



Ms Sheila Davies

Director of Development and
Regeneration
Rhondda Cynon Taf CBC
Valleys Innovation Centre
Navigation Park
Abercynon
CF45 4SN

Eich cyf • Your ref: 12.14.16
Ein cyf • Our ref: APP-030-01-019

20 February 2007

Dear Ms Davies

**RHONDDA CYNON TAF LOCAL DEVELOPMENT PLAN (2006-21) – PREFERRED STRATEGY
REGULATION 15 PRE-DEPOSIT CONSULTATION
WELSH ASSEMBLY GOVERNMENT RESPONSE**

Thank you for consulting the Welsh Assembly Government regarding the Rhondda Cynon Taf LDP pre-deposit documents. The Assembly is pleased to see progress being made in furthering a development plan for the area within the Delivery Agreement timetable.

I would refer firstly to the new approach to examining LDPs and how the Assembly proposes to address this stage of pre-deposit documents involving the preferred strategy, options and other background material.

In the past our comments at UDP pre-deposit draft stage would have been in the form of specific objections to policy omission, relevance or wording which, if not addressed at deposit or pre-inquiry changes, would be considered by the Inspector in arriving at the recommendations in the Inspector's Report.

Under the new system, the responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination.

Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Assembly Government is committed to helping local planning authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation, and particularly at the Regulation 15 pre-deposit consultation stage.



To do this, the Assembly looks for clear evidence that the ten tests of soundness (as set out in the LDP Wales and the LDP Manual and explained further in guidance issued by the Planning Inspectorate) are being addressed.

Having considered all the submitted documents provided by Rhondda Cynon Taf CBC under Regulation 15, we acknowledge the amount of work undertaken by the authority to reach this stage. We are aware that the authority has been involved in spear-heading much of this work under the new LDP system, in association with the South East Wales LDP Pathfinder Group.

We have attempted to provide a strategic assessment of the Preferred Strategy document (as supported by the other documentation you have provided), and the intention of our response is to assist you in securing a sound plan in due course. We have indicated where evidence of soundness is not immediately clear, and we suggest these matters are discussed with us for clarification. The annexe to this letter sets out the detailed comments of the Assembly Government on the Preferred Strategy document; some comments relate to more than one test of soundness and we have provided cross-references where most appropriate.

We have noted some areas of concern, both where the documentation has not made clear certain matters, as well as in relation to certain strategy and policy issues. We suggest that to support your self-assessment regarding soundness, you take steps to provide:

- clear links between the evidence base (including availability of evidence) / contextual background studies and the robustness of the preferred strategy and the strategic sites;
- clear evidence of liaison with neighbouring authorities in order to consider how RCT's aspirations / options and strategy(ies) mesh with those of other areas (especially with emerging LDPs);
- clarity on how other key sub-regional work is influencing the Preferred Strategy (especially housing apportionment), and how settlements within RCT will relate to other settlements outside RCT;
- clarity on how key issues have affected the development of the Preferred Strategy and strategic site selection, (such as flooding, climate change – see consultation draft Climate Change MIPPS, infrastructure availability, land contamination, coal resource safeguarding);
- clarity in relation to flexibility of the emerging LDP in relation to developments outside as well as within the plan area (e.g. St Athan, M4 Junction 33 Culverhouse Cross);
- an affordable housing target (or range).

You should document your response to our comments in your Consultation Report.

Please advise if you would like us to complete the standard response form.

I suggest we meet to discuss our response in the near future. If you have any queries in relation to the response, please contact Elaine Ancrum or myself.

Yours sincerely

Lesley Punter
Development Plans Team

(enclosure – annexe)

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