



Mr Paul Selby BEng (Hons) MSc MRTPI
c/o LDP Examination Programme Officer
Unit 5, Triangle Business Park,
Pentrebach,
Merthyr Tydfil
CF48 4TQ
Sent by email to: programmeofficer@merthyr.gov.uk

Dyddiad/Date: 31st October 2019

Ein Cyf./Our ref.:
EXAM02

Gofynnwch am/Please ask for:

Mr John Raine
(Planning Policy Group Leader)

Eich Cyf./Your ref.:
PS/ST

Llinell Uniongyrchol/Direct Line:

01685 726279

e-bost/e-mail:

john.raine@merthyr.gov.uk

Dear Mr Selby;

Local Development Plan Examination: Matters Arising Changes consultation

Further to your letter dated 28th October 2019 the Council has considered the matters raised in relation to the Hoover Strategic Regeneration Area (HSRA) Concept Plan and can advise as follows.

Natural Resources Wales has indicated that the zone C2 flood outline shown on the proposed HSRA Concept Plan (MAC10) does not accord with the current Development Advice Map (DAM) that accompanies Technical Advice Note (TAN) 15 'Development and Flood Risk'. The latest version of the DAM was published on the Lle Geo-Portal for Wales on 1st October 2019¹.

The Development Advice Map is updated quarterly by Natural Resource Wales to take account of any flood map challenges that have been agreed in the intervening period. Challenges can be made regarding the accuracy of the DAM either due to changes in the land, or in light of more accurate survey and modelling data.

The latest version of the DAM contains changes to the flood zone C2 outline at Abercanaid where highly vulnerable development should not be permitted under TAN 15 policy. This change is based on more accurate hydraulic modelling data for the Nant Canaid to the west of the HSRA and the River Taff that NRW have accepted through the map challenge process. Plans illustrating the changes are attached to this letter as Enclosure 1.

The amendments to the flood zone C2 outline do not change the policy position prohibiting highly vulnerable development (including residential) at Dragon Parc or Land West of Gethin Street in Abercanaid as these sites remain located within or are accessed from areas of flood zone C2. Future mitigation works may reduce flood risk within this part of the HSRA so that proposals for highly vulnerable development could be permitted, however, these mitigation works would need to be physically undertaken and a DAM challenge agreed prior to proposals for highly vulnerable development being determined. The position set out at paragraphs 4.43 – 4.45 of the Replacement LDP Written Statement (document ED56) therefore remains unchanged.

¹ <https://lle.gov.wales/catalogue/item/DevelopmentAdviceMap2/?lang=en>

The Replacement LDP is accompanied by a separate Constraints Map which illustrates the NRW Development Advice Map as at June 2018. An updated Constraints Map will be published alongside the adopted Replacement LDP. Paragraph 1.11 of the LDP Written Statement clarifies the status of the LDP Constraints Map and advises that it is correct at the time of publication and may be updated in the future. Furthermore, it states that the Constraints Map is indicative only and detailed development proposals should be informed by up-to-date constraints information available from the relevant responsible designating authority such as Natural Resources Wales, Welsh Government or Cadw.

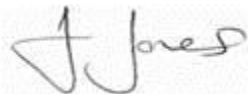
Unlike the Constraints Map, the HSRA Concept Plan would form part of the LDP Written Statement. It contains a disclaimer that states it is a diagrammatic concept plan to be rigorously tested and modified according to the placemaking principles as detailed proposals progress.

Whilst the DAM changes do not alter the policy position prohibiting highly vulnerable development at Dragon Parc or Land West of Gethin Street, additional reasoned justification text could be added to explain the status of the HSRA Concept Plan and that the constraints illustrated may change in the future. Suggested reasoned justification text has been proposed below:

6.4.46 An indicative Concept Plan for the HSRA has been prepared which sets out the vision for the future redevelopment of the regeneration area based on the HSRA Framework Masterplan (June 2018). The Concept Plan is diagrammatic only and development proposals will be rigorously tested and modified with reference to the Placemaking principles set out in Policy SW6. Key environmental and physical constraints have been illustrated on the Concept Plan for indicative purposes only and it should be noted that these may change in the future. For example, regular updates are made to the NRW Development Advice Map relating to flood risk. Detailed development proposals should be informed by up-to-date constraints information that can be obtained from the relevant responsible designating authority.

For accuracy, an amended HSRA Concept Plan has also been prepared that incorporates the updated C2 flood zone (no other changes have been made). This is attached to this letter as Enclosure 2.

Yours sincerely,



MISS J JONES
PRIF SWYDDOG CYNLLUNIO A GWASANAETHAU CYMDOGAETH/ CHIEF OFFICER PLANNING AND
NEIGHBOURHOOD SERVICES

Enclosures:

1. Plans illustrating Development Advice Map C2 Flood Zone changes
2. Updated Hoover Strategic Regeneration Area Concept Plan (October 2019)