcW8

Map: FC30: EcW8: Renewable Energy & Monitoring Framework

Issue: FC Renewable Energy-FC Renewable Energy

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F7/6.5.40/SW6		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC11 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.32, para.6.5.40

Policy: SW6

Map: FC11: Policy SW6: Hoover Regeneration Area

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC11

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F8/6.5.62/SW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC12 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.38,

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F8/6.5.62/SW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC12 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

para.6.5.62

Policy: SW10

Map: FC12: Policy SW10: Protecting & Improving Open Spaces

Issue: FC Open Spaces-FC Open Spaces

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC12

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F9/6.5.69/SW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC14 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.69

Policy: SW11

Map: FC14: Policy SW11: Sustainable Design & Placemaking

Issue: FC Miscellaneous Policy Matters-FC Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC14

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F10/6.5.69/SW		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC16 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.69

Policy: SW11

Map: FC16: Policy: SW11: Sustainable Design &

Issue: FC Miscellaneous Policy Matters-FC Miscellaneous Policy Matters

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F10/6.5.69/SW		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC16 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Placemaking

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC16

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F11/6.6.10/C		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC18 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.46,
para.6.6.10

Policy: CW1

Map: FC18: Policy CW1: The Historic
Environment

Issue: FC Historic Environment-FC Historic Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC18

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F12/6.6.12/C		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC19 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Document:FC Written Statement Policies & Proposals, p.46,
para.6.6.12

Policy: CW1

Map: FC19: Policy CW1: The Historic
Environment

Issue: FC Historic Environment-FC Historic Environment

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F12/6.6.12/C		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC19 - We note and support the changes proposed to the plan as a result of our comments relating to matters of clarity

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . We note and support the changes proposed to the plan as a result of our comments relating to matters clarity - FC19

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F13/6.7.27/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC21 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.53,
para.6.7.27

Policy: EnW1

Map: FC21: Policy EnW1: Nature Conservation &
Ecosystem Resil

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC21

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F14/6.7.16/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC22 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.55,
para.6.7.16

Policy: EnW2

Map: FC22: Policy EnW2 : Nationally Protected
Sites & Species

Issue: FC Natural Environment-FC Natural Environment

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F14/6.7.16/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC22 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC22

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F15/6.7.25/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC23 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.57,
para.6.7.25

Policy: EnW3

Map: FC23: Policy EnW3: Regionally Important
Geological Sites

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC23

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F16/6.7.31/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC25 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Policies & Proposals, p.59,
para.6.7.31

Policy: EnW4

Map: FC25: Policy EnW4: Environmental

Issue: FC Natural Environment-FC Natural Environment

18/03/2019

Page 14 of 67

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F16/6.7.31/En		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC25 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Protection

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC25

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F17//EnW1		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC45 - We support the following focused changes and are satisfied that they address the representations we made on the Deposit Plan

Document:FC Written Statement Monitoring Framework, p.53

Policy: EnW1

Map: FC45: Section 9 – Monitoring Framework,
LDP Obj. 10

Issue: FC Monitoring Framework-FC Monitoring Framework

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

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

FC45

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F18//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - It is unclear from the conclusions why Site 2 (NE of Trelewis) is not considered of Medium sensitivity.

Document:FC Landscape Sensitivity Study, p.78

Policy: EcW8

Map: FC30: EcW8: Renewable Energy &

Issue: FC Renewable Energy-FC Renewable Energy

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F18//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - It is unclear from the conclusions why Site 2 (NE of Trelewis) is not considered of Medium sensitivity.

Monitoring Framework

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council welcomes the support for the additional evidence prepared in response to NRW's Deposit Plan representation. The following response is provided to the queries and request for clarification on elements of the Landscape Sensitivity study.

In response to Representation 103.F18 regarding Section 12.2 and table 12.3 (the use of medium low sensitivity category), the Council would advise that the assessment of landscape sensitivity matrix makes provision for a medium-low sensitivity category as well as medium, medium-high, high and very high. In the absence of definitive guidance from NRW on Landscape Sensitivity to Solar Farm development, our methodology was modelled on previous work carried out for assessing high level landscape sensitivities in other areas (such as the Landscape Sensitivity Study prepared for the Powys REA that has recently been accepted at Examination).

The matrix methodology has been developed to provide an overall sensitivity score which balances both medium landscape susceptibility and landscape value scores. In the absence of detailed site development proposals that can be assessed, there may remain capacity in the assessed area and therefore a medium-low sensitivity category provides a cautious approach that prevents prejudice against detailed development that may come forward. In the North East Trelewis case this reflects the fact that parts of the search area to the north are of lower landscape value as illustrated in the LANDMAP Evaluation Criteria map on page 30 of the study. The approach is therefore considered to be sufficiently robust for a high level landscape sensitivity assessment.

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F19//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - The concluding text of Site 8 (N of Cefn Coed) should be amended

Document:FC Landscape Sensitivity Study, p.78

Policy: EcW8

Map: FC30: EcW8: Renewable Energy & Monitoring Framework

Issue: FC Renewable Energy-FC Renewable Energy

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F19//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - The concluding text of Site 8 (N of Cefn Coed) should be amended

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council welcomes the support for the additional evidence prepared in response to NRW's Deposit Plan representation. The following response is provided to the queries and request for clarification on elements of the Landscape Sensitivity study.

In response to Representation 103.F19, regarding the landscape sensitivity assessment text for Site 8 North of Cefn Coed, the Council accept that the wording should state "Landscape highly vulnerable to change from the development type" to reflect the "very high" score. Importantly however, this incorrect statement has not affected the conclusion for the site which correctly states that "the landscape is highly vulnerable to change from the development type. No potential for locating the development type".

Question: 2c **Representation Text**

Representation Text: . 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;

- 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'.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
103.F20//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - The title of Site 10 (W of Heolgerrig) states 'Medium', but the text relates to a 'Medium-High' sensitivity.

Document:FC Landscape Sensitivity Study, p.78

Policy: EcW8

Map: FC30: EcW8: Renewable Energy & Monitoring Framework

Issue: FC Renewable Energy-FC Renewable Energy

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council welcomes the support for the additional evidence prepared in response to NRW's Deposit Plan representation. The following response is provided to the queries and request for clarification on elements of the Landscape Sensitivity study.

In response to Representation 103.F20 regarding the Landscape Sensitivity score text for Site 10 West of Heolgerrig, this is a typographical error and the Council agrees that the title should read "Medium-High" to reflect the correct description that follows.

Question: 2c **Representation Text**

Representation Text: . 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;

- 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'.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
103.F20//EcW8		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC30 - The title of Site 10 (W of Heolgerrig) states 'Medium', but the text relates to a 'Medium-High' sensitivity.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

116 Home Builders Federation HBF

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F1/6.5.15/SW2		21/02/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC4 - Objection - The newly inserted wording should be changed to: 'development proposals will deliver up to..'

Document: FC Written Statement Policies & Proposals, p.23,
para.6.5.15

Policy: SW2

Map: FC4: Policy SW2: Provision of affordable
housing

Issue: FC Affordable Housing-FC Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that the wording proposed in FC4 is sufficiently clear and does not consider the proposed change to be necessary.

Question: 2c **Representation Text**

Representation Text: . 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..'

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F2//SW3		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC8 - The HBF are concerned with the reference to 'phasing' and a table which puts start and finish dates against individual sites.

Document: FC Written Statement Policies & Proposals, p.25

Policy: SW3

Map: FC8: Policy SW3: Sustainably Supplying
New Homes

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Although the term 'phasing' is used in the description of FC8 in the schedule of focused changes, the terminology used in the change itself, in the LDP Written Statement, is 'Indicative Delivery Timescale'. There is no formal phasing policy in the Replacement Plan and therefore the supply of sites would not be restricted.

With regard to the timescales contained in Policy SW3, this information reflects the dates included within the LDP housing trajectory and are included as 'indicative' timescales based on the best available information from landowners and developers. This approach is supported by Welsh Government

Question: 2c **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F2//SW3		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC8 - The HBF are concerned with the reference to 'phasing' and a table which puts start and finish dates against individual sites.

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

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F3/6.5.23/SW3		21/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC9 - The changes to the housing supply table are supported, but clarification should be provided as to whether the allocations figure takes into account the sites already built

Document:FC Written Statement Policies & Proposals, p.25,
para.6.5.23

Policy: SW3

Map: FC9: Policy SW3 & SW1

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that Table 2 contained in FC9 provides clarity in terms of the components of housing supply.

The figures in row D outline the number of units remaining on housing allocations excluding completions on allocated sites; units under construction on allocated sites; and units contained in row C of the table (all of which are on allocated sites). These components are shown as separate rows in Table 2 to avoid double counting.

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F4/6.7.25/En		21/02/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC25 - The HBF objects to the additional wording which 'requires' that development should improve water quality.

Document:FC Written Statement Policies & Proposals, p.59,
para.6.7.25

Policy: EnW4

Map: FC25: Policy EnW4: Environmental
Protection

Issue: FC Natural Environment-FC Natural Environment

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F4/6.7.25/En		21/02/2019	<input type="checkbox"/>	E	O	W	M		Summary: FC25 - The HBF objects to the additional wording which 'requires' that development should improve water quality.

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers the proposed changes to be appropriate, as any improvements to water quality will only be required 'where opportunities exist.'

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F5//SW3		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC40 - 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

Document:FC Written Statement Appendix 1, p.25

Policy: SW3

Map: FC40: Section 8 – Site Allocation Details

Issue: FC Infrastructure and Delivery-FC Infrastructure and Delivery

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The wording included has been agreed with DCWW and clearly sets out expectations in terms of delivering water infrastructure on sites.

DCWW have also indicated that they are broadly satisfied with the indicative delivery timescales of the LDP's housing allocations, and that there are unlikely to be any insurmountable constraints in relation to the strategy of the LDP being delivered.

Question: 2c **Representation Text**

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
116.F6//SW3		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC49 - The table should be amended to show the actual agreed figures.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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116.F6//SW3		21/02/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC49 - The table should be amended to show the actual agreed figures.
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Document:FC Written Statement Appendix 2, p.25

Policy: SW3

Map: FC49: Appendix 2 – Housing Trajectory & Land Supply Info

Issue: FC Housing Supply-FC Housing Supply

Question	Representation Texts
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Question:	Rec. by Officers
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Council Response: The housing land supply figures contained in the 2017 and 2018 JHLAS have been calculated against the housing requirement of the current adopted LDP. The purpose of the table contained in FC49 is to indicate the housing land supply based on the housing requirement of the Replacement LDP. Therefore, no change to the trajectory table is considered necessary.

Question: 2c	Representation Text
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Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

119 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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119.F1		28/02/2019	<input type="checkbox"/>	E	S	I	M		Summary: Pleased to see that the Council have taken into consideration our representation on the Deposit Plan, are supportive of the proposed focused changes as set out.
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Document:FC Written Statement

Issue: -General Comments

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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.

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

Representation Text: . 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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119.F2/6.5.40/SW6		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC11 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected
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Document:FC Written Statement Policies & Proposals, p.32,
para.6.5.40

Policy: SW6

Map: FC11: Policy SW6: Hoover Regeneration
Area

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F3/6.5.69/SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC14 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.69

Policy: SW11

Map: FC14: Policy SW11: Sustainable Design & Placemaking

Issue: FC Miscellaneous Policy Matters-FC Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC14

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F4/6.5.69/SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC15 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.69

Policy: SW11

Map: FC15: Policy SW11: Sustainable Design & Placemaking

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC15

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F5/6.5.69/SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC16 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.69

Policy: SW11

Map: FC16: Policy: SW11: Sustainable Design & Placemaking

Issue: FC Miscellaneous Policy Matters-FC Miscellaneous Policy Matters

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC16

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F6/6.7.31/SW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC25 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Policies & Proposals, p.40,
para.6.7.31

Policy: SW11

Map: FC25: Policy EnW4: Environmental Protection

Issue: FC Natural Environment-FC Natural Environment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC25

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F7//SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC38 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Appendix 1, p.25

Policy: SW3

Map: FC38: Section 8 – Site Allocation Details

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC38

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F8//SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC40 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Appendix 1, p.25

Policy: SW3

Map: FC40: Section 8 – Site Allocation Details

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC40

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F9//SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC41 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F9//SW3		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC41 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Appendix 1, p.25

Policy: SW3

Map: FC41: Section 8 – Site Allocation Details

Issue: FC Housing Supply-FC Housing Supply

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC41

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
119.F10//EcW1		28/02/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC42 - the following proposed focused changes are particularly welcomed as they ensure that our infrastructure and the water environment are adequately protected

Document:FC Written Statement Appendix 1, p.65

Policy: EcW1

Map: FC42: EcW1: Provision of Employment Land

Issue: FC Economy and Employment-FC Economy and Employment

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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:

- FC42

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

122 Mineral Products Association Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F1/1.4/		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC51 - Footnote 5 should be updated to recognise the consultation on PPW V10

Document:FC Written Statement Intro, p.1, para.1.4

Map: FC51: All reference to PPW 9 should be updated to PPW10

Issue: -General Comments

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Council will up-date to acknowledge publication of Edition 10.

Question: 2c **Representation Text**

Representation Text: . Footnote 5 - This footnote should be updated to recognise the consultation on PPW V10. Previous representation maintained.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F2/1.12/		01/03/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC1 - We support proposed change to include MTAN, but remain of the opinion that the RTS should also be included.

Document:FC Written Statement Intro, p.3, para.1.12

Map: FC1: Intro para 1.2

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The paragraph is an introductory paragraph which refers to the national policy context the plan is prepared in. It is not considered necessary for soundness to refer to the Regional Technical Statement in this section. It is not national policy but a regional technical statement on aggregates which is referred to under the minerals section of the LDP Written Statement (page 85 onwards).

Question: 2c **Representation Text**

Representation Text: . We support proposed change to include MTAN, but remain of the opinion that the RTS should also be included.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F3/6.5.7/EcW1		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Consider the implications of additional housing and infrastructure on mineral supply.

Document:FC Written Statement Policies & Proposals, p.86, para.6.5.7

18/03/2019

Page 28 of 67

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F3/6.5.7/EcW1		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Consider the implications of additional housing and infrastructure on mineral supply.
Policy: EcW10		Map: Non-FC Rep: Non-FC Rep				Issue: FC Housing Supply-FC Housing Supply			

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D3 and page 22 of the Deposit Plan Consultation report, document SD14).

Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period.

That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.

The Council maintains its position that there are sufficient reserves of minerals to ensure an adequate supply of aggregates throughout the Plan period and appropriate policies have been included in the Plan in accordance with national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves.

Question: 2c **Representation Text**

Representation Text: . The Plan identifies the need for a further 2,250 residential properties but seeks provision for 2,825 properties.

No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements.

Consider the implications of additional housing and infrastructure on mineral supply.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F4/2.11/EcW1		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives

Document:FC Written Statement Context & Key Issues, p.86, para.2.11

Policy: EcW10 Map: Non-FC Rep: Non-FC Rep Issue: FC Minerals-FC Minerals

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F4/2.11/EcW1		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Figure 1 and the Sustainability Appraisal should be amended to reflect both Safeguarding and Supply as recognized in the LDP objectives

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D4 and page 32 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . Figure 1 refers to the "protection" of mineral resources.

Our previous comments from August 2017 referred to the Sustainable Supply of Minerals. The Council's Initial Consultation report, acknowledges this approach. The sustainable management of mineral resources, is not solely about protection (minerals safeguarding) of resources but also about the safeguarding of infrastructure and sustainable supply of minerals to meet society's needs.

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

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F5//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - 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.

Document:FC Written Statement Policies & Proposals, p.86

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D5 and page 119 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . Footnote 27 refers to a document entitled Merthyr Tydfil: Understanding Urban Character Cadw: 2015.

The report referred to, highlights the sources of building stone within the borough. These building stones are important and necessary in order to meet the requirements of Policy CW1: The Historic Environment. These resources are not safeguarded and the provision of such stone not catered for in the minerals policies. It is therefore unclear how the requirements of Policy CW1 can be met.

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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F5//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Amend Policies EcW10 and EcW13 to address the need for the provision and safeguarding of building stone resources and reserves in order to meet the requirements of other policies in the plan.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F6//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Consider the implications of the proposed transport network improvements on mineral supply.

Document:FC Written Statement Policies & Proposals, p.86

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Transport-FC Transport

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D8 and page 70 of the Deposit Plan Consultation report, document SD14).

The LDP includes the heads of the Valleys Road improvement scheme, a Welsh Government proposal, and a range of other minor local transport schemes consistent with the Local Transport Plan. With the exception of these, and new access/estate roads to be provided as part of development sites, there are no other new road building proposals.

Paragraph 3.15.7 of the Sustainability Appraisal Baseline Scoping Report, dated January 2017, recognises the RTS 1st Review recommendations to each mineral planning authority regarding apportionments and the total tonnage of any new allocations, which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period.

That paragraph further states that 'no further allocations for crushed rock are required to be identified within the replacement Merthyr Tydfil LDP as the land bank provides for more than 20 years of aggregates extraction' and that 'there is no apportionment for sand and gravel in South East Wales, due to the region's reliance on marine-dredged aggregates from the Bristol Channel and the Severn Estuary'.

Paragraph 3.15.8 of the Sustainability Appraisal Baseline Scoping Report also notes the recommendations of the RTS 1st Review to encourage "the use of construction, demolition and excavation waste as an alternative to primary land-won aggregates; safeguarding resources of both crushed rock aggregates and land-based sand and gravel; and safeguarding existing railheads in order to provide a full range of sustainable transport options".

Whilst specific reference to the potential impact of transport network improvements on the minerals supply chain has not been made, it is considered that the level of growth would not have a significant impact on the minerals supply of the area. The level of growth in the Replacement LDP has been identified with reference to historic past build rates and there are sufficient reserves to ensure an adequate supply of aggregates throughout the Plan period. Accordingly, appropriate minerals policies have been included in the Plan to satisfy national planning policy. Given the level of planned growth and extent of permitted mineral reserves, there is unlikely to be a significant impact on the supply of minerals and there is no need for additional allocations beyond permitted reserves. It is therefore considered that the implications and requirements of planned growth have been considered.

Question: 2c **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F6//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Consider the implications of the proposed transport network improvements on mineral supply.
Consider the implications of the proposed transport network improvements on mineral supply.									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F7//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Consider the implications of additional 36.65ha of employment land on mineral supply.

Document:FC Written Statement Policies & Proposals, p.86

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D9 and page 127 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . The development of 36.65ha of employment land will inevitably have a demand on raw materials. No assessment is made in the Sustainability Report of the implications on mineral supply chain and raw material requirements.

Consider the implications of additional 36.65ha of employment land on mineral supply.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F8/6.8.88/EcW		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Adapt paragraph 6.8.89 (now 6.8.88) to reflect PPW and reflect the requirements of the RTS and MTAN.

Document:FC Written Statement Policies & Proposals, p.86,
para.6.8.88

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D10 and page 120 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . This paragraph sets out four key point in terms of the role of the plan, but does not truly follow the requirements of the current PPW which are outlined in paragraph 14.7.1 of PPW.

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F8/6.8.88/EcW		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Adapt paragraph 6.8.89 (now 6.8.88) to reflect PPW and reflect the requirements of the RTS and MTAN.
<p>"Development plans should set out the broad strategy for mineral working and related development taking into account the Welsh Government's policies. They should provide a clear guide to where mineral extraction is likely to be acceptable and include policies which protect sensitive environmental features and provide environmental and resource protection. Policies and proposals should relate to identifiable areas of land unless there is a good reason why this is not possible and should cover mineral resources which are currently used or which may need to be used in the foreseeable future." This should be the recognised role of the plan.</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"> • The technical capability of one type of aggregate to interchange for another • The relative environmental cost of substitution of one type of aggregate by another • The relative environmental effects of changing patterns of supply; and • Whether adequate production capacity can be maintained to meet the required level of supply. <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> <p>Adapt paragraph 6.8.89 (now 6.8.88) to reflect PPW and reflect the requirements of the RTS and MTAN.</p>									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F9/6.8.91/EcW		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - 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.

Document:FC Written Statement Policies & Proposals, p.85, para.6.8.91

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question	Representation Texts
Question:	Rec. by Officers
Council Response:	The paragraph is one of a number of introductory paragraphs to the minerals planning policies. Paragraph 6.8.91 seeks to clarify the landbank position and need for new allocations in the LDP in relation to national policy requirements. No further changes to this paragraph are considered necessary for soundness.

Question: 2c	Representation Text
Representation Text:	. This paragraph states that there is no need for further allocations as the two sites indicated have significant crushed rock reserves.
	The purpose of this paragraph is not clear. It is the size of an authority's landbank which is relevant in relation to the need for any allocations in its development plan, not the size of the permitted reserve or end date of the mineral permission at any individual site. The paragraph should be re-written to state that the current RTS (2014) did not require any minimum allocation for the Brecon Beacons National Park and Merthyr.
	Amend text accordingly. Previous representation maintained. This should also acknowledge the review of RTS currently taking place.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F10/6.8.91/Ec		01/03/2019	<input type="checkbox"/>	E	C		M		Summary: FC31 - Amendments made to clarify the land bank position. We acknowledge the proposed changes, but feel these should also acknowledge the review of RTS currently taking place.

Document:FC Written Statement Policies & Proposals, p.86,
para.6.8.91

Policy: EcW10

Map: FC31: Sustainably Supplying Minerals para
6.8.91

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change. Whilst the RTS is under review a draft has not been received and it is not anticipated to be finalised until early 2020. An update to this will be provided by the Council as part of the Examination. No further changes to this paragraph are considered necessary for soundness.

Question: 2c **Representation Text**

Representation Text: . 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.

We acknowledge the proposed changes, but feel these should also acknowledge the review of RTS currently taking place.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F11//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - No reference is made to the supply of building stone to meet the needs of Policy CW1.

Document:FC Written Statement Policies & Proposals, p.86

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D6 and page 124 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . As mentioned above, no reference is made to the supply of building stone to meet the needs of Policy CW1.

Amend Policy accordingly.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F12/6.8398/Ec		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC33 -Clarification of crushed rock landbank requirement

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F12/6.8398/Ec		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC33 -Clarification of crushed rock landbank requirement

Document:FC Written Statement Policies & Proposals, p.86,
para.6.8398

Policy: EcW10

Map: FC33: EcW10: Sustainably supplying
minerals

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . The requirement in Para. 49 of MTAN 1 is that 'a minimum 10-year landbank of crushed rock shall be required during the entire plan period of each development plan'. The supporting text should reflect that.

Change made, no additional comment.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F13//EcW11		01/03/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC34 - Removal of word 'only' from policy text.

Document:FC Written Statement Policies & Proposals, p.88

Policy: EcW11

Map: FC34: EcW11: Mineral Development

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . 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.

Change made & supported.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F14//EcW11		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC35 - Amendments made to criteria to avoid repetition throughout the written statement.

Document:FC Written Statement Policies & Proposals, p.88

18/03/2019

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F14//EcW11		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: FC35 - Amendments made to criteria to avoid repetition throughout the written statement.
Policy: EcW11				Map: FC35: EcW11: Mineral Development				Issue: FC Minerals-FC Minerals	

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . A strong criticism of many Local Development Plans is that they are often too long and repetitive. A number of the "Environmental Criteria" indicated in the bullet points simply repeat the requirements of other Policies in the plan. The second bullet point repeats the considerations of Policy CW1 (Historic Environment) and EnW1 (Nature Conservation), whilst Bullet Point 3 by EnW5 (landscape). The remaining bullet points are largely addressed through Policy EnW4 (Environmental Protection).

Review the bullet points and delete matters which are more appropriately addressed in the other identified policies in the plan.

Change made & supported.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F15/6.8.102/E		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - If no evidence linking non-energy extraction to health impacts on local communities can be provided, paragraph 6.8.103 (now 6.8.102) should be amended.

Document:FC Written Statement Policies & Proposals, p.88,
para.6.8.102

Policy: EcW11 Map: Non-FC Rep: Non-FC Rep Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D16 and page 123 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . The paragraph states that "Mineral extraction can have significant consequences for the environment and on the health and amenity of local communities.

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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F16//EcW12		01/03/2019	<input type="checkbox"/>	E	S	W	M		Summary: FC36 - EcW12 - Policy amended to provide clarity in regard to mineral buffer zones.

Document:FC Written Statement Policies & Proposals, p.89

Policy: EcW12

Map: FC36: Policy EcW12: Minerals Buffer Zones

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: . Policy EcW12

MTAN 1, para. 70 requires and MPPW make it clear that Buffer Zones are to be established "around permitted and allocated mineral extraction sites". Policy EcW12 should be amended to accord with that policy requirement.

Change made & supported.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F17//EcW13		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Amend text and proposals map to include minerals infrastructure and building stone.

Document:FC Written Statement Policies & Proposals, p.90

Policy: EcW13

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D18 and page 125 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . Policy EcW13

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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F18/6.8.112/E		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - Review paragraph 6.8.113 (now 6.8.112) as it is contrary to national policy in PPW.

Document:FC Written Statement Policies & Proposals, p.90,
para.6.8.112

Policy: EcW13

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D19 and page 125 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: Paragraph 6.8.113 (now 6.8.112) 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.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F19//EcW10		01/03/2018	<input type="checkbox"/>	E	S	W	M		Summary: FC48 - Amendment of Indicator 16.1 (now 17.1) to align with MTAN requirements

Document:FC Written Statement Monitoring Framework, p.86

Policy: EcW10

Map: FC48: Section 9 – Monitoring Framework,
LDP Obj. 17

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Support welcomed and comments noted.

Question: 2c **Representation Text**

Representation Text: Monitoring Target: -Maintain a 10-year bank of permitted aggregate reserves.

This does not accord with MTAN1 which requires a minimum landbank of 10 years during the entire period of the plan.

Amend wording to read "Maintain a minimum 10-year landbank of permitted aggregate reserves during the entire period of the development plan".

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F19//EcW10		01/03/2018	<input type="checkbox"/>	E	S	W	M		Summary: FC48 - Amendment of Indicator 16.1 (now 17.1) to align with MTAN requirements
Change made & supported.									

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
122.F20//EcW10		01/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Repeat of previous rep, not related to a focussed change - The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.

Document: FC Written Statement Monitoring Framework, p.86

Policy: EcW10

Map: Non-FC Rep: Non-FC Rep

Issue: FC Minerals-FC Minerals

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The representation does not relate to a focused change but reiterates a representation made during the Deposit Plan consultation (see representation 122.D21 and page 127 of the Deposit Plan Consultation report, document SD14). The Council stands by its previous response and considers the proposed change is unnecessary for soundness.

Question: 2c **Representation Text**

Representation Text: . Trigger Point: - Less than 10 years.

We are concerned that a trigger point which only comes in to effect once the landbank falls below 10 years will not meet the requirement of PPW, MTAN1 and the RTS. The Mineral Products Association surveys its members annually over the time taken to find, secure and release a mineral reserve. Typically, it takes between 5 and 15 years to convert sites from exploration in to active operational sites, almost three years of which is in the planning process.

The trigger proposed is too short and should be extended to reflect the time taken to secure and deliver mineral sites.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

124 The Coal Authority

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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124.F1		04/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: No specific comments to make
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Document:FC Written Statement

Issue: -General Comments

Question	Representation Texts
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Question:	Rec. by Officers
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<i>Council Response:</i>	Response is noted.
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Question: 2c	Representation Text
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<i>Representation Text:</i>	. Thank you for your consultation received on the 21 January 2019 in respect of the above consultation.
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I have reviewed the focussed changes proposed and can confirm that we have no specific comments to make.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

188 Collins, Mr A

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
188.F1		13/02/2019	<input type="checkbox"/>	P	C	W	M		Summary: No comments to make

Document:FC Written Statement

Issue: -General Comments

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: Response is noted.

Question: 2c **Representation Text**

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

207 Merthyr Tydfil Heritage Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F1/6.5.12/SW2		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC3 & FC4 - A new LHMA is urgently needed and should be developed in partnership with local social housing providers / housing charities in the voluntary sector.

Document: FC Written Statement Policies & Proposals, p.23,
para.6.5.12

Policy: SW2

Map: FC3: Policy SW2: Provision of affordable housing

Issue: FC Affordable Housing-FC Affordable Housing

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The current Local Housing Market Assessment (LHMA) has been produced in accordance with the latest Welsh Government guidance and identifies the level and type of affordable housing need across the County Borough. The LHMA covers the time period of 2014-2019. Accordingly, the Replacement LDP has been informed by the latest available study. The Council intends to produce an updated LHMA once the new Common Housing Register has had sufficient time to bed in and provide the required base data.

Question: 2c **Representation Text**

Representation Text: . 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.

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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F1/6.5.12/SW2		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC3 & FC4 - A new LHMA is urgently needed and should be developed in partnership with local social housing providers / housing charities in the voluntary sector.

Representation Text: . Affordable housing

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F2/6.5.9/SW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC9 - The Heritage Trust objects to the adjusted target of 2,820 new homes.

Document:FC Written Statement Policies & Proposals, p.22,
para.6.5.9

Policy: SW1

Map: FC9: Policy SW3 & SW1

Issue: FC Housing Supply-FC Housing Supply

Question Representation Texts

Question: Rec. by Officers

Council Response: A housing requirement of 2250 dwellings was considered amongst a range of other scenarios, and was considered to be an appropriate level of growth by key stakeholders and statutory consultees.

The overall housing provision of 2820 dwellings (which amounts to a 25% flexibility allowance) is also considered to be an appropriate level of flexibility, and has also been supported by key stakeholders and statutory consultees.

The Council therefore considers the overall level of housing provision contained in the LDP to be appropriate.

Question: 2c Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F2/6.5.9/SW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC9 - The Heritage Trust objects to the adjusted target of 2,820 new homes.

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

Question: 3b Subject at Public Examination Hearing

Representation Text: . Housing supply.

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F3/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Objection to turning the Hoover Sports Ground into a car park, shop and community space & to the designation of Pentrebach station as a Metro 'hub'

Document: FC Written Statement Policies & Proposals, p.32,
para.6.5.40

Policy: SW6

Map: FC11: Policy SW6: Hoover Regeneration
Area

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question Representation Texts

Question: Rec. by Officers

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

Question: 2c Representation Text

Representation Text: . 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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.F3/6.5.40/SW6

04/03/2019



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Summary: FC11 - Objection to turning the Hoover Sports Ground into a car park, shop and community space & to the designation of Pentrebach station as a Metro 'hub'

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 Rhydycar 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).

To recap:

Merthyr Tydfil Heritage Trust objects to FC9 as most of the amendments are designed simply to 'puff up' the flawed, cut-down Hoover SRA version 3 (2 previous versions being revised LDP SW6/consultants' masterplan of 2018 and the original HSRA concept used in MTCBC's LDP stakeholder consultations of January/February 2017)

The HSRA needs improvement - it needs to be fit for purpose in the regeneration of all of the wider Hoover site (west and east of the river-bank) for redevelopment with flood risk issues, infrastructure issues, highways and active travel issues, existing unsuitable/potentially polluting/poor quality build and landscaping as well as wider environmental and sustainable development issues all dealt with at the outset instead of at the whim of the private sector uncontrolled or insufficiently controlled by planning policies or planners.

A Metro 'hub' with bus interchange and 'park and ride' should be developed at Brandy Bridge - in fact, the 1.5 hectare former Hoover car park could be used as the 'park and ride' car park.

The 1948 Hoover factory façade should be retained - and integrated into new housing development or high quality business centre.

Claims that the Hoover sports ground is a 'brownfield' site (as promulgated to the Cardiff Capital Region Board via consultants Redstart) should be dropped - it should be adopted as a green open space.

Plans for a convenience store, 'park and ride' car park and housing development on the sports ground should be abandoned (although as an alternative there clearly is room enough to develop the fringes of the sports ground allowing room for the cricket ground to be retained to the necessary first class size for Wales national cricket matches).

Question: 3b

Subject at Public Examination Hearing

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F3/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Objection to turning the Hoover Sports Ground into a car park, shop and community space & to the designation of Pentrebach station as a Metro 'hub'

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F4/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Various objections to changes made as part of the focussed change

Document:FC Written Statement Policies & Proposals, p.32,
para.6.5.40

Policy: SW6

Map: FC11: Policy SW6: Hoover Regeneration
Area

Issue: FC Hoover Strategic Regeneration Area-FC Hoover Strategic Regeneration Area

Question Representation Texts

Question: Rec. by Officers

Council Response: The Council believes that Policy SW6 clearly sets out key principles from the framework masterplan in order to explain how the LDP envisages the site coming forward. The Focused Changes to the policy are considered necessary to guide future redevelopment proposals and to demonstrate how the redevelopment of the strategic site and level of growth will be achieved.

In accordance with comments from Welsh Government, the policy text will be complemented in the LDP Written Statement by an indicative 'concept plan' that will be prepared to further clarify how the site is expected to come forward.

Question: 2c Representation Text

Representation Text: . 1.FC11 Justification: "addition of the placemaking principles from the HSRA framework masterplan"
The Heritage Trust comment is that FC11 includes far more than just the placemaking principles - it adopts detailed proposals wholesale. Effectively it states that "development proposals will be required to include the following proposals". Equally it does not say that "these development proposals must be design in line with the following placemaking principles". This will lead to confusion.

2.FC11 Movement:

The Heritage Trust objection to this amendment is straight forward. A 'park and ride' - a car park - cannot be an "attractive gateway" to Merthyr Tydfil or any location. Building a car park across a grassed cricket pitch/sports ground is not an "upgrade". The proposal is worthy of a "carbuncle of the year" award.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F4/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Various objections to changes made as part of the focussed change
<p>3.FC11 Movement: The suggestion of "a legible environment" with a "clear hierarchy of streets reinforced by landscaping and the built form" does not appear in the main schedule of masterplan "design requirements - although differently worded in the body of the masterplan report. The Heritage Trust view is that this too facilitates confusion - the consultants' masterplan is sufficient as a guide to designers/developers provided given an endorsement as part of revised HSRA proposals.</p> <p>4.FC11 Movement: The Heritage Trust objects to this amendment - as it suggests that there is an existing network of active travel routes and that there are active travel standard connections to the Taff Trail and the Trevithick Trail and that these are also to active travel standard. The Heritage Trust disputes this.</p> <p>5.FC11 Development: The Heritage Trust objects to the inclusion of any suggestion that the 440 dwellings proposed in the HSRA will be provided to meet local needs unless that is amended "to help meet the housing needs of local people". The Heritage Trust also objects to the suggestion now included through FC11 that the 440 new dwellings will provide a "new sustainable mixed use community" i.e. that the housing will be privately developed and then marketed and sold to buyers from outside of the county borough of Merthyr Tydfil.</p> <p>6.FC11 Development: The Heritage Trust objects to the proposal for "high density development, as appropriate" even if near Pentrebach Metro station. The Heritage Trust is aware of design guidance for Metro 'hubs' - also from the consultants who drafted and revised the HSRA masterplan? Pentrebach station is far too constrained by the existing barriers of main and trunk roads and the river to provide a Metro 'hub' - only a small segment of adjacent land is available for housing. In general, high density development is not seen as appropriate in Merthyr Tydfil - given that the local authority has admitted its own past failings and demolished flats and other properties - including modern terraces - on a massive scale.</p> <p>7.FC11 Development The Heritage Trust comments on the proposal for 'public realm' improvements - millions of pounds have already been spent on paving blocks and slabs with what is arguably a low return on investment. And a 'park and ride' car park will still be just a car park.</p> <p>8.FC11 Development The Heritage Trust objects to the proposal to build a retail convenience store on the Hoover sports ground - it is unnecessary as the Co-op store is close by as well as other retail stores like Home Bargains and Iceland in the business/retail park just across the road. A convenience store would be useful as part of a Metro 'hub' / interchange at Brandy Bridge.</p> <p>9.FC11 Development The Heritage Trust objects to the suggestion that developers must "deliver distinctive character areas which create a sense of place". The problem with vague 'back-stop' policies is that they are wide open to interpretation and misinterpretation by planners, designers and developers.</p> <p>10.FC11 Development The Heritage Trust objects to the proposal that "employment zones" are provided that for a "range of employment types" and "adaptable to future need". This is a policy that results in development to the lowest common standard - not to the higher standard needed to provide for quality, well-remunerated and sustainable employment opportunities. We note that Merthyr Tydfil is already - according to ONS reports - the local authority with the lowest median in earnings in Wales.</p> <p>11.FC11 Development The Heritage Trust maintains that the cultural heritage of the 1948 Hoover factory frontage should be retained in new development - and not bulldozed.</p> <p>12.FC11 Development The Heritage Trust points out that modern terraced houses bears very little relation to historic terraced houses - the only similarity probably being that are joined up or linked instead of detached or semi-detached.</p>									

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F4/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Various objections to changes made as part of the focussed change
13.FC11 Development									
The Heritage Trust objects to the suggestion that the development should be a "flagship" of sustainability "where viable". Carbon-low/free builds - for example, to passiv haus standard - are now the norm and should be compulsory. The "re-use of existing employment buildings" (in particular the 1948 Hoover factory façade and its adjuncts) would, of course, be welcome.									
14.FC11 Open Space									
The Heritage Trust comments that retaining the Hoover sports ground / cricket pitch provides the best way of ensuring play and recreation open space for the development on the east bank - there will be an opportunity to develop new community-based outdoor sports and leisure facilities with the existing cricket ground as soon as the site is purchased by the public sector with public funds and this should not be 'fumbled' just to benefit the private sector.									
15.FC11 Open Space									
"Incorporating the river Taff"... and using "the river corridor as green spine that filters into the development" is - in the Heritage Trust's view - total nonsense. The railway line - much of it on an embankment - acts as a complete visual and physical barrier to the eastern bank of the river. It can't be accessed and can't be seen from the housing developments on the Hoover site. This is a relic of the earlier versions of the HSRA that included the west bank.									
16.FC11 Open Space									
"Opening up the riverside" and "creating a pedestrian-friendly movement corridor along it" also only makes sense - in the Heritage Trust's view - if the west bank is re-integrated back into the HSRA. The corridor would need to extend from the Abercanaid footbridge across the river northwards all the way along the west bank through the Willows section of the HSRA to Rhydyar to connect across/through the disused former railway embankment. This corridor should also be a cycle route.									
17.FC11 6.5.40									
Although the only change here is to introduce (HSRA) in the text the Heritage Trust still strongly objects to the inclusion of claims about "Merthyr Tydfil's growing reputation" that seem not to be supported by evidence in any way at all.									
18.FC11 6.5.42									
The Heritage Trust points out that a change suggesting 1.5 hectares of employment land - but the 'headline' figure is still 6.5 hectares of employment land in the HSRA.									
19.FC11 6.5.43									
The Heritage Trust objects to the vision statement being incorporated into the LDP in this way. Pentrebach meaning can be 'little village'. So, 'Little village village'? Obviously, there is already a village called Pentrebach - and proudly so. "A strong waterside environment" when development will actually be next to a railway line? Again that's just a marketing claim.									
20.FC11 6.5.44									
The Heritage Trust comments that there is no need for this duplication. If the placemaking and design requirements are in the masterplan why re-produce them (in part only) in the LDP and why link them to the vision statement. Again confusion may arise and the opportunity for developers to open up cracks and fissures in LDP policy.									
21.FC11 6.5.46									
The amendment here is clear - "physical mitigation" is "likely to be required" where as in the previous version "physical mitigation" should be implemented (the strong implication being that it had to be). The Heritage Trust is of the view that the main reason for the drastic cut-back in the scope and scale of the HSRA is now much less of a certainty. "Further refinements to the HSRA framework masterplan may be necessary" is an addition and one that now should be revised. The necessity / desirability for flood mitigation should be investigated as a matter of urgency and the HSRA masterplan should then be reviewed and amended again so the whole of the original HSRA is included and that the regeneration proposals are revised and re-submitted. The Heritage Trust is of the view that the present masterplan (version 3) and the proposals should be put on hold until there is a clear view of the bigger picture. It is unacceptable that development proposals should be given the go-ahead for one part of the original HSRA when the public sector needs to intervene - at the very least in thorough flood risk testing and potential flood risk mitigation measures – in the wider area (the west bank of the river Taff).									
22.FC11 6.5.47									

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.F4/6.5.40/SW6		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC11 - Various objections to changes made as part of the focussed change
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Again there is the inclusion of a figure of 6.5 hectares - this time for "vacant and underused land" at the Willows/Abercanaid Industrial Estate. The Heritage Trust objects to the proposal that land should be designated for "less vulnerable development" in the C2 flood zone. This is the wrong approach. The flood risk should be assessed thoroughly through the hydraulic modelling referred to until there is clarity and certainty as to what flood mitigation is needed for the whole of the wider HSRA. This sort of proposal is likely to result in future land-use that is unsustainable and likely to be contrary to the sustainability principle (not going ahead with development that restricts the opportunities for future generations).

Question: 3b Subject at Public Examination Hearing

Representation Text: . 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.

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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207.F5//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC12 - Objection to the stipulation that "development proposals that improve the quality, quantity or access to open space will generally be supported"
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Document:FC Written Statement Policies & Proposals, p.38

Policy: SW10

Map: FC12: Policy SW10: Protecting & Improving Open Spaces Issue: FC Open Spaces-FC Open Spaces

Question Representation Texts

Question: Rec. by Officers

Council Response: The wording of Policy SW10 proposed by FC12 enables the Council to both improve and protect open spaces.

The first part of the policy actively supports improvements to open space, whereas the second part of the policy aims to protect open spaces by ensuring that any loss of open space can only take place after satisfying the criteria contained in the policy.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F5//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC12 - Objection to the stipulation that "development proposals that improve the quality, quantity or access to open space will generally be supported"

Question: 2c Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Open Spaces

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F6//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC13 - Objection to the amendment that includes new wording "to conserve and enhance biodiversity and improve access to nature, the following Local Nature Reserves are proposed:"

Document:FC Written Statement Policies & Proposals, p.38

Policy: SW10

Map: FC13: Policy SW10: Protecting & Improving Open Spaces

Issue: FC Open Spaces-FC Open Spaces

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F6//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC13 - Objection to the amendment that includes new wording "to conserve and enhance biodiversity and improve access to nature, the following Local Nature Reserves are proposed."

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council considers that FC13 is appropriate as it clarifies the purpose of Local Nature Reserves.

The Council does however accept that designating the LNRs is a starting point, and the success of the LNRs will be dependent on a number of other factors.

Question: 2c **Representation Text**

Representation Text: . 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.

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

Representation Text: . Local Nature Reserves

Question *Questions of Soundness*

Question: 2a **Soundness Test 1**

Representation Text: .

Question: 2a **Soundness Test 2**

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F6//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC13 - Objection to the amendment that includes new wording "to conserve and enhance biodiversity and improve access to nature, the following Local Nature Reserves are proposed:"

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F7/6.5.79/SW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC16 & FC17 -The amendments - including 'active travel' routes along with bus and train - will not be in the least effective in reducing the 'need to travel'.

Document:FC Written Statement Policies & Proposals, p.40,
para.6.5.79

Policy: SW11

Map: FC17: Policy: SW11: Sustainable Design &
Placemaking

Issue: FC Miscellaneous Policy Matters-FC Miscellaneous Policy Matters

Question	Representation Texts
Question:	Rec. by Officers
<i>Council Response:</i>	The Council considers the changes made under FC16 and FC17 to be appropriate as they reinforce the importance of green infrastructure and active travel within the LDP. These changes are in accordance with updated national planning policy.

Question: 2c Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F7/6.5.79/SW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC16 & FC17 -The amendments - including 'active travel' routes along with bus and train - will not be in the least effective in reducing the 'need to travel'.

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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Active travel

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F8/6.6.10/CW		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC18 - 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

Document:FC Written Statement Policies & Proposals, p.46,
para.6.6.10

Policy: CW1

Map: FC18: Policy CW1: The Historic
Environment

Issue: FC Historic Environment-FC Historic Environment

Question Representation Texts

Question: Rec. by Officers

Council Response: The paragraph sets out the range of assessments that could be referred to when considering development proposals against Policy CW1. It may not be appropriate to prepare assessments for all development proposals depending on the scale, type and location of the proposal.

The Council considers that changing the wording to "where appropriate" would clarify the issue, as this will enable such assessments to be sought where they are not currently available but are considered necessary.

Question: 2c Representation Text

Representation Text: . FC18 Policy CW1:- The Historic Environment

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F8/6.6.10/CW		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC18 - 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

"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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Historic Environment

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F9//EcW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC26 - 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.

Document:FC Written Statement Policies & Proposals, p.65

Policy: EcW1

Map: FC26: EcW1: Provision of Employment Land

Issue: FC Economy and Employment-FC Economy and Employment

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F9//EcW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC26 - 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.

Question Representation Texts

Question: Rec. by Officers

Council Response: In order to facilitate the delivery of the employment land requirement of the LDP strategy (14.46ha), the Council has allocated 30.65ha of employment land across 4 sites, which will provide a sufficient range and choice of sites to the employment market.

The Council considers this approach to be appropriate and does not consider any changes to be necessary.

Question: 2c Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Economy and Employment

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F9//EcW1		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC26 - 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.

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F10/6.8.51/Ec		04/03/2019	<input type="checkbox"/>	E	C	I	M		Summary: FC28 - Re-assurance is sought that this proposal in relation to retail impact assessments does actually work in protecting or supporting the town centre

Document:FC Written Statement Policies & Proposals, p.74,
para.6.8.51

Policy: EcW6

Map: FC28: EcW6: Out-of-Town Retailing Areas

Issue: FC Retail-FC Retail

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The changes made to Policy EcW6 under FC28 have been made in order to clarify when retail impact assessments will be required. The changes made are consistent with national policy and are considered appropriate by the Council.

Question: 2c Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Out-of-town retail

Question *Questions of Soundness*

Question: 2a Soundness Test 1

18/03/2019

Page 56 of 67

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F10/6.8.51/Ec		04/03/2019	<input type="checkbox"/>	E	C	I	M		Summary: FC28 - Re-assurance is sought that this proposal in relation to retail impact assessments does actually work in protecting or supporting the town centre

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F11//SW12		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FCM8 - Objection to both the strategic footpaths/cycle routes map and the active travel routes map - they appear to be inaccurate.

Document:FC Proposals Map, p.43

Policy: SW12

Map: FCM8: Policy SW12, Constraints Map

Issue: FC Transport-FC Transport

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: FCM8 has been proposed in order to clarify the strategic footpath/cycleway routes that are shown on the LDP Constraints Map. The layer now includes designated routes only.

FCM10 has been proposed in order to update the LDP Proposals Map to accurately reflect the approved proposals from the Council's Active Travel Integrated Network Map.

The two layers do not necessarily correspond as they display different information.

Question: 2c Representation Text

Representation Text: . 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Strategic footpaths/cycle routes and active travel routes

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
207.F11//SW12		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FCM8 - Objection to both the strategic footpaths/cycle routes map and the active travel routes map - they appear to be inaccurate.

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

248 Trago Mills Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
248.F1/6.8.27/EcW		28/02/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC27 - Trago Mills should be included together with Cyfarthfa Park as an edge-of-centre facility, or both should be categorised as out-of-town centre

Document: FC Written Statement Policies & Proposals, p.69, para.6.8.27

Policy: EcW3

Map: FC27: Policy EcW3 Retail Hierarchy: Supporting Retailing

Issue: FC Retail-FC Retail

Question Representation Texts

Question: Rec. by Officers

Council Response: The term 'edge of centre' under policy EcW3 has been used to physically describe Cyfarthfa Retail Park, as its location and relationship with Merthyr Tydfil Town Centre does differ from the other out-of-centre retail areas given its proximity to the Town Centre. Trago is further separated by the strategic highway network (A470) and it is not considered appropriate to describe the Trago site as edge of centre.

In terms of how the LDP policies will be applied, Policy EcW6 clearly identifies the four out-of-centre retail areas (i.e. retail areas outside the town and local centres), and Policy EcW3 clearly sets out that any retail proposals outside the defined centres will be subject to the same assessments and tests (assessment of retail need and sequential test). Advice on these assessments is provided at paragraphs 6.8.51 and 6.8.52.

Reference to the Merthyr Tydfil Retail and Commercial Leisure Study (June 2017) is considered to remain appropriate as it sets out the hierarchy and policy approach in Policy EcW3. It also provides a useful reference for future users of the LDP.

Question: 2c Representation Text

Representation Text: 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
248.F1/6.8.27/EcW		28/02/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC27 - Trago Mills should be included together with Cyfarthfa Park as an edge-of-centre facility, or both should be categorised as out-of-town centre

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

Question: 3b Subject at Public Examination Hearing

Representation Text: . FC27 and FC28.

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

271 Cwm Taf LHB

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
271.F1//SW13		04/03/2019	<input type="checkbox"/>	E	C	W	M		Summary: Not related to a focussed change - We are aware of the additional housing pressures in the Merthyr Vale community and have identified the need for replacement primary care premises.

Document: FC Written Statement, p.45

Policy: SW13

Map: Non-FC Rep: Non-FC Rep

Issue: FC Community Facilities-FC Community Facilities

Question *Representation Texts*

Question: **Rec. by Officers**

Council Response: The Council welcomes the response from the Local Health Board, and will be happy to assist in identifying an appropriate site for the premises in the future. In this respect, LDP Policy SW13 supports proposals for new or enhanced community facilities subject to satisfying other relevant LDP Policies.

Question: 2c **Representation Text**

Representation Text: 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

287 Davies, Mr Jim

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
287.F1//SW3		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC6 - Objection to housing allocation SW3.31 - Cwmfelin

Document:FC Written Statement Policies & Proposals, p.25

Policy: SW3

Map: FC6: Policy SW3: Sustainably Supplying New Homes

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

Question Representation Texts

Question: Rec. by Officers

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

Given comments received as part of the consultation on the Replacement Deposit LDP, the Council considered that it would be appropriate to reduce the number of dwellings proposed on the allocation from 50 to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout which took account of the sites topography. The Council maintains the site is a logical and deliverable allocation to meet local housing needs and therefore no changes are proposed.

Question: 2c Representation Text

Representation Text: 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: Housing

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
287.F1//SW3		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FC6 - Objection to housing allocation SW3.31 - Cwmfelin

Question ***Questions of Soundness***

Question: 2a **Soundness Test 2**

Representation Text: .

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

288 Friends of Nant Llwynog Park

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
288.F1//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FCM7 - The new boundaries of the proposed nature reserve area for Nant Llwynog, Bedlinog need to be justified in nature conservation terms, as well as relating to other factors.

Document: FC Proposals Map North East, p.38

Policy: SW10

Map: FCM7: Policy SW10, Proposals Map North East & South East

Issue: FC Local Nature Reserves-FC Local Nature Reserves

Question *Representation Texts*

Question: Rec. by Officers

Council Response: The change to the boundary of the Nant Llwynog LNR corresponds with the amendments to Policy SW10, which clarifies the purpose of LNRs in relation to conserving and enhancing biodiversity, and improving access to nature.

The amended boundary excludes two playing fields and the playground to the South West of the site that were previously included in the 'multifunctional' open space boundary that the proposed LNR is based on. This was to avoid conflict between users and to provide a logical and workable site boundary for the LNR.

The excluded areas do not have significant biodiversity value and the changes would not compromise access to the wider LNR or have a significant impact on the function of the designation.

Therefore, the Council considers that the amendment provides an appropriate boundary for the Nant Llwynog & Coed yr Hendre LNR that balances the benefits of the designation and avoids conflict with more formal leisure and recreational uses.

Question: 2c Representation Text

Representation Text: . 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.

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
288.F1//SW10		04/03/2019	<input type="checkbox"/>	E	O	I	M		Summary: FCM7 - The new boundaries of the proposed nature reserve area for Nant Llwynog, Bedlinog need to be justified in nature conservation terms, as well as relating to other factors.

Question: 3b Subject at Public Examination Hearing

Representation Text: . Protecting and Improving Open Spaces

Question Questions of Soundness

Question: 2a Soundness Test 2

Representation Text: .

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

289 Price, Mr Paul

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
289.F1//SW3		21/02/2019	<input type="checkbox"/>	P	O	I	M		Summary: FC6 - The proposed development on Cwmfelin Slopes (SW3.31) does not meet the Soundness Tests

Document: FC Written Statement Policies & Proposals, p.25

Policy: SW3

Map: FC6: Policy SW3: Sustainably Supplying New Homes

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

Question Representation Texts

Question: Rec. by Officers

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

Given comments received as part of the consultation on the Replacement Deposit LDP, the Council considered that it would be appropriate to reduce the number of dwellings proposed on the allocation from 50 to 30. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside officer in terms of the development's impact on the SINC, and facilitated the principle of an appropriate access and layout which took account of the sites topography. The Council maintains the site is a logical and deliverable allocation to meet local housing needs and therefore no changes are proposed.

Question: 2c Representation Text

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

Test 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

Representations & Council Responses juxtaposed

Merthyr Tydfil County Borough Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=F

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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289.F1//SW3		21/02/2019	<input type="checkbox"/>	P	O	I	M		Summary: FC6 - The proposed development on Cwmfelin Slopes (SW3.31) does not meet the Soundness Tests
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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 LOP, 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.

Question: 3b Subject at Public Examination Hearing

Representation Text: . FC6 in relation to Cwmfelin Slope. SW3.31, incorporating SINC 33. Damage to the environment for both wildlife and local inhabitants.

Question Questions of Soundness

Question: 2a Soundness Test 1

Representation Text: .

Question: 2a Soundness Test 2

Representation Text: .

Question: 2a Soundness Test 3

Representation Text: .