



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

HEARING SESSION 1
PLAN PREPARATION, VISION AND OBJECTIVES
TUESDAY JUNE 25TH 2019

PUBLISHED: 11th JUNE 2019

MATTER 1: PLAN PREPARATION, VISION AND OBJECTIVES - HEARING STATEMENT

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Hearing Session 1: Plan Preparation, Vision and Objectives

1.1 Preparation and procedural requirements

a. Has the Plan been prepared in accordance with the approved Delivery Agreement and Community Involvement Scheme?

Yes, the overall objectives of the Community Involvement Scheme (CIS) as set out in the approved Delivery Agreement (DA) (SD19), including the CIS have been met.

The Council has undertaken both statutory and non-statutory consultation processes, engaging with the general public, stakeholders, statutory bodies and industry representatives, where required by the Regulations and as indicated within the CIS.

A comprehensive record of Plan preparation, in accordance with the DA comprising the timetable and CIS, agreed by Welsh Government on 10th August 2016, is set out in the following submitted documents:

- Initial Consultation Report, June 2018 (Document SD15), covering the pre-deposit stages which identified the steps taken to publicise plan preparation (e.g. an Expression of Interest Consultation); how it complied with the CIS contained in the DA (see section 14, SD15); all bodies engaged or consulted at that stage (e.g. Call for Candidate Sites, Cwm Taf Understanding Our Communities Environmental Well-being Workshop, Meetings of the LDP Steering and Working groups - comprising external and internal stakeholders and Members, meetings with external utility bodies e.g. Dwr Cymru Welsh Water and internal Council departments as necessary e.g. Highways and Engineers); the main issues raised and how they influenced the preparation of the Deposit LDP (see Appendices 40 and 41, SD015);
- Deposit Consultation Report, December 2018 (Document SD14), covering the Deposit LDP public consultation. This summarised the representations received and the Council's responses to the matters raised during this stage. In addition, it includes a Statement of Compliance with the CIS at section 8, set out in Table 3 (pages 150 – 152) ; and
- Focussed Change's Consultation Report, March 2019 (Document SD59), which provided an update to the Deposit Plan Consultation Report required under LDP Regulation 22(2). It summarises the representations received during the Focused Changes public consultation, held between 21st January 2019 and 4th March 2019.

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Plan preparation has been an iterative process, with consultation responses considered by the Council throughout, details and summaries of which can be found in Appendices attached to the above reports (Appendix 40 and 41, SD015, Appendix 15, SD14 and Appendix 8, Document SD59). These were made publically available via the Council's website with hard copies being available at locations throughout the County Borough.

i. As per Regulation 9(6)¹, are there reasonable grounds to believe that any deviations have not been likely to prejudice any person's opportunity to be involved in the plan-making process²?

Yes, the Council through its DA and CIS has sought to ensure effective early engagement with stakeholders and the wider community in addition to the statutory public consultation processes.

Every effort has been made to comply with the content and objectives of the CIS throughout the Replacement Development Plan process. There were some areas of departure from the CIS at the Deposit Plan stage of preparation where it was not possible to use the consultation methods originally indicated in the CIS or where it was considered that previous early engagement negated the need to hold further face to face meetings.

This specifically relates to the following:

- Utilising the Cwm Taf Hub, although the Hub website was utilised for the early replacement plan preparation stages the Council's communications team ceased supporting it at the start of the Deposit Plan preparation stage (in part due to poor response rates generally) so alternative consultation and engagement methods as outlined in Appendix 3 of the DA were used;
- Use of the Council 'Contact' magazine, again although this was utilised at the pre-deposit preparation stages the Council reduced circulation of the magazine to quarterly which did not correspond with the Deposit Plan consultation period. The Council used alternative methods to publicise the Deposit Plan and public consultation drop in events (through social media, posters and direct communications) and a press release for the Deposit Plan public consultation generated front page coverage in the Merthyr Express newspaper dated August 2018, entitled '*Council sets out its 13 year plan for 2,250 new homes*; and

¹ Of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended)

² Deposit Plan Consultation Report 2018 [SD14] paragraphs 8.8-8.9.

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- A face to face meeting with the Cwm Taf Public Service Board, at this stage was deemed unnecessary given that:
 - the joint engagement that took place during 'Understanding Our Communities' stakeholder events held to feed into the Cwm Taf Well-being Strategy (see SD54);
 - representatives of the service bodies sat on the Replacement LDP working groups and steering group;
 - members of the LDP Team attended Cwm Taf Public Engagement Group launch event held on Friday, 21st July to explore the draft well-being objectives and to support the Public Services Board to develop them, and
 - each service board would be individually consulted via direct mailing or emailing as part of public consultation process.

It is therefore not considered that these departures prejudiced any person's opportunity to be involved in the plan-making process.

ii. Were stakeholders given a fair opportunity to comment on the Preferred Strategy and Deposit Plan during the consultation periods?

Yes, all stakeholders were given a fair opportunity to comment during the Preferred Strategy and Deposit Plan consultation periods as highlighted in the ICR (Document SD15) and Deposit Plan CR (Document SD14) as demonstrated below:

Preferred Strategy Consultation:

- Prior to the PS Consultation, meetings of the LDP Steering and Working Groups were held (see Section 8 and Appendices 10 - 22, SD15);
- Following the Full Council meeting held on 28th June 2017 the Council resolved that the Preferred Strategy, the Initial Sustainability Appraisal Report (ISA), and the Habitats Regulations Assessment Screening (HRA) Report be approved for a 6 week period of public consultation;
- Preferred Strategy public consultation began on Friday 14th July 2017 until Friday 6th October 2017, providing members of the public and stakeholders with additional time to comment on the Strategy (above the statutory minimum);
- All documents (including a Preferred Strategy Easy read version, Document ED011) were made available to view throughout that time on the Council Website and Cwm Taf websites with hard copies made available at locations throughout the County Borough including the Council Offices at the Civic Centre and Unit 5 Pentrebach, and all

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libraries situated in the Town Centre, Rhydycar, Treharris, Dowlais and Aberfan;

- Public consultation drop-in events, where planning officers were available to answer questions, were held in Dowlais Library, Aberfan Community Library, Bedlinog Inn, Merthyr Food Festival (held in Penderyn Square) and Parc Taf Bargoed and Cyfarthfa Park during other public events throughout July 2017 (see Appendix 36, SD15);
- A presentation was given at a meeting of the Merthyr Tydfil Borough Wide Youth Forum (MTBWYF) in August 2017 (see Appendix 39, SD15);
- The consultation was publicised on the Council Twitter account, *Contact Magazine* and posters distributed throughout the County Borough area (see Appendices 43 and 37, SD15);
- Direct emails and letters were sent out to all stakeholders held on the LDP database (see Appendix 42, SD15); and
- A separate Candidate Sites Consultation was also held between 13th October - 24th November 2017, giving stakeholders an additional opportunity to submit Candidate Sites (in addition to the 'Call for Candidates sites Consultation which took place between 8th September 2016 and 2nd December 2016 page 9, SD15) and the public to submit comments. A meeting was also held with Bedlinog Community Council (the only Community Council in the County Borough) at that time and additional advertising took place on Twitter and the Council and Cwm Taf Hub websites (see section 15, SD15).

Deposit Plan Consultation:

- Prior to the Deposit Plan Consultation meetings of the LDP Steering Group were held (see paragraphs 8.2.4 -5 & Appendices 23 -25, SD15);
- Following the Full Council meeting held on 25th July 2018 the Council resolved that the Replacement Deposit Local Development Plan 2016 - 2031 and associated documents be approved for public consultation purposes;
- The Deposit Plan consultation took place between Monday 30th July 2018 and Monday 10th September 2018 (see section 3, SD14);
- All documents (including an Easy Read version of the Deposit Plan, Document ED012, see Appendices 9 and 10, SD14) were made available to view throughout that time on the Council Website (see Appendix 11, SD14) and hard copies made available at locations throughout the County Borough including the Council Offices at the Civic Centre and Unit 5 Pentrebach, and all libraries situated in the Town Centre, Rhydycar, Treharris, Dowlais and Aberfan;

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- Public consultation drop-in events where planning officers were available to answer any questions were held in Dowlais Library, Aberfan Community Centre, Bedlinog Inn, St. Tydfil's Shopping Centre) and Cyfarthfa Park and Treharris Library throughout July and August 2018;
- The consultation was publicised on the Council Twitter account, in the Merthyr Express and posters were distributed throughout the County Borough area (see Appendices 5 - 8 & 12, SD14) and
- Direct emails and letters were sent out to all stakeholders held on the LDP database (see Appendices 2 – 4, SD14).

b. Has the Plan been subject to satisfactory Sustainability Appraisal (SA) / Strategic Environmental Assessment, with the likely significant effects on the environment of reasonable alternatives identified, described and evaluated within the SA Report and its Addendum³?

Yes, the LDP has been subject to a joint Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), in accordance with the Town and Country Planning (LDP) (Wales) Regulations 2005. The combined SA and SEA process is referred to as the Sustainability Appraisal or "SA" which appraises the likely significant effects (LSE's) and comprises the following reports:

1. The Sustainability Appraisal Baseline Scoping Report, January 2017 (SD10);
2. The Initial Sustainability Appraisal Report (ISA)(SD09) and Non-Technical Summary, June 2017 (Document ED013);
3. The Deposit Plan Sustainability Appraisal Report, June 2018 (SD06);
4. The Deposit Plan Sustainability Appraisal Report – Non Technical Summary, June 2018 (SD07);
5. The Deposit Plan Sustainability Appraisal Report Addendum, December 2018 (SD08).

Prior to the preparation of the SA Baseline Scoping Report (SD10) an inception meeting was held with *Enfusion* (environmental planning and sustainability consultants) who provided the Council with feedback as necessary throughout the Sustainability Appraisal process.

The ISA appraised 'reasonable' alternatives of LSE's as discussed in section 7, SA of Strategic Options (pages 13 -14, 64 -66, SD09) and SA of Spatial Options (pages 13 - 17, 67 -68, SD09). The short-listed options / alternatives were appraised utilising the SA Frameworks set out in the Baseline Report prior to publication (see section 5, Tables 5.1 and 5.2 Strategic SA Framework of SD10

³ Sustainability Appraisal Report June 2018 [SD06] and Addendum December 2018 [SD08]

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and Table 6.1 in SD09). At this stage NRW, as the statutory Environmental consultee, stated that the *'scope and methodologies proposed for the SA seem reasonable. The scope has identified the likely environmental characteristics effected by the LDP and recognises the existing environmental problems within the LDP area'* (Appendix 2, SD10). Their later response letter dated 03/10/17 stated that they had no concerns over the ISA and its findings, including the methodology (see Appendix 28, ICR SD15).

The ISA identifies the LSEs in regard to all the strategic options considered, both in terms of the level and distribution of growth.

Level of Growth Options

The 'planning for population decline' option would have resulted in a declining population that could have a significant negative effect on economic growth and social well-being, although this option would have potentially had less of an impact against some environmental objectives.

Both growth strategies (Mid Growth and Enhanced Growth) have the potential to have significant effects on the environment, with the precise nature of these effects becoming more apparent once the spatial element of the Strategy is considered. However, the significant positive effects that are likely to occur from some level of overall growth are likely to be acceptable in terms of overall sustainability.

Spatial Options

In considering where to accommodate any proposed growth, the Council assessed three spatial options:

- An urban extension in Merthyr Tydfil (Cwmglo and Glyndyrys SSSI) and other small sites.
- A strategic regeneration area in Merthyr Tydfil (Hoover site) and other small sites.
- The dispersal of small sites across the County Borough (continuation of existing LDP).

The 'urban extension' option was considered to have positive effects on population growth and housing, however there are fundamental constraints regarding the likely significant negative effects of this option in relation to biodiversity, soils, landscape and heritage. Developing the Cwmglo and Glyndyrys SSSI as the key component of the LDP strategy was considered to be completely inappropriate given the suitability of the alternative spatial options.

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Whilst the 'dispersed sites' option is essentially a continuation of the spatial strategy of the current LDP, which would be likely to have significant positive effects in regard to population, housing and economic growth, the option does not present the same opportunities that the 'Hoover Strategic Regeneration Area' (HSRA) option does.

The positive effects of the 'HSRA' option are likely to be more significant than the effects of the other spatial options as it will capitalise on the South Wales Metro proposals more than the other spatial options due to its location adjacent to existing strategic public transport infrastructure routes.

The location of the strategic site will also assist in integrating the northern and southern halves of the County Borough. Developing the site will also regenerate a former industrial site that has been largely vacant for nearly 10 years for housing, employment use and leisure facilities. The combination of these likely significant positive effects resulted in the Council considering that the 'Hoover Strategic Regeneration Area' option is the preferred spatial option for delivering sustainable population growth in Merthyr Tydfil County Borough to 2031.

Given that SA is an iterative process the Deposit Plan SA Report and non-technical summary (SD06 and SD07) updates the SA Baseline Scoping Report (SD10) and the ISA (SD09).

Section 7 of the Deposit Plan SA, paragraphs 7.6- 7.18, SD06, summarises the SA of the Growth and Spatial Options, whilst paragraphs 7.19 – 7.27 discusses the SA of the Deposit Plan Growth and Spatial Strategies.

The LSE's of candidate or 'reasonable alternative' sites were appraised using the Sites SA Framework (paragraphs 5.6 – 11, Table 5.4 of SD10 and Table 6.2 of SD09) as summarised in section 8 and Matrix 8.1 of the Initial Sustainability Appraisal (SD09). As SA is an iterative process this was up-dated for the Candidates Sites Consultation held between 8th September and 2nd December 2016. The Candidates Sites Register, dated October 2017 (SD18), which supersedes the previous Candidate Site register, includes SA's of each individual site using the Site SA Framework. The appraisal of allocated sites is contained in the Deposit Plan SA Report and summarised in Figure 7.3 and at paragraphs 7.36-7.37 (SD06), whilst paragraphs 7.38 – 7.55 provides an overview of the allocated site assessments.

An overall summary of the LSE's of the Deposit Plan is given in paragraphs 1.5 – 1.10 of the Deposit SA Report (SD06). An Addendum to the Deposit Plan

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Sustainability Appraisal (SA) was also prepared in December 2018 to appraise the LSE's of the proposed 'Focussed Changes' to the Deposit Plan. In addition, the Addendum makes a comparison for compliance with the requirements of the Future Generations and Well-being Act (FGA) 2015 and in particular the five Ways of Working prescribed by the Act. It highlights the effects that the proposed focused changes to the Replacement LDP have had in regard to the SA of the Deposit Plan. Following consideration of the updated appraisals no implications on the overall SA of the Deposit Plan were identified.

c. Has the Plan been subject to satisfactory Habitats Regulations Assessment?

Yes, the Replacement LDP has been subject to Habitats Regulations Assessment (HRA), as set out in the Conservation of Habitats and Species Regulations 2017.

The Preferred Strategy HRA, June 2017 (Document SD13) considers the potential for the Merthyr Tydfil Local Development Plan (LDP) Preferred Strategy to adversely affect the integrity of any Natura 2000 Sites (also known as 'European Sites'). Given that no sites exist in the County Borough the screening assessment focused on the likelihood of significant impacts on the ten European Sites within 15km of Merthyr Tydfil County Borough. The methods and findings of that screening report reflects the fact that the screening process would be re-run to inform the replacement 'Deposit LDP' to consider the following matters that were not screened out at this stage:

1. All development allocations in the deposit plan must avoid the loss and or degradation of marsh fritillary habitat (of relevance to the Aberbargoed Grasslands SAC and Blaen Cynon SAC).
2. Emissions from new industrial development on protected and allocated industrial sites in the deposit plan must not directly contribute to the degradation of the environmental conditions of the Brecon Beacons SAC, Coedydd Nedd a Mellte SAC, Cwm Cadlan SAC, and Llangorse Lake SAC.

This was in accordance with the response received from NRW as the Statutory Consultee (see Appendices 30 & 31 of the ICR, SD15). A summary of other responses received in relation to the HRA can be seen at Appendix 32 of the ICR (SD15).

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The Deposit HRA, June 2018 (SD12) was re-run to assess the remaining matters as other were screened out at the PS stage. The Deposit Plan Screening Report concluded that the LDP is not likely to significantly adversely affect the integrity of any Natura 2000/European Sites either alone, and given the absence of direct affects, or 'in-combination' with other plans, projects and programmes considered in the light of all available evidence.

In light of the decision of the European Court of Justice in People Over Wind and Sweetman v Coillte Teoranta (c322/17) it was considered necessary to review the HRA screening and prepare an Appropriate Assessment (AA) of the potential for the LDP to adversely affect the above matters either alone or 'in-combination'. This took account of the most recent available information for other plans and projects as well as potential mitigation measures, proposed in the Deposit Plan, to avoid significant adverse effects on the integrity of the sites.

The AA dated December 2018 (SD11) concluded that all significant effects have been discounted and that it is not necessary to examine alternative options for mitigation. No stage 3 detailed assessments were identified as necessary.

d. Does the evidence⁴ demonstrate that statutory duties conferred on the Council under other legislation have been integrated into the plan-making process, including:

i. The well-being duty⁵,

Yes, the Statutory Duty conferred on the Council in relation to the well-being duty has been integrated into the plan – making process as demonstrated in the Section 5 of the Deposit Plan SA Addendum Report (SD08) which summarises compliance with The Well-being of Future Generations Act (FGA) 2015.

This is that the LDP was informed by the key trends and issues identified through preparation of the SA/SEA Scoping Report and ISA which comprised a general review of social, economic and environmental information, the national, regional and local policy context, including national well-being goals. As a result the Deposit Plan Objectives, broadly laid out in line with the main themes of the Duty, address a variety of issues which contribute to

⁴ Including the Cwm Taf Wellbeing Assessment Consultation Report [SD54] and Equalities Impact Assessment Briefing Paper [ED007b]

⁵ Well-being of Future Generations (Wales) Act 2015, section 3

improving the social, cultural, environmental and economic well-being of Wales and helps to ensure that the LDP links in closely with the broader aims of the FGA which defines sustainable development as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle. In addition, the SA Monitoring Framework (section 8, SD06) includes indicators that relate to the Future Generations and Well-being Act (FGA).

ii. The public sector equality duty⁶?

Yes, the Statutory Duty conferred on the Council in relation to the public sector equality duty has been integrated into the plan – making process as demonstrated in the Equalities Impacts Briefing Paper, May 2019 (ED007b), which sets out how the three aims of the Public Sector Equality Duty (PSED) have been integrated into the plan-making process.

In general this has meant undertaking early and effective community involvement to enable the consideration of wide ranging views and the building of a broad consensus as outlined in the CIS of the DA. This detailed how and when the Council would involve the community and other stakeholders in the preparation of the replacement LDP. Its aim was to make the process transparent, enable effective engagement and to build consensus on the Replacement LDP.

This included creating and holding Working Group meetings and other mechanisms for involving stakeholders and communities at each stage in preparing the LDP which were designed to maximise opportunities for joint engagement (such as the Cwm Taf stakeholder workshops and utilising existing planned events e.g. The Merthyr Food Festival). In addition to respond to the population profile (attached at Appendix 5 of the DA), in particular in relation to people from protected groups, direct contact was made throughout public consultation exercises, as part of plan preparation. This included attending a meeting of the Merthyr Borough Wide Youth Forum and emails to Voluntary Action Merthyr (VAMT) who support groups working with or representing people from protected groups such as age, race, religion and sexual orientation.

The Equalities Impacts Briefing Paper also sets out how the Plan might affect persons or groups with protected characteristics under the Equality Act 2010. This was assessed through Equality Impact Assessments at the Preferred Strategy and Deposit Plan stages and an Integrated Impact Assessment at

⁶ Equality Act 2010, section 149

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the Submission and Focused Change stage. These assessments are shown in document ED007b and found that there would likely be low positive impacts against the protected characteristics arising from the fact the LDP will facilitate the delivery of development, services and facilities that can be used by all.

e. Does the Plan have regard to current national planning policy including Planning Policy Wales Edition 10 (PPW) and the Wales Spatial Plan?

Yes, the Plan's spatial strategy stems from the Plan's Vision and the framework is set by the Plan's strategic objectives. The vision and objectives promote Merthyr Tydfil as a key settlement⁷ that has a crucial role to play in the success of the Capital Region, in accordance with the Wales Spatial Plan (WSP, paragraph 19.4)⁸. This recognises that the County Borough has opportunities for growth presented by the dualling of the A465 Heads of the Valleys Road enabling the County Borough to play a full part in the further development of the Capital Region. According to paragraph 19.7 of the WSP this could comprise modern shopping, leisure, community and cultural facilities, more attractive and affordable housing, a clean, vibrant town centre, accessible open countryside and employment opportunities. It is considered that policies contained in the Plan in particular relating to retailing, the town centre, community facilities, employment, open space and the natural environment.

It is however, acknowledged that the WSP was last up-dated 11 years ago and whilst it remains the extant national framework for consideration, it will in due course be replaced by the National Development Framework (NDF), which will set out a 20 year land use framework for Wales. At the time of writing, a draft is due out for consultation in July 2019, and Assembly consideration by April 2020, and it is hoped by that time the Replacement LDP will have been adopted prior to publication of the NDF by September 2020. It is however, likely that Merthyr Tydfil will retain its position in the settlement hierarchy and still play a crucial role in the success of the Capital Region, so that consistency will remain between the local policies contained in the replacement LDP and national planning framework.

Given that PPW10 was up-dated and approved in December 2018, during preparation of the Replacement LDP Deposit Plan Written Statement (as amended by focussed changes, December 2018), every effort has been made to include up-to-date references to PPW. In particular, where the

⁷ See paragraph 2.4 of Document SD01

⁸ People, Places, Futures – The Wales Spatial Plan, 2008 Update

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nature of the guidance has changed, measures have been proposed to ensure consistency with PPW10, and where changes are deemed necessary, these have been dealt with as Proposed Matters Arising Changes.

f. Does the Plan have regard to other relevant plans and strategies?

Yes, the Plan has had regard to relevant plans and strategies as can be seen in section 2 of the Sustainability Appraisal Baseline Scoping Report (SD10), which lists key national, regional and local plans and programmes that are of relevance to the replacement LDP. This was up-dated as attached at Appendix 2, page 103 of the ISA (SD09) and Appendix 1 of the Deposit Plan Sustainability Appraisal Report (SD06).

Each of the documents are addressed as shown below:

i. The Cwm Taf Well-being Plan 2018-2023.

During preparation of the Cwm Taf Well-being Plan the LDP Team held a joint engagement event 'LDP and Well-being of Future Generations Wellbeing Assessment' on 4th November 2016, as part of the *Understanding Our Communities* stakeholder workshops held to inform the Well-being Plan (see Appendix 1: page 109 of SD10 for full list of Understanding Our Communities stakeholder workshops). The findings of the workshops are set out in Cwm Taf: Understanding Our Communities Wellbeing Assessment Consultation: Brief Analysis Report, December 2016 (SD54). Paragraph 1.6 of that document states "*It is also important to note that all of the workshops were designed to inform the 1st Replacement Merthyr Tydfil Local Development Plan, with the Environmental well-being workshop, particularly being run (and funded by MTCBC) to focus on key issues for the Plan*". In this case the findings and issues raised from the workshops and in particular the Environmental Well-Being workshop was fed into formulating the 'key issues' and LDP objectives as set out in the Preferred Strategy (SD17). As mentioned earlier, members of the LDP Team also attended the Cwm Taf Public Engagement Group launch event held on Friday, 21st July 2017 to explore the draft well-being objectives and to support the Public Services Board to develop them.

Since that time as the Plan has progressed regard has been had to the published Cwm Taf Well-being Plan 2018-2023, May 2018 (SDED006), which covers Merthyr Tydfil and Rhondda Cynon Taf County Borough areas. For example, the Well-being Plan identifies prioritised well-being objectives and the steps needed to achieve them, the cross-cutting objective being to 'tackling loneliness & isolation'. It is considered that Deposit Plan policies

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including SW10, SW11, SW12, SW13, EnW4, EcW7 and EcW8 would help to achieve some of the steps set out on page 2 of that document and in particular in relation to the long term vision, which include:

- A safe, healthy environment which people use, value and enjoy;
- A better understanding of our natural assets and how our actions impact on them;
- People of all ages spend time outdoors, using and enjoying their local environment to improve their health and wellbeing;
- Encourage opportunities for development and regeneration as the City Deal delivers jobs and returns on its investments, including attracting hotels;
- Supporting the development of a clean economy and
- A vibrant tourist industry attracting people from near and far, enjoying our natural environment, history and culture.

The Plan's policies can also help towards achieving other steps outlined in the document including:

- Reviewing our public land assets to maximise their contribution for communities and ecosystem resilience;
- Helping groups to take ownership or adopt open green spaces;
- Helping groups to improve rundown buildings for community use;
- Helping people who have poor mental health, are lonely or have damaged the local environment to get involved in local projects;
- Making the most of opportunities to walk and cycle to work and school with safe routes to schools, community venues, the natural environment and new Metro links to encourage walking and cycling.
- Integrating outdoor activity into daily lives e.g. daily mile and outdoor learning in schools, identifying walking routes near workplaces to encourage activity in breaks and walking routes in every community and
- Using our Local Development Plans, planning laws and publicly owned land to increase safe access to the outdoors, walking and cycling with a healthy range of food outlets.

ii. The Local Transport Plan for the South East Wales Valleys

The South East Wales Valleys 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,

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including the status of schemes identified, is due to be reviewed and updated in 2020.

The Replacement LDP has reviewed the schemes identified in the LTP and has included transport schemes within Policy SW12 where these remain up to date and where sufficient information is available and the schemes are likely to take place within the plan period. Further details of the schemes considered is provided in the Council's Hearing Statement for Matter 2: Plan Strategy, Delivery and Infrastructure.

With regards to Merthyr Tydfil, Table 1 of the LTP (Issues, Opportunities and Interventions) identifies that people without access to a car may be excluded from accessing some job and leisure opportunities and therefore seeks to improve non-car travel opportunities between communities, employment and healthcare sites, through supporting, for example, active travel schemes, bus infrastructure improvements and Park and Ride schemes.

It is considered that Replacement LDP Policy SW12 would support the LTP objectives and supports its implementation, in particular through:

- The proposed Active Travel Routes (identified in the Integrated Network Map);
- The allocation of land for the new bus station; and
- Pentrebach Station Park and Ride.

iii. The Cardiff Capital Region Industrial and Economic Growth Plan

The Cardiff Capital Region Industrial and Economic Growth Plan was published in February 2019, following submission of the Replacement LDP in January 2019. This has been submitted as Examination Document ED014.

This Industrial and Economic Plan is a high level strategy produced by the Cardiff Capital Region (City Deal) Economic Growth Partnership. It sets out a long-term 20 year plan to boost productivity and accelerate economic and inclusive growth in the Cardiff Capital Region (CCR). This would be achieved through making the region a highly investable proposition, backing businesses to create good and sustainable jobs through targeted investments in skills, priority industries, infrastructure and innovation. The document also sets the vision for the future economic growth of the region under various themes such as investment, intervention frameworks, productivity, business development, skills, infrastructure, and innovation.

The Cardiff Capital Region Industrial and Economic Growth Plan (Document ED014) identifies Merthyr Tydfil as one of seven 'Strategic Hubs' in the region, reflecting the town's economic and social role in the Heads of the Valleys and good highway and public transport links. It also identifies the benefits of the South Wales Metro as a backbone to connecting CCR and shaping places on its networks. The Replacement LDP Strategy, through focusing new development within the Primary Growth Area and at the Hoover Strategic Regeneration Area, is therefore consistent with this element of the CCR Economic Growth Plan.

Whilst the Replacement LDP was prepared prior to the publication of the strategy it is considered the LDP and its proposals are consistent with the new Industrial and Economic Growth Plan. This is considered to be the case as the Replacement Plan has been informed by an up-to-date Employment Land Review published in June 2018 (SD35) which has ensured the Plan's economic development policies remain effective and that appropriate employment site provision is made. The Employment Land Review also reviewed the policy and economic context of the County Borough including the evolving City Deal proposals and the previous Cardiff Capital Region economic strategy 'Powering the Welsh Economy' that was published in 2015 (SD35, pages 31-34). Consequently, it is considered that the Plan has regard to the evolving Cardiff Capital Region proposals and the vision contained within the Cardiff Capital Region Industrial and Economic Growth Plan (Document ED014).

iv. The adopted Local Development Plans of neighbouring authorities?

The Merthyr Tydfil Replacement LDP has had regard to the following neighbouring authorities' Adopted LDPs:

- Caerphilly County Borough Council Local Development Plan 2006 - 2021, adopted November 2010;
- Rhondda Cynon Taf Local Development Plan 2006-2021, adopted March 2011; and
- Brecon Beacons National Park Local Development Plan 2011-2026, adopted December 2013;

The Council has had due regard to adjoining adopted Local Development Plans and it is considered that there are no significant conflicts with the Replacement LDP and adjoining LDPs. The strategy and level of growth that

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has been proposed is considered to be realistic for the County Borough and is not reliant on proposals in neighbouring LDPs.

The iterative Sustainability Appraisal process (SD06, SD08, SD09, SD10) has also reviewed and identified local and regional issues as part of the plans, policies and programmes review which where relevant were considered as part of the appraisals. In addition, Habitats Regulations Assessment Reports (SD11, SD12 and SD13) have considered the potential impacts on European protected sites in adjoining local authorities.

Key pieces of the evidence base such as the Employment Land Study (SD35), Merthyr Tydfil Retail Study and Commercial Leisure Study (SD30), Special Landscape Areas background paper (SD26) and Sites of Importance for Nature Conservation background paper (SD27) have also considered planning and development issues in adjoining local authorities.

During preparation of the Replacement LDP:

- It was found that RCT and Caerphilly have sufficient employment land to meet their own needs and need not rely on land in MTCB area to support their needs;
- It was decided to propose new Sites Importance for Nature Conservation (SINCs) to align with those designated in RCT for consistency;
- In line with those already designated in RCT and Caerphilly It was decided to propose Special Landscape Areas (SLA's) which serve to conserve and protect locally special landscapes and views;
- It was decided to include retail policies supported by evidence gathered from within the MTCB area and the surrounding LPA areas, recognising its place as a regional centre in the heads of the valleys area;
- It was decided to safeguard transport schemes with regional benefits such as the South Wales Metro proposals and land for the future rail line extension Cwm Bargoed to Dowlais Top.

1.2 Key issues, vision and objectives

a. Has the Plan adequately captured the key land use issues and opportunities facing the County Borough, including 'areas of concern' outlined in the 2016 Review Report⁹?

Yes, the Council considers that the Plan adequately captures the key land use issues and opportunities facing the County Borough. The main opportunity has arisen through the opportunity to strategically redevelop the Hoover Factory Site and wider surrounding area.

Other key land use issues that have been captured in the Plan include access to open space of a sufficient quality; the need for more social, affordable and older persons housing; the limited development of employment land during the past 5 years; the connectivity of footpaths and cycleways; the need to protect and proactively manage high quality landscape areas; and the need to regenerate underused/disused brownfield land. The Replacement LDP contains a number of policies, allocations and designations that directly aim to address these issues.

Paragraph 2.2 of the Review Report, April 2016 (document SD20) identified the following areas of concern which the replacement Plan has sought to address as discussed below:

- The supply of housing land;
The housing land supply figure had been below the minimum requirement of 5 years since the LDP was adopted in 2011, and had dropped to less than 2 years in 2016.

The replacement LDP proposes a level of housing growth that is more realistic and deliverable than the adopted LDP, and coupled with the allocation of some new housing sites, this will result in the Council having a housing land supply of over 6 years upon adoption, with the trajectory indicating that this figure will rise throughout the Plan period.

- The number of dwellings built in the Primary Growth Area and the number of dwellings being built, particularly general market dwellings;
These two indicators were areas of concern as the number of completions in the PGA and the overall number of dwellings completed in the County

⁹ Review Report 2016 [SD20] paragraph 2.2

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Borough were significantly lower than the levels required in the adopted LDP.

Again, the replacement LDP proposes a level of housing growth that is more realistic and deliverable than the adopted LDP, and coupled with the allocation of some new housing sites, these two areas of concern will be addressed.

- The amount of employment floorspace built in the Primary Growth Area (PGA) and the delivery of B1 employment floorspace;

Increasing employment opportunities in the County Borough was a key component of the adopted LDP growth strategy. In order to implement this strategy a need for 0.7 ha for industrial/warehousing and 8.5 ha for office (B1) provision was identified.

However an over provision of 27.52 ha was allocated to take account of the additional needs of the waste management sector and to enable choice and flexibility for the employment market and although some interim targets were met, meeting the longer term targets remained a challenge.

In this case, the employment needs of the County Borough area were reviewed in the Merthyr Tydfil Employment Land Review, June 2018 (Document SD35) and regard was had to the Council's emerging Economic Growth Strategy which took account of the City Deal and the aspiration of the Cardiff Capital Region (CCR). In line with this the replacement Plan seeks to maximise the economic potential offered by the improvements to the connectivity of transport links; support the growth of indigenous businesses and to attract inward investment. The Plan seeks to achieve this by allocating and protecting a range of employment land and premises at suitable locations well connected to the transportation network whilst prioritising the use of previously developed land.

- The percentage of LDP land allocations delivered and the percentage of total development permitted on allocated sites;

These two areas of concern are also linked to the over-ambitious level of growth proposed in the adopted LDP as both indicators were regularly scoring significantly lower than the monitoring framework required.

The most recent AMR, October 2018 (Document ED015) states that approximately 36% of allocations has been developed by March 2018,

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where the LDP required 65% of allocations to be completed by the end of 2016. The same AMR also shows that the percentage of total development permitted on allocated sites had dropped below the trigger of 80% for 2 consecutive years, with the figure for 2017/18 being 19%.

The more realistic level of growth proposed in the replacement LDP, coupled with the allocation of sites in the Plan that have been subject to closer scrutiny in regards to their deliverability, should enable these two areas of concern to be addressed.

- The vacancy rate of retail premises in Merthyr Tydfil Town Centre:
This is a contextual indicator which reflects the general 'health' of the Town Centre. Whilst economic conditions have been identified as the principal cause behind the failure to improve vacancy rates, it is hoped that the broader policy interventions including considering other commercial and complimentary uses contained in the replacement LDP will assist in improving the vitality and viability of the Town Centre.

b. Are the vision and objectives consistent with national Key Planning Principles¹⁰ and will they contribute towards the National Sustainable Placemaking Outcomes¹¹?

Yes, it is considered that the LDP vision and objectives are both consistent with and can contribute towards the National Sustainable Placemaking Outcomes as specified in PPW10. They provide an over-arching context for the plan and show how economic, social, cultural and environmental considerations are balanced to deliver development in a sustainable manner in line with the Key Planning Principles.

Vision

The adopted LDP vision was up-dated in the replacement Plan to align with the Single Integrated Plan (SIP)¹² vision as proposed in paragraph 3.5 of the Review Report, April 2016 (document SD20) which states "*Whilst the visions of the LDP and SIP are broadly compatible, the LDP Vision should be revised to align more closely with the Vision of the SIP particularly in respect of the*

¹⁰ PPW Figure 3

¹¹ PPW Figure 4

¹² Single Integrated Plan for Merthyr Tydfil 2013 -2017

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emphasis on the development of people's health, skills and life-long learning".

Paragraph 3.7 noted that the SIP would shortly be replaced by the Local Well-being Plan (LWP) and stated although the LWP *"for the County Borough is at an early stage of development, it is considered beneficial to undertake a brief assessment of whether the Vision of the LDP contributes to the achievement of the well-being goals"*. The LDP Team worked together with the team responsible for preparing the authorities' Local Well-being Statement and ensured that the visions aligned. Appendix 10, of the 2018/19¹³ LWP version sets out the authorities shared vision for Merthyr Tydfil which forms the basis for the replacement LDP vision as follows:

*"To strengthen Merthyr Tydfil's position as the regional centre for the Heads of the Valleys, and be a place to be proud of where:
People learn and develop skills to fulfil their ambitions,
People live, work, have a safe, healthy and fulfilled life,
People visit, enjoy and return"*.

The replacement LDP vision builds on this by adding reference to the Cardiff Capital Region (CCR) and a sustainable level of population growth as follows:

*"To strengthen Merthyr Tydfil's position as the regional centre for the Heads of the Valleys, within the Cardiff capital region, to encourage a sustainable level of population growth and be a place to be proud of where:
People learn and develop skills to fulfil their ambitions,
People live, work, have a safe, healthy and fulfilled life,
People visit, enjoy and return"*.

Table 1.1 below demonstrates where the vision is consistent with and can contribute to the national Key Planning Principles¹⁴ and thereby steer the Plan towards taking forward the National Sustainable Outcomes.

Table 1.1 How the Vision contributes to the Key Planning Principles:	
Growing our economy in a sustainable manner:	<ul style="list-style-type: none"> • Strengthening Merthyr Tydfil's position as the regional centre for the Heads of the Valleys and within the Cardiff capital region • People learn and develop • People work
Making better use of resources:	<ul style="list-style-type: none"> • Encouraging a sustainable level of population growth
Facilitating accessible and healthy environments:	<ul style="list-style-type: none"> • People have a safe and healthy life • People visit, enjoy and return

¹³ Merthyr Tydfil County Borough Council Statement of Wellbeing 2018/19 (ED016)

¹⁴ PPW10 Figure 3

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Creating & Sustaining communities:	<ul style="list-style-type: none"> • Encouraging a sustainable level of population growth • People live, work, have a safe, healthy and fulfilled life • People fulfil their ambitions
Maximising environmental and limiting environmental impacts:	<ul style="list-style-type: none"> • Encouraging a sustainable level of population growth

Objectives

The LDP objectives add further detail as to how the Plan and local planning decisions will deliver the vision. They have been formulated to realise the vision, support local well-being objectives and address key issues raised through consultation and identified during gathering the evidence base including aligning with national policy. They address various social, cultural, environmental and economic outcomes and provide a framework for policies and proposals formulated to deliver the Plans vision. Table 1.2 below shows that whilst the objectives have links to the Key Planning Principles they are cross cutting in nature and will therefore be relevant to a number of the National Sustainable Placemaking Outcomes.

Table 2.1 How the LDP Objectives are consistent and can contribute to the Key Planning Principles/National Sustainable Placemaking Outcomes:

Key Planning Principles: Creating and Sustaining Communities	
National Sustainable Placemaking Outcomes	Replacement LDP Objectives
<ul style="list-style-type: none"> • Enables the Welsh language to thrive • Appropriate development densities • Homes and jobs to meet society's needs • A mix of uses • Offers cultural experiences • Community based facilities and services 	<ul style="list-style-type: none"> • <i>To protect and enhance Welsh language and culture.</i> • <i>To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.</i> • <i>To provide and safeguard appropriate land for economic and skills development.</i> • <i>To protect, enhance and promote all heritage, historic and cultural assets.</i> • <i>To support existing community facilities and suitable community led development.</i>
Key Planning Principles: Making Best Use of Resources	
National Sustainable Placemaking Outcomes	Replacement LDP Objectives
<ul style="list-style-type: none"> • Makes best use of natural resources • Prevents waste • Prioritises the use of previously developed land and existing 	<ul style="list-style-type: none"> • <i>To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities.</i> • <i>To promote renewable and low carbon energy.</i>

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<ul style="list-style-type: none"> • buildings • Unlocks potential and regenerates • High quality and built to last 	<ul style="list-style-type: none"> • To ensure a sustainable supply of minerals. • To promote the suitable reuse of previously developed land and the continued regeneration of local communities. • To ensure that community infrastructure and open space supports the regeneration of local communities • To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change.
Key Planning Principles: Maximising Environmental Protection and Limiting Environmental Impact	
National Sustainable Placemaking Outcomes	Replacement LDP Objectives
<ul style="list-style-type: none"> • Resilient biodiversity and ecosystems • Distinctive and special landscapes • Integrated green infrastructure • Appropriate soundscapes • Reduces environmental risks • Manages water resources naturally • Clean air • Reduces overall pollution • Resilient to climate change • Distinctive and special historic environments 	<ul style="list-style-type: none"> • To improve ecosystem resilience and connectivity which support • To protect and enhance the character and appearance of the landscape and the countryside. • To promote renewable and low carbon energy. • To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change. • To protect, enhance and promote all heritage, historic and cultural assets
Key Planning Principles: Growing Our Economy in a Sustainable Manner	
National Sustainable Placemaking Outcomes	Replacement LDP Objectives
<ul style="list-style-type: none"> • Fosters economic activity • Enables easy communication • Generates its own renewable energy • Vibrant and dynamic • Adaptive to change • Embraces smart and innovative technology 	<ul style="list-style-type: none"> • To provide and safeguard appropriate land for economic and skills development. • To strengthen and diversify the rural economy. • To promote renewable and low carbon energy. • To support sustainable tourism, leisure and recreation developments and encourage an all year round tourism industry. • To develop the town and local centres as accessible, attractive, viable and vibrant places.
Key Planning Principles: Facilitating Accessible and Healthy Environments	
National Sustainable Placemaking Outcomes	Replacement LDP Objectives
<ul style="list-style-type: none"> • Accessible and high quality green space 	<ul style="list-style-type: none"> • To ensure that community infrastructure and open space supports the

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<ul style="list-style-type: none">• Accessible by means of active travel and public transport• Not car dependent• Minimises the need to travel• Provides equality of access• Feels safe and inclusive• Supports a diverse population• Good connections• Convenient access to goods and services• Promotes physical and mental health and well-being	<p><i>regeneration of local communities</i></p> <ul style="list-style-type: none">• <i>To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.</i>• <i>To encourage a sustainable level and distribution of population growth.</i>
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