



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

HEARING SESSION 1
PLAN PREPARATION, VISION AND OBJECTIVES
ACTION POINT 1.1 – COUNCIL RESPONSE

HEARING 1 – ACTION POINT 1 RESPONSE

Action Point

Council to adjust the SA Report in accordance with Appendix 1 of its written statement for hearing 1.

Council's Response

This note has been prepared by the Council in response to an issue that arose prior to Hearing Session 1 through the Inspector's supplementary note (ED35) in relation to that hearing session and the effects of the Plan on the use of the Welsh Language. The Council prepared a response, examination document ED041, which set out responses to the following questions raised by the Inspector:

- Firstly, whether secondary Welsh medium education was addressed in the SA and whether the SA Report should be amended to identify any impacts in this regard.
- Secondly, having regard to the SA, the CIL Regulations, the CIL infrastructure evidence and any potential future changes to MTCBC's CIL Regulation 123 list, whether additional reasoned justification relating to policy SW9 criterion 4 should be added to the Plan to clarify the position in relation to secondary Welsh medium education, and specifically the circumstances under which necessary contributions towards Welsh medium secondary education might be sought and secured in the future, subject to compliance with CIL Regulations or any successor regulations.
- Thirdly, whether any amendments to the Infrastructure Schedule are necessary.

Further to the discussions that took place at Hearing Session 1, it was considered appropriate to include the additional information and proposed amendments to the Replacement LDP Sustainability Appraisal, however, further clarifications regarding 16-18 further education school place demand was requested by Rhondda Cynon Taff County Borough Council and the Inspector. Accordingly, the Council has attached an updated addendum to the Sustainability Appraisal Report to this statement that clarifies how Welsh Medium Education has been considered through the SA process, using the following calculations. This addendum will be incorporated into the final Replacement LDP Sustainability Appraisal Report to be prepared prior to adoption of the Plan.

In order to generate a figure for new secondary pupil spaces (including 16-18 further education school places), Merthyr Tydfil CBC uses the following ratios:

- 1 secondary (11-16) pupil per 5.71 dwellings.
- 1 secondary (16-18) pupil per 33 dwellings.

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The level of housing growth proposed in the Replacement LDP (2250 dwellings) would generate a total of approximately 460 additional secondary pupil spaces (comprised of three hundred and ninety four 11-16 spaces, and sixty eight 16-18 spaces). MTCBC uses an assumption of 11% of spaces being taken up by Welsh Medium provision. The Replacement LDP would therefore generate a need for approximately 50 secondary Welsh Medium pupil spaces over the plan period. The Council considers that in the short to medium term, the additional demand for Welsh secondary provision can be met at Ysgol Gyfun Rhydywaun through a proposed extension that increases capacity to 1200. Longer term requirements in regard to both Primary and Secondary Welsh Medium Education will need to be monitored by the Council and considered as part of Band C of the 21st Century Schools programme which commences in 2026.

Whilst pupil projection figures are available for Ysgol Gyfun Rhydywaun to 2024 the corresponding projected admissions figure arising from Welsh Medium primary schools in the MTCBC area is not currently available. For the purposes of the Sustainability Appraisal addendum the projected admissions figures for 2019-2023 used in the Council's previous response (ED041) have been used. It is not considered that the use of the additional projection figure for 2024 would have a significant impact on the overall projected level of Welsh Medium school place demand.

The above Welsh Medium secondary education pupil projections have been used to update the proposed Sustainability Appraisal addendum. This information provides greater certainty regarding the likely sustainability effects of the Plan, in particular, against SA Objective 17 (To facilitate services and facilities that support distinctive local culture and the Welsh language).

Whilst additional detail and certainty can be added to the assessments for the Spatial Strategy, Growth Strategy and potential site allocation impacts, it is considered that the overall effect would not change the assessment scores originally identified against the SA objective. Consequently, it is considered there would be no overall impact to the Sustainability Appraisal of the Replacement LDP.

Any changes considered necessary to clarify the SA of the Replacement LDP have been indicated at Appendix 1 of this statement.

Appendix 1: Addendum to the Replacement LDP Sustainability Appraisal to update Welsh Language assessment

Initial SA (ISA) Report June 2017 (SD09)

Growth Strategy Assessment (p115 of the ISA, SD09)

SA Objective	Planning for population decline	Sustainable population growth	Continuation of Existing Enhanced Growth Strategy
17. To facilitate services and facilities that support distinctive local culture and the Welsh language.	The LDP accepts trend based population projections that anticipate population decline towards the end of the Plan period, and seeks to manage this as effectively as possible. Will require approximately 50-70 dwellings per annum.	The LDP seeks to facilitate and manage a level of sustainable population growth by 2031 (approx. 8% increase). The level of house building will continue broadly along the lines of recent (10 year average) build rates (150 dwellings per annum).	Continuation of current LDP strategy to build over 200 dwellings per annum and subsequently attempt to manage a population increase of over 15% by 2031.
Key Issue:	Population decline is likely to result in a decrease in the number of Welsh speakers in the County Borough, <u>however, this scenario would generate a need for approximately 20 additional secondary Welsh Medium pupil spaces.</u>	The option is likely to attract people into the County Borough, although the LDP cannot directly influence how much of the increased population will be Welsh speakers. Measures to promote the Welsh language will need to be robustly implemented.	The level of population increase could see any distinctiveness of local culture be diluted unless measures to promote local culture and Welsh language are robustly implemented.
Decision Aided Question	Also, the low level of investment (given the low level of development proposed) could result in the condition of assets that reflect the cultural significance of Merthyr Tydfil deteriorating or potentially being lost.	<u>Population growth will increase demand for Welsh medium education and it is estimated that the Replacement LDP will generate a need for approximately 50 additional secondary Welsh Medium pupil spaces over the plan period. Whilst positive effects are realised through the increased number of Welsh medium school pupils, this will place additional pressure on Welsh medium school places. The Council's Education department have advised that they are satisfied the overall level of pupil growth in the County Borough can be accommodated, through a combination of utilising existing</u>	<u>Population growth would increase the number of pupils attending Welsh medium education which would result in positive effects.</u> The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance, however there extra pressure for land for housing <u>and other facilities</u> may result in some of these assets being lost <u>and other negative effects. This</u>
Does the option present opportunities to facilitate the promotion of the Welsh language or local arts, sports and culture in the plan area?			

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		<p><u>capacity, and extensions to existing premises where appropriate. Welsh medium secondary education needs are currently met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff. In the short to medium term, the additional demand for Welsh secondary provision can be met at Ysgol Gyfun Rhydywaun through a proposed extension that would increase capacity to 1200. Longer term requirements in regard to both Primary and Secondary Welsh Medium Education will need to be monitored by the Council and considered as part of Band C of the 21st Century Schools programme which commences in 2026</u></p> <p>The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance</p>	<p><u>includes, for example, an increase in demand for Welsh medium education (approximately 85 additional spaces) which would require additional land for the provision of new and/or extended school sites.</u></p>
Category of Significance	? = Uncertain or Unknown Effects	0 = Neutral effect	? = Uncertain or Unknown Effects

Spatial Strategy Assessment (p128 of the ISA, SD09)

SA Objective	Urban extension and other small sites	Strategic brownfield site and other small sites	Dispersal of small sites across County Borough
17. To facilitate services and facilities that support distinctive local culture and the Welsh language.	Majority of housing (upto 1500 dwellings) would be located on an urban extension at Cwm Glo and Glyndyrys SSSI along with associated leisure, retail and tourism development.	Significant proportion of housing (upto 800 dwellings) will be located on a strategic regeneration site (Abercanaid/Pentrebach). The site will also facilitate employment use and leisure facilities and will form a key part of the South Wales Metro proposals.	Housing will be located on a number of sites across the County Borough (approx. 50-150 dwellings per site), the majority of these sites will be situated in the main Merthyr Tydfil settlement.
Key Issue: Merthyr Tydfil has the second highest proportion of population who are unable to communicate in Welsh (after Blaenau Gwent)	The option is likely to attract people into the County Borough, although the LDP cannot directly influence how much of the increased population will be	The option is likely to attract people into the County Borough, although the LDP cannot directly influence how much of the increased population will be Welsh speakers. Measures to promote the	The option is likely to attract people into the County Borough, although the LDP cannot directly influence how much of the increased population will be

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at 91.36% (2011 Census).	Welsh speakers. Measures to promote the Welsh language will need to be robustly implemented.	Welsh language will need to be robustly implemented.	Welsh speakers. Measures to promote the Welsh language will need to be robustly implemented.
Decision Aided Question	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.
Does the option present opportunities to facilitate the promotion of the Welsh language or local arts, sports and culture in the plan area?	<u>The distribution of growth could be accommodated through the County Borough's existing Welsh medium primary schools. In this respect, the level of growth identified is likely to have a greater impact against this objective. Secondary Welsh medium provision would continue to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term with longer term effects being monitored by the Council.</u>	<u>The distribution of growth could be accommodated through the County Borough's existing Welsh medium primary schools. In this respect, the level of growth identified is likely to have a greater impact against this objective. Secondary Welsh medium provision would continue to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term with longer term effects being monitored by the Council.</u>	<u>The distribution of growth could be accommodated through the County Borough's existing Welsh medium primary schools. In this respect, the level of growth identified is likely to have a greater impact against this objective. Secondary Welsh medium provision would continue to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term with longer term effects being monitored by the Council.</u>
Category of Significance	0 = Neutral effect	0 = Neutral effect	0 = Neutral effect

Deposit Plan SA Report June 2018 (SD06)

Overview of the potential impacts of Allocated Sites

Paragraph 7.54: Sites perform universally positively against Welsh language Objective 17. This is due to the fact that sites would either provide housing in areas within the catchments of either of the 2 Welsh primary schools in the County Borough, thereby providing additional potential pupils for these schools, or would provide non-residential development in these areas (retail, employment, tourism etc.), thereby making the areas more attractive places to live, work and visit and therefore support the County Borough as a place of distinctive Welsh culture. This ensures that the LDP has the scope to facilitate services and facilities that support distinctive local culture and the Welsh language.

7.55 The level of growth proposed will increase demand for Welsh medium education and it is estimated that the Replacement LDP will generate a need for approximately 50 additional secondary Welsh Medium pupil spaces over the plan period. Whilst positive effects are realised through the increased number of Welsh medium school pupils, this will place additional pressure on Welsh medium school places. The Council's Education department have advised that they are satisfied that the overall level of pupil growth in the County Borough can be accommodated, through a combination of utilising existing capacity, and extensions to existing premises. The distribution of growth can be accommodated through the County Borough's existing Welsh medium primary schools given their location in the north and south of the County Borough and capacity (Ysgol Gymraeg Santes Tudful is located in Merthyr Tydfil and Ysgol Rhyd Y Grug in Aberfan). Secondary Welsh medium provision would continue to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term through a proposed extension that would increase capacity to 1200. Longer term requirements in regard to both Primary and Secondary Welsh Medium Education will need to be monitored by the Council and considered as part of Band C of the 21st Century Schools programme which commences in 2026. The Replacement LDP would therefore have the scope to facilitate services and facilities that support distinctive local culture and the Welsh language.

Conclusion: Health, Equalities and Welsh Language Impact Assessment

Paragraph 9.10: The compatibility analysis for the Deposit Plan vision shows a neutral effect on the Welsh language; however LDP Objective 2 specifically relates to the Welsh language and performs positively in this respect. The Plan is considered likely to attract people into the County Borough and although the Plan cannot directly influence how many will be Welsh speakers, the level of growth proposed is likely to result in investment being attracted to facilitate improvements to community facilities or assets of cultural significance and this will help to retain Welsh speaking residents. Sites perform universally positively in regards to the Welsh language. This is due to the fact that sites would provide housing in areas within the catchments of the 2 Welsh primary schools in the County Borough, thereby providing additional potential pupils for these schools. The level of growth will increase demand for Welsh medium education and it is estimated that the Replacement LDP will generate a need for approximately 50 additional secondary Welsh Medium pupil spaces over the plan period. Whilst positive effects are realised through the increased number of Welsh medium school pupils, this will place additional pressure on Welsh medium school places. The Council's Education department have advised that they are satisfied that the overall level of pupil growth in the County Borough can be accommodated, through a combination of utilising existing capacity, and extensions to existing premises. Secondary Welsh medium provision would continue

to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term through a proposed extension that would increase capacity to 1200. Longer term requirements in regard to both Primary and Secondary Welsh Medium Education will need to be monitored by the Council and considered as part of Band C of the 21st Century Schools programme which commences in 2026.

9.11 Additionally the Plan would provide **for** non-residential development in these areas (retail, employment, tourism), thereby making the areas more attractive places to live work and visit and supporting the County Borough as a place of distinctive welsh culture. ~~This will ensure that the LDP has~~ **The Replacement LDP would therefore have** the scope to facilitate services and facilities that support distinctive local culture and the Welsh language.

Overall summary of the sustainability of the Deposit Plan

Paragraph 1.10: In terms of the Welsh language, the compatibility analysis for the LDP vision shows a neutral effect on the Welsh language; however LDP Objective 2 specifically relates to the Welsh language and performs positively in this respect. The Deposit Plan is considered likely to attract and retain population in the County Borough. Although the LDP cannot directly influence how many will be Welsh speakers, the level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance and this will help to retain Welsh speaking residents. Sites perform universally positively in regards to the Welsh language. This is due to the fact that sites would provide housing in areas within the catchments of the 2 Welsh Primary schools in the County Borough, thereby providing additional potential pupils for these schools. **Whilst positive effects are realised through the increased number of Welsh medium school pupils, this will place additional pressure on Welsh medium school places. The Council's Education department have advised that they are satisfied that the overall level of pupil growth in the County Borough can be accommodated, through a combination of utilising existing capacity, and extensions to existing premises. Secondary Welsh medium provision would continue to be met at Ysgol Gyfun Rhydywaun in Rhondda Cynon Taff in the short to medium term. Longer term requirements in regard to both Primary and Secondary Welsh Medium Education will need to be monitored by the Council and considered as part of future investment programmes.** Sites for non-residential development (retail, employment, tourism) will help make the area a more attractive place to live work and visit and will support the County Borough as a place of distinctive Welsh culture. This will ensure that the LDP has the scope to facilitate services and facilities that support distinctive local culture and the Welsh language.