

Merthyr Tydfil
Replacement Local Development Plan (2016-2031)
EXAMINATION

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EXAMINATION MATTERS, ISSUES AND QUESTIONS

Important notes from the Inspector:

The purpose of the examination is to determine whether the [Local Development Plan \(as amended by the Focussed Changes\)](#) is sound in accordance with the tests of soundness set out in the [Local Development Plan Manual Edition 2](#).

This schedule sets out the **matters, issues and questions** on which I seek further written or oral evidence.

If you are a confirmed examination participant and you wish to submit one or more written statements, it is important that you first read the [Examination Guidance Notes](#) on how to do this. Otherwise there is a risk that your further written statement will not be accepted.

If you have any questions please contact the Programme Officer, Tracey Smith.

MATTER 1: PLAN PREPARATION, VISION AND OBJECTIVES

1.1. Preparation and procedural requirements

- a. Has the Plan been prepared in accordance with the approved Delivery Agreement and Community Involvement Scheme?
 - i. As per Regulation 9(6)¹, are there reasonable grounds to believe that any deviations have not been likely to prejudice any person's opportunity to be involved in the plan-making process²?
 - ii. Were stakeholders given a fair opportunity to comment on the Preferred Strategy and Deposit Plan during the consultation periods?
- b. Has the Plan been subject to satisfactory Sustainability Appraisal (SA) / Strategic Environmental Assessment, with the likely significant effects on the environment of reasonable alternatives identified, described and evaluated within the SA Report and its Addendum³?
- c. Has the Plan been subject to satisfactory Habitats Regulations Assessment?
- d. Does the evidence⁴ demonstrate that statutory duties conferred on the Council under other legislation have been integrated into the plan-making process, including:
 - i. The well-being duty⁵, and
 - ii. The public sector equality duty⁶?
- e. Does the Plan have regard to current national planning policy including Planning Policy Wales Edition 10 (PPW) and the Wales Spatial Plan?

¹ Of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended)

² Deposit Plan Consultation Report 2018 [SD14] paragraphs 8.8-8.9.

³ Sustainability Appraisal Report June 2018 [SD06] and Addendum December 2018 [SD08]

⁴ Including the Cwm Taf Wellbeing Assessment Consultation Report [SD54] and Equalities Impact Assessment Briefing Paper [ED007b]

⁵ Well-being of Future Generations (Wales) Act 2015, section 3

⁶ Equality Act 2010, section 149

- f. Does the Plan have regard to other relevant plans and strategies including:
 - i. the Cwm Taf Well-being Plan 2018-2023
 - ii. the Local Transport Plan for the South East Wales Valleys
 - iii. the Cardiff Capital Region Industrial and Economic Growth Plan, and
 - iv. the adopted Local Development Plans of neighbouring authorities?

1.2. Key issues, vision and objectives

- a. Has the Plan adequately captured the key land use issues and opportunities facing the County Borough, including 'areas of concern' outlined in the 2016 Review Report⁷?
- b. Are the vision and objectives consistent with national Key Planning Principles⁸ and will they contribute towards the National Sustainable Placemaking Outcomes⁹?

MATTER 2: PLAN STRATEGY, DELIVERY AND INFRASTRUCTURE

2.1. Plan strategy (including policies SW4 and SW5)

- a. Would the planned distribution of growth support National Sustainable Placemaking Outcomes in all parts of the County Borough?
- b. Has the spatial strategy been formulated in a manner consistent with the site search sequence outlined in Planning Policy Wales Edition 10 (PPW)¹⁰, including in relation to accessibility, previously developed land and 'Best and Most Versatile' agricultural land?
- c. Does policy SW4 set out sufficiently robust assessment criteria for managing the form of the County Borough's settlements?
- d. Policy SW5 permits small scale affordable housing schemes "adjoining settlement boundaries". Should it also apply to small settlements lacking designated boundaries¹¹?

2.2. Delivery and infrastructure

- a. The Council has submitted a schedule of infrastructure required to deliver the Plan¹².
 - i. Is there sufficient certainty regarding the funding and delivery of the required or safeguarded infrastructure identified in the schedule?
 - ii. Should the schedule (in whole or part) be included as a Plan appendix, with delivery of infrastructure monitored against the indicative timescales?
- b. Does the viability evidence adequately take account of policy and legislative requirements on the delivery of site allocations?
- c. What are the practical implications of the new sustainable drainage consenting regime on the delivery of the Plan? Is there evidence to demonstrate that allocated sites could viably support sustainable drainage and be delivered as per assumed timescales¹³?
- d. Is the strategy flexible enough to deal with future changes, including external economic factors?

⁷ Review Report 2016 [SD20] paragraph 2.2

⁸ PPW Figure 3

⁹ PPW Figure 4

¹⁰ PPW paragraphs 3.37 to 3.55

¹¹ PPW paragraph 4.2.34

¹² Replacement LDP Infrastructure Schedule May 2019 [ED007a]

¹³ Council's Response to the Inspector's Initial Letter [ED007]

2.3. Planning obligations (policy SW9)

- a. Is the reference to an "indicative" level of affordable housing in criterion 1 of policy SW9 sufficiently clear?
- b. Paragraph 6.5.59 indicates that open space provision will be determined in accordance with standards included in the Open Space Strategy (OSS)¹⁴.
 - i. Are the standards expressed in the OSS sufficiently clear and/or should they be summarised within the Plan itself?
 - ii. Would Section 106 pooling restrictions or conflicts with infrastructure included on the adopted Community Infrastructure Regulation 123 list prevent the effective application of criterion 3 of policy SW9?

2.4. Transport infrastructure (policy SW12)

- a. The Council has proposed changing Plan paragraph 1.11 to clarify that the Constraints Map does not form part of the Plan¹⁵. As Active Travel routes are designated under the Active Travel (Wales) Act 2013 should approved routes be identified on the Constraints Map rather than the Proposals Map?
- b. Does the Plan support the implementation of schemes identified in the Local Transport Plan¹⁶ and programmed investments by Transport for Wales? Are these adequately captured in the submitted infrastructure schedule¹⁷?
- c. Are the safeguarding designations for the Cwm Bargoed rail line extension to Dowlais Top and the new Metro station at the Hoover Strategic Regeneration Area justified by the transport evidence¹⁸?

MATTER 3: HOUSING

3.1. Housing requirement and affordable housing (policies SW1 and SW2)

- a. Is the housing requirement of 2,250 units over the Plan period appropriate and founded on robust evidence?
- b. Does the identified housing requirement sufficiently respond to Merthyr Tydfil's status as a 'primary key settlement' in the Wales Spatial Plan¹⁹?
- c. The identified affordable housing need for 5,490 dwellings is based on the 2014-19 Local Housing Market Assessment (LHMA)²⁰. What are the practical implications for this Plan, if any, of an updated LHMA not yet being available?

3.2. Housing supply (including policy SW3)

- a. The Plan makes provision for 2,820 homes during the plan period. Is the flexibility allowance of 570 units (around 25% above the requirement) appropriate?
- b. Appendix 1 of the Plan indicates that development is now complete on some site allocations (SW3.2, SW3.12, SW3.13, SW3.18, SW3.27). Some are under construction in whole or part (SW3.25, SW3.26 and SW3.29) and two have full planning permission

¹⁴ Merthyr Tydfil Open Space Strategy June 2016 [SD47]

¹⁵ Council's Response to the Inspector's Initial Letter [ED007]

¹⁶ Including those in Tables 5 and 10 of the SE Wales Valleys Local Transport Plan January [SD40]

¹⁷ Replacement LDP Infrastructure Schedule May 2019 [ED007a]

¹⁸ SE Wales Valleys Local Transport Plan January [SD40]; Hoover SRA Strategic Transport Assessment [SD51]

¹⁹ People, places, futures – The Wales Spatial Plan update 2008, chapter 19

²⁰ SD28

(SW3.16 and SW3.28). Has double-counting been avoided in the calculation of components of housing supply²¹?

- c. Is the large site windfall allowance appropriate? Specifically, has double-counting been avoided where sites gained planning permission prior to being allocated in the current adopted Local Development Plan²²?
- d. Several site allocations which have not commenced implementation have been carried over (in whole or part) from the adopted Local Development Plan²³. For all these sites, delivery timescales (including first housing completions) have been delayed by between 2 and 7 years relative to the adopted Plan, and in most cases unit numbers have been reduced²⁴.
 - i. Is there a realistic prospect of these sites delivering housing units according to the new timescales indicated in the housing trajectory?
 - ii. In combination these sites account for over a third of the Plan's housing requirement. Should these 'carried over' allocations be subject to a specific monitoring indicator which would trigger a partial revision to the Plan or other proactive measures by the Council if they are not progressed as envisaged?
- e. Paragraph 6.5.25 of the Plan states that the number of units proposed for each site is based on an assessment of "appropriate density". Has the right balance been struck between seeking an efficient use of land whilst not overestimating site capacities?

3.3. Specialist housing needs

- a. The LHMA estimates that around 7-20% of new affordable housing will need to be supported or adapted for older people, and that remaining demand for housing suitable for older people should be met by the private sector²⁵. How would the Plan secure housing suitable for older people in all tenures and monitor progress in this area?

MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS

4.1. Housing allocations – general (policy SW3 and Appendix 1)

- a. Does Appendix 1 provide an appropriate level of detail in relation to site allocations?
- b. Appendix 1 states that for allocations typically over 100 dwellings "hydraulic modelling assessments...will be required". Is this justified, and/or should it be expressed as a policy requirement?

4.2. Housing allocations – specific (policy SW3 and Appendix 1)

- a. **SW3.4 Brondeg, Heolgerrig:** Are the boundaries of this site allocation logical, defensible and consistent with Plan objectives?
- b. **SW3.5 Erw Las, Gellideg:** Would the development of this site accord with Plan objectives, including in relation to open space?
- c. **SW3.8 South of Castle Park:** Would the development of this site accord with Plan objectives, including in relation to historic assets and ecology?

²¹ As indicated in Table 2 of the LDP, which uses a base date of 31 March 2018

²² See Background Paper: Housing land supply and trajectory [SD29] paragraph 3.5

²³ SW3.3 Upper Georgetown Plateau; SW3.4 Brondeg; SW3.7 Winchfawr; SW3.8 South of Castle Park; SW3.10 Trevor Close; SW3.14 Pen y Dre Fields; SW3.17 Haydn Terrace; SW3.19 Twynyrodyn; SW3.21 Bradley Gardens 2; SW3.22 Former St Tydfil's Hospital; SW3.31 Cwmfelin; SW3.33 Cilhaul; SW3.34 Oaklands; SW3.35 Clwydyfagwr

²⁴ Housing Land Supply and Trajectory Background Paper [SD29]

²⁵ Merthyr Tydfil Local Housing Market Assessment 2014-19 page 43 [SD28]

- d. **SW3.29 adjacent to Manor View, Trelewis; SW3.30 Stormtown, Trelewis:** Appendix 1 indicates that water supply issues affecting these sites would not be addressed by Dŵr Cymru Welsh Water's Asset Management Plan to 2020. Are they deliverable according to the timescales indicated in the trajectory²⁶?
- e. **SW3.31 Cwmfelin, Bedlinog:** Is this site deliverable according to the trajectory timescale and would its development accord Plan objectives, including in relation to ecology, environmental protection, highway safety and landscape character?
- f. **SW3.34 Oaklands, Treharris:** Would the development of this site accord with Plan objectives, including in relation to open spaces and community facilities; and with broader well-being/placemaking objectives?
- g. **Other non-strategic site allocations (if any)**

4.3. Hoover Strategic Regeneration Area (HSRA) (policy SW6 and Appendix 1)

- a. Is the boundary of the HSRA appropriate? Should it be included on the Proposals Map?
- b. Are the number of residential units and amount of retail floorspace/employment land expressed sufficiently clearly and flexibly in policy SW6?
- c. Should the policy specify the location and amount of open space to be retained or provided within the site?
- d. Are the policy's sustainable placemaking design principles appropriate and consistent with the site allocation details set out in Appendix 1?
- e. Is the extent of land safeguarded for a Metro station sufficiently clear, and is it justified?
- f. Housing completions are anticipated from 2023/24 onwards at a rate of 50 per annum thereafter. Is this lead-in time and delivery rate realistic and reflective of:
 - i. The development constraints identified in Appendix 1, including the Development High Risk Coal Area and potential water/sewerage network improvements
 - ii. The extent of flood risk zones, and
 - iii. The current status of land ownership/acquisition²⁷?

4.4. The Former Ivor Steel Works Regeneration Site (policy SW7)

- a. Is policy SW7 sufficiently clear and effective?

MATTER 5: COMMERCIAL, RETAIL, LEISURE AND TOURISM DEVELOPMENT

5.1. Employment allocations (policy EcW1 and Appendix 1)

- a. Policy EcW1 allocates over 30ha of land for B uses at four locations²⁸. Would these sites be capable of accommodating identified demands for both smaller and larger units²⁹?
- b. Policy EcW1 and Appendix 1 indicate that office floorspace would be permitted at the allocated employment sites.
 - i. Have these locations been sequentially tested³⁰?

²⁶ Housing Land Supply and Trajectory Background Paper [SD29]

²⁷ Paragraph 8.17 of the Employment Land Review 2018 [SD35] indicates that the Welsh Government expects to acquire all land/property held by Hoover Candy by 2019.

²⁸ EcW1.1 Hoover Factory car park; EcW1.2 Goatmill Rd; EcW1.3 Ffos-y-Fran; EcW1.4 S of MT Industrial Park

²⁹ Employment Land Review 2018 [SD35] paragraph 8.13

³⁰ Planning Policy Wales Edition 10 (PPW) paragraph 4.3.21

- ii. Would the development of office floorspace at these locations be contrary to core monitoring indicator 14.3?
- c. The adopted Local Development Plan (LDP) anticipates that the Hoover Factory car park (allocation EcW1.1) would be delivered between 2012-16 and the Ffos-y-Fran site (allocation EcW1.3) between 2017-21³¹. In addition, the ELR notes that uncertainties around access, viability and feasibility make it difficult to determine the quantum of employment land which could be delivered at Ffos-y-Fran³².
 - i. Is there a realistic prospect of these sites delivering the anticipated quantum of employment floorspace within the plan period?
 - ii. Given the Plan's over-allocation of employment land³³ has the suitability of these sites for housing uses (or a mix of uses) been assessed³⁴?
- f. Does monitoring indicator 12.1 provide an effective basis on which to monitor delivery of employment floorspace at all allocated sites? Given the findings of the Review Report³⁵, should *completions* be monitored rather than planning permissions?

5.2. Protecting employment sites (policy EcW2)

- a. Policy EcW2 permits certain changes of use where "it can be demonstrated that the existing use is *inappropriate*". What does this mean in practice?

5.3. Retail hierarchy and centres (policies EcW3, EcW5 and EcW6)

- a. Does policy EcW3 strike an appropriate balance between rigour and flexibility?
- b. Should policy EcW3 also apply to complementary non-retail uses as indicated at paragraph 7.1 of Technical Advice Note (TAN) 4 'Retail and Commercial Development'?
- c. Is the Plan sufficiently clear about how the sequential test would be applied, including for stores selling bulky goods or requiring showrooms³⁶?
- d. The Plan describes both Trago Mills and Cyfarthfa Retail Park as edge-of-centre retail locations³⁷.
 - i. Does this accord with paragraph 7.4 of TAN 4?
 - ii. Does the evidence support either location being identified as 'edge-of-centre'?
- e. The second part of policy EcW5 sets out criteria for assessing changes of use to non-retail uses in the Primary Shopping Area and local centres.
 - i. Are the first two criteria effective?
 - ii. Are the 'or' and 'and' clauses correct and able to be implemented consistently?
 - iii. Should the final criterion seek to protect the viability of existing businesses with reference to the 'agent of change principle' included in PPW³⁸?
- f. Monitoring indicator 14.7 refers to non-residential uses. Should this be non-retail uses?

³¹ Merthyr Tydfil Local Development Plan 2006-2021, Appendix 5

³² Employment Land Review 2018 [SD35] paragraphs 6.41 and 8.53 and Table 31

³³ Employment Land Review 2018 [SD35], based on historic rates of take-up and assuming a 40% plot ratio

³⁴ PPW paragraph 4.2.17

³⁵ Review Report 2016 [SD20] paragraph 2.2

³⁶ PPW paragraphs 4.3.19 and 4.3.23

³⁷ Plan paragraphs 4.40 and 6.8.27

³⁸ PPW paragraphs 4.3.44 and Chapter 6

5.4. Retail supply and allocations (policies EcW4 and SW6)

- a. The evidence³⁹ indicates that the Hoover Strategic Regeneration Area (HSRA) could support around 320sqm of class A use floorspace, but appears to assume a greater quantum of dwellings and employment floorspace than has been allocated at the site.
 - i. In light of this is the quantum of local convenience retail floorspace allocated at the HSRA (409sqm), and its inclusion within a new local centre, justified?
 - ii. Have potential alternative, deliverable sites for accommodating any residual need for retail and commercial leisure floorspace been rigorously and sequentially assessed?

5.5. Tourism development (policy EcW7)

- a. Is the Plan founded on evidence⁴⁰ which adequately considers potential needs for all forms of tourism and leisure development?
- b. Should the potential economic and social benefits of tourism proposals outside settlement boundaries be considered alongside other considerations in policy EcW7?
- c. Would the policy facilitate the provision of complementary tourism developments as sought by national policy⁴¹?

MATTER 6: DEVELOPMENT MANAGEMENT POLICIES 1

6.1. Nature Conservation and Ecosystem Resilience (Policy EnW1)

- a. Does the Plan's definition of 'ecosystem resilience' accord with that set out at paragraph 6.4.21 of Planning Policy Wales Edition 10?

6.2. Nationally Protected Sites and Species (policy EnW2)

- a. Should policy EnW2 refer to sites as well as species within the policy text?
- b. Would this policy be used to assess potential effects on European Sites in neighbouring Local Planning Authorities, and if so should this be stated in paragraph 6.7.16?

6.3. Sites of Importance for Nature Conservation (policy EnW3)

- a. Are the Sites of Importance for Nature Conservation (SINC) designations founded on robust and up-to-date evidence⁴²? Specifically, do the designated areas encompass parcels of land which accord with the selection criteria for each SINC?

6.4. Environmental Protection (policy EnW4)

- a. Would the application of policy EnW4 support national policy objectives including those relating to air quality and soundscape⁴³?

³⁹ Retail and Commercial Leisure Study 2017 [SD30] paragraph 5.45

⁴⁰ Retail and Commercial Leisure Study 2017 [SD30]

⁴¹ PPW paragraph 5.5.6

⁴² Sites of Importance for Nature Conservation Background Paper 2018 [SD27]; Rhydyar West Survey and SINC Assessment 2006 [SD55]

⁴³ Planning Policy Wales Edition 10 (PPW) paragraphs 6.7.2 to 6.7.5

- b. Should the reasoned justification provide greater clarity about how proposals would be assessed where these would have the potential to detrimentally affect air quality or increase exposure within an Air Quality Management Area (AQMA)?
- c. Should indicator 7.4 monitor the application of policy EnW4 with reference to levels of air pollution within AQMAs rather than solely the number of AQMAs?
- d. The final part of policy EnW4 requires proposals to incorporate measures to improve water quality where opportunities exist. Given the separate consenting process for sustainable drainage systems, should the reasoned justification at 6.7.31 explain how this would apply in relation to planning applications?

6.5. Landscape Protection (policy EnW5)

- a. Does the evidence⁴⁴ provide a robust and credible basis for the Special Landscape Area designations, consistent with national policy and guidance⁴⁵?

MATTER 7: DEVELOPMENT MANAGEMENT POLICIES 2

7.1. Open spaces and Local Nature Reserves (policy SW10)

- a. Does policy SW10 apply to all open spaces or only to those identified on the Constraints Map? As the Council has proposed modifications clarifying the non-statutory status of the Constraints Map⁴⁶, should these open spaces be identified on the Proposals Map?
- b. Are the open space standards expressed sufficiently clearly in the Open Space Strategy⁴⁷ and/or should they be summarised within the Plan itself?
- c. Local Nature Reserves (LNRs) are designated under the National Parks and Access to the Countryside Act 1949.
 - i. In light of this what is the purpose of the second part of policy SW10?
 - ii. Is there evidence that the proposed LNRs are likely to achieve designation as LNRs under the 1949 Act in terms of qualifying features and land ownership?
 - iii. Should LNRs be defined on the Constraints Map rather than the Proposals Map?
- d. Are the boundaries of identified open spaces and LNRs justified and defensible?
- e. Would monitoring indicator 5.4 assist in evaluating the effectiveness of policy SW10?

7.2. Sustainable design and placemaking (policy SW11)

- a. Policy SW11 lists 11 criteria which new development *will be required to meet* [my emphasis] irrespective of the scale or nature of the proposal. Is the wording of the policy sufficiently flexible, particularly given that a single application permitted contrary to the policy would fall foul of monitoring target 6.1?
- b. Is the requirement under criterion (4) to "contribute to the provision of green infrastructure" justified in all cases, including, for example, changes of use?
- c. Would the Council's suggested changes to criterion (4) and paragraph 6.5.72⁴⁸ provide sufficient clarity about how the separate sustainable drainage consenting and land use planning considerations would be considered by the relevant authorities?

⁴⁴ Background Paper: Special Landscape Areas [SD26]

⁴⁵ PPW paragraph 6.3.11; LANDMAP Guidance Note 1 – LANDMAP and Special Landscape Areas 2017 (Natural Resources Wales)

⁴⁶ Council's Response to the Inspector's Initial Letter [ED007]

⁴⁷ Merthyr Tydfil Open Space Strategy June 2016 [SD47]

⁴⁸ Council's Response to the Inspector's Initial Letter [ED007]

7.3. Historic environment (policy CW1)

- a. Does the first paragraph of policy CW1 apply only to *designated* historic assets and the second paragraph to *undesigned* assets? If so should this be clarified, including at paragraph 6.6.8 which refers to statements of significance⁴⁹?
- b. Paragraph 6.6.16 refers to a potential "local list" of non-designated structures. Would policy CW1 afford an appropriate level of protection to such assets?
- c. Is it sufficiently clear how policy CW1 would support proposals which could secure an historic asset's survival or provide it with a sound economic future⁵⁰?
- d. The policy states that development within Urban Character Areas "must have regard to their special character".
 - i. Does the evidence⁵¹ justify this level of policy protection?
 - ii. Is the policy wording sufficiently flexible given that a single application permitted contrary to the policy would fall foul of monitoring target 9.2?
- e. Is the identification of two Historic Landscapes as "designated historic environment assets" at paragraph 6.6.6 justified and consistent with national policy guidance⁵²?
- f. Should paragraph 6.6.10 indicate that proposals within Historic Landscapes should be accompanied by character assessments *where appropriate*?
- g. Should the monitoring framework include an indicator on the condition of historic assets (if this information is available)?

7.4. Other policies

- a. Are the following policies sufficiently clear and capable of effective implementation:
 - i. Policy EcW14 (Waste Facilities)?
 - ii. Policy SW13 (Protecting and Improving Community Facilities)

MATTER 8: RENEWABLE ENERGY, MINERALS & MONITORING

8.1. Renewable energy and district heating (policies EcW8 and EcW9)

- a. Are the designated renewable energy Local Search Areas founded on robust evidence⁵³ which accords with national practice guidance⁵⁴?
- b. Policy EcW8 seeks to protect the setting of the Brecon Beacons National Park. Is that consistent with Planning Policy Wales Edition 10 (PPW) paragraph 5.9.17?
- c. Paragraph 6.8.72 of the Plan refers to residential amenity, noise and odour. Should these considerations be expressed within policy EcW8 or are they adequately covered elsewhere?
- d. Should paragraph 6.8.86 state that the energy strategy should include consideration of viability, as is indicated in policy EnW9?

⁴⁹ Technical Advice Note (TAN) 24 'The Historic Environment' paragraphs 1.12 and 1.15

⁵⁰ Planning Policy Wales Edition 10 (PPW) paragraph 6.1.11

⁵¹ Merthyr Tydfil: Understanding Urban Character [SD39]

⁵² TAN 24 paragraphs 7.6 to 7.8 and Annex D

⁵³ Renewable Energy Assessment (2017) and Addendum (2018) [SD21 and SD22]

⁵⁴ Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners

8.2. Minerals (policies EcW10, EcW11, EcW12 and EcW13)

- a. Does the Plan provide an effective framework for managing the County Borough's mineral reserves, consistent with national policy and forecast needs?
- b. Do the safeguarding of the primary coal resource and assessment criteria in policy EcW13 'Minerals Safeguarding' accord with paragraph 5.10.17 of PPW?
- c. Is it sufficiently clear how policy EcW11 'Minerals Development' and its reasoned justification at paragraphs 6.8.104-106 would operate alongside national policy set out at paragraphs 5.10.14-15 of PPW?

8.3. Monitoring framework

- a. Will the monitoring framework enable the Council to track the implementation of the Plan's strategy and policies on an annual basis and, if necessary, trigger a plan revision?

Paul Selby
Inspector

13 May 2019