



Cyngor Bwrdeistref Sirol  
**MERTHYR TUDFUL**  
**MERTHYR TYDFIL**  
County Borough Council

HEARING SESSION 2  
PLAN STRATEGY, DELIVERY AND INFRASTRUCTURE  
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MATTER 2: PLAN STRATEGY, DELIVERY AND INFRASTRUCTURE - HEARING STATEMENT

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## Hearing Session 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?**

Yes. The growth strategy of the Replacement LDP requires the delivery of 2,250 dwellings over the 2016 - 2031 Plan period, in order to sustainably grow the County Borough's population by 8% to approximately 64,000 by 2031. To deliver this level of planned growth, provision has been made for 2,820 new dwellings (including a flexibility allowance of approximately 25%).

The spatial strategy focuses on regeneration opportunities at the 'Hoover Strategic Regeneration Area' (HSRA) at Abercanaid/Pentrebach and the development of other smaller sites across the County Borough, with the majority of new development (i.e. 2,015 new dwellings or 71.4% of the overall supply) taking place in the Primary Growth Area and other realistic and deliverable development opportunities identified in the Other Growth Area (i.e. 805 new dwellings or 28.6% of the overall supply).

The Initial Sustainability Appraisal (ISA) of the Preferred Strategy (section 7 and Appendix 5, Document SD09) identified significant positive impacts for population growth, economic development, transport and infrastructure and also scores positively in terms of housing, communities and human health and the regeneration of brownfield land. Potential negative impacts were identified with regard to environmental impacts associated with population growth, however the level and distribution of new development increases the likelihood of mitigation/compensation being achieved.

The focus of the LDP Strategy on the HSRA at Abercanaid/Pentrebach aims to prioritise the regeneration of the Hoover Factory site and significant brownfield land in Merthyr Tydfil that is largely vacant or underused. The regeneration of the site would build on opportunities provided by planned sustainable transport improvements, in particular improved train service frequency, improvements to Pentrebach Station, park and ride facilities and a potential new metro station to the north of the HSRA. The regeneration of the area would provide approximately 20% of the identified housing requirement over the Plan period as well as additional employment, local retail and open space provision. By focusing future development opportunities at the HSRA the Plan seeks to ensure the redevelopment of the

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former Hoover Factory site and thereby deliver on the National Sustainable Placemaking Outcomes.

The Primary Growth Area (PGA) is based around the principal town of Merthyr Tydfil where the majority of the County Borough's future growth needs will be met (approximately 70%). This element of the strategy seeks to locate the majority of future development close to where a large number of existing services and facilities are located and in areas which are already serviced by good public transport and strategic highways. This focus will also enable the regeneration of previously developed land, as well as the development of greenfield sites where necessary, providing new housing in an area of high housing need (approximately 83% of overall affordable housing need is located in the PGA). A total of 853 dwellings (53%) in the PGA would be located on allocated brownfield sites (e.g. the Hoover Factory Site, Upper Georgetown Plateau, Beacon Heights, Cyfarthfa Mews, Trevor Close, East Street, St Johns Church, Victoria House, Goetre Primary School, Former General Hospital, Former St Peter and Paul Church, Former St Tydfils Hospital, Former Miners Hall, Former Ysgol Santes Tudful & Sandbrook Place). A further 290 dwellings would be located on allocated sites where there has been former industrial activity (e.g. former mining tips) which could be considered as being sites that have regenerated to greenfield status (e.g. Twynyrodyn, Bradley Gardens II, Clwydyfagwr).

The Other Growth Area (OGA) includes the mid valley communities of Troedyrhiw, Aberfan, Merthyr Vale and Bedlinog and the lower valley settlements of Treharris and Trelewis. The smaller proportion of growth identified for this area (approximately 30%) reflects the more limited development opportunities and more marginal development viability in this area whilst aiming to ensure that local housing needs can be addressed over the Plan period (approximately 17% of overall affordable housing need is located in the other growth area). This level of growth also ensures that individual settlements in the lower valley area remain viable by retaining a critical mass of population.

Whilst the OGA has more limited services and facilities than the PGA, it comprises of established settlements with services and facilities and good transport links to the wider region (including bus and rail services). Delivering an element of growth in the OGA also enables the continued regeneration of these settlements through the allocation of brownfield land where appropriate. A total of 176 dwellings (28%) in the OGA would be located on allocated brownfield sites (e.g. Project Riverside and Walters Terrace) with a further 50 dwellings located on former industrial land but which could now be



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considered as being regenerated to greenfield status (e.g. Stormtown, Trelewis).

The Council has provided more detailed justification regarding how the Plan's allocations address local housing need by ward and Growth Area (Table 4, Document SD29 and Table 1, Document SD43). This demonstrates that whilst housing provision and need does not precisely match, the level of housing provision and distribution broadly aligns with the identified need and areas of highest affordable housing need.

Table 2.1 below summarises how the LDP spatial strategy and distribution of growth addresses the wide range of National Sustainable Placemaking Outcomes in all parts of the County Borough.

Table 2.1

<b>National Sustainable Placemaking Outcomes</b>	<b>Replacement LDP Distribution of Growth</b>
<p><b>Creating and Sustaining Communities</b></p> <ul style="list-style-type: none"> <li>• Enables the Welsh language to thrive</li> <li>• Appropriate development densities</li> <li>• Homes and jobs to meet society's needs</li> <li>• A mix of uses</li> <li>• Offers cultural experiences</li> <li>• Community based facilities and services</li> </ul>	<p>The Replacement LDP seeks to locate new development in the Primary Growth Area (approximately 70% of new residential development).</p> <p>The allocation of brownfield land has been prioritised through the allocation of the HRSA which accounts for 20% of the residential allocation. The development comprising of a mix of other uses, including employment retail and new open spaces, has been identified for this area.</p> <p>Overall 46% (1,011 dwellings) are allocated on brownfield sites.</p> <p>To ensure housing needs can be addressed throughout the County Borough and to ensure established lower valley settlements remain viable, by retaining a critical mass of population, a smaller proportion of growth (approximately 30% of new residential development) is located in the OGA.</p>

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<p><b>Making Best Use of Resources</b></p> <ul style="list-style-type: none"> <li>• Makes best use of natural resources</li> <li>• Prevents waste</li> <li>• Prioritises the use of previously developed land and existing buildings</li> <li>• Unlocks potential and regenerates</li> <li>• High quality and built to last</li> </ul>	<p>To make best use of natural resources the Plan seeks to protect land located throughout the County Borough with special geological, ecological and landscape characteristics or features.</p> <p>A key issue of the Plan is the opportunity to regenerate 'large underused/disused brownfield sites', given this, the spatial strategy focuses on regeneration opportunities at the 'Hoover Strategic Regeneration Area' (HSRA) at Abercanaid / Pentrebach and the development of other smaller sites across the County Borough.</p> <p>The Plan also supports the regeneration of local communities across the County Borough directing some growth to post-industrial communities in the mid and lower valley.</p>
<p><b>Maximising Environmental Protection and Limiting Environmental Impact</b></p> <ul style="list-style-type: none"> <li>• Resilient biodiversity and ecosystems</li> <li>• Distinctive and special landscapes</li> <li>• Integrated green infrastructure</li> <li>• Appropriate soundscapes</li> <li>• Reduces environmental risks</li> <li>• Manages water resources naturally</li> <li>• Clean air</li> <li>• Reduces overall pollution</li> <li>• Resilient to climate change</li> <li>• Distinctive and special historic environments</li> </ul>	<p>The spatial distribution of growth supports the aims of maximising environmental protection, and limiting environmental protection, by directing the majority of development towards existing built up areas and avoiding the development of sites that have significant landscape and biodiversity value.</p> <p>The spatial distribution also supports resilience to climate change as no allocations have been proposed on areas deemed to be at risk of flooding on NRW's Development Advice Maps.</p> <p>The distribution also increases the opportunity to successfully integrate green infrastructure as part of new development, as linking a larger number of smaller sites through green infrastructure was considered more appropriate than concentrating on a smaller number of larger strategic sites.</p>
<p><b>Growing Our Economy in a Sustainable Manner</b></p> <ul style="list-style-type: none"> <li>• Fosters economic activity</li> <li>• Enables easy communication</li> <li>• Generates its own renewable energy</li> <li>• Vibrant and dynamic</li> <li>• Adaptive to change</li> <li>• Embraces smart and innovative technology</li> </ul>	<p>The spatial distribution of the LDP strategy enables the economy of Merthyr Tydfil County Borough to grow in a sustainable manner by focussing the majority of growth in the main Merthyr Tydfil settlement, where there are more opportunities for development.</p> <p>The spatial strategy also enables the economy of other areas of the County Borough to grow sustainably by allocating sufficient growth in these areas to retain a critical mass of population that can support new services/facilities. An employment site is allocated in the Other Growth Area in the</p>

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	<p>Replacement LDP, where the current adopted LDP only allocated employment land within the Primary Growth Area.</p> <p>The allocation of the HSRA also enables easy communication with its location capitalising on improvements to the public transport links, and also providing a connection between the Primary and Other Growth Areas.</p>
<p><b>Facilitating Accessible and Healthy Environments</b></p> <ul style="list-style-type: none"> <li>• Accessible and high quality green space</li> <li>• Accessible by means of active travel and public transport</li> <li>• Not car dependent</li> <li>• Minimises the need to travel</li> <li>• Provides equality of access</li> <li>• Feels safe and inclusive</li> <li>• Supports a diverse population</li> <li>• Good connections</li> <li>• Convenient access to goods and services</li> <li>• Promotes physical and mental health and well-being</li> </ul>	<p>The spatial distribution of growth supports the facilitation of accessible and healthy environments in a number of ways.</p> <p>The allocation of housing sites within existing settlements increases the likelihood of the population having access to high quality open space, as well as access to active travel routes and good public transport links, which can help to reduce the dependence on cars.</p> <p>The HSRA will provide a unique opportunity to provide a large amount of housing with excellent public transport links; include a significant amount of high quality open space as part of the development; and capitalise on existing green infrastructure such as the two national cycle routes and strategic footpaths that run to the East and West of the site (although improved links to these routes will be required to maximise their accessibility).</p>

**b. Has the spatial strategy been formulated in a manner consistent with the site search sequence outlined in Planning Policy Wales Edition 10 (PPW)<sup>1</sup>, including in relation to accessibility, previously developed land and 'Best and Most Versatile' agricultural land?**

Yes. The Council's consideration of the spatial strategy options is contained in the Replacement LDP Preferred Strategy, June 2017 (Document SD17), Initial Sustainability Appraisal Report, June 2017 (Document SD09) and Initial Consultation Report, June 2018 (Document SD15). The site search sequence is also summarised in the Site Assessment background paper, June 2018 (Document SD46).

<sup>1</sup> PPW paragraphs 3.37 to 3.55

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Reasonable alternatives for the distribution of growth were presented by the candidate sites submissions received in December 2016 which informed the identification of the spatial strategy. No further suggestions were forthcoming at the steering and working groups held during January and March 2017, and as such three options were selected for detailed consideration.

Each of the options would focus new development within or adjoining the principal town of Merthyr Tydfil and are reflective of the fact that it has the best prospects for sustainable growth and that the majority of development will be focused in this area. The spatial options considered had varying sustainability effects (document SD09) and demonstrate that the Council has considered the site search sequence set out in PPW at paragraphs 3.37 – 3.44.

The Spatial Options considered included:

- **Urban extension in Merthyr Tydfil (Cwm Glo Glyndyrys SSSI) and other small sites.** The majority of housing (up to 1500 dwellings) would be located on an urban extension at Cwm Glo and Glyndyrys Site of Scientific Interest (SSSI) along with associated leisure, retail and tourism development.
- **'Hoover Strategic Regeneration Area' and other small sites.** A significant proportion of housing (up to 1000 dwellings) will be located on the 'Hoover Strategic Regeneration Area' (Abercanaid/Pentrebach) which will also support employment uses and form a key part of the 'South Wales Metro' proposals.
- **Dispersal of small sites across the County Borough** (continuation of adopted LDP strategy). Housing will be located on a number of sites across the County Borough (approx. 50-150 dwellings per site). The majority of these would be situated in the main settlement of Merthyr Tydfil.

The Council's preferred strategy for the Replacement LDP was the 'Hoover Strategic Regeneration Area and other smaller sites' strategy.

With regards to the site search sequence, PPW paragraph 3.39-3.40 advises that:

*3.39 In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. When identifying sites in their development plans planning authorities should consider previously*

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*developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage. It is recognised, however, that not all sites of this nature are suitable for all types of development.*

*3.40 Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements.*

In this respect, the majority of new allocations (32 of the 34 housing allocations, and 3 out of 4 employment allocations) have been made within existing settlement limits. Two housing sites (adjacent to Manor View, Trelewis and South of Castle Park), and one employment site (Ffos y Fran) that are currently located within settlement boundaries under the adopted LDP have been extended into areas adjacent to settlement limits. No site allocations have been made in the open countryside away from established settlements.

With regards to previously developed land, the Replacement LDP spatial strategy also prioritises brownfield site development with 46% (i.e. 1,011 dwellings) of residential allocations being on previously developed land. The two spatial strategy options that were considered but not taken forward would have resulted in a higher proportion of greenfield development and / or settlement extensions due to the nature of available candidate sites promoted (in relation to the urban extension to Merthyr Tydfil) and limited availability of deliverable brownfield site allocations within existing settlements in the mid and lower valley areas (in relation to the dispersal of small sites across the County Borough).

Whilst some greenfield allocations have been necessary these are either located within existing settlement limits or adjoining established settlements. In particular, within the principal town of Merthyr Tydfil that comprises the primary growth area or in other established settlements in the mid and lower valley settlements which comprise the OGA. Of these, 17 of the 34 allocated housing sites (approx. 1184 units) are classed as greenfield sites. However, it should be noted that 6 of these 17 sites (approx. 420 units) have previously been developed or worked in the past, but have sufficiently regenerated and could be classed as greenfield land.

Consequently, the Council considers that it has followed the approach outlined in PPW paragraphs 3.46 and 3.47 by striking a balance between locating development in both the rural and urban areas of the County

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Borough, and has located major generators of travel demand within existing urban areas that are sufficiently served by public transport, building on planned public transport investments in the South Wales Metro. In this respect, the Council has sought to encourage higher densities of development in urban centres and close to the public transport network through site allocations such as the HSRA, Miners Hall and the Former General Hospital.

With regards to 'Best and Most Versatile' agricultural land, there is no grade 1, 2, or 3a agricultural land located within the County Borough. Therefore, the Replacement LDP site search and proposals comply with national policy to protect higher grades of agricultural land.

**c. Does policy SW4 set out sufficiently robust assessment criteria for managing the form of the County Borough's settlements?**

Yes, Policy SW4 clearly identifies the areas with identified settlement boundaries where future development opportunities will be favoured in order to support the County Boroughs' existing settlements and National Sustainable Placemaking Outcomes.

The policy sets out the range of appropriate 'countryside development' that would be permitted outside the identified settlement boundaries in accordance with the aims of PPW paragraph 3.56 regarding new development in the countryside. A Matters Arising Change is proposed however to clarify that tourism, recreation or leisure facilities will be permitted where the need for a countryside location is fully justified in accordance with PPW paragraphs 3.56 and 5.5.1 - 5.5.7 in relation to tourism development.

**Proposed Matters Arising Change**

"Policy SW4: Settlement Boundaries"

To encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined as follows:

Primary Growth Area:

- Merthyr Tydfil
- Trefechan

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Other Growth Areas:

- Troedyrhiw
- Aberfan and Merthyr Vale
- Quakers Yard, Edwardsville, Treharris and Trelewis
- Bedlinog

Outside defined settlement boundaries, proposals will be regarded as 'countryside development' and will not be permitted unless the development:-

- is for the purposes of agriculture or forestry;
- is associated with rural enterprises or the winning and working of minerals;
- is for the re-use, adaptation, or replacement of rural buildings and dwellings;
- supports the expansion of an existing business in the countryside;
- is for ~~low impact~~ tourism, recreation or leisure facilities **where the need for a countryside location is fully justified** ~~in accordance with Policy EcW7;~~
- is for the provision of public utilities, infrastructure or waste management facilities that cannot reasonably be located elsewhere;
- is required for the reclamation or treatment of unstable or contaminated land;
- is for renewable energy in accordance with Policy EcW8;
- is for affordable housing in accordance with Policy SW5;
- or is low impact One Planet Development.

Where 'countryside development' is acceptable in principle, the proposal must also satisfy other relevant plan policies".

**d. Policy SW5 permits small scale affordable housing schemes "adjoining settlement boundaries". Should it also apply to small settlements lacking designated boundaries<sup>2</sup>?**

No, Policy SW5 does not include additional wording with regards to affordable housing schemes at rural settlements without settlement boundaries as there are no such settlements within the County Borough where rural exceptions affordable housing would be appropriate.

There is a small linear development of 10 dwellings located in the countryside to the north of the County Borough at Pontsarn, however the Council does

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<sup>2</sup> PPW paragraph 4.2.34



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not consider that these remote dwellings represent a settlement where new development would be appropriate.

**2.2 Delivery and infrastructure**

**a. The Council has submitted a schedule of infrastructure required to deliver the Plan<sup>3</sup>.**

**i. Is there sufficient certainty regarding the funding and delivery of the required or safeguarded infrastructure identified in the schedule?**

Yes, the Council considers that there is sufficient certainty regarding the funding and delivery of the required and safeguarded infrastructure identified in the infrastructure schedule (Document ED007).

With regard to the site specific infrastructure schedule, the pieces of infrastructure identified in this schedule are required in order to deliver the sites allocated in the Plan for residential and employment uses. All items identified in this schedule are to be funded by the developer, with the majority of requirements taking the form of local highway network improvements. The precise nature of these works on each individual site will be identified through the planning application process, and will need to be carried out as part of the proposed development.

The scale of works proposed on the majority of sites is unlikely to prove onerous, as the types of highway improvement required are likely to be of a similar scale to improvements carried out on sites that have already been delivered. In addition, including indicative costs in the infrastructure schedule will enable developers to factor in these costs as early as possible.

With regard to the additional infrastructure schedule, the items included in this schedule are not required to bring individual allocated sites forward, however delivery of these proposals will contribute towards the achievement and implementation of the LDPs objectives and policies.

Where the information is known, the schedule identifies indicative costs; funding sources; delivery mechanisms; and timescales for delivery. Of the items included in this schedule, funding has been secured on a number of

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<sup>3</sup> Replacement LDP Infrastructure Schedule May 2019 [ED007a]



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proposals, with delivery timescales known for projects such as Active Travel improvements; South Wales Metro improvements; a new central bus station; and the dualling of the A465 trunk road.

**ii. Should the schedule (in whole or part) be included as a Plan appendix, with delivery of infrastructure monitored against the indicative timescales?**

Yes, including the information contained in the Infrastructure Schedule (Document ED007) would provide additional clarity to potential developers regarding potential development costs.

The Council would propose to include the two schedules included in ED007a 'Site Specific Infrastructure Schedule' and 'Additional Infrastructure identified or safeguarded in the LDP' as an appendix to the LDP Written Statement. This change is shown under a proposed Matters Arising Change set out below.

The Council also proposes adding indicators to the LDP monitoring framework to monitor the delivery of the 'Additional Infrastructure identified or safeguarded in the LDP' as part of a proposed Matters Arising Change set out in the Council's Hearing Statement for Matter 8: Renewable Energy, Minerals and Monitoring which incorporates all proposed changes to the Monitoring Framework.

The Council does not consider it necessary to monitor the 'Site Specific Infrastructure Schedule' as the infrastructure identified in this schedule will come forward as part of the development of the individual sites, which will be being monitored through the housing and employment monitoring indicators of the Plan.

**Proposed Matters Arising Change**

Insert the Council's Infrastructure Schedule as a new Appendix as follows:

**Appendix 6 – Infrastructure Schedule**

**The following tables highlight the pieces of infrastructure that are required in order to deliver the housing and employment allocations included in the Plan. Information is included in regard to the types of infrastructure**

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works required; indicative costs and anticipated timescales for delivery.  
This schedule should be considered alongside Appendix 1 – Site Allocation Details.

Site Specific Infrastructure Schedule

Housing Allocations

<u>Policy Ref. / Site Name</u>	<u>Total Dwellings</u>	<u>Item</u>	<u>Indicative Cost</u>	<u>Funding Source</u>	<u>Delivery Mechanism</u>	<u>Timescales</u>
<u>Policy SW3.1 Hoover Factory Site</u>	<u>440</u>	<u>New footbridge/cycle path across the River Taff</u>	<u>£4,200,000</u>	<u>Developer/ Welsh Government</u>	<u>Developer/ Welsh Government</u>	<u>Alongside delivery of housing units during 2026/2027</u>
<u>Policy SW3.2 Sweetwater Park</u>	<u>10</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.3 Upper Georgetown Plateau</u>	<u>50</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.4 Brondeg</u>	<u>50</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required at junction with Heolgerrig Road.</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside initial completions on-site. Scheduled for 2020/21</u>
<u>Policy SW3.5 Erw Las, Gellideg</u>	<u>10</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.6 Beacon Heights</u>	<u>20</u>	<u>FINAL PHASE OF 14 DWELLINGS NOW UNDER CONSTRUCTION. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.7 Winchfawr</u>	<u>20</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.8 South of Castle Park</u>	<u>160</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required along Winchfawr Road.</u>	<u>Over £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process./ Potential contribution from CIL</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside initial completions on-site. Scheduled for 2026/27</u>
<u>Policy SW3.9</u>	<u>19</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				

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<u>Cyfarthfa Mews</u>						
<u>Policy SW3.10 Trevor Close</u>	<u>20</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.11 East Street, Dowlais</u>	<u>10</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Minor highway network improvements required at the site.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2019/20</u>
<u>Policy SW3.12 St Johns Church</u>	<u>20</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.13 Victoria House</u>	<u>19</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.14 Pen y Dre Fields</u>	<u>40</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.15 Goetre Primary School</u>	<u>120</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required within the vicinity of the site</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process./ Potential contribution from CIL</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2028/29</u>
<u>Policy SW3.16 Former Merthyr Care Home</u>	<u>20</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required within the vicinity of the site.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2022/23</u>
<u>Policy SW3.17 Haydn Terrace</u>	<u>40</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.18 Former St Peter and Paul Church, Abercanaid</u>	<u>13</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				

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<u>Policy SW3.19 Twynyrodyn</u>	<u>150</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required along Twynyrodyn Road</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside initial completion of housing units on site. Scheduled for 2023/24</u>
<u>Policy SW3.20 Former Mardy Hospital</u>	<u>114</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required along Glasier Road</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2021/22</u>
<u>Policy SW3.21 Bradley Gardens II</u>	<u>100</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.22 Former St Tydfils Hospital</u>	<u>50</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required within the vicinity of the site</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2021/22</u>
<u>Policy SW3.23 Miners Hall</u>	<u>12</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required within the vicinity of the site</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2022/23</u>
<u>Policy SW3.24 Former Ysgol Santes Tudful</u>	<u>10</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required along Queens Road.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2022/23</u>
<u>Policy SW3.25 Sandbrook Place</u>	<u>12</u>	<u>SITE UNDER CONSTRUCTION. 12 SELF BUILD PLOTS, 11 PLOTS ARE ON-SITE AT PRESENT. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				

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<u>Policy SW3.35</u> <u>Clwydyfagwr,</u> <u>Swansea</u> <u>Road</u>	<u>40</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required along Swansea Road.</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2024/25</u>
<u>Policy SW3.36</u> <u>P and R</u> <u>Motors,</u> <u>Pentrebach</u>	<u>22</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.26</u> <u>Project</u> <u>Riverside</u>	<u>153</u>	<u>DEVELOPMENT NOW UNDER CONSTRUCTION. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.27</u> <u>Railway</u> <u>Close,</u> <u>Walters</u> <u>Terrace</u>	<u>23</u>	<u>SITE NOW COMPLETE. NO FURTHER INFRASTRUCTURE REQUIREMENTS</u>				
<u>Policy SW3.28</u> <u>Opp Kingsley</u> <u>Terrace</u>	<u>12</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.29</u> <u>adj to Manor</u> <u>View,</u> <u>Trelewis</u>	<u>248</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Minor highway network improvements required at the site.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2021/22</u>
<u>Policy SW3.30</u> <u>Stormtown,</u> <u>Trelewis</u>	<u>80</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required within the vicinity of the site</u>	<u>Over £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process./ Potential contribution from CIL</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2023/24</u>
<u>Policy SW3.31</u> <u>Cwmfelin</u>	<u>50</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>				
<u>Policy SW3.33</u> <u>Cilhaul</u>	<u>30</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the</u>	<u>Developer will be required to deliver infrastructure as part of construction</u>	<u>Alongside delivery of housing units on site. Scheduled for 2023/24</u>

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		<u>required along Cilhaul.</u>		<u>planning application process.</u>	<u>of housing development</u>	
<u>Policy SW3.34 Twynygarreg/Oaklands</u>	<u>50</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required around the site.</u>	<u>£50,000 - £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of housing units on site. Scheduled for 2024/25</u>

### Employment Allocations

<u>Policy Ref. / Site Name</u>	<u>Size (ha)</u>	<u>Item</u>	<u>Indicative Cost</u>	<u>Funding Source</u>	<u>Delivery Mechanism</u>	<u>Timescales</u>
<u>Policy EcW1.1 Former Hoover Factory Car Park</u>	<u>1.5</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required around the site.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of the employment use on site. MTCBC Employment Land Review indicates site could come forward in 3-5 years.</u>
<u>Policy EcW1.2 Goatmill Road</u>	<u>16.98</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required around the site.</u>	<u>£0 - £50,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of the employment use on site. MTCBC Employment Land Review indicates site could come forward within 2 years.</u>
<u>Policy EcW1.3 Ffos y Fran</u>	<u>18.85</u>	<u>Standard drainage and ground work infrastructure required to serve the development. Local highway network improvements required around the site.</u>	<u>Over £200,000</u>	<u>Developer. Necessary works will be negotiated and conditioned through the planning application process.</u>	<u>Developer will be required to deliver infrastructure as part of construction of housing development</u>	<u>Alongside delivery of the employment use on site. MTCBC Employment Land Review indicates site likely to come forward in 10-15 years.</u>

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<u>Policy EcW1.4</u> <u>Land South of</u> <u>Merthyr</u> <u>Tydfil</u> <u>Industrial</u> <u>Park</u>	<u>3.1</u>	<u>Standard highways, drainage and ground work infrastructure required to serve the development. No additional costs for any on or off-site infrastructure requirements.</u>
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**The following table lists other infrastructure items identified or safeguarded in the Replacement LDP. The development of individual allocated sites included in the Plan is not reliant on any of the following infrastructure proposals, however delivery of these proposals would contribute towards the achievement of the LDP Objectives.**

<u>Policy Ref. / Proposal</u>	<u>Description</u>	<u>Indicative Cost</u>	<u>Funding Source</u>	<u>Delivery Mechanism</u>	<u>Timescales</u>
<u>Policy SW12.3 – South Wales Metro rail line improvements</u>	<u>Range of improvements along the Merthyr to Cardiff rail line, including installation of passing loops and electrification of the line.</u>	<u>TBC</u>	<u>Welsh Government/ Transport for Wales</u>	<u>Transport for Wales. Proposals will be delivered as part of South Wales Metro Scheme</u>	<u>Due for completion by 2024.</u>
<u>Policy SW12.5 – Park and ride/ Metro Station improvements</u>	<u>Improvements to existing Pentrebach Station including a larger car park; retail floorspace and general station improvements.</u>	<u>TBC (£15m has been secured for a range of projects that includes these proposals)</u>	<u>Welsh Government/ Transport for Wales</u>	<u>Transport for Wales. Proposals will be delivered as part of South Wales Metro Scheme</u>	<u>Due for completion by 2022</u>
<u>Policy SW12.4 – Proposed new Metro Station</u>	<u>Land is safeguarded at the Northern end of the Hoover factory site for a potential new metro station.</u>	<u>TBC</u>	<u>Welsh Government/ Transport for Wales</u>	<u>Transport for Wales</u>	<u>TBC</u>
<u>Policy SW12.1 – Active Travel Route improvements</u>	<u>Improvements to Active Travel routes that have been put forward through the MTCBC Active Travel Integrated Network Map</u>	<u>Total TBC. £365,000 secured for first phase of improvement s</u>	<u>Welsh Government/ MTCBC</u>	<u>MTCBC. Initial improvements will be delivered using first tranche of funding. Due for completion by 2021</u>	<u>The Active Travel proposals cover the period 2018-2033</u>
<u>Policy SW12.2 – New Merthyr Tydfil Central Bus Station</u>	<u>Construction of a new central bus station for Merthyr Tydfil at the former Hollies health centre/ Police Station site.</u>	<u>£9.8m</u>	<u>MTCBC/ Welsh Government (Wales Infrastructure Investment Fund)</u>	<u>MTCBC. New station is a key priority for MTCBC as part of Town Centre and wider regeneration programmes.</u>	<u>Construction to commence Autumn 2019. Completion due 2021.</u>
<u>Policy SW12.8 – A465 dualling</u>	<u>Dualling of the Heads of the Valleys trunk road between Dowlais Top and Hirwaun.</u>	<u>£500m</u>	<u>Welsh Government</u>	<u>Welsh Government. Scheme will form the final phase of long term dualling project.</u>	<u>Construction to commence late 2019. Completion due 2023.</u>

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<u>Policy SW12.7 – Extension of Cwm Bargoed rail line</u>	<u>Land is safeguarded to the North and West of the Cwmbargoed rail line for the potential extension of the existing line to Dowlais Top following the restoration of Ffos y Fran.</u>	<u>TBC</u>	<u>TBC</u>	<u>TBC</u>	<u>TBC</u>
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**b. Does the viability evidence adequately take account of policy and legislative requirements on the delivery of site allocations?**

Yes, the Council considers that the Viability Assessment (Document SD34) informing the Replacement LDP takes account of policy and legislative requirement as far as practically possible. Pages 5 and 6 of document SD34 outline all the assumptions used in the viability appraisals.

Policy compliant levels of affordable housing and Community Infrastructure Levy (CIL) have been factored into the viability assessments on each individual site, and the additional cost of installing fire sprinkler systems has also been included in the assessments. Where appropriate, the cost of provision of on-site open space has also been factored into the relevant site assessment.

Paragraph 4.2.19 of PPW states that “for sites which are key to the delivery of the plan’s strategy a site specific viability appraisal must be undertaken...” In order to comply with this policy requirement, and demonstrate that the strategic site contained in the LDP is deliverable, the Council has carried out a strategic site viability appraisal for the Hoover Strategic Regeneration Area (HSRA) that is appended to this hearing statement at Appendix 1. It must be noted that this appraisal is a high level assessment, aiming to give an indication that the site is economically viable in regard to the development being proposed. A number of the inputs included are indicative as there is a limited amount of definitive information available at this point in time.

The appraisal indicates that the site is financially deliverable taking into account development costs and land values broadly in line with the assumptions included in the broad level viability assessment. The appraisal has factored in assumptions for additional development costs where known, for example, estimated construction costs for a new footbridge, potential costs for addressing land contamination, and demolition costs.



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The land values inputted into the appraisal are values that would be considered reasonable values in order to persuade a landowner to sell land for residential development. The land values for the Hoover Factory site have been set higher than values included for the majority of the sites included in document SD34, and this highlights that there remains a level of economic viability in the HRSA development, even if additional costs were to be identified on top of those identified in the strategic site appraisal.

The new sustainable drainage regime is a new legislative requirement and was not factored directly into the Viability Assessment. Notwithstanding this, costs for physical attenuation works had been assumed for 5 out of the 11 case study sites, where these were considered necessary due to the characteristics of the site.

The assessments of these sites indicate that where drainage attenuation works would be required the development site remained financially viable. These sites are located at a variety of locations across the County Borough, and are of differing sizes, therefore giving a reasonable indication, at this point in time, of the financial implications of any drainage works required.

There have been no local SAB application approvals since the new regime came into effect. Consequently, there is limited case study information available in order to accurately estimate the costs implications of meeting the Sustainable Drainage Standards. It is anticipated that additional costs will be incorporated into typical design and development costs as industry practices develop. Standard S6 of the Statutory Sustainable Drainage Standards (Document ED30) requires that all elements of surface water drainage systems should be designed so that they can be constructed, operated and maintained easily, safely, cost-effectively, in a timely manner, and with the aim of minimising the use of scarce resources and embedded carbon (energy). Furthermore, the Sustainable Drainage statutory guidance (Document ED031) indicates that the incorporation of multi-benefit SuDS can be cost beneficial to developers in even the most constrained sites where systems are considered at an early stage in the design process (paragraph 2.24, ED31).

Consequently, it is considered that any significant cost impacts should be monitored over the Replacement LDP plan period.

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- 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 timescales<sup>4</sup>?**

There is potential for the new drainage regime to have implications on the delivery of the Plan, particularly in regard to the number of dwellings delivered on sites if the drainage solution required takes up a large area of the site.

In order to demonstrate that allocated sites can viably support Sustainable Drainage Systems (SuDs), and deliver the anticipated number of dwellings, the Council has prepared a SuDs Background Paper (ED009) that considers the opportunity for SuDs on each allocated housing and employment site. The paper makes recommendations with regard to potential drainage solutions that may be appropriate on each site, and also identifies whether any changes are required to the site boundaries, or number of dwellings proposed, in order to maximise the likelihood of an appropriate drainage solution being achieved. Two new housing allocations are proposed to take account of the reduction in dwelling numbers proposed for sites SW3.19 – Twynyrodyn and SW3.21 – Bradley Gardens 2, Penyard.

The Council considers that the assumed timescales for delivery of allocations is unlikely to be affected by the new drainage regime, however the housing trajectory has been revised in order to take other changes into account. These changes are addressed in the Council's Hearing Statement for Matter 4: Strategic and Housing Allocations.

- d. **Is the strategy flexible enough to deal with future changes, including external economic factors?**

Yes, the Council considers that there is sufficient flexibility in the strategy to deal with future changes such as external economic factors.

With regard to the housing and employment land provision proposed in the Plan, the Council has made provision for 25% more housing than the requirement of the Plan; and allocated over 30 ha of employment land in comparison to a requirement of 14.46 ha.

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<sup>4</sup> Council's Response to the Inspector's Initial Letter [ED007]

The overall level of growth proposed is based on a long term average rate of house building that has been calculated over a period of time that takes into account both economically buoyant times as well as periods where there has been an economic downturn. Therefore the Council considers that the strategy is both robust and flexible enough to be delivered alongside the wider economic cycles that may arise over a 15 year period.

### **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?**

Yes, the Council considers that the current wording of the policy is appropriate as it gives the Council sufficient flexibility to negotiate appropriate levels of affordable housing.

As the overall affordable housing need will not be met by the LDP, the policies contained within the Plan need to ensure that affordable housing provision is maximised as much as possible. Whilst the Plan seeks to provide developers with as much certainty as possible, there still has to be the flexibility in Policy SW9 to enable levels of affordable housing to be sought, both higher and lower than the levels stated in the policy, when development viability has been taken into consideration.

#### **b. Paragraph 6.5.59 indicates that open space provision will be determined in accordance with standards included in the Open Space Strategy (OSS)<sup>5</sup>.**

##### **i. Are the standards expressed in the OSS sufficiently clear and/or should they be summarised within the Plan itself?**

Whilst the Council considers that the standards expressed in the Open Space Strategy (OSS) are sufficiently clear, it is considered that amending Policy SW9 to include a reference to the standards; and including the standards as an Appendix in the Plan, will assist in making the Plan more user-friendly. These

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<sup>5</sup> Merthyr Tydfil Open Space Strategy June 2016 [SD47]

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changes are set out in the proposed Matters Arising Change below in response to question ii.

**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?**

The Council considers that S106 pooling restrictions and Community Infrastructure Levy Regulation (CIL) 123 list (Document ED017) will not prevent the effective application of criterion 3 of Policy SW9. However, removing reference to improvement of open space has been suggested in order to clarify the types of open space provision that will be sought. This change is included in the proposed Matters Arising Change set out below.

Policy SW9 explicitly seeks the on-site provision of open space on sites of 10 dwellings or more. Financial contributions towards the provision/ improvement of open space will not be sought through S106 agreements.

The Regulation 123 list states that CIL can be spent on:

- *“Upgrade existing Leisure facilities provision;*
- *Off-site formal leisure facilities (e.g. Sports pitches and changing facilities, Multi-use games areas, Neighbourhood equipped area for play)”*

Therefore, any funds to be used towards open space from the planning system will be secured through the CIL regime.

**Proposed Matters Arising Change**

Policy SW9: Planning Obligations

Where appropriate and having regard to development viability, planning obligations will be sought for:

1. On site provision of affordable housing on sites of 10 homes or more at an indicative level of:
  - 10% in the Primary Growth Area.
  - 5% in the Other Growth Area.
2. A financial contribution towards the provision of affordable housing:

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- On sites of between 5 and 9 homes or;
  - On sites of 10 or more homes, where on-site provision is not appropriate.
3. The provision ~~and / or improvement~~ of open space on sites of 10 homes or more, **where there is an identified need, and in accordance with the standards identified in Appendix 7.**
4. Other relevant obligations not included within the Council's Community Infrastructure Levy (CIL) Regulation 123 List of Infrastructure (Document ED017).
- 6.5.59 With regard to planning obligations being sought for the provision ~~or improvements~~ of open space, together with appropriate maintenance contributions, these will include the creation of new on-site facilities where there is a quantitative or qualitative deficiency in open space provision in the area. The precise nature of new provision will be identified at planning application stage in accordance with standards included in the **most up to date** Open Space Strategy.

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Insert the Council's open space standards as a new appendix as follows:

**Appendix 7**

**The following standards need to be considered alongside other information contained within the Council's adopted Open Space Strategy.**

<b><u>Minimum Quantity Standards for Open Space Typologies</u></b>	
<b><u>Typology</u></b>	<b><u>Minimum quantity per 1000 population (ha)</u></b>
<b><u>Allotment and Community Growing Space</u></b>	<b><u>0.25</u></b>
<b><u>Amenity Greenspace</u></b>	<b><u>0.80</u></b>
<b><u>Designated equipped play space (LAP)</u></b>	<b><u>0.25</u></b>
<b><u>Informal Playing Space (LEAP)</u></b>	<b><u>0.55</u></b>
<b><u>Children's Playing Space (NEAP)</u></b>	<b><u>0.8</u></b>
<b><u>Multifunctional greenspace</u></b>	<b><u>1.7</u></b>
<b><u>Natural/Semi Natural greenspace</u></b>	<b><u>2.0</u></b>
<b><u>Outdoor sports areas/pitches</u></b>	<b><u>1.15</u></b>
<b><u>Strategic Public Parks or Gardens</u></b>	<b><u>2.04</u></b>
<b><u>Smaller and Major Public Parks or Gardens</u></b>	<b><u>0.54</u></b>

## 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 Plan<sup>6</sup>. 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?**

No, whilst the Integrated Network Map (INM) routes are designated under the Active Travel (Wales) Act 2013 they are proposed routes for improvement that may have land use implications. Planning Policy Wales Edition 10 (paragraph 4.1.32) requires that INM route proposals are identified and safeguarded in the LDP. Consequently, the approved proposed routes are protected under policy SW12 and shown on the Proposals Map. Consequently, no changes are required to Focused Change FCM10.

Existing routes identified on the Active Travel 'Existing Routes Map' (ERM) can however be identified on the Constraints Map. These are separate from the INM routes and are not currently shown on the Proposals or Constraints Map. A proposed matters arising change is therefore attached at Appendix 2 of this statement to include the ERM on the Constraints Map.

To clarify the policy it is proposed to delete reference to 'existing and proposed Active Travel Routes' and replace this with 'Proposed Active Travel Integrated Network Map Routes'.

### **Proposed Matters Arising Change**

#### Policy SW12: Improving the Transport Network

Development that encourages a modal shift towards sustainable transport will be supported, including the enhancement of pedestrian, cycle, rail and bus facilities, in addition to any necessary road improvements. Development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport.

To support the County Borough's transport network the following schemes are proposed:

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<sup>6</sup> Council's Response to the Inspector's Initial Letter [ED007]

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Walking and cycling

1. Existing and ~~p~~Proposed Active Travel Integrated Network Map Routes;

Bus and rail

2. New Merthyr Tydfil Central Bus Station;
3. South East Wales Metro (Merthyr Tydfil Valley line) improvements;
4. Safeguarding of land for a new metro station at the Hoover Strategic Regeneration Area;
5. Pentrebach Rail Station Park and Ride;
6. Safeguarding of the Cwm Bargoed rail line and rail head;
7. Safeguarding of land for the future rail line extension (Cwm Bargoed to Dowlais Top); and,

Highways

8. Safeguarding land for the duelling of the A465 (T) Heads of the Valleys Road.

**b. Does the Plan support the implementation of schemes identified in the Local Transport Plan<sup>7</sup> and programmed investments by Transport for Wales? Are these adequately captured in the submitted infrastructure schedule<sup>8</sup>?**

Yes, the Local Transport Plan (LTP) was published in January 2015 and contains a number of proposals for the 2015-2020 LTP plan period. It identifies other medium and longer term aspirations. The LTP, including the status of schemes identified, is due to be reviewed and updated in 2020.

In accordance with Planning Policy Wales (paragraph 5.3.3 relating to the safeguarding of schemes and paragraphs 5.3.6 to 5.3.13 relating to public transport and the strategic road network) the Replacement LDP has facilitated the provision of public transport infrastructure and other necessary transport schemes including the safeguarding of schemes where appropriate. This has included reviewing the proposals in the January 2015 LTP.

The Replacement LDP has included the following LTP proposals that promote public transport improvements and which are considered to require safeguarding. These schemes have also been included in the Infrastructure Schedule (document ED007a) and include:

- Bus Station Improvement (new town centre bus station)
- Pentrebach Station Park and Ride

<sup>7</sup> Including those in Tables 5 and 10 of the SE Wales Valleys Local Transport Plan January [SD40]

<sup>8</sup> Replacement LDP Infrastructure Schedule May 2019 [ED007a]



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- Active Travel Routes (Integrated Network Map route proposals)

Local highway improvements required for the development of individual site allocations (and to be refined as part of the consideration of detailed development proposals) are also set out in the submitted Infrastructure Schedule. Reference to these will be included for each site at Appendix 1 of the Written Statement as part of a Matters Arising Change proposed in response to question 2.2 above.

Since the publication of the LTP, further details have emerged regarding the South East Wales Metro (to be delivered by Transport for Wales) and other regional public transport proposals. In this respect, the published South East Wales Metro brochure 'Rolling out our Metro' has been submitted as an examination document (ED018). Consequently, it is considered appropriate to include these proposals or where possible to safeguard specific routes in the Replacement LDP. Reference to these schemes has also been included in the Infrastructure Schedule. Policy SW12 additionally identifies:

- South East Wales Metro (Merthyr Tydfil Valley line) improvements;
- Safeguarding of land for a new metro station at the Hoover Strategic Regeneration Area;
- Safeguarding of the Cwm Bargoed rail line and rail head;
- Safeguarding of land for the future rail line extension (Cwm Bargoed to Dowlais Top);

No additional transport proposals (e.g. public transport or highway improvements) have been identified in the Replacement LDP or Infrastructure Schedule. In this respect, the LTP includes a number of schemes that are not considered appropriate or necessary to be identified in the Replacement LDP given that limited information about the schemes is available and it is considered that they are unlikely to be implemented within the Plan period. In particular, this relates to the following schemes originally identified in the January 2015 LTP:

Short term programme to 2020

- Mill Road Highway Improvements.

Medium to longer term aspirations to 2030

- Abercanaid Alternative Road Access;
- Road widening at Pentwyn Road, Quakers Yard to Nelson and
- Bus Rapid Transit Corridor scheme (Aberdare – Merthyr Tydfil – Ebbw Vale – Abergavenny)

With regards to the Abercanaid Alternative Road Access, bridge repair and renovation works to the existing Brandy Bridge was undertaken by the Council in 2017/2018, in order to safeguard its future operation and structural integrity. There are no current proposals for a new road bridge to Abercanaid and the redevelopment of the Hoover Strategic Regeneration Area (HRSA) is not reliant on the provision of a new road bridge. Furthermore, it is unlikely that the HRSA proposals would provide sufficient funding to deliver a new road bridge without additional public sector investment. As the existing Brandy Bridge remains the only road bridge in to Abercanaid, an alternative road access remains a long term aspiration of the Council. However, at present no funding is available and no detailed proposals exist for this scheme.

With regards to the Heads of the Valleys Bus Rapid Transit Corridor (Aberdare – Merthyr Tydfil – Ebbw Vale – Abergavenny) this is identified in the South East Wales Metro proposals under 'Future Phases' (beyond 2023). However, currently there are no details regarding the highway or land implications in order to accurately safeguard the proposal.

Limited details exist in relation to the road widening at Pentwyn Road, Quakers Yard to Nelson and Mill Road highway improvements and there are no proposals to bring forward the schemes during the Plan period.

**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 evidence<sup>9</sup>?**

Yes, the current South East Wales Valleys Local Transport Plan was published in January 2015 and is due to be updated in 2020. In preparing the Replacement LDP the Council has considered a number of additional plans and programmes that have been proposed since the LTP was published.

This includes the Cardiff Capital Region (CCR) City Deal that was agreed in 2016 between the UK Government, the Welsh Government and the ten local authorities in South East Wales to bring about significant economic growth in the region through investment, upskilling, and improved physical and digital connectivity.

As part of the City Deal, one of the main priorities with regards to improved transportation is the delivery of the South Wales Metro. £738million has been

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<sup>9</sup> SE Wales Valleys Local Transport Plan January [SD40]; Hoover SRA Strategic Transport Assessment [SD51]

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pre-allocated for the project, which will be split between the Valley Lines Electrification programme and the wider South Wales Metro scheme.

Whilst the delivery of a new Metro station to the north of the Hoover Strategic Regeneration Area (HSRA) has not been included in the current Transport for Wales train operating franchise agreement (2018-2033), the safeguarding of land for a new Metro station at the Hoover Strategic Regeneration Area has been suggested by Transport for Wales as part of the preparation of the HSRA framework masterplan.

It is understood that the planned track, signalling and frequency improvements would enable additional capacity for new Metro stations on the Merthyr Tydfil line. The safeguarding of the proposal during the plan period would ensure new development at the HSRA would not prevent the proposal could come forward in the future.

In respect of the safeguarding land and planning blight TAN 18 (Transport) advises that:

*“8.22 Where local planning authorities wish to safeguard land for particular transport proposals, including road, rail, light rail or interchange schemes, they should do so through a proposal in the development plan. When the precise route of a proposed new or improved road is known at the time of preparation of development plans, this should be shown on the proposals map as the route to be safeguarded. When the precise route is not known, but where proposals are sufficiently advanced the authority may define on the proposals map the area of land over which it intends to apply a safeguarding policy. The use of diagrammatic lines on the proposals map to illustrate the route should not be used where it would be misleading.*

*8.23 Blight should be kept to a minimum by including in plans only firm schemes on which work will commence within the plan period. Planning authorities should consult with the relevant transport infrastructure authorities to ensure the feasibility of a scheme commencing within the lifetime of a plan. This timescale limitation does not apply to the safeguarding of disused railway lines or disused inland waterways where their re-use for transport purposes may be a realistic possibility after the end of the plan period. The process of preparing or amending development plans should review transport proposals and remove or revise proposals, which have previously been safeguarded and are now revised or abandoned”.*

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Whilst the scheme is not included in the Metro proposals published in 2018, (Document ED018) the Council considers that the new metro station at the Hoover Strategic Regeneration Area (HRSA) is a realistic long term proposal that could come forward as part of future metro improvements. There remains a real possibility that this could take place during the Plan period if additional funding is made available, particularly as development of the HRSA progresses towards the end of the Plan period. If the site adjacent to the existing rail line were not safeguarded, there is a risk that future development proposals could sterilise or prevent the future delivery of a new Metro station close to new residential and employment development.

With regard to the safeguarding of the Cwm Bargoed rail line, there have been discussions at a regional level between Caerphilly CBC and Merthyr Tydfil CBC to reintroduce passenger services to Trelewis as part of potential future metro improvements. The Metro proposals include a possible extension of rail passenger services north of Nelson under the 'Future Phases' (beyond 2023) diagram. Consequently, it is considered there remains a realistic possibility that the scheme could come forward during the Replacement LDP period.

The scheme has also included aspirations for the extension of the existing Cwm Bargoed rail line to Dowlais Top with potential for a new station to serve Dowlais and planned employment developments. In addition, the plateau required for the Cwm Bargoed to Dowlais Top rail line extension has been included in the Ffos Y Fran land restoration scheme which is scheduled to be completed by 2024. A route for the possible future rail line extension is therefore known and safeguarding the land would prevent any inappropriate development. Whilst there are no current proposals to deliver the extension of the rail line, this scheme could be brought forward by future Metro funding during the Plan period. The Council therefore considers that the identified route should be safeguarded on the LDP Proposals Map.

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**Appendix 1: Strategic site viability appraisal for the Hoover Strategic Regeneration Area (HSRA)**

<b><u>Scheme Revenue</u></b>				
	No. units	Size	Sale price	
4 bed detached house	80	120 sqm	£255,000	
3/4 bed townhouse	40	105 sqm	£205,000	
3 bed semi	74	80 sqm	£179,950	
3 bed terrace	54	72 sqm	£165,000	
2 bed terrace	40	65 sqm	£137,500	
2 bed flats	49	45 sqm	£72,500	
1 bed flats	60	38 sqm	£62,500	
1 bed flat (AFFORDABLE)	30	38 sqm	£50,000	Value of units to be transferred to RSL.
2 bed flat (AFFORDABLE)	14	45 sqm	£60,000	
	441 total			
400sqm of convenience retail			£150,000	For the purposes of this high level assessment a minimum estimated value has been used (assuming £1m per hectare minimum benchmark land value for retail and approx. 0.15 hectares of land).
Employment land 1.5 ha			£150,000	Minimum estimated value
<b>TOTAL REVENUE</b>		<b>£66.209m</b>		
<b><u>Scheme Development Costs</u></b>				
build cost house per sqm		£950 (BCIS + 5% + CIL)		5% allowance for external/site works
build cost flats per sqm		£1165 (BCIS + 5% + CIL)		
Cost of sprinklers (£2500 per unit)			£1,100,000	
Physical infrastructure costs	Footbridge		£2,700,000	Costs allowance based on example costs for an iconic cable stayed bridge at £4500 per sqm

**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL  
REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 -2031**

**MATTER 2: PLAN STRATEGY, DELIVERY AND INFRASTRUCTURE - HEARING STATEMENT**

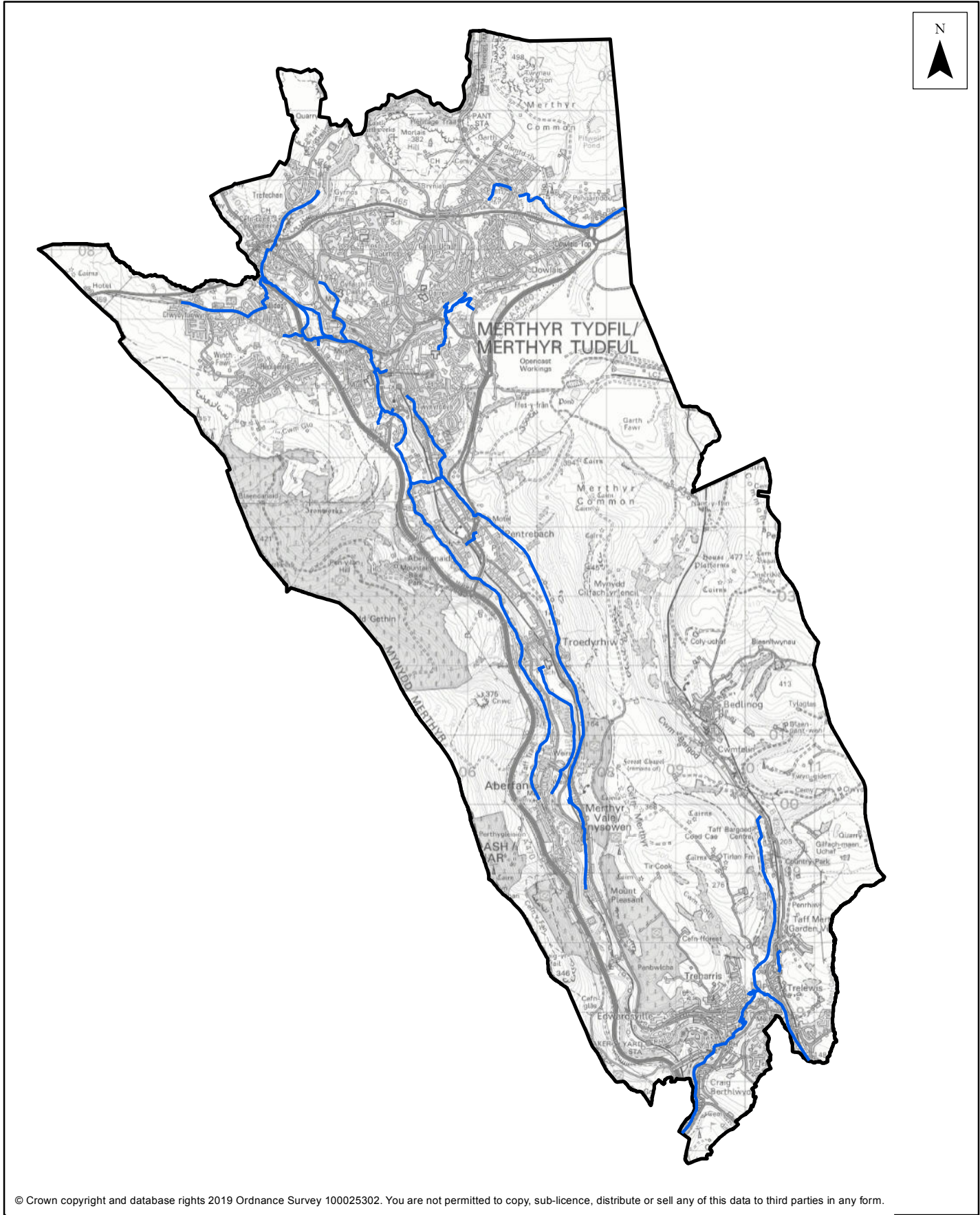
Abnormal costs (land contamination)			£800,000	Based on per hectare assumption used for Country Borough
Factory demolition costs			£1,000,000	
Estimated total land purchase			£7,500,000	Approx. £223k per acre/ £535k per hectare
Professional fees inc planning		8% of build costs		
Overheads		2% of build costs		
Contingency		3% of build costs		
Finance		5% of build costs		
Sales and marketing		1.5% of market value		
Developer return		20% of market value		
S106 costs		1 NEAP 1 LEAP	£125,000	
<b>TOTAL SCHEME COSTS</b>		<b>£64.556m</b>		
<b>RESIDUAL VALUE</b>		<b>£1,653,000</b>		

**Appendix 2: Proposed Matters Arising Change to the Constraints Map  
to add the Active Travel 'Existing Routes Map'**



Policy: SW12 Improving the Transport Network

Amendment: Add the Active Travel "Existing Routes Map" to the Constraints Map



— Active Travel existing route  
— Merthyr Tydfil LDP 2016-2031 boundary

Scale = 1:2,500  
0 1,000 2,000  
Metres