



Merthyr Tydfil Heritage Trust Ltd

Merthyr Tydfil Replacement Local Development Plan 2016 - 2031

Examination Hearings

Merthyr Tydfil Heritage Trust

Submission 2:

Plan strategy, delivery and infrastructure

Policy SW4: Settlement Boundaries

The settlement boundaries proposed appear to be similar to those in the LDP 2006-2021 – with the two neighbouring but quite distinct villages of Pentrebach and Abercanaid lumped into the Merthyr Tydfil Primary Growth Area.

The new LDP clarifies the position of those villages – they are to be swallowed up in a greater Merthyr Tydfil and lose their LDP status as communities. Plymouth Ward is split -for planning purposes. In the ‘dash for growth’ of the LDP 2006-2021 there seemed to be some reasoning for this. The Gethin Tip areas could be redeveloped for private housing extending Abercanaid south and west.

There are strong reasons for resisting the development proposals also. It would mean building homes far out of the town centre and sending traffic on a circuitous route and then through the terraced streets of historic Abercanaid to reach them. Western upslope housing development would mean a further motor transport crossing of the Taff Trail which runs along an historic stretch of the former Glamorganshire Canal raised up above the terraces and their gardens. All this heritage would be at risk with another estate (Anthony’s Grove at the northern end of the main village was built in the late 1970s off the old Graig Road). Possibly the impact on the Taff Trail by housing development could be mitigated if a substantial corridor is left either side of the canal. And a bridge. Or tunnel. But it would remain an area of housing distant from facilities and amenities.

However, it is the loss of community status (in the LDP) for both Abercanaid and Pentrebach that concerns us in this submission. The knock-on from that could be damaging with possibly also the loss of any rural grant funding opportunities that may emerge following the demise of EU aid.

Policy SW5: Affordable Housing Exception Sites

We are concerned that what seems to be a somewhat desperate proposal is being put forward – with apparently no evidence of need and certainly no up-to-date Local Housing Marketing Assessment. If operated it would quickly break down – and the wording of the caveats suggests this. Just beyond the settlement boundaries lies outstanding countryside –



we risk this at our peril. Providing affordable/social housing on the periphery of the town – the primary growth area – and away from community and social facilities also seems unsatisfactory. No doubt the standard rules for any housing development in rural areas could apply if there are exceptional cases.

Deliverability and viability evidence

We are concerned to see both the housing and the employment aspirations of the LDP delivered smoothly and effectively. The housing trajectory is welcome but careful scrutiny of its scheduling may be needed – viability evidence is needed.

Our worry is the past suggestion made by MTCBC in the Joint Housing Land Availability Studies (JHLAS) that because so much land with the potential for so many units of housing is in local authority hands it would be straight forward to ‘hit the ground running’ if there was a sufficient economic upturn.

Our analysis of the JHLAS does not wholly confirm this.

This table of figures from the annual JHLAS reports from 2014 through to 2018 indicates that there may be a problem.

MTCBC Joint Housing Land Availability Studies 2014- 2018

	Units in categories 3&4 – planning stages	MTCBC units in categories 3&4	Survey work
JHLAS 2018	2,200	1,500	Surveys completed – potential 600-700 dwellings
JHLAS 2017	2,100	1,500	Surveys completed – potential 600-700 dwellings
JHLAS 2016	2,317	1,600	Surveys completed (via VVP project) in 2015-16
JHLAS 2015	2,264	1,400	Commissioned surveys of sites 2014-15
JHLAS 2014	2,339	1,400	VVP could lead to 600 more units in 3 years

It appears that no new builds were even started on local authority land. Note that the JHLAS reports were all brief and gave little detail.

On the positive side, it seems that useful survey work has helped to establish which local authority sites have potential.

Viability evidence may be necessary if we are to make anything of the new build housing sites, the housing trajectory or the overall housing targets.



We have to be somewhat concerned about the strategy (business i.e. employment and housing) put forward in the LDP because there is a need for evidence. Statistics for housing in particular are available in abundance and an overview of local and wider market trends could be added as an appendix to an LDP report.

Infrastructure required to support the planned level and distribution of growth

We note that the Inspector has already asked MTCBC to provide the hearings of details of infrastructure proposals.

At this stage we are unsure if that relates to infrastructure on-site only or that of the wider community.

But infrastructure should include the gamut of what our communities need. Highways and public transport but also the active travel network (pedestrian and cycle), water/drainage, electricity, gas, broadband signal and mobile phone coverage. Hard engineering features including bridges, tunnels, bridleways, cycle routes and rights of way should also feature in the assessment.

Large parts of our infrastructure are a legacy of the iron and coal industries. Roads – often re-surfaced tramroads or inclines – were not developed with modern usage in mind. Many bridges are historic – old replacements of originals that failed.

The river system with its tributaries – many culverted now – is subject to flood risk. Our history shows this has always been so. Now with climate change and the hard surfaces of 20th century development the risks of flooding are rising – as MTCBC belatedly seems to have remembered. Yet the Flood Risk Management Strategy (2015) appears to be a warning that nothing can be done unless the local authority is given funding.

We are of the view that infrastructure issues need to be addressed with the local authority working with Welsh Government – bridges, rivers and waterways, active travel routes all need further investigation with plans for long-term renewal and/or improvement.

We are disappointed that there is so little of this reflected in LDP proposals. It is regrettable that land-owners and developers appear to be left as the major funders of renewal not just on their own sites but across the infrastructure. Not that we would not expect them to be making substantial contributions.

Viability assessment work needs to be extended right across the physical, community and natural environment infrastructure. It is disappointing that the LDP does not feature more than basic – sometimes very basic – site infrastructure viability assessments or fit better with other MTCBC reports. An opportunity lost. Ten more years to be wasted?