



Judith Jones
Head of Planning and Countryside
Planning and Countryside Department
Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

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Dear Judith,

**Merthyr Tydfil County Borough Council – Deposit Plan 1st Revision –
Regulation 17 Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Merthyr Tydfil County Borough Council Deposit Local Development Plan (LDP). We acknowledge that the preparation of a LDP and the supporting evidence is a significant undertaking and recognise the amount of work your authority has undertaken to date in moving the plan forward from Preferred Strategy to Deposit stage.

At Preferred Strategy (Regulation 15) our representations highlighted a range of issues that in our opinion needed to be addressed if your replacement plan was to be considered 'sound'. In moving the plan forward, we are pleased to see that your authority has taken into account the majority of our comments and prepared a Deposit plan and supporting evidence base that is clear and concise covering key aspects of each topic area. This approach is welcomed by the Welsh Government.

In moving forward to the LDP examination, demonstrating delivery of the strategy will be essential. The development planning system in Wales is evidence-led; demonstrating how a plan is shaped by this evidence is a key requirement of the examination. Showing the delivery and viability of all sites in the plan is critical, particularly development proposed on large scale regeneration sites and other large housing/employment allocations which are integral to the strategy/objectives of the plan.

Without prejudice to the Welsh Minister's powers and the independent examination, the Welsh Government is committed to helping local planning authorities through the plan making process. With regard to the comprehensive evidence base supporting plan, we are pleased to inform you that **we have no fundamental objections on the soundness of the plan or its translation of national planning policy, a Category C objection**. Our representations set out below relate to matters of clarity which should be addressed in advance of the examination:

- **Hoover Strategic Regeneration Area (HSRA)** – To ensure comprehensive development and good design principles the authority should repeat the key principles from the Framework/Masterplan into Policy SW6. As parts of the site are located in a C2 flood zone, these areas are unsuitable for waste management facilities in line with TAN 15 and should be made clear in Policy EcW2.
- **Delivery and Implementation** – To ensure effective implementation and monitoring of the plan’s housing delivery, both the housing trajectory (Figure 1) and housing land supply table (Table B) set out in the ‘Housing Land Supply and Trajectory’ paper should be included in the LDP appendices, with a cross-reference in the reasoned justification to Policy SW3. The phasing of housing allocations as set out in Table C of the above paper should also be included as an additional column to the table in Policy SW3.
- **Components of Housing Supply** – To clearly identify all housing components including those under construction and those with planning permission, the authority should replace Table 1 in the Deposit plan with Table 1 in the Preferred Strategy, updating this to April 2018. All components (in rows A-F) should be identified in the trajectory ensuring no double counting.
- **Affordable Housing Need and Target** – The affordable housing need of 5,505 units over the plan period should be set out in the reasoned justification to Policy SW2. The target to be delivered through the planning system (set out in Policy SW2) should be based on the housing requirement of 2,250 units, not the provision. Is the correct target a 25% reduction of the 261 units currently stated?
- **Gypsy Traveller Accommodation Needs Assessment (GTANA)** – The authority should ensure their GTANA Update (2018) is signed-off by Welsh Ministers in advance of the LDP examination with any need met, through site allocations, during the plan period.
- **Renewable Energy** – The REA is unclear on the constraints that have been applied and how this aligns with the Toolkit methodology and Welsh Government approach to designating Strategic Search Areas (SSAs), particularly in relation to solar energy and grid connectivity where distances of 2km have been applied as opposed to the standard 10km. The authority should clearly list the constraints and any buffers that have been applied along with the rationale for this approach. The summary tables for renewable heat and electricity set out in the addendum to the REA (Figures 12 & 13) should be inserted in the reasoned justification to Policy EcW8 and included in the monitoring framework.
- **Minerals Buffer Zones** – PPW Edition 10 (anticipated to be published later this year) only requires the safeguarding of primary coal resources which, if published before or during the examination, should be reflected in the plan.

The Welsh Government is committed to ensuring a plan-led approach to development in Wales. I trust that these representations will assist you in ensuring your LDP can be found ‘sound’ and adopted following independent examination. Please contact me if you wish to meet and discuss matters arising from this formal response to your Deposit LDP.

Yours sincerely,



Mark Newey

**Head of Plans Branch
Planning Directorate**