

Further Representation to the Replacement Merthyr Tydfil Local Development Plan by Rhondda Cynon Taf County Borough Council

Representor Number 154

Further Representations Relating to Matters/Hearing Session 2: Plan Strategy, Delivery and Infrastructure.

1. Further to our representations made to the MTCBC Deposit Replacement LDP, Rhondda Cynon Taf would like to take this opportunity to raise a small number of issues in relation to Matter 2: Plan Strategy, Delivery and Infrastructure, particularly section 2.2 Delivery and Infrastructure of the forthcoming examination; to be subsequently discussed at Hearing 2 on 25th June.
2. Firstly, it is necessary to summarise our representations made to these matters at the Deposit stage of the plan, understood to be reference **154 – D1**.
3. It is noted that there is to be a natural increase in the school age population in Merthyr Tydfil during the plan period (to 2031), whilst the plan also identified the need for 2,250 new houses in the County Borough in this time. Furthermore, it is stated that there is capacity in the existing schools to allow for this development without the need for new schools. A further element of the LDP sets out its intent to support the growth of the Welsh Language in the County Borough.
4. Accordingly, it is considered that the increase in the younger population along with the trend to see greater demand for Welsh medium education will clearly see greater pressure on the capacity of the Welsh medium schools provided for Merthyr Tydfil pupils.
5. However, the secondary medium education provision for Merthyr Tydfil is met by Ysgol Gyfun Rhydywaun in nearby Hirwaun in Rhondda Cynon Taf CBC. This school is already operating at capacity, and cannot accommodate increased pupil numbers associated with the proposed residential and population growth. Current plans to provide necessary extensions and improvements to the school to meet the current capacity issues are in the early stages of development and temporary classrooms have recently been placed on the school site to provide a temporary solution to this growing issue.
6. A proposal to improve and extend a Welsh medium primary school has recently been announced for MTCBC which will inevitably have an impact upon the pupil numbers at YG Rhydywaun, this coupled with additional housing in Merthyr Tydfil can only increase pressure on an already over-subscribed school.
7. The MTBC Deposit Plan does not propose to build a new Welsh medium secondary school, nor does it include a policy to ensure that financial planning obligations are to be secured from new residential permissions to contribute

towards other solutions e.g. extending the capacity and improving the facilities of YG Rhydywaun.

8. The response by MTCBC to our initial representation stated that education is included in the CIL 123 list or otherwise, if removed, that the planning obligations policy could cover other, necessary on-site requirements. We would like to emphasise our concern relating to the certainty that we could ever receive monies from CIL, considering the vast other infrastructure topics that sit on this 123 list.
9. Although it may have been indicated that CIL payment levels are appropriate to allow for viable developments to come forward on the housing allocation, it hasn't been proven that the CIL payments are sufficient to meet all the necessary infrastructure needs. Such needs may need to be made by developers – i.e. the infrastructure costs set out in examination document ED007a, although requirements for greater strategic infrastructure may well be more substantial.
10. This ED007a Infrastructure Schedule document also stated that the *Council's Education Department have confirmed that they are satisfied that the overall level of pupil growth can be accommodated in the County Borough, through a combination of utilising existing capacity, and extensions to existing premises, where appropriate. The detailed proposals for new education facilities are formulated through the 21st Century Schools programme.*
11. Band B of the 21st Century Schools and Education programme can contribute 65% of the capital costs towards delivery of the construction projects and RCTCBC would welcome a collaborative approach with MTCBC to deliver increased capacity and improved education facilities at YG Rhydywaun. Historically however, MTCBC have not contributed funding towards YG Rhydywaun in a capital or revenue capacity, and offers of working collaboratively on past and future projects have not been reciprocated.
12. This presumably includes the non-prioritisation of existing CIL funds. This doesn't indicate with sufficient certainty that the matter will be prioritised in relation to ongoing CIL collected in relation to the Replacement LDP period, and the ongoing and future capacity issues at the school.
13. With regards to the Planning Obligations policy, again, there is no clear certainty how appropriate, necessary 106 agreement payments could be forthcoming. As previously stated, it would be preferable to have a specific criteria in the policy in relation to S106 contributions for Welsh Medium Secondary Education, along with details within an SPG of standard contributions – as set out in our original representations. However, it should be emphasised that this is for future capacity needs, whilst the financial contribution mechanisms for existing capital works requirements at YG Rhydywaun should be agreed now.
14. If these matters can't be appropriately resolved as requested, then we hold a concern from this Welsh medium secondary education perspective, that the

MTCBC Replacement LDP can't appropriately meet the proposed housing growth proposed within it.

15. It is also argued that the needs of the Welsh Language associated with the LDP are also therefore not being sufficiently dealt with.