

**Cynllun Datblygu Lleol Newydd Cyngor Bwrdeistref Sirol Merthyr Tudful (2016-2031)**  
**Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016-2031)**



**Deposit Plan Sustainability Appraisal Report - Further Addendum**

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## 0. Executive Summary

- 0.1 This document is a further Addendum to the Deposit Plan Sustainability Appraisal (SA) Report, June 2018, one of the deposit plan documents prepared for the Merthyr Tydfil County Borough Council (MTCBC) Replacement Local Development Plan (LDP) 2016 -2031. An initial addendum was produced in December 2018 that considered the impact on the Sustainability Appraisal of the Focussed Changes that were proposed to the Deposit Plan.
- 0.2 Further changes have been proposed to the LDP through the Examination process, and these are contained in the Schedule of Matters Arising Changes (MACs) to the Replacement LDP dated September 2019.
- 0.3 This report assesses these changes through the SA process comprising:
- Screening all the proposed changes to identify whether a detailed SA for each MACs is required;
  - Undertaking a detailed SA of the MACs that have not been screened out; and
  - Considering the overall effect on the Sustainability Appraisal of the Replacement LDP

The findings are set out in this document in Tables 3.1, 4.2 and at Section 7 - Conclusions and Recommendations.

- 0.5 On adoption of the Replacement LDP, the Council will publish an adoption statement explaining how the SA has influenced the LDP and a Final SA Report. This will include reference to the updated detailed assessments contained in this Addendum where necessary.
- 0.6 This addendum highlights the effects that the proposed Matters Arising Changes have had with regard to the Sustainability Appraisal of the Deposit Plan. Following consideration of the updated detailed appraisals, no implications on the overall SA of the Deposit Plan were identified.

## 1. Introduction

- 1.1 An initial addendum to the Deposit Plan SA was report was produced in December 2018 in order to consider the effects of the proposed Focused Changes to the LDP on the Sustainability Appraisal of the Plan. As a result of the Examination process the Council has considered a number of further changes to the LDP are necessary in order to make the Plan sound. These changes have been categorised as Matters Arising Changes (MACs) and are set out in the *Schedule of Matters Arising Changes to the Replacement LDP – September 2019*.
- 1.2 All proposed changes require consideration of the potential impacts on the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in order to check if they alter the 'likely significant effects' predicted in the Deposit SA Report, or may lead to any new potential significant effects.
- 1.3 This document forms a further Addendum to the June 2018 Deposit Plan SA Report and identifies whether the outcomes of that report should be varied from those originally reported as a result of the MACs. If they should be varied, this addendum specifies where and how. As such, although this addendum is a full SA of the Matters Arising Changes, it should still be read in conjunction with the Deposit SA Report (June 2018) and SA Addendum (December 2018).
- 1.4 This Addendum includes the following:
  - A screening of the Matters Arising Changes to see if they 'materially' change what the SA assessed, or what the SA assumed about how the LDP would be implemented (i.e. whether there would be changes to the actions the LDP might inevitably lead to);
  - A detailed assessment of the proposed changes that have been 'screened in' as requiring further assessment; and
  - Conclusions and recommendations to clarify where references in the original SA Report should be changed and consideration of the implications any potential significant effects on the overall Sustainability Appraisal of the Plan which could be brought about by the proposed Matters Arising Changes.

## 2. Statutory Requirements

- 2.1 Section 69(6) of the Planning and Compulsory Purchase Act 2004 (UK Government, 2004), as amended, requires the Council to appraise the sustainability [Sustainability Appraisal or 'SA'] of the LDP and to report its findings as an integral part of the plan preparation process. Under the 2004 Act, SA must cover the social and economic effects of the LDP as well as the environmental effects.
- 2.2 In addition, the Council must comply with EU SEA Directive 2001/42/EC and the Environmental Assessment of the Plans and Programmes (Wales) Regulations 2004 which transposes the requirement to undertake formal Strategic Environmental Assessment (SEA) during plan preparation into Welsh law.
- 2.3 The Well-being of Future Generations Act (FGA) 2015 places a duty on the council to carry out sustainable development and requires an improvement in the delivery of social, economic, environmental and cultural well-being. The Act established seven well-being goals and in order to demonstrate that appropriate consideration has been given to the Well-being goals and sustainable development principle the Council is required to have regard to the 'five ways of working' contained in the Well-being Act.
- 2.4 The Council has a duty under the Equality Act 2010 to assess the impact of its policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. This is carried out through an Equality Impact Assessment (EqIA).
- 2.5 TAN 20 states that the SA should assess evidence of the impacts of the spatial strategy, policies and allocations on the Welsh language whilst the Planning (Wales) Act 2015 contains provisions relating to the consideration of the Welsh language in the appraisal of development plans.
- 2.6 Health Impact Assessment (HIA) is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thereby the overall SA process.

### 3. Screening of Matters Arising Changes

- 3.1 As part of the Examination process the Council has proposed a number of Matters Arising Changes to the Deposit Plan which are considered necessary to make the Plan sound. A list of these can be found in the *Schedule of Matters Arising Changes to the Replacement LDP September 2019*, published alongside an up-dated *Deposit Plan Written Statement*.
- 3.2 The proposed Matters Arising Changes have the potential to change the assessment of likely effects on social, economic and environmental interests. However, many of the changes proposed are minor or relate to updates or clarifications that are not significant in terms of their impact.
- 3.3 The first step is an initial SA 'screening' of all the Matters Arising Changes to identify those that could have a significant effect on the final outcome of implementation of the Plan. In some cases, a single substantive change resulted in a number of consequential changes throughout the Plan to update policies and justification paragraphs to take account of the change. Each proposed Matters Arising Change has first been compared against the Deposit Plan policies and supporting information to check whether or not it changes the intention of the policy or supporting text, and thereby the Deposit Plan SA assessments or any of the SA's original assumptions. This Initial Screening is set out in the Table 3.1 below.

**TABLE 3.1: Initial Screening Assessment of Matters Arising Changes**

MAC ref: MAC1		Policy /Section/Map: Contents page	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amendment to contents page. Consequential changes due to additional Appendices.	No	A consequential change that does not have an effect on the implementation of the Plan	
MAC ref: MAC2		Policy /Section/Map: Introduction	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amendment to clarify that the Constraints Map does not form part of the development plan and is a separate supplementary document.	No	This clarification does not have an effect on the implementation of the Plan.	

<b>MAC ref: MAC3</b>		<b>Policy /Section/Map: Para 4.40</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Clarification of the status of Trago Mills and Cyfarthfa Retail Park as out of centre developments		No	This clarification does not have an effect on the implementation of the Plan.
<b>MAC ref: MAC4.1 – MAC4.8</b>		<b>Policy /Section/Map: Policy SW1: Provision of new homes; Policy SW2: Provision of Affordable Housing; Policy SW3: Sustainably distributing new homes</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Policies SW1, 2 and 3 have been amended to reflect changes to residential site allocations. Clarifications regarding the Plan's affordable housing policy and provision have also been included.		Yes	The amendments do not affect the assessments of the policies themselves as the overall level of housing, affordable housing provision, and the spatial distribution of new homes has not significantly changed. However, SA assessments of the new housing allocations have been undertaken and are appended to this document (see section 4).
<b>MAC ref: MAC5</b>		<b>Policy /Section/Map: Policy SW3: Sustainably distributing new homes</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to Table 2 (components and distribution of housing supply) to reflect the changes to the components and distribution of housing supply as a result of the changes to the allocated sites under Policy SW3.		No	A consequential change that does not have an effect on the implementation of the Plan.
<b>MAC ref: MAC6</b>		<b>Policy /Section/Map: Policy SW4: Settlement Boundaries</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Clarification of the approach to assessing tourism, leisure and recreation development and complementary development outside settlement boundaries.		No	The amendments do not affect the SA of the policy, but clarify how the policy will assess certain types of development in line with national policy.
<b>MAC ref: MAC7</b>		<b>Policy /Section/Map: Para 6.5.31</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>

Additional text to ensure alignment with changes to Policies SW4 and EcW7 with regards to leisure, tourism and recreation development.	No	A consequential change that does not have an effect on the implementation of the Plan.
<b>MAC ref: MAC8</b>	<b>Policy /Section/Map: Para 6.5.32</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Deletion of paragraph to ensure alignment with Policy SW4 and in line with MAC7.	No	A consequential change that does not have an effect on the implementation of the Plan.
<b>MAC ref: MAC9</b>	<b>Policy /Section/Map: Policy SW6: Hoover Strategic Regeneration Area</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to the amount of retail provision sought on site, and clarification with regards to the amount of open space to be provided.	No	Amendments to the policy are clarifications which do not have a significant impact on the implementation of the policy or the sustainability objectives.
<b>MAC ref: MAC10</b>	<b>Policy /Section/Map: Appendix 1</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Addition of a Hoover Strategic Regeneration Area 'Concept Plan' to the LDP Written Statement in order to give greater clarity as to how the Council envisages development at the HSRA coming forward.	No	The change adds additional information/clarification to the Plan and does not have an impact on the implementation of the policy or the sustainability objectives.
<b>MAC ref: MAC11</b>	<b>Policy /Section/Map: Policy SW7: The Former Ivor Steel Works Regeneration Site</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to the policy to clarify and improve the effectiveness of Policy SW7.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC12</b>	<b>Policy /Section/Map: Policy SW9: Planning Obligations</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify the wording of the policy in relation to affordable housing levels to be	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.



sought, and to clarify the types of open space provision that will be sought.			
<b>MAC ref: MAC13</b>	<b>Policy /Section/Map: 6.5.59</b>		
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Amendments to clarify: the types of open space provision that will be sought; that SUDs could contribute to public open space provision; and to include a reference to the Council's open space standards at Appendix 7 of the LDP.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
<b>MAC ref: MAC14</b>	<b>Policy /Section/Map: Policy SW10: Protecting and Improving Open Spaces</b>		
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Removal of proposed Local Nature Reserves from Policy SW10.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
<b>MAC ref: MAC15</b>	<b>Policy /Section/Map: 6.5.63</b>		
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Amendment to state that Open Spaces should be shown on the LDP Proposals Map.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
<b>MAC ref: MAC16</b>	<b>Policy /Section/Map: 6.5.65</b>		
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Deletion of paragraph that refers to Local Nature Reserves.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
<b>MAC ref: MAC17</b>	<b>Policy /Section/Map: Para 6.4.65/66</b>		
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Insertion of text to promote specialist housing needs.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	

MAC ref: MAC18		Policy /Section/Map: Policy SW11: Sustainable Design and Placemaking	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amendments to the policy to ensure there is sufficient flexibility in the application of the policy; and to encourage inclusive/adaptable design.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
MAC ref: MAC19		Policy /Section/Map: Policy SW11: Sustainable Design and Placemaking	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amendments to justification text in order to provide sufficient clarity with regard to the separate consenting regimes for planning permission and sustainable drainage systems.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.	
MAC ref: MAC20		Policy /Section/Map: Policy SW11: Sustainable Design and Placemaking	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Additional justification paragraph to provide additional clarity with regard to the separate consenting regimes for planning permission and sustainable drainage systems.	No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter.	
MAC ref: MAC21		Policy /Section/Map: Policy SW12: Improving the Transport Network	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Reference to 'existing and proposed' Active Travel Routes has been deleted and replaced with 'Proposed Active Travel Integrated Network Map' Routes to clarify what is shown on the Proposals Map.	No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter.	

<b>MAC ref: MAC22</b>		<b>Policy /Section/Map: Policy SW13: Protecting and Improving Community Facilities</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional supporting text to clarify that the definition of community facilities could include existing corner or village shops and other facilities that fulfil a role of serving the community.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC23.1 - 3</b>		<b>Policy /Section/Map: Policy CW1: The Historic Environment</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify that part 1 of Policy CW1 is intended to refer to designated historic assets and part 2 to undesignated assets. Further amendments to justification text to clarify how the policy will be implemented.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC24</b>		<b>Policy /Section/Map: Para 6.5.10</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Minor textual amendments to clarify that assessments listed in Policy CW1 would be requested in the consideration of development proposals where appropriate.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC25</b>		<b>Policy /Section/Map: Para 6.6.8</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to strengthen reference to the 'step-wise' approach set out in PPW10 and help to clarify how development proposals would be assessed.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC26</b>		<b>Policy /Section/Map: Para 6.6.12 - 14</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to ensure consistency with national policy and Policy EnW1 which use the		No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter and

<p>term 'clearly outweighs' for instances where harmful environmental effects outweigh other material considerations, and to clarify how development proposals would be assessed against a step-wise approach.</p>		<p>how the policy will be implemented.</p>
<p><b>MAC ref: MAC27</b></p>	<p><b>Policy /Section/Map: Policy EnW2: Internationally and Nationally Protected Sites and Species</b></p>	
<p><b>Proposed MAC</b></p>	<p><b>Detailed SA required? Yes/No</b></p>	<p><b>Reason</b></p>
<p>Amendments to correct the typographical error in transposing Focused Change 22 in the composite version of the Written Statement, to clarify reference to 'conservation value' in part one of the policy and changes to accord with the step-wise approach set out in paragraph 6.4.1 of PPW10 in part two of the policy.</p>	<p>No</p>	<p>The amendments and clarifications will not affect the assessment of the policy, but provide clarification on a specific matter and how the policy will be implemented.</p>
<p><b>MAC ref: MAC28</b></p>	<p><b>Policy /Section/Map: Para 6.6.22-24</b></p>	
<p><b>Proposed MAC</b></p>	<p><b>Detailed SA required? Yes/No</b></p>	<p><b>Reason</b></p>
<p>New justification text to ensure that any future development proposal within the County Borough that has the potential for adverse impacts on the integrity of European sites in neighbouring areas would be subject to a Habitats Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017.</p>	<p>No</p>	<p>The amendments will not affect the assessment of the policy, but clarifies how the policy will be implemented.</p>
<p><b>MAC ref: MAC29</b></p>	<p><b>Policy/Section/Map: Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species.</b></p>	
<p><b>Proposed MAC</b></p>	<p><b>Detailed SA required? Yes/No</b></p>	<p><b>Reason</b></p>

Amendments to Policy EnW3 to add reference to Local Nature Reserves (given they are a local designation to protect sites of local natural scientific interest) and to accord with changes made to Policy SW10. Further amendments included to differentiate between nature conservation features and geological features within the policy. Amendments to the supporting text to include reference to qualifying features and dates and availability of site surveys (or resurveys) evidence within an Appendix to the Plan; and to clarify the role local nature reserves.	No	The amendments will not affect the assessment of the policy, but provide clarification on specific matters and on how the policy would be implemented. Changes to the supporting text and appendices provide additional background information regarding Regionally Important Geological Sites (RIGS) and Local Nature Reserves.
<b>MAC ref: MAC30</b>	<b>Policy /Section/Map: Policy EnW4: Environmental Protection</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to ensure consistency with PPW paragraphs 6.7.1 and 6.7.6	No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter and how the policy will be implemented.
<b>MAC ref: MAC31</b>	<b>Policy /Section/Map: 6.6.33 - 35</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional supporting paragraphs to clarify how proposals would be assessed where they have the potential to affect air quality or exposure in an AQMA.	No	The amendments will not affect the assessment of the policy, but will clarify the information requirements for future planning applications and will clarify how the policy will be implemented.
<b>MAC ref: MAC32</b>	<b>Policy /Section/Map: 6.6.38-39</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment and new paragraph to explain how the new consenting regime for sustainable drainage systems would apply to planning applications.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.

<b>MAC ref: MAC33.1</b>		<b>Policy /Section/Map: Policy EcW1: Provision of employment land and Policy EcW2: Protecting Employment Sites</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Clarification that that the allocated B1 uses at employment sites relate to light industrial uses under the B1(b) and B1(c) uses classes.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC33.2</b>		<b>Policy /Section/Map: Para 6.7.17</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify that new B1 (a) development for new office floorspace should be subject to the sequential test, consistent with PPW paragraph 4.3.21 and changes proposed to policy EcW3.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC34</b>		<b>Policy /Section/Map: Para 6.7.22</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify and expand the list of evidence that could be provided in order to justify a change of use from existing employment uses under Policy EcW2.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC35</b>		<b>Policy /Section/Map: Policy EcW3: Retail Hierarchy – supporting retailing provision</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to include reference to leisure and other complementary uses to align with national policy and guidance.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy accords with national policy and guidance.
<b>MAC ref: MAC36</b>		<b>Policy /Section/Map: Para 6.7.27</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify the status of Cyfarthfa Retail Park, and Trago as out-of-centre retail parks to accord with TAN 4 and further justification provided by the Council.		No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter.

<b>MAC ref: MAC37</b>		<b>Policy /Section/Map: Policy EcW4: Retail Allocation</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment in policy to clarify the retail floorspace allocation at the HSRA, and additional justification text to clarify the need for the retail allocation to meet local needs arising from the development.		No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter.
<b>MAC ref: MAC38.1-2</b>		<b>Policy /Section/Map: Policy EcW5: Town and Local Centre Development and paragraph 6.7.50</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to clarify the implementation of the policy, including the additional reference to the 'viability' of neighbouring uses to cover impacts on existing businesses and to the 'agent of change principle' included in PPW Edition 10 (paragraph 6.7.5).		No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter and how the policy will be implemented.
<b>MAC ref: MAC39</b>		<b>Policy /Section/Map: Para 6.8.56</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional justification text to clarify the sequential test approach for bulky showroom retailing.		No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter and how the policy will be implemented.
<b>MAC ref: MAC40</b>		<b>Policy /Section/Map: Policy EcW7: Tourism, Leisure and Recreation Development</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to ensure the policy accords with paragraphs 5.5.1 to 5.5.6 of PPW10 to clarify that other relevant social and economic impacts and benefits would be considered.		No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC41</b>		<b>Policy /Section/Map: Para 6.8.57</b>	
<b>Proposed MAC</b>		<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to the supporting text clarify the approach to		No	The amendments will not affect the assessment of the policy, but will clarify

assessing new leisure, tourism and recreational development in the countryside, including for complementary tourism, leisure and recreation developments.		how the policy will be implemented.
<b>MAC ref: MAC42</b>	<b>Policy /Section/Map: Para 6.7.75</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to the supporting text to cross reference other relevant policies in the LDP (such as policies SW11 and EnW4) that will need to be considered.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC43</b>	<b>Policy /Section/Map: Para 6.7.89</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to ensure that viability as well as technical feasibility is considered in Energy Strategies submitted in support of development proposals in Heat Priority Areas.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC44</b>	<b>Policy /Section/Map: Para 6.7.91</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to the supporting text to remove reference to areas where future coal extraction will be unacceptable to align with changes to Policy EcW13 and national policy.	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC45</b>	<b>Policy /Section/Map: Para 6.7.97 &amp; 98</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional text to clarify that safeguarding the primary coal resource is not required by national policy but safeguarding of primary coal resources can be locally justified.	No	The amendments will not affect the assessment of the policy, but provide clarification on a specific matter.
<b>MAC ref: MAC46</b>	<b>Policy /Section/Map: Policy EcW11: Minerals Development</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>



Inclusion of criterion that refers to wholly exceptional circumstances in the case of coal resource extraction in line with national policy.	No	The amendment relates to a specific matter and will not affect the assessment of the policy, but will ensure that the policy is consistent with national policy with regards to the justification required for future coal extraction.
<b>MAC ref: MAC47</b>	<b>Policy /Section/Map: Para 6.7.107 - 109</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to supporting text to align with changes made to Policy EcW11 and to ensure consistency with national policy.	No	The amendments will not affect the assessment of the policy, but will ensure that the policy is consistent with national policy and other policies within the LDP.
<b>MAC ref: MAC48</b>	<b>Policy /Section/Map: Policy EcW13: Minerals Safeguarding</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional policy wording to clarify the approach set out in national policy regarding the justification required for the prior extraction of coal resources.	No	The amendments will not affect the assessment of the policy, but will ensure that the policy is consistent with national policy.
<b>MAC ref: MAC49</b>	<b>Policy /Section/Map: Para 6.7.116</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Additional supporting text to clarify the approach set out in national policy regarding prior extraction of coal resources.	No	The amendments will not affect the assessment of the policy, but will ensure that the policy is consistent with national policy.
<b>MAC ref: MAC50</b>	<b>Policy /Section/Map: Policy EcW14: Waste Facilities</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to restructure the policy wording in order to clarify the part one requirements.	No	The amendments do not change the effect of the policy and will not affect the assessment of the policy, but will clarify how the policy will be implemented.
<b>MAC ref: MAC51</b>	<b>Policy /Section/Map: Para 6.7.125</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Updating of reference to national policy to accord with changes made to Policy EcW14	No	The amendments will not affect the assessment of the policy, but will clarify how the policy will be implemented.

<b>MAC ref: MAC52</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Additional indicators related to housing that would be consistent with proposed indicators included in Draft LDP Manual, Edition 3.	No	The amendments provide an additional monitoring indicator which would not have an impact on the assessment of the Plan.	
<b>MAC ref: MAC 53</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Amendment to indicator 4.1 to correct a typographical error and to correctly refer to all previously developed land.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
<b>MAC ref: MAC54</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Additional indicator to monitor Policy SW10.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
<b>MAC ref: MAC55</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
Clarification of indicator relating to the number of Air Quality Management Areas (AQMA)	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
<b>MAC ref: MAC56</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
New Indicator that considers AQMA in more detail.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
<b>MAC ref: MAC57</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	
New indicator to monitor LNRs under the monitoring of Policy EnW3	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
<b>MAC ref: MAC58</b>		<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>	

Deletion of indicator 10.3	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC59</b>	<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to indicator 12.1 Economic Development.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC60</b>	<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendment to indicator 12.3 Economic Development to ensure consistency with version 3 of the LDP Manual	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC61</b>	<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amendments to indicator 14.3 to clarify that where new major office development outside established centres and existing employment sites is permitted that this would be contrary to the aims of Policies EcW1, EcW2 as well as Policy EcW3.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC62</b>	<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amend typographical error in indicator 14.7	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC63</b>	<b>Policy /Section/Map: Monitoring Framework</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amend typographical error in indicator 15.3	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC64</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Clarification in regard to when	No	Amendment does not have an impact

hydraulic modelling will be required.		on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC65</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Deletion of Site Allocation Details for sites SW3.5 Erw Las and SW3.31 – Cwmfelin, Bedlinog	No	Consequential change related to housing allocations. All new allocations and been assessed.
<b>MAC ref: MAC66</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amended Site Allocation Details for SW3.8 – South of Castle Park	No	Consequential change related to housing allocations. All individual allocations and housing policies have been assessed. Amendment does not have a significant impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC67</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amended Site Allocation Details Housing Allocations for sites SW3.19 – Twynyrodyn, SW3.20 – Bradley Gardens 2 and SW3.30 – Stormtown, Trelewis	No	Consequential change related to housing allocations. All individual allocations and housing policies have been assessed. Amendment does not have a significant impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC68</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Site Allocation Details – Housing Allocations for site SW3.36 P & R Motors	No	Consequential change related to housing allocations. All individual allocations and housing policies have been assessed (see section 4).
<b>MAC ref: MAC 69</b>	<b>Policy /Section/Map: Appendix 1- Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Addition of Site Allocation Details for Housing Allocations SW37 – Land South of Bryniau Road, Pant; SW3.38 – Land North of Ty Llwyd, Incline Top; SW3.39 – Y Goedwig,	No	Consequential change related to housing allocations and provision which do not effect the assessment of the Plan. All individual allocations and housing policies have been assessed (see

Edwardsville.		section 4).
<b>MAC ref: MAC70</b>	<b>Policy /Section/Map: Appendix 1 - Site Allocation Details</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Employment Site Allocation Details amended to reflect changes to clarify sites are allocated for light industrial B1(b) and (c) class uses excluding B1(a) offices (see MAC33).	No	Consequential change related to employment allocations and provision. All individual allocations and employment policies have been assessed. Amendment does not have a significant impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC71</b>	<b>Policy /Section/Map: Appendix 2 - Housing Trajectory and Land Supply Information.</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Up-date Appendix 2 Housing trajectory and Land Supply Information to accord with PPW10.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC72</b>	<b>Policy /Section/Map: Appendix 4 Lists of Sites of Importance for Nature Conservation (SINCS within in Merthyr Tydfil County Borough</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Replace Appendix 4 - Lists of Sites of Importance for Nature Conservation (SINCS within in Merthyr Tydfil County Borough with revised Appendix 4 - Qualifying features of Sites of Importance for Nature Conservation (SINCS) and Regionally Important Geological Sites (RIGS) in Merthyr Tydfil County Borough, attached at Appendix 5.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MAC73</b>	<b>Policy /Section/Map: New Appendix 5 Infrastructure Schedule</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Add the Infrastructure Schedule prepared by the Council as shown in its hearing statement and ED041 to the Plan (as a new Appendix 5).	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.

MAC ref: MAC74		Policy /Section/Map: New Appendix 6 Open Space Standards	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Add the Council's Open Space Standards to an appendix to the Plan.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
MAC ref: MapMAC1		Policy /Section/Map: Housing Allocation SW3.8	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amend boundary at housing allocation SW3.8 - land at Castle Park.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
MAC ref: MapMAC2		Policy /Section/Map: Housing Allocation 3.15	
Proposed MAC	Detailed SA required? Yes/No	Reason	
Amend boundary at housing allocation SW3.15 – Goetre Primary School, Gurnos.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.	
MAC ref: MapMAC3		Policy /Section/Map: Housing Allocation 3.36	
Proposed MAC	Detailed SA required? Yes/No	Reason	
New Housing allocation SW3.36 – P and R Motors.	Yes	The new housing allocation has been subject to an SA assessment that is included in this report.	
MAC ref: MapMAC4		Policy /Section/Map: Housing Allocation 3.37	
Proposed MAC	Detailed SA required? Yes/No	Reason	
New Housing Allocation SW3.37 – North of Pant Industrial Estate.	Yes	The new housing allocation has been subject to an SA assessment that is included in this report.	
MAC ref: MapMAC5		Policy /Section/Map: Housing Allocation 3.38	
Proposed MAC	Detailed SA required? Yes/No	Reason	
New Housing Allocation SW3.38 – North of Ty Llwyd, Incline Top	Yes	The new housing allocation has been subject to an SA assessment that is included in this report.	
MAC ref: MapMAC6		Policy /Section/Map: Housing Allocation 3.39	
Proposed MAC	Detailed SA required? Yes/No	Reason	

New Housing Allocation SW3.39 – Y Goedwig, Edwardsville.	Yes	The new housing allocation has been subject to an SA assessment that is included in this report.
<b>MAC ref: MapMAC7</b>	<b>Policy /Section/Map: Proposals Map</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Amend Settlement Limit boundary in Treharris on the Proposals Map	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MapMAC8</b>	<b>Policy /Section/Map: Proposals Map</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Add Hoover Strategic Regeneration Area (HSRA) boundary to the legend key to the electronic pdf and printed hard copies of the Proposals Map.	No	The MAC is a correction to the legend key of the Proposals Map that clarifies the symbology used for the HSRA boundary shown on the Plan.
<b>MAC ref: MapMAC9</b>	<b>Policy /Section/Map: Proposals Map</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Transfer the identified open spaces currently shown on the Constraints Map to the LDP Proposals Map.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.
<b>MAC ref: MapMAC10</b>	<b>Policy /Section/Map: Proposals and Constraints Map</b>	
<b>Proposed MAC</b>	<b>Detailed SA required? Yes/No</b>	<b>Reason</b>
Delete proposed LNRs from the Proposals Map given the designations are made through separate legislation and transfer the existing Cwm Taf Fechan LNR to the Constraints Map.	No	Amendment does not have an impact on implementation of the plan or the sustainability objectives.

#### 4. Detailed Assessment of Matters Arising Changes

- 4.1 The second step of the SA of the MACs requires that the changes that have been 'screened in' are assessed in more detail. This has involved analysing the main identified outcomes of the changes against the objectives and questions set out in the SA Framework. The appraisal considers the effects against the SA objectives and identifies the extent to which the MAC has changed these outcomes against the SA Framework.
- 4.2 Following the initial screening, there was a total of 4 MACs which were identified as 'substantive changes' which may change the likely significant effects previously identified (all 4 propose the inclusion of a new housing allocation). These MACs have been assessed in the Table 4.2 below.

Key:	Effect
++	Policy will considerably progress the sustainability objective
+	Policy progresses the sustainability objective to an extent
0	No/neutral effect – policy will not affect the sustainability objective
?	Policy will have uncertain effect on sustainability objective
-	Policy will conflict with sustainability objective to an extent
--	Policy will conflict considerably with the sustainability

Table 4.2: Detailed Assessment of Matters Arising Changes			
MAC Ref: MapMAC3		Policy /Section/Map: Housing Allocation SW3.36	
Proposed MAC: New Housing allocation SW3.36 – P and R Motors			
No.	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	+	The site has the potential to provide new housing (less than 50 dwellings) & therefore



	types.		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.
<b>MAC ref:</b>		<b>Policy /Section/Map: Housing Allocation 3.37</b>	
<b>MapMAC4</b>			
<b>Proposed MAC: New Housing Allocation SW3.37 – North of Pant Industrial Estate</b>			
<b>No.</b>	<b>SA Objective</b>	<b>Score</b>	<b>Comments</b>
1	To ensure that the community and social infrastructure needs of all	+	The site is located within reasonable walking distance (800m) of the local shops, services

	residents and communities are met.		and school in Pant.
2	To maintain and enhance community and settlement identities.	+	The site is located within the existing settlement boundary and with the settlement of Pant. Development would support the character and identity of a community by enabling it to grow sustainably.
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. 0.96 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 within reasonable walking distance to bus stops (400m) with a frequent service and is within 100m of an Active Travel Route. However it is not within 800m of a train station.
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 majority of the site is greenfield and will not result in the loss of best and most versatile 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 in close proximity to the Bryniaus SINCC. Developments at the site is not likely to contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a neutral effect.
13	To minimise the demand for water and improve the water environment.	0	No water-courses or water-bodies are within or in close proximity to the site. The site option is unlikely to lead to any significant effects on water quality,
14	To minimise the risk of flooding.	+	The site option is not located within an area of flood risk and is not at risk of surface water

			flooding.
15	To protect and conserve soil and safeguard mineral resources.	-	The majority of the site is greenfield and there is no clear mitigation for the impact on soil.
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 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 option 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.
<b>MAC Ref: MapMAC5</b>		<b>Policy /Section/Map: Housing Allocation 3.38</b>	
<b>Proposed MAC: New Housing Allocation SW3.38 – North of Ty Llwyd, Incline Top</b>			
No.	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 some of the local services, facilities & schools of Penyard & Penydarren.
2	To maintain and enhance community and settlement identities.	+	The site is located within the existing settlement boundary and within the Incline Top/Goatmill Road area, which has a smaller residential element. Development would support the character and identity of an area by enabling it to grow sustainably.
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 4 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 area of the site is 0.42 Ha.
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 within reasonable walking distance to bus stops (400m) with a frequent service & within 100m of an active travel route or key pedestrian/cycling route. The site is not within 800m of a train station.

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 brownfield land and will not result in the loss of best and most versatile agricultural land.
12	To maintain and enhance biodiversity and ecosystem connectivity.	0	Development at the site is not likely to have negative effects on any nationally or locally designated biodiversity, contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a neutral effect.
13	To minimise the demand for water and improve the water environment.	0	No water-courses or water-bodies are within or in close proximity to the site. The site option is unlikely to lead to any significant effects on water quality,
14	To minimise the risk of flooding.	+	The site option is not located within an area of flood risk and is not at risk of surface water flooding.
15	To protect and conserve soil and safeguard mineral resources.	++	The site is brownfield and would not hinder the future extraction of safeguarded mineral 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 heritage assets are located within or in close proximity to the site. Development at the site option will have no significant effect. No heritage assets within the influence of proposed development
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.
<b>MAC Ref: MapMAC6</b>		<b>Policy /Section/Map: Housing Allocation 3.39</b>	
<b>Proposed MAC: New Housing Allocation SW3.39 – Y Goedwig</b>			
<b>No.</b>	<b>SA Objective</b>	<b>Score</b>	<b>Comments</b>
1	To ensure that the community and social infrastructure needs of all residents and communities are met.	++	The site is within 800m of the local services, facilities & schools of Treharris.
2	To maintain and enhance community and settlement identities.	+	The site is located within the existing settlement boundary and within the settlement of Treharris. Development would support the character and identity of the area

			by enabling it to grow sustainably.
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 5 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. 0.93 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 within reasonable walking distance to bus stops (400m) with a frequent service. The site is also within 100m of an active travel route & within 800m of a train station
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 majority of the site is greenfield and does not contain any best and most versatile agricultural land.
12	To maintain and enhance biodiversity and ecosystem connectivity.	?	Areas of TPOs/Ancient Woodland are within or in close proximity to the site. An element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.
13	To minimise the demand for water and improve the water environment.	0	No water-courses or water-bodies are within or in close proximity to the site. The site option is unlikely to lead to any significant effects on water quality,
14	To minimise the risk of flooding.	+	The site is not located within an area of flood risk and is not at risk of surface water flooding.
15	To protect and conserve soil and safeguard mineral resources.	-	The majority of the site is greenfield and there is no clear mitigation for the impact on soil.
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 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 Gymraeg Rhyd-y-grug).
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 and within an existing settlement. However, the site is mainly greenfield. Additionally, a small part of the site is within a proposed SLA (with the site being adjacent to the SLA). An element of uncertainty exists until more detailed lower level assessments have been carried out.

4.3 The four new housing sites all score well against SA objectives relating to communities, housing and reducing the need to travel. There is potential for negative impacts on objectives relating to landscape and soils, similar to other housing allocations. The overall level and spatial distribution of housing growth between the growth areas has not changed significantly. Specific effects that depend on the design and layout of proposals (for example regarding landscape impact) will be considered in more detail against the Plan's development management policies at a later stage in the planning and development process. Given the overall level and spatial distribution of residential development in the County Borough has not changed significantly, it is considered that there would be no overall impacts on the Sustainability Appraisal of the Replacement LDP.

## **5. Welsh language, Health and Equality Impact Assessments**

- 5.1 The appraisal of the Deposit Plan aimed to integrate Welsh language, health and equality assessments. These issues are well represented in the SA Framework [through objectives and decision-aiding questions relating to SA Objective 17, for the Welsh language, and for SA Objective 4, for Health and equalities] against which the Deposit Plan policies have been assessed. Consideration of Welsh language, health and equality issues has also been addressed iteratively as the appraisal process has progressed.
- 5.2 During the examination process, further work was carried out by the Council in relation to Welsh medium secondary education provision. Some amendments to the SA documents were identified and these can be seen in Appendix 1 of this report. These amendments will be incorporated into the Final SA Report to be prepared prior to adoption of the LDP. The results of the additional assessment work, whilst providing more certainty and a more detailed analysis, do not change the assessment scores originally identified against the SA objectives. Consequently, it is considered there would be no overall impact to the Sustainability Appraisal of the Replacement LDP.

## **6. Conclusions**

- 6.1 This addendum highlights the effects that the proposed Matters Arising Changes to the Replacement LDP have with regards to the Sustainability Appraisal of the Replacement LDP. This document should be read alongside the original SA of the Deposit Plan (SD06), the addendum published in December 2018 (SD08).
- 6.2 All changes have been screened as to whether a new detailed appraisal would be necessary. None of the policy amendments have necessitated a new detailed appraisal due to the scale and nature of the changes. New assessments for the four new proposed housing allocations (referenced under MAC4 and MapMAC3 to MapMAC6) have been carried out and indicate that the new sites score well against the SA framework and have similar impacts to other comparable residential allocations.
- 6.3 Following consideration of the updated detailed appraisals, no implications on the overall SA of the Deposit Plan were identified.

## Appendix 1 – Welsh Language Impact Assessment Update

Changes to the 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.
<b>Key Issue:</b>	Population decline is likely to result in a decrease in the number of Welsh speakers in the County Borough, <b><u>however, this scenario would generate a need for approximately 20 additional secondary Welsh Medium pupil spaces.</u></b>	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.
<b>Decision Aided Question</b>		<b><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</u></b>	<b><u>Population growth would increase the number of pupils attending Welsh medium education which would result in positive effects.</u></b> The level of growth proposed is likely to result in investment being attracted to facilitate
Does the option present opportunities to facilitate the promotion of the Welsh language or local arts, sports and culture	Also, the low level of investment (given the low level of development proposed) could		



<p>in the plan area?</p>	<p>result in the condition of assets that reflect the cultural significance of Merthyr Tydfil deteriorating or potentially being lost.</p>	<p><b><u>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 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></b></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>improvements to assets of cultural significance, however there extra pressure for land for housing <b><u>and other facilities</u></b> may result in some of these assets being lost <b><u>and other negative effects. This 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></b></p>
<p><b>Category of Significance</b></p>	<p><b>? = Uncertain or Unknown Effects</b></p>	<p><b>0 = Neutral effect</b></p>	<p><b>? = Uncertain or Unknown Effects</b></p>

Spatial Strategy Assessment (Appendix 5, 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.
<b>Key Issue:</b>	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 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 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.
Merthyr Tydfil has the second highest proportion of population who are unable to communicate in Welsh (after Blaenau Gwent) at 91.36% (2011 Census).			
<b>Decision Aided Question</b>			
Does the option present opportunities to facilitate the promotion of the Welsh language or local arts, sports and culture in the plan area?	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.  <b><u>The distribution of growth could be accommodated through the County Borough's existing Welsh medium primary</u></b>	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.  <b><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</u></b>	The level of growth proposed is likely to result in investment being attracted to facilitate improvements to assets of cultural significance.  <b><u>The distribution of growth could be accommodated through the County Borough's existing Welsh medium primary</u></b>

	<u>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>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>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

Changes to the 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.