



Merthyr Tydfil Heritage Trust Ltd

Merthyr Tydfil Replacement Local Development Plan 2016 - 2031

Examination Hearings

Submission by Merthyr Tydfil Heritage Trust

Hearing 1:

General background

Merthyr Tydfil Heritage Trust was founded 40 years ago – it is a charitable trust and limited company run by a membership of volunteers. It has a proud record of helping rescue and restore historic Dowlais Stables (social housing flats), Ynysfach Engine House (a heritage centre currently closed) and 4 Chapel Row, the birthplace of Joseph Parry. It has run museums and education programmes, published booklets, held heritage events and campaigned for heritage.

The Heritage Trust's executive board includes a published historian/master of a Welsh college, a retired GP, two former local authority planning committee chairs – one of them also a former local health board chair – a former head of town planning, a retired engineer, a retired school teacher and a writer/journalist/former local authority communications and PR manager.

We see our role at the public examination hearings as supporting the case for heritage, for the environment (which is also our heritage), for local communities and for the well-being of local people – and also backing up our own previous comments and objections on sites, strategies, plans, policies and partnerships.

We seek to question. That is to test the claims that have been made by, in particular, Merthyr Tydfil County Borough Council who bear the responsibility for the plan preparation, the preparation of a raft of complicated documents (including 10 in June 2018 prior to an online public consultation) and the factual accuracy of the deposit Local Development Plan itself, the 'supporting' paperwork and the evidence or lack of evidence.

We recognise that it is for the Inspector to decide and to rule whether a proposal or a proposition in the LDP is 'sound' or otherwise and to determine what is a 'fit' and what is 'effective'. And what is not.

We maintain that there is more work to be done – as some policies don't have the support of a strong evidence base.



Climate emergency

The Welsh Government has declared a climate emergency in Wales (29 April 2019) and has committed to:

- achieving a carbon neutral public sector in Wales by 2030 and to
- coordinating action to help other areas of the economy make a decisive shift away from fossil fuels.

The declaration sends a clear signal that the Welsh Government wants to tackle climate change because of the threat to health, the economy, infrastructure and the natural environment.

This is important for everyone at all levels of the public sector – and Merthyr Tydfil even though the smallest local authority in Wales is no exception. All local authorities are required to produce an LDP by Welsh Government – in the current round it seems that Merthyr Tydfil CBC is the first to go for a full replacement LDP. We believe that any temptation to sneak past quietly making light of the Welsh Government’s climate emergency, Planning Policy Wales Edition 10, the Well-being of Future Generations Act must be resisted strongly.

“The planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environments and to contribute to the achievement of the well-being goals,” Planning Policy Wales (PPW10).

We agree. The Local Development Plan 2016-2031 should, in our view, take into account the significance of the 2030 carbon neutral commitment.

At the examination stage there should be a strong focus on ensuring that obligations under Planning Policy Wales Edition 10, the Well-being of Future Generations Act, the Active Travel (Wales) Act and, of course, the Historic Environment Wales Act are supported – and making sure the planning system supports the local authority, other public service agencies, the voluntary sector and local communities as well as the private sector. But the private sector too has a role to play. After all, who would have thought the latest B&Q store here would win an award for energy conservation?

This is an opportunity for Merthyr Tydfil to set out its stall as a pioneer with a robust renewable energy policy, better waste management and recycling, active travel networks that encourage all types of non-motorised use, environmentally friendly river management, green open spaces, areas for bio-diversity with habitat protection, parks for local people, recreation spaces and sports grounds.



Merthyr Tydfil Heritage Trust – LDP submission 1

We have found that the submission by Friends of Nant Llwynog Park to be very helpful in identifying key environmental and biodiversity issues. We support their suggestions for being positive but we also stress the need to be ever-vigilant in planning terms right across the LDP policies.

Merthyr Tydfil has great heritage. It has some top-quality natural environment. But unchecked development has ruined much and could ruin more. ‘Act today – benefit in years to come’ may sound good but ‘act in haste repent at leisure’ is probably a more relevant adage for us now.

We have some general submissions we wish to make during the hearings. These are that:

- one central strategy of the LDP – that of building private housing estates that would attract thousands of working-age people to the area – does not seem to be supported by any evidence
- there continues to be a serious flaw in relation to the house-building strategy because – despite the Welsh Government’s request – there is no new Local Housing Market Assessment
- another central strategy – that of allocating large areas of land for employment in the hope that something will turn up – is weak and, unfortunately, means key sites will continue to lie vacant and derelict
- the ‘Hoover Regeneration Strategy Area’ masterplan – probably about to go into its third iteration due to the re-organisation of Hoover Candy following its take-over by Hiaer - needs to be scrapped. In our view, there is no way the report meets the recommendations for a regeneration proposal set out in the Development Plan Manual. The brief for a new plan for the whole (original) HRSA should be re-issued immediately with the priority the development of a new environmentally based river and river tributary SuDS restoration scheme to ‘reclaim’ the River Taff west bank, protect the village of Abercanaid and deliver the already promised green river bank corridor
- the ‘metro for Merthyr Tydfil’ initiative proposed by the Heritage Trust should also be explored with the town area pioneering new electric buses, links to the Metro with extension routes for its rail and road trams and active travel cycle and pedestrian networks that are actually fit for purpose and comply with Welsh Government expectations and guidance
- revisiting MTCBC’s own Open Spaces Strategy to identify possible sites for facilities ward by ward and then adding those sites to the LDP constraints map. Flag up



potential housing and other development sites on the LDP where they might need to incorporate a community open space or play facility

- identifying and, where possible, protecting potential and actual green corridors to link up the larger green open spaces – many of which are quite isolated
- our previous objections to development on open green urban spaces – many of which are owned by the local authority – and also on green sites outside the settlement boundaries are maintained.

Process of plan production

MTCBC's review of the Local Development Plan in 2016 was mistaken in using out-of-date population projections – with a discrepancy of several thousand upwards of the then-current Welsh Government projections. We wrote to MTCBC to point this out. Although our argument was not accepted the population projections did subsequently change – with MTCBC attributing this to an Excel software package that spat out eight options (Welsh Government projections offer only five.)

An exercise was carried out within the local authority in which predictions of doom and gloom MTCBC services were attached to the (Welsh Government) no-growth and low-growth projections.

The chosen population projection of 63,000 aligned with the previously used 'old' Welsh Government figures.

This all appears to us to be highly unsatisfactory – especially as new house-building figures used by MTCBC seemed to vary with Welsh Government published ones.

MTCBC put forward a theory that population increases in Merthyr Tydfil are related to 24 month surges in new house-building – this had happened at the start and end of the 1980s.

We have found it frustrating that no supporting evidence has been put forward for this or for the formula used to adjust the population projections.

In addition, everyone was hampered during the mainly online public consultation because of an absence of interactive layered mapping on the MTCBC website. Recently this has been available – although the Ordnance Survey layered interactive mapping appears to be limited in availability to council departments.

The online public consultation using the 'Our Cwm Taf' hub has had problems – although it has also 'bedded down' recently. Still content can appear and remain posted when out of date.



Supporting evidence and appraisals/assessments

We have noted that there is no up-to-date Local Housing Market Assessment – despite a Welsh Government request and our own questioning of the validity of MTCBC’s ‘projection’ of the 2014 5-year LHMA to 2031.

We have raised points about supporting evidence – particularly in relation to housing.

Fit with other strategies and plans

The Heritage Trust has noted that PPW10 has laid stress that:

“1.27 LDPs should have regard to the relevant local well-being plans and area statements which have been produced for the area. LDPs must be in general conformity with the NDF and SDP.”

We would be happy to have re-assurances on this at the hearing.

We have noted there appears to have been little shared policy development between MTCBC and neighbouring local authorities on the LDP.

The LDP does not appear to be aligned with the Cwm Taff Well-being Plan over population growth projections – although MTCBC is a lead partner.

We are not convinced that the LDP fits with MTCBC’s own strategies – for example, Open Spaces and Flood Protection Management.

RT 10-06-19