



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

# **HEARING SESSION 4**

## **STRATEGIC AND HOUSING SITE ALLOCATIONS THURSDAY**

### **27<sup>TH</sup> JUNE 2019**

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## Hearing Session 4: Strategic and Housing Site Allocations

### 4.1 Housing allocations – general (Policy SW3 and Appendix 1)

#### a. Does Appendix 1 provide an appropriate level of detail in relation to site allocations?

Yes, the Council considers that Appendix 1 contains an appropriate level of detail in relation to allocated housing and employment sites. However, in order to provide additional clarity to developers regarding potential constraints/development costs, a schedule has been added as an appendix to the LDP Written Statement that identifies both 'site specific infrastructure' and 'additional infrastructure identified or safeguarded in the LDP'.

This schedule is included as a Matters Arising Change in the Council's Hearing Statement for Matter 2 – Plan Strategy, Delivery and Infrastructure, and includes information such as indicative costs; funding sources; delivery mechanisms and timescales for delivery for both the site specific and other infrastructure requirements.

#### b. Appendix 1 states that for allocations typically over 100 dwellings “hydraulic modelling assessments...will be required”. Is this justified, and/or should it be expressed as a policy requirement?

No, the Council does not consider that it is appropriate to express this as a policy requirement, however in order to provide clarity on this issue, the following change is proposed to the relevant paragraph in Appendix 1 of the LDP.

#### Proposed Matters Arising change

##### Appendix 1

...

For some of the larger allocations (for example, typically over 100 dwellings), hydraulic modelling assessments of the water/sewerage network will be required **where appropriate**, with the developer then funding the necessary reinforcement works to accommodate their site. Again, for the allocations where these reinforcement works are required, their undertaking should not affect the anticipated timescales for site deliverability.

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

**a. SW3.4 Brondeg, Heolgerrig: Are the boundaries of this site allocation logical, defensible and consistent with Plan objectives?**

Yes, the Council considers that the boundaries of this allocation are logical, defensible and consistent with Plan objectives. The site boundary has been amended since publication of the Deposit Plan to reflect a previous planning permission on the site for residential development.

The Council has amended the settlement boundary in the Replacement LDP at this location (as part of Focussed Change FCM5) in order to provide a more logical settlement boundary. It is considered that the existing curtilage of the 'Greenacres' property to the East; the curtilages of the properties at Brondeg to the North; and the extent of the housing allocation would provide a more logical settlement boundary in this area.

There have been previous pre-application discussions surrounding the land in question, and given the constraints included in this area (the area includes SINC and TPO designations), and the fact that no firm proposals were subsequently submitted to the Council, it is considered that tightening the settlement boundary in this location provides clarity regarding this area of land. This housing allocation boundary and settlement boundary also assist the LDP in meeting objectives relating to Biodiversity and Landscape, whilst still delivering on objectives relating to Sustainable Population Growth and Housing Provision.

**b. SW3.5 Erw Las, Gellideg: Would the development of this site accord with Plan objectives, including in relation to open space?**

Yes, the Council considers that development of this site would accord with the objectives contained within the LDP. Whilst the site is currently amenity green space, the area is not defined as open space in the Council's adopted Open Space Strategy and has been deemed surplus to requirements by the Council's Estates Department.

Further assessments of the site have indicated that the site is suitable for residential development. The site is accessible from an adopted highway and adjoins an existing settlement. Development of the site would also provide a logical small scale infill within the settlement, and would contribute to local housing land supply.

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LDP Objective 15 – Leisure, Recreation and Tourism states that the LDP will “support sustainable tourism, leisure and recreation developments...” and development in this location will assist in supporting a number of open spaces within the vicinity of the site, as well as tourism and recreation opportunities such as the Taff Trail and the two nearby out of town retail parks. Locating new housing development in this location also accords with LDP Objective 5 by ensuring that open space supports the regeneration of local communities.

**c. SW3.8 South of Castle Park: Would the development of this site accord with Plan objectives, including in relation to historic assets and ecology?**

Yes, the Council considers that development of this site would accord with the objectives contained within the LDP.

*LDP Objective 9 – Heritage and Cultural Assets*, states that the LDP will protect, enhance and promote all heritage, historic and cultural assets. Given that, the site is situated within the Merthyr Tydfil Landscape of Outstanding Historic Interest, and lies adjacent to both a Scheduled Ancient Monument (SAM) and a proposed Special Landscape Area (SLA), an Assessment of the Significance of the Impacts of Development on the Historic Landscape (ASIDOHL) will be required as part of any planning application on the site. Additionally, an ASIDOHL will assist in ensuring that any proposed development will accord with LDP Objective 9, and any relevant LDP policies such as *Policy CW1: Historic Environment*.

Although, the site boundary does not contain any significant nature conservation value, it does lie adjacent to a Site of Importance for Nature Conservation (SINC) and provides a corridor for Great Crested Newt migration in the area.

These issues could be addressed by providing an appropriate ecological buffer zone along the extent of the site that borders the SINC, creating a connective corridor that links the site to the Clwydyfagwr SINC to the East. This corridor may also enable an appropriate linear SuDs solution for the development. These measures would help to ensure that any proposed development accords with *LDP Objective 10 – Biodiversity*, which states that the LDP will improve ecosystem resilience and connectivity which support habitats and species of principle importance.

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The Council has prepared a Sustainable Drainage background paper (ED009) that assesses the potential impact of the new Sustainable Drainage consenting regime on the sites allocated in the LDP. Housing allocation SW3.8 – South of Castle Park, is a site that was identified as requiring an extension to the allocated site boundary in the background paper. This is considered necessary to provide greater flexibility, so that the site can deliver the required number of dwellings and provide an appropriate drainage solution, and satisfy other policy requirements in accordance with LDP objectives.

The Council proposes to extend the site boundary to the South West to incorporate an area of approximately 0.5 hectares that is currently part of the Winchfawr West SINC. Whilst this extension has the potential to conflict with objectives relating to ecology/biodiversity, the Council considers that any development proposals on the site can still accord with Policy EnW3 through appropriate mitigation and compensation measures.

The potential loss of this 0.5 hectares on the edge of the SINC will not adversely affect the overall integrity of the SINC (which is 170 hectares in total), as it is considered that appropriate mitigation and compensation measures can be provided as part of the development, potentially incorporated into the drainage solution provided.

**d. SW3.29 adjacent to Manor View, Trelewis; SW3.30 Stormtown, Trelewis: Appendix 1 indicates that water supply issues affecting these sites would not be addressed by Dŵr Cymru Welsh Water's Asset Management Plan to 2020. Are they deliverable according to the timescales indicated in the trajectory<sup>1</sup>?**

Yes, the Council considers that both of these sites are deliverable according to the timescales indicated in the LDP housing trajectory. Whilst Dwr Cymru Welsh Water (DCWW) have indicated that water supply issues affecting these sites will not be addressed in their current Asset Management Plan (AMP) which runs to 2020, this does not preclude these sites from coming forward as anticipated. If the proposals were to come forward in advance of any works being carried out by DCWW, then the developer would have to fund the necessary water infrastructure improvements as part of the development.

The Housing Trajectory background paper indicates that SW3.29 will deliver completions in two phases between 2021-2023, and 2027-2029. The completions between 2021 and 2023 are on a phase of the development

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<sup>1</sup> Housing Land Supply and Trajectory Background Paper [SD29]

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that has recently renewed its outline permission, and DCWWs consultation response on that application indicated that there is no issue with water supply on that phase. The Council considers that the remaining units have a realistic and deliverable timescale for development, allowing the proposals to be factored into future AMPS, given that DCWWs next AMP covers the period 2020-2025.

The Housing Trajectory background paper indicates that SW3.30 will deliver completions between 2023 and 2026. However, in order to enable greater flexibility as to how the water supply issue can be resolved, the Council proposes to include completions on SW3.30 from 2028 to 2031. This change can be seen in the amended Housing Trajectory attached at Appendix 3 to this Hearing Statement.

**e. SW3.31 Cwmfelin, Bedlinog: Is this site deliverable according to the trajectory timescale and would its development accord Plan objectives, including in relation to ecology, environmental protection, highway safety and landscape character?**

Yes, the Council considers that development of this site would accord with the objectives contained within the LDP.

In regard to objectives relating to ecology, the Council considered that it would be appropriate to reduce the number of dwellings proposed on the allocation to 30 as a result of consultation on the Deposit Plan. This number more closely reflects a layout approved as part of the most recent outline permission, which satisfied the Council's Countryside Officer in terms of the development's impact on the SINC.

With regard to environmental protection, detailed consideration will be given to issues such as land stability as part of any planning applications on the site, and these issues are not considered insurmountable in relation to the site being developed within the timescale of the Replacement LDP.

With regard to highway safety, access is an issue that will be fully considered at planning application stage and is therefore not considered insurmountable with regard to the site being developed within the timescale of the Replacement LDP. The previous outline permission contained an access that satisfied the Council's Highways Department, and delivery of the site has

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been phased later on in the Plan period in order to allow sufficient time for issues such as access arrangements and ownership to be resolved.

In relation to issues of landscape character, the Council considers that reducing the overall number of dwellings proposed, from 50 to 30, addresses both the visual impact of the proposed development, as well as the potential impact of proposals on the nature conservation value of the landscape.

**f. SW3.34 Oaklands, Treharris: Would the development of this site accord with Plan objectives, including in relation to open spaces and community facilities; and with broader well-being/placemaking objectives?**

Yes, the Council considers that development of this site would accord with the objectives contained within the LDP. LDP Objective 12 – Community Facilities seeks to support existing community facilities, and Objective 15 – Leisure, Recreation and Tourism, states that the LDP will “support sustainable tourism, leisure and recreation developments...”

SW3.34 would accord with these objectives as development in this location has the potential to incorporate good quality open space within the urban area of Treharris, and capitalise on the allotments that are located immediately to the South of the site. The Council did not receive any representations on site SW3.34 Oaklands, Treharris during any of the public consultations on the Replacement LDP.

During the Deposit Plan public consultation, a number of representors made representations on Site SW3.32 - Commercial Field, Treharris, but incorrectly quoted a site reference number of SW3.34 in their representation text. The site that was actually being referred to in these representations (SW3.32 - Commercial Field, Treharris) is no longer allocated for residential development in the LDP, and accordingly, there is no longer any potential conflict with open space/community facility objectives, or broader well-being/placemaking objectives.



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**g. Other non-strategic site allocations (if any)**

Since preparation of the Deposit Replacement LDP (as amended by the Focussed Changes), the Council has been in pre-application discussions with a volume housebuilder on two of the proposed housing allocations; SW3.19 – Twynyrodyn and SW3.21 – Bradley Gardens 2, Penyard.

These discussions have indicated that both the sites will be unable to accommodate the number of units originally proposed in the LDP (150 and 100 respectively), with the new Sustainable Drainage consenting regime proving to be a key factor. SW3.19 has been reduced to 120 dwellings, and SW3.21 has been reduced to 90 dwellings.

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 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.

The site boundary has been extended on two existing allocations (SW3.8 – South of Castle Park, and SW3.15 – Goetre Primary School, Gurnos) in order to maximise the likelihood that those sites have sufficient flexibility in terms of incorporating a SuDS solution that still results in the site delivering the anticipated number of dwellings.

As a result of the changes to SW3.19 and SW3.21, and in order to retain a level of flexibility of 25% in the Replacement LDPs overall housing provision, the Council proposes allocating a new site at P and R Motors, Pentrebach (SW3.36). The site has recently had outline permission renewed for 22 dwellings, and would present an additional opportunity for development in the Other Growth Area without affecting the overall distribution of growth proposed as part of the LDP strategy. A full site assessment and Sustainability Appraisal of the site can be found attached at Appendix 1 to this Hearing Statement. Appropriate text to include in Appendix 1 of the LDP written statement (Site Allocation Details) is also attached to this statement.

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A revised Housing Trajectory is also appended to this document (Appendix 3) that incorporates all changes made to housing allocations. Plans that show the new boundaries for sites SW3.8 and SW3.15 (Appendix 2), and a plan showing the new allocation at P and R Motors (Appendix 1), are also attached to this document.

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

**a. Is the boundary of the HSRA appropriate? Should it be included on the Proposals Map?**

Yes, the Council considers that the boundary of the HSRA is appropriate. The boundary of the HSRA currently includes:

- the housing allocation at the Hoover Factory site;
- the employment allocation at the Former Hoover Factory Car Park;
- land for a new Pentrebach Park and Ride Metro Station;
- land safeguarded for a new Metro Station; and
- areas of land to the West of the River Taff that will need to be sufficiently integrated to the main proposals of the HSRA, but also provide potential opportunities for development themselves.

The Council considers the boundary appropriate as the HSRA proposals need to be considered as a whole, and the Council wants to ensure that any development proposals in that area incorporate the placemaking principles identified in Policy SW6.

The HSRA has been included on the Deposit Plan Proposals Map, however this was not listed in the map legend that accompanied the electronic pdf and hard copy versions of the plans. The Council will correct this issue and ensure that the boundary is clearly included on future versions of the Proposals Map.

In addition to including the boundary on the Proposals Map, a concept plan has been prepared that gives greater detail as to how the Council envisages the development coming forward. This plan will be included in Policy SW6 of the LDP, and is included as appendix 4 of this Hearing Statement.

**b. Are the number of residential units and amount of retail floorspace/employment land expressed sufficiently clearly and flexibly in policy SW6?**

The Council considers that the number of residential units, the amount of retail floorspace, and the amount of employment land is expressed clearly and flexibly in Policy SW6. In order to deliver the HSRA in accordance with the

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framework masterplan, the Council considers that it is appropriate to explicitly express the number of dwellings anticipated on the site, alongside the quantities of employment land, retail provision, and open space that will be required as part of the HSRA. This gives as much clarity as possible, at this point in time, as to what the developers will be expected to deliver on the site.

**c. Should the policy specify the location and amount of open space to be retained or provided within the site?**

The Council does not consider it appropriate to specify the location of open space to be retained/provided within the site as part of Policy SW6. In order to allow the proposals to come forward in accordance with the placemaking principles, a degree of flexibility will be required, and specifying too much detail at this point in time may hinder the implementation of some of the principles at a later date.

With regard to the amount of open space to be provided, the Council proposes including an additional bullet point in Policy SW6 that states a minimum of 1.79 ha of open space will be provided. This quantity reflects a requirement generated by applying the standards that the Council has used in its adopted Open Space Strategy, and takes into account any surpluses and deficiencies within the Plymouth ward.

**Proposed Matters Arising Change**

Policy SW6: Hoover Strategic Regeneration Area

The Hoover Strategic Regeneration Area is identified to facilitate a major mixed-use development comprising of:

- 440 new homes,
- Local convenience retail provision of 409 sqm,
- New employment development on 1.5 hectares of land,
- Pentrebach Station Park and Ride,
- Provision of a new footbridge/cycle bridge to Abercanaid; ~~and~~
- Safeguarded land for a new Metro station, and
- **A minimum of 1.79 ha of open space.**

...

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**d. Are the policy's sustainable placemaking design principles appropriate and consistent with the site allocation details set out in Appendix 1?**

Yes, the Council considers that the placemaking design principles contained in Policy SW6 are both appropriate, and consistent with the site allocation details set out in Appendix 1 of the LDP.

The framework masterplan for the HSRA (SD49) sets out the vision for the redevelopment of the area:

*"To create Pentrebach Village; a mixed use neighbourhood of new homes and businesses in a strong waterside environment and with excellent connectivity to the rest of the Capital City Region."*

In order to realise this Vision, it is vital that development proposals at the HSRA incorporate the placemaking principles that are set out in Policy SW6, and then expanded upon in the framework masterplan. Capitalising on the opportunities at the HSRA, such as the public transport links and the site's relationship with the River Taff, will enable the site to be delivered in a way that provides wider regeneration in Merthyr Tydfil, rather than simply delivering new housing.

The Council considers that there is no conflict between these principles and the site allocation details, as the placemaking principles contained in the Policy cover issues that will need to be incorporated into any development proposals once the works that are deemed necessary in Appendix 1 are confirmed. There are also issues that are specifically mentioned in both the Policy and Appendix 1 (such as focussing on the River Taff), highlighting their importance in achieving the successful redevelopment of the HSRA.

**e. Is the extent of land safeguarded for a Metro station sufficiently clear, and is it justified?**

Yes, the Council considers that the land safeguarded for a new Metro Station at the North of the Hoover Factory Site is sufficiently clear and justified. In accordance with paragraph 8.22 of TAN 18 (Transport), the Council has defined an area of land which it intends to safeguard for a transport proposal, as the precise location of the new station is unknown at present, but the proposal is considered sufficiently advanced to justify being safeguarded.

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A more detailed indication as to where a new station may go (alongside the location of uses such as the proposed open space and retail provision) can be seen in the framework masterplan for the HSRA. The Council does not consider placing this amount of detail on the Proposals Map appropriate, at this point in the development process, as some flexibility may be required if proposals change slightly prior to the site coming forward.

**f. Housing completions are anticipated from 2023/24 onwards at a rate of 50 per annum thereafter. Is this lead-in time and delivery rate realistic and reflective of:**

**i. The development constraints identified in Appendix 1, including the Development High Risk Coal Area and potential water/sewerage network improvements**

Yes, the Council considers that the lead-in time and delivery rate of housing units are realistic and reflective of the constraints identified in Appendix 1 of the LDP.

Whilst the site is situated in a Development High Risk Coal Area, and that is considered a constraint on development, it is a constraint that occurs on a regular basis across Merthyr Tydfil County Borough and the wider South Wales Coalfields. Accordingly, the Council considers that the lead-in time of 4 years post adoption of the Replacement LDP is sufficient to allow all relevant survey work to be carried out, and for solutions to any issues to be identified and implemented as appropriate.

Similarly, with regard to the requirement for a hydraulic modelling assessment, the Council considers that sufficient lead-in time has been factored to the delivery timescales. DCWW have also commented that if any reinforcement works are required, then their undertaking should not affect the anticipated timescales for the delivery of sites.

With regard to all other issues raised in Appendix 1 (a Transport Assessment; Ground Investigation Report; Ecological Impact Assessment and an Archaeological Assessment), the Council considers that the lead-in time of 4 years post adoption of the Replacement LDP is sufficient to allow all relevant survey work to be carried out, and for appropriate solutions to any issues to be identified and carried out.

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With regard to the rate of delivery (55 units per annum), the Council considers that this rate is realistic as it amounts to the delivery of approximately 4-5 units per month, which is a rate that developers will be satisfied with, and is a rate of delivery that has been achieved on larger housing sites in the County Borough in the recent past.

**ii. The extent of flood risk zones, and**

Yes, the Council considers that the lead-in time and delivery rate of housing units are realistic and reflective of the extent of flood risk zones on the site as the housing allocation within the HSRA is covered by a Flood Zone B designation, with no areas of C2 Flood Zone. There are also areas at risk of surface water flooding across the site, and these will need to be incorporated into the sustainable drainage solution for the site, however this work is considered unlikely to affect the timescales of development.

**iii. The current status of land ownership/acquisition<sup>2</sup>?**

Yes, the Council considers that the lead-in time and delivery rate of housing units are realistic and reflective of the current land ownership status. A sale has been agreed between Welsh Government and Hoover Candy on the initial phase of development, with completion anticipated during 2019. The Council considers that the lead-in time of 4 years post adoption of the Replacement LDP, and following the purchase of the site, is sufficient to allow the site to progress in accordance with the timescales indicated in the housing trajectory.

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<sup>2</sup> Paragraph 8.17 of the Employment Land Review 2018 [SD35] indicates that the Welsh Government expects to acquire all land/property held by Hoover Candy by 2019.

MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS - HEARING STATEMENT

#### 4.4 The Former Ivor Steel Works Regeneration Site (Policy SW7)

##### a. Is Policy SW7 sufficiently clear and effective?

The Council has identified the Former Ivor Steel Works in Dowlais as a regeneration site for redevelopment opportunities. There have been previous proposals for residential development on the site, however significant additional development costs relating to land contamination issues, and the costs of addressing the listed building on site, have meant that development costs have been prohibitively high. Consequently, the site has not been specifically allocated for residential use as there is not sufficient certainty regarding timescale for its development.

The Council would favour residential-led regeneration proposals that enable the land to be remediated and for development to take place. In order to clarify and improve the effectiveness of Policy SW7, the Council would propose the following changes.

##### **Proposed Matters Arising Change**

###### Policy SW7: The Former Ivor Steel Works Regeneration Site

Appropriate **residential-led mixed use re**development on the former Ivor Steel Works site in Dowlais will be supported, **where the proposals contribute to the regeneration of the local community and are fully justified.**

6.5.48 The former Ivor Steel Works site in Dowlais offers the potential to stimulate regeneration, economic growth and environmental improvements in the Primary Growth Area. Although a detailed masterplan exists for a mixed use development known as 'Project Heartland', the current viability deficit, **(due to issues such and land contamination, and addressing the listed building on the site)**, is such that the plan cannot reasonably rely on the site to deliver development within the plan period. Nevertheless, should proposals for appropriate development or funding proposals be forthcoming, they could be supported subject to adherence to other relevant policies.



**APPENDIX 1 – Site Plan, Site Assessment and Sustainability Appraisal for new housing allocation at P and R Motors, Pentrebach.**

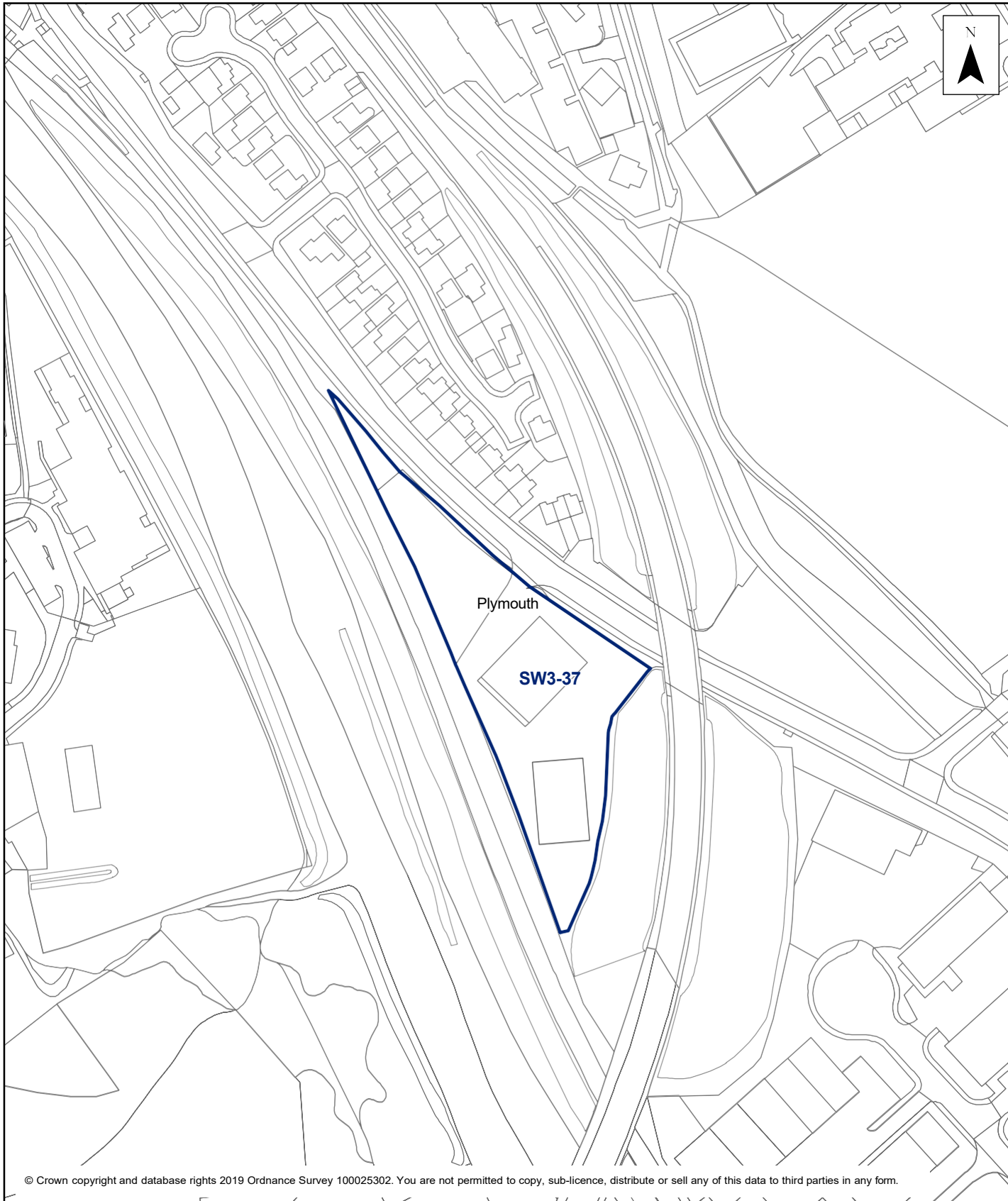
**Proposed Matters Arising Change Plan. Ref: MACXX**



**Policy:**     Housing allocation (Policy SW3-37)                      **Site Size:**     0.63 (Ha)


**Amendment:**     Add Housing Allocation                      **Ward:**     Plymouth

**Site Name:**     P & R Motors, Pentrebach



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 New Housing Allocation Boundary

Scale = 1:2,500  
0     25     50  
 Metres

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

SITE DETAILS	
Site Reference:	SW3 - 36
Site Address:	P & R Motors, Merthyr Road, Pentrebach. CF48 4UB
Area (Ha):	0.63
Current Use(s):	Operational vehicle repair business.
Proposed Use(s):	Residential
OWNERSHIP	
Is the site wholly in the ownership of the proposer?	Yes - P & R Motors Merthyr Ltd.
If not, are all other land owners aware of this submission?	N/A

SITE SUITABILITY ISSUES		
LAND TYPE	YES/NO	COMMENTARY
Is the site greenfield or brownfield?	Yes	Brownfield
Is the site situated on BMV agricultural land? (Grades 1, 2 and 3a)	No	N/A
Is the site within an existing settlement?	Yes	The site is situated in Pentrebach.
LOCATION AND ACCESSIBILITY	YES/NO	COMMENTARY
Is the site easily accessible to local services and facilities by public transport, walking and cycling?		The site is within the vicinity of Abercanaid Community and Greenfield Special Schools, Pentrebach Retail Park and Post Office. Pentrebach Train Station is situated within walking distance. The site is

		served by buses 78; 79; E79; S79 S80 and the 4X. Both the Taff and Trevithick Trails are within proximity.
Is the site currently accessible from the existing highway network?	Yes	The site fronts onto Merthyr Road (A4054), in the north west. The nearby A4060 (T) flyover provides a link to the A470 (T). A new site access road could be required, constructed within the central part of the site, to link the site Merthyr Road.
Is the site likely to affect the setting of a Listed Building or a Scheduled Ancient Monument?	No	N/A
Is the site located within or adjacent to a Conservation Area, Registered Historic Park and Garden or Historic Landscape?	Yes	The site lies within the Registered Historic Landscape: Taff Vale Industrial and Business Parks HLCA015: wider area site of ironworks, infrastructure management Immediate area site of tramroads and railways. Current use likely to have removed evidence of previous; nearby uses similar to proposed. No mitigation proposed (MYT0260).
Is the site located within a mineral safeguarding area?	No	N/A
Are there any other important features associated with the site, e.g. boundary walls or trees?	Yes	Adjoining the south west boundary is a hedgerow and mature trees, which runs parallel to a railway with the River Taff.
Is this site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	Yes	A Railway line lies to the south west of the site.
ENVIRONMENTAL	YES/NO	COMMENTARY
Is the site located within or adjacent to a European, National, regional or Local ecological designation?	Yes	<p>There are bat records within c.50m, bird records within c.200m and the Afon Taff SINC is within c.30m of the site.</p> <p>There are buildings onsite adjacent to tree/scrub habitat with potential suitability for roosting bats linked to a wooded railway corridor and wooded river corridor of the Afon Taf (SINC 58) suitable for foraging and commuting bat species.</p> <p><b>Preliminary Roost Assessment (PRA) for bats and nesting birds of the onsite building and any adjacent trees are required which will inform whether further bat activity surveys are required.</b></p> <p>An Otter Survey of the River Taff at Abercanaid (South and West Wildlife Trust 2006) showed that Otters still use the river Taff corridor. However, the site appears to be securely fenced off from the adjacent tree/scrub which is cut off from any reasonable likelihood of impact upon otter (EPS) by a railway track. If this is the case, no otter presence or likely absence survey is required. However,</p>

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		there must be consideration for otter both during and post-construction with e.g., no lighting of the boundary habitat.
Will the proposal involve the removal of trees with TPO or ancient woodland?	No	N/A
Is there a possibility that the site is contaminated?	Yes	The site comprises an operational vehicle repair shop and lies adjacent to Protected Business/Employment site.
Is the site affected by any existing planning designations or permissions?	Yes	A slightly larger 0.98 Ha site was included in the adopted LDP as H36 – P & R Motors Pentrebach. The site had outline planning consent which was renewed for to 22 units in 2016 - P/16/0057 also P/06/0102 – Outline Approval & P/10/0341 Full Approval for residential development. An application for renewal of the consent has recently been submitted (P/19/0088) with an indicative layout for 22 units, which is likely to be approved.
PHYSICAL CONSTRAINTS	YES/NO	COMMENTARY
Is the site within a flood risk zone?	Yes	Site lies within Zones B Flood risk and adjacent to C1 flood risk zone.
Is the topography of the land suitable for development? Does the site have any other physical constraints? (E.g. topography, access, severe slope, vegetation cover etc.)	Yes	There is a woodland area to the south-east. The site is dark from the east and south in part and sits in the shadow of the A4060 embankment. Existing vegetation surrounding the site provides some screening although there is a need for a frontage buffer strip to the land fronting the A4054 and this should be protected as part of the proposed development.
WIDER BENEFITS	YES/NO	COMMENTARY
Are there other potential benefits associated with the development e.g. provision of community facilities?	Yes	Access and landscape improvements to the Priority Open Space; Pentrebach Recreation Ground, should be a consideration of any Section 106 or Community Infrastructure Levy accruals relating to this development. <b>It would be appropriate to secure 10% affordable housing on site.</b>
DELIVERABILITY AND VIABILITY (Residential only)	YES/NO	COMMENTARY
Have reasonable steps been taken to demonstrate that the site is deliverable in the plan period and is viable? (e.g. any technical feasibility studies or development viability appraisals)	Yes	A Design and Access Statement accompanied the 2016 application. The need to carry out an ecological survey in relation to bats and nesting birds within the on-site buildings and adjacent trees has been highlighted.
Is the site subject to any other key constraints that might affect the developable area or wider deliverability of the site?	No	N/A
SITE APPRAISAL SUMMARY		

The site is within an existing settlement and the majority of the site is allocated in the current LDP. It is accessible from an adopted highway and whilst some constraints have been identified these are not considered to be untypical for the area or insurmountable i.e. ecological surveys and ground investigations will be required.

## STAGE 2 ASSESSMENT

SERVICE PROVIDER	SUMMARY OF COMMENTS AND POTENTIAL ISSUES	MITIGATION NECESSARY
NRW	Do not have any comment to make on the potential housing allocation as the potential site affects is not a matter listed on our Consultation Topics, <i>Development Planning Advisory Service: Consultation Topics</i> (September 2018): <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en</a> .	N/A
Power	Wales & West Utilities has pipes in the area. Our apparatus may be affected and at risk during construction works. You must not build over any of our plant or enclose our apparatus. There are also indications of gas pipes owned by other GTs, or otherwise privately owned, which may be present in this area. We normally advise if the route of the gas service needs to be known, then hand dug trial holes would need to be carried out on the assumed route to visually identify the service. The assumed route of the gas service is the most direct route from the gas main to the gas meter, but this can vary depending on the ground conditions etc. A gas service is averagely laid at around 375mm deep. Again, this is the assumed route and depth.	Consultation with utility providers as part of detailed development proposals will be required to identify whether any protection measures or upgrades would be required.
Water/Sewerage	<u>Water supply</u> There are no issues in providing this site with a supply of clean water as a water supply can be made available to serve this proposed development. <u>Sewerage</u> There are no issues in the foul only flows being accommodated within the public sewerage network, though some level of offsite sewers will be required and the developer will need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. <u>Wastewater treatment</u> There are no problems in the foul flows from this site being accommodated at Cilfynydd Wastewater Treatment Works (WwTW).	N/A
Health	No health care capacity issues have been raised regarding the levels of proposed growth in the LDP.	N/A
Education	Sufficient capacity can be provided for future levels of planned growth within the County Borough.	N/A

Highways (including drainage)	<p>Visibility splays of 4.5m x 33m, 2.4m x 43m need to be satisfied.</p> <p>A site investigation prior to foundation design is considered necessary.</p> <p>Storm water design to comply with SUDS requirements.</p> <p>Details of the means of foul and surface water drainage incorporating SUDS principles will be required where appropriate.</p> <p>Welsh Government (Transport) have no objections to the proposed development. However, any existing boundary fences are property of WG and should not be removed or interfered with in any way.</p> <p>Part of the site lies within a Zone B flood risk area, where a precautionary approach to the design of the development should be taken and addressed as part of a reserved matters application.</p> <p>No water should be disposed of into the River Taff during or post construction.</p>	<p>The use of SUDS is recommended with respect to surface water drainage e.g. soakaways.</p> <p>Consideration of sustainable drainage systems would also be required.</p> <p>Any future developments will require a submission of a 'SAB'.</p>
Environmental Health	<p>The site is situated on potentially contaminated land. This should be investigated. Physical sampling can be limited to the external areas that are going to be used for soft landscaping. A Phase 1 Land Contamination investigation is required, if this identifies potentially unacceptable risks a phase 2 investigation will be required.</p>	<p>Mitigation work required during construction with regard to dust.</p> <p>Should contamination be identified a remediation scheme will be required and verified.</p> <p>All imported soils or site won material will require testing prior use on site.</p>
Network Rail	<p>It is recommended no trees are planted closer than 1.5 times their mature height to the boundary fence.</p> <p>All buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance.</p> <p>The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway work to be carried out without involving entry onto Network Rail's infrastructure.</p>	<p>The developer should seek specific advice from Network Rail on any significant raising or lowering of the levels of the site.</p>
<b>OVERALL CONCLUSION AND NEXT STEPS</b>		
<p>The site assessment has not identified any insurmountable constraints and development of the site is considered to be realistic and deliverable within the replacement LDP plan period. Development of the site would contribute towards the Plan's housing and regeneration objectives (particularly objectives 1, 3, 4), providing an additional housing site within the Primary Growth Area. The site could therefore be recommended for allocation within the Replacement LDP.</p>		

**Site Ref.** SW3.36  
**Site** P&R Motors, Pentrebach  
**Ward** Plymouth  
**Current** Car sales & repair garage  
**Proposed** Residential  
**Co-ords** 306204, 203539

	SA Objective	Score	Comments
1	To ensure that the community and social infrastructure needs of all residents and communities are met.	+	The site is within 800m of the retail offering at Pentrebach Retail Park, & the local schools, services & facilities at Abercanaid.
2	To maintain and enhance community and settlement identities.	+	The site is located within the existing settlement boundary, close to the residential areas of Abercanaid & Pentrebach & commercial area of Pentrebach Retail Park, and would support the sustainable growth of the community.
3	To support a sustainable level of population growth.	N/A	
4	To improve human health and well-being and reduce inequalities.	+	The site is located within reasonable walking distance of 3 typologies of open space (as specified & identified the Open Space Strategy), & has the potential to deliver new provision or an off-site contribution.
5	To meet the housing needs of all through a mix of dwelling tenures and types.	+	The site has the potential to provide new housing (less than 50 dwellings) & therefore has some potential to deliver a mix & range of dwelling types & tenures. The site measures approx. 0.63 hectares.
6	To improve the overall quality and energy efficiency of the housing stock.	N/A	
7	To enhance the attractiveness of the County Borough to support economic development.	N/A	
8	To reduce the need to travel and encourage sustainable modes of transport.	++	The site is near key cycling routes (Trevithick & Taff Trail) and is within reasonable distance (800m) of Pentrebach train station and a bus stop with a frequent service (400m).



9	To ensure essential utilities and infrastructure are available to meet the needs of all.	++	Sufficient infrastructure headroom exists in all utilities and connections are straight forward.
10	To minimise efficiency use and optimise opportunities for renewable energy generation.	?	The site is not promoted for renewable or low carbon energy and it is unclear whether it has the potential to support renewable technologies.
11	To minimise the contribution to climate change whilst maximising resilience to it.	++	The site is entirely brownfield land, currently used as a car sales & repair garage, and will not result in the loss of any agricultural land.
12	To maintain and enhance biodiversity and ecosystem connectivity.	0	The site is not in within any locally or nationally designated biodiversity areas. However, it is close proximity to the Afon Taf SINC. Developments at the site is not likely to have negative effects on any nationally or locally designated biodiversity
13	To minimise the demand for water and improve the water environment.	?	The River Taff runs in close proximity to the site. There is an element of uncertainty; most likely until further detailed assessment work has been carried out.
14	To minimise the risk of flooding.	0	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. However, development could avoid this area, or suitable mitigation is available, with the potential for a residual neutral effect.
15	To protect and conserve soil and safeguard mineral resources.	++	The site is previously developed land and will not hinder the future extraction of safeguarded minerals resources.
16	To protect and enhance of heritage assets that defines the County Borough as the most significant Welsh town of the Industrial Revolution.	0	No designated or non-designated heritage assets are within or within close proximity to the site. Development at the site will have no significant effect.
17	To facilitate services and facilities that support distinctive local culture and the Welsh language.	+	Development at the site has the potential for minor positive effects because it is within the catchment of an existing Welsh language primary school (Ysgol Gynradd Gymraeg Santes Tudful).
18	To protect and enhance the quality of designated areas of landscape value and good quality townscapes.	+	The site is located within the existing settlement boundary, is not within a draft SLA and is brownfield land.

### **Site Allocation Details**

	No of units
SW3.36 – P and R Motors Pentrebach	22
<p>This 0.63 hectare site is located in the community of Pentrebach. The site is allocated for 22 dwellings and is anticipated deliver affordable housing and other planning obligations in accordance with Policy SW9.</p> <p>The Council's Engineers have advised that the principle of development is considered acceptable. New highways, drainage infrastructure or ground works will be required to bring forward an acceptable development proposal, however, this does not represent an insurmountable constraint.</p> <p>A wooded area to the south-east of the site should be retained, and access to wider open spaces in the locality should be improved.</p> <ul style="list-style-type: none"> <li>• A comprehensive Road Safety Audit or Transport Assessment (dependent on the exact development proposed) should be carried out to identify the required local and wider highway network improvements.</li> <li>• A Ground Investigation Report will be required, including a contamination survey, due to various past activities on site.</li> <li>• An Ecological Impact Assessment will be required in order to ascertain any potential mitigation, compensation and/or enhancement required.</li> <li>• A Desk Based Assessment of the archaeology of the site would be required.</li> </ul> <p>The site is anticipated to deliver approximately 11 dwellings a year during 2027 and 2028.</p>	

**APPENDIX 2: Plans showing amended boundaries at housing allocations SW3.8  
Land south of Castle Park, and SW3.15 – Goetre Primary School, Gurnos.**

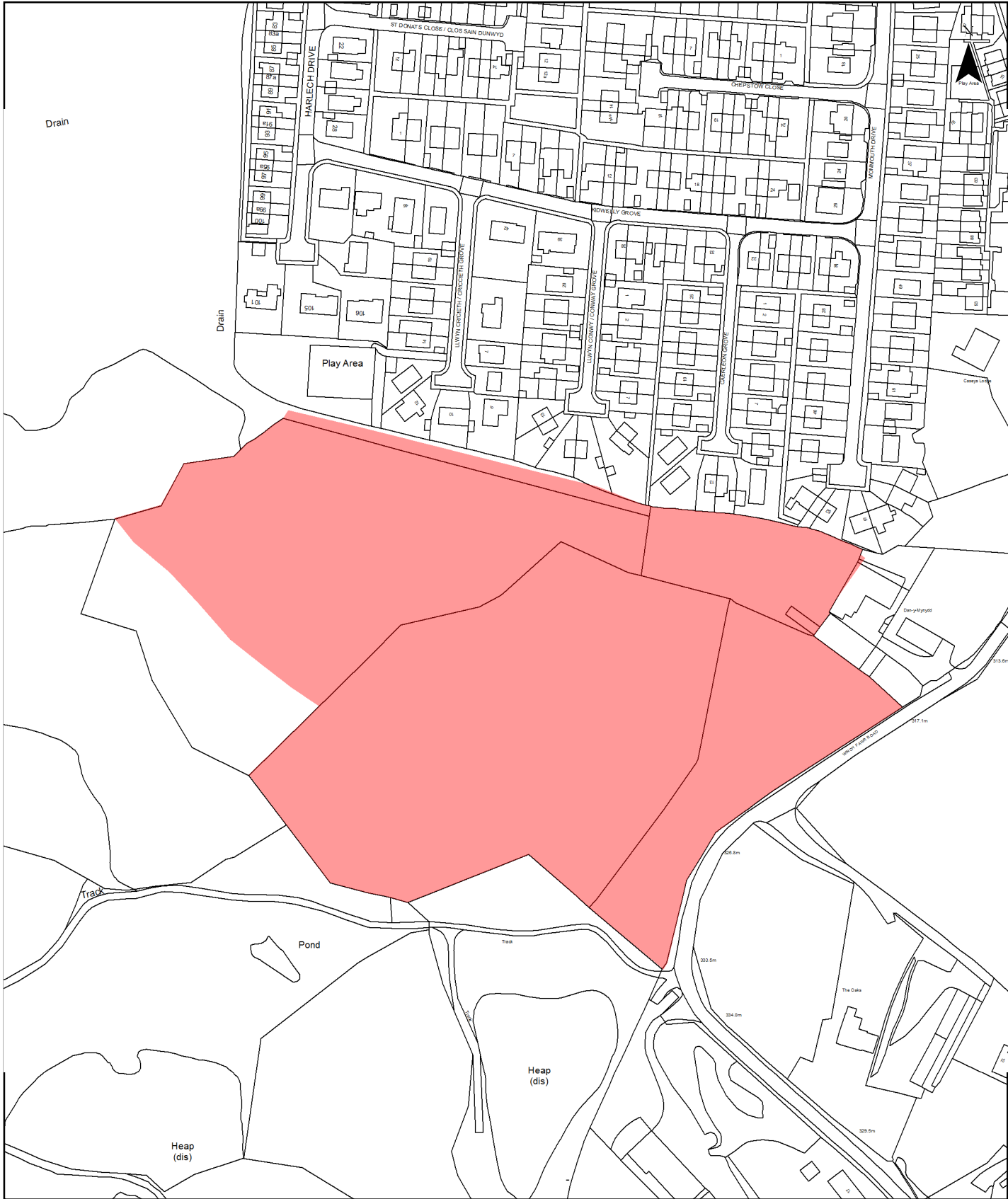
**Proposed Matters Arising Change Plan. Ref: MACXX**





**Policy:**     Housing Allocation (Policy SW3-8)                      **Site Size:**     5.79 (Ha)

**Amendment:**     Amend Housing Allocation                      **Ward:**     Cyfarthfa

**Site Name:**     Land South of Castle Park, Twyncarmel

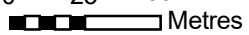


 Housing Allocation - Proposed amended site allocation boundary (Matters Arising change)

 Housing Allocation area (Deposit Plan)

Scale = 1:2,500

0    25    50

 Metres

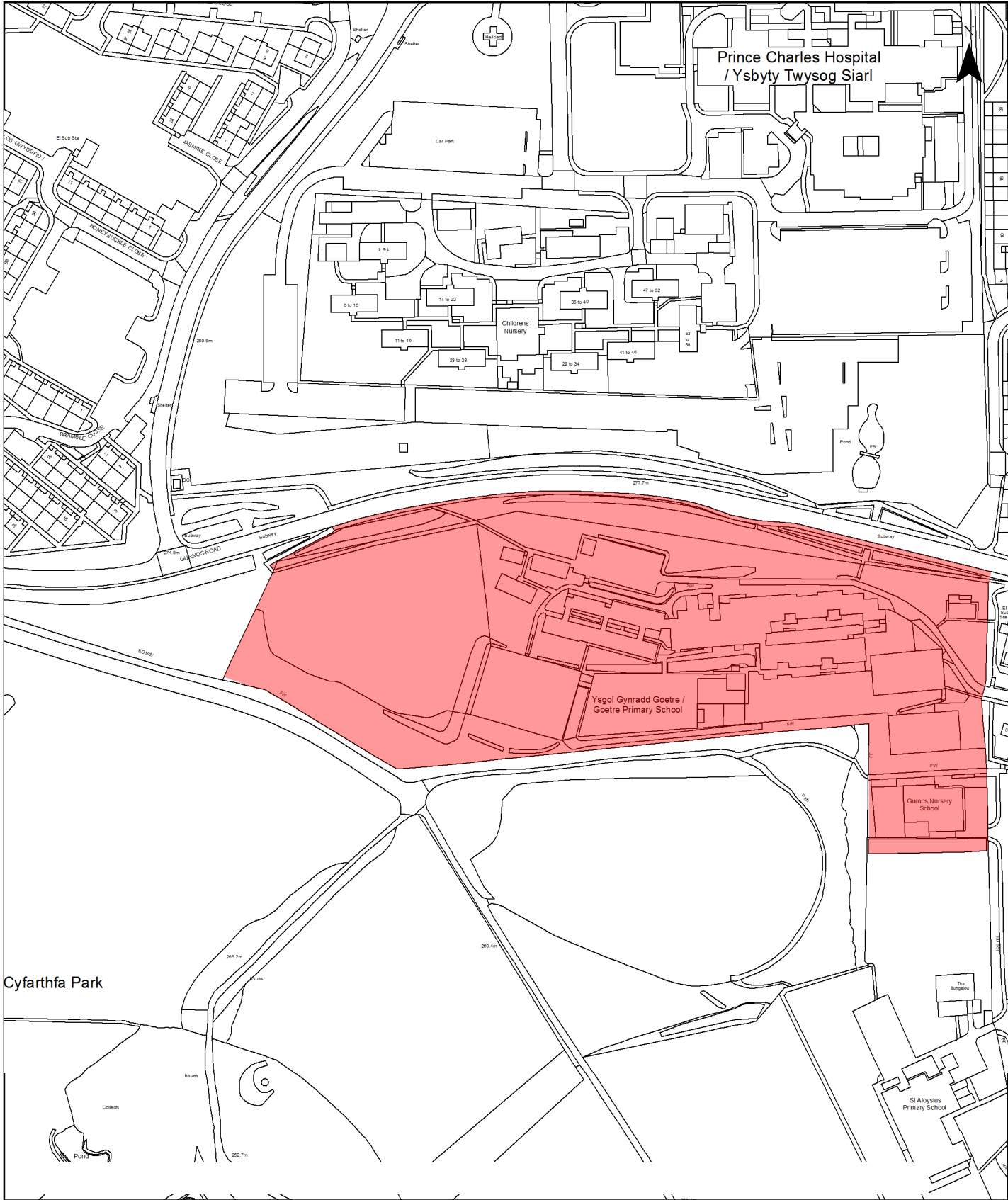
**Proposed Matters Arising Change Plan. Ref: MACXX**




**Policy:** Housing Allocation (Policy SW3-15)      **Site Size:** 4.17 (Ha)


**Amendment:** Amend Housing Allocation      **Ward:** Gurnos

**Site Name:** Goetre, Gurnos and St Aloysius School Sites



 Housing Allocation - Proposed amended site allocation boundary (Matters Arising change)

 Housing Allocation area (Deposit Plan)

Scale = 1:2,500  
0 25 50  
 Metres

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

**EXAMINATION HEARING SESSION - STATEMENT**

**APPENDIX 3 – Revised Housing Trajectory**

Site Ref	Name	Total Dwellings	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
SW3.1	Hoover Factory Site	440	0	0	0	0	0	0	0	55	55	55	55	55	55	55	55
SW3.2	Sweetwater Park	10	8	1	1	0	0	0	0	0	0	0	0	0	0	0	0
SW3.3	Upper Georgetown Plateau	50	0	0	0	0	10	10	30	0	0	0	0	0	0	0	0
SW3.4	Brondeg	50	0	0	0	10	10	10	10	10	0	0	0	0	0	0	0
SW3.5	Erw Las, Gellideg	10	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0
SW3.6	Beacon Heights	20	2	4	0	4	5	5	0	0	0	0	0	0	0	0	0
SW3.7	Winchfawr	20	0	0	0	0	0	0	0	3	3	3	3	3	3	2	0
SW3.8	South of Castle Park	160	0	0	0	0	0	0	0	0	0	10	30	30	30	30	30
SW3.9	Cyfarthfa Mews	19	15	0	4	0	0	0	0	0	0	0	0	0	0	0	0
SW3.10	Trevor Close	20	0	0	0	5	10	5	0	0	0	0	0	0	0	0	0
SW3.11	East Street, Dowlais	10	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0
SW3.12	St Johns Church	20	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0
SW3.13	Victoria House	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SW3.14	Pen y Dre Fields	40	0	0	0	0	0	0	0	0	20	20	0	0	0	0	0
SW3.15	Goetre Primary School	120	0	0	0	0	0	0	0	0	0	0	0	0	40	40	40
SW3.16	Former Merthyr Care Home	20	0	0	0	0	0	0	20	0	0	0	0	0	0	0	0
SW3.17	Haydn Terrace	40	0	0	0	0	0	0	0	10	15	15	0	0	0	0	0
SW3.18	Former St Peter and Paul Church, Abercanaid	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>SW3.19</b>	<b>Twynnyrodyn</b>	<b>120</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>30</b>	<b>30</b>	<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
SW3.20	Former Mardy Hospital	114	34	30	0	0	25	25	0	0	0	0	0	0	0	0	0
<b>SW3.21</b>	<b>Bradley Gardens II</b>	<b>90</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>30</b>	<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
SW3.22	Former St Tydfils Hospital	50	0	0	0	0	0	10	20	20	0	0	0	0	0	0	0

## MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS - HEARING STATEMENT

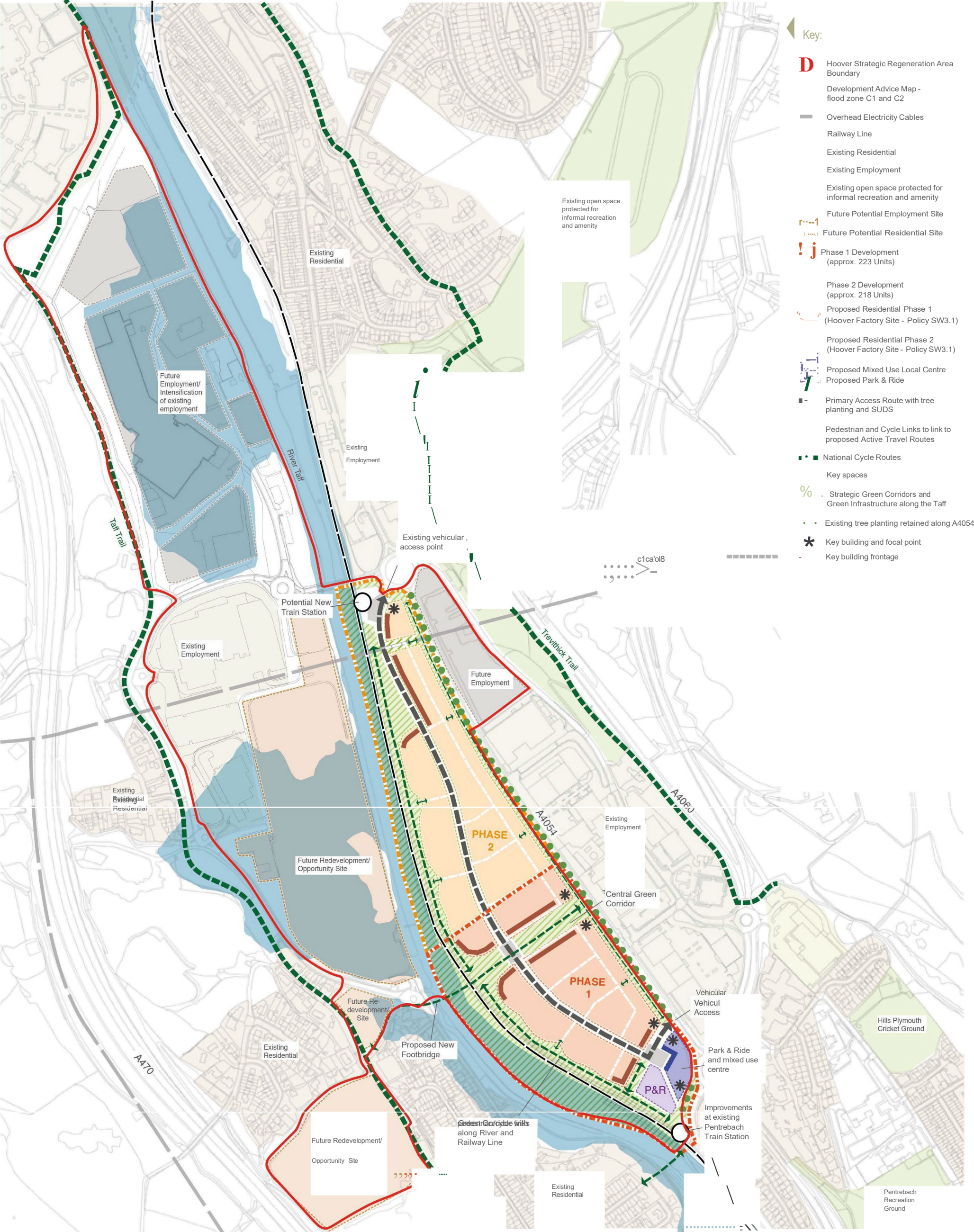
SW3.23	Miners Hall	12	0	0	0	0	0	0	12	0	0	0	0	0	0	0	0
SW3.24	Former Ysgol Santes Tudful	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0
SW3.25	Sandbrook Place	12	0	1	3	4	4	0	0	0	0	0	0	0	0	0	0
SW3.35	Clwydyfagwr	40	0	0	0	0	0	0	0	0	20	20	0	0	0	0	0
<b>SW3.36</b>	<b>P and R Motors Pentrebach</b>	<b>22</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>0</b>
SW3.26	Project Riverside	153	0	0	0	20	45	45	43	0	0	0	0	0	0	0	0
SW3.27	Railway Close, Walters Terrace	23	0	23	0	0	0	0	0	0	0	0	0	0	0	0	0
SW3.28	opp Kingsley Terrace	12	0	0	0	8	2	2	0	0	0	0	0	0	0	0	0
SW3.29	adj Manor View, Trelewis	248	48	2	0	0	40	40	38	0	0	0	20	30	30	0	0
<b>SW3.30</b>	<b>Stormtown, Trelewis</b>	<b>80</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>20</b>
SW3.31	Cwmfelin	30	0	0	0	0	0	0	0	0	0	0	10	10	10	0	0
SW3.33	Cilhaul	30	0	0	0	0	0	0	0	15	15	0	0	0	0	0	0
SW3.34	Twynygarreg/Oaklands	50	0	0	0	0	0	0	0	0	15	15	20	0	0	0	0
		<b>2177</b>	<b>139</b>	<b>61</b>	<b>28</b>	<b>61</b>	<b>181</b>	<b>192</b>	<b>213</b>	<b>143</b>	<b>173</b>	<b>168</b>	<b>179</b>	<b>159</b>	<b>188</b>	<b>147</b>	<b>145</b>

Small windfall contribution		30	19	20	20	20	20	20	20	20	20	20	20	20	20	20	20
Large windfall contribution		4	0	24	24	24	24	24	24	24	24	24	24	24	24	24	24
Total windfall allowance	<b>625</b>																
Completions		<b>173</b>	<b>80</b>	<b>72</b>	<b>105</b>	<b>225</b>	<b>236</b>	<b>257</b>	<b>187</b>	<b>217</b>	<b>212</b>	<b>223</b>	<b>203</b>	<b>232</b>	<b>191</b>	<b>189</b>	
LDP Requirement	<b>2250</b>																
<b>Flexibility</b>	<b>552</b>	<b>24.50%</b>															
<b>Provision</b>	<b>2802</b>																

**APPENDIX 4: Hoover Strategic Regeneration Area – Concept Plan**



# Hoover Strategic Regeneration Area - Concept Plan



Diagrammatic only. Concept plan to be rigorously tested and modified according to placemaking principles as detailed proposals progress.



**MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS - HEARING STATEMENT**

**APPENDIX 5 – Consequential policy amendments**

Policy SW1: Provision of New Homes

To sustainably grow our population, 2,250 additional homes are required. To ensure these are delivered, provision is made for ~~2820~~ **2802** additional homes.

...

***Dwelling Requirement***

6.5.7 To facilitate the sustainable population growth of the LDP Strategy (growing to approximately 64,000 people by 2031), we have forecast that 2,250<sup>3</sup> new homes will be required over the Plan period. To ensure these homes are delivered, the LDP provides an additional flexibility allowance of approximately 25%, reflecting the focus of the strategy on using brownfield land. This flexibility allowance is considered appropriate as detailed in the Housing Supply background paper.

...

***Components of Supply***

- 6.5.9 The components of supply for the ~~2820~~ **2802** homes in the Deposit LDP will be:
- Allocations for housing land listed in Policy SW3: Sustainably Distributing New Homes.
  - A windfall contribution (details are included in Policy SW3).
  - Completions between 1.4.16 and 31.3.18.

...

Policy SW2: Provision of Affordable Housing ...

6.5.15 The affordable housing target figure in Policy SW2 is indicative and relates only to those affordable homes secured through the planning system. The figure includes contributions from committed sites, additional housing from new allocations, and windfall sites as identified in Policy SW3. The affordable housing target is based on the housing requirement of 2250 dwellings, not the overall housing provision of ~~2820~~ **2802** dwellings. The components of the affordable housing target can be seen in Table 1 below.

...

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<sup>3</sup> Merthyr Tydfil County Borough Council, Population and housing requirements background paper 2017.

**MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS - HEARING STATEMENT**

Policy SW3: Sustainably Distributing New Homes

New homes will be concentrated within the main settlement of Merthyr Tydfil. The following sites are allocated for residential development within 'Primary Growth Area':

Site No.	Site Name	Dwellings	Indicative Delivery Timescale
19	Twynyrodyn	<del>150</del> <b>120</b>	<del>2024-2028</del> <b>2021-2024</b>
21	Bradley Gardens 2, Penyard	<del>100</del> <b>90</b>	<del>2029-2031</del> <b>2025-2027</b>
<b>36</b>	<b><u>P and R Motors, Pentrebach</u></b>	<b>22</b>	<b>2027-2028</b>
	Sub Total	<del>1569</del> <b>1551</b>	

New homes will also be directed to our other settlements of Troedyrhiw, Merthyr Vale and Aberfan, Bedlinog, and Edwardsville, Quakers Yard, Trelewis and Treharris. The following sites are allocated for residential development within the 'Other Growth Area':

30	Stormtown, Trelewis	80	<del>2023-2026</del> <b>2028-2031</b>
	Sub Total	626	

...

6.5.19 In accordance with the LDP Strategy and Policy SW1: Provision of New Homes, land has been allocated for ~~2195~~ **2177** dwellings over the Plan period on 34 sites across the County Borough. All allocated sites will be expected to contribute to the range and choice of housing types within Merthyr Tydfil County Borough, and contribute to the need identified for affordable housing in Policy SW2, at the levels identified in Policy SW9: Planning Obligations.

...

***Distribution between the Primary and Other Growth Areas***

6.5.23 Approximately 70% of new homes will be directed towards Merthyr Tydfil (Primary Growth Area), with the remaining 30% directed towards our other settlements, Troedyrhiw, Merthyr Vale and Aberfan, Bedlinog, Edwardsville, Quakers Yard, Trelewis and Treharris (Other Growth Area).

...

**MATTER 4: STRATEGIC AND HOUSING SITE ALLOCATIONS - HEARING STATEMENT**

Table 2 – Components and distribution of housing supply as of 1<sup>st</sup> April 2018.

	Components of Housing Supply	Primary Growth Area	Other Growth Areas	Total
A	Total completions (small and large) 01.04.16 – 31.03.18	172	81	253*
B	Under construction	25	0	25
C	Units with planning permission or included in Category 2 of JHLAS (31.03.18)	75	271	346
D	New Housing Allocations	<del>1342</del> <b><u>1324</u></b>	282	<del>1624</del> <b><u>1606</u></b>
E	Large windfall sites (13 years remaining)	219	93	312
F	Small windfall sites (13 years remaining)	182	78	260
G	Total Housing Provision	<del>2015</del> <b><u>1997</u></b>	805	<del>2820</del> <b><u>2802</u></b>
*200 of 253 completions to 31 <sup>st</sup> March 2018 have taken place on allocations				