



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

28 February 2019

Dear Judith,

**Merthyr Tydfil County Borough Council – Replacement Local Development Plan –
Focussed Changes Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government regarding Merthyr Tydfil County Borough Council's Replacement Local Development Plan's proposed Focussed Changes.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in light of the representations made to the Deposit Plan on 21 August 2018, in accordance with the tests of soundness. The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations. The annex sets out where and why our objections are maintained and, if the Inspector considers it appropriate, they can be addressed through the hearing sessions.

Following the Deposit Plan consultation, Planning Policy Wales (PPW) Edition 10 has been published. The authority will need to consider if there are any implications for the plan. As set out in the attached Annex the majority of our Deposit objections have been addressed. Only minor points of clarification relating to renewable energy, coal safeguarding and the strategic site allocation remain. Welsh Government officials will continue to work with Council officers to resolve any outstanding issues prior to the examination.

Without prejudice to the Minister's powers to intervene in the process and the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Newey', written in a cursive style.

Mark Newey
Head of Plans Branch
Planning Directorate

Annex

Annex to Welsh Government's Letter (28 February 2019) in response to Merthyr Tydfil County Borough Council's proposed Schedule of Focussed Changes.

FC No.	Welsh Government comment
Affordable Housing	
FC3 Objection addressed	<p>Policy SW2: Provision of Affordable Housing</p> <p>Our Deposit representation required the authority to identify the total need for affordable housing, as identified in the LHMA, in order to ensure the LPA has sufficient evidence to secure affordable housing. FC3 inserts the affordable housing need as 5,490 units over the plan period into the reasoned justification to Policy SW2 'Provision of Affordable Housing'. Our Deposit representation has been addressed.</p>
FC4 Objection addressed	<p>Our Deposit representation sought to establish the affordable housing target set out in Policy SW2: Provision of Affordable Housing and how it was derived, to ensure it is based on the housing requirement, not the provision. FC4 amends the affordable housing target in Policy SW2 from 261 units to 251 to align with the housing requirement. This change satisfies our Deposit representation in this respect. FC4 also introduced a new table setting out the components of the affordable housing target which adds clarity to the plan and will ensure effective monitoring as advocated in the LDP Manual (Edition 3). The proposed FC is supported.</p>
FC8 Objection addressed	<p>Our Deposit representation required the LPA to identify the timing and phasing of housing allocations in Policy SW3: Sustainably Distributing New Homes. The proposed FC now includes indicative delivery timescales for allocated sites. Our Deposit representation has been addressed.</p>
Housing	
FC9 Objection addressed	<p>Table 2 - Components of housing supply</p> <p>Our Deposit representation required clarification on the spatial distribution of housing by component of supply, in order to add clarity to the plan and aid effective monitoring. FC9 inserts an updated table in this respect which follows the template set out in the LDP Manual (Edition 3). Our Deposit representation has been addressed.</p>
FC11 Partially addressed	<p>Policy SW6: Hoover Strategic Regeneration Area</p> <p>Our Deposit representation stated that to ensure the comprehensive development of key sites the authority should embed the key principles from the framework masterplan into the plan. This is essential to deliver the placemaking approach required by PPW and ensure the effective implementation and delivery of the key site in the plan.</p> <p>The proposed FC is now more explicit and includes placemaking and key design requirements which are supported. However, WG considers that as the key principles (e.g. land use areas, key access points, park and ride, green corridors) have been identified in the text, it is logical to identify these key parameters and locational requirements spatially on a schematic/concept plan. This would not involve additional work as the detail is already set out in the framework. The plan should also set out the area that is currently unsuitable for highly vulnerable development due to flood risk. The emerging LDP Manual (Edition 3) sets out the master planning approach and explains how placemaking tools such as concept plans should be used for key sites in the plan.</p>

FC9	Appendix 2 – Housing Trajectory and Land Supply Information The proposed FC introduces the housing trajectory and land supply information within the plan which is supported. Our Deposit representation has been addressed.
Renewable Energy	
FC30 Partially addressed	Policy EcW8: Renewable Energy Our Deposit representation stated the summary tables from the REA (Figures 12 and 13) regarding the potential for heat and electricity should be inserted into the reasoned justification to Policy ECW8 and included in the monitoring framework. The proposed FC addresses our objection in this respect. We note the Council has produced an additional background paper which is a detailed Landscape Sensitivity Study for the Solar Search Areas (SD53). This work has resulted in the proposed deletion of the search area at Merthyr Vale. The WG does not have any comments in this respect. The assumptions made will be for the LPA to justify. The Council has provided no explanation regarding our Deposit representation which sought clarification on some of the assumptions with the REA, particularly why a 2km accessible grid connection has been applied instead of the standard 10km used by WG and other LPAs in Wales. The Council need to explain why they have chosen a lower distance than the standard 10km.
Minerals	
FC32 FCM2 Partially addressed	Safeguarding of secondary coal resources deleted Our Deposit representation (August 2019) made reference to <u>Draft</u> Planning Policy Wales (PPW) edition 10, which required authorities to safeguard primary coal resources only. PPW edition 10 (published December 2018) and the policy relating to the safeguarding of coal has been amended further. There is no requirement to safeguard primary coal resources now; this is for the LPA to determine. FC32 removes the safeguarding of secondary coal resources, but retains the safeguarding of primary coal resources. We do not object to FC32. If the LPA safeguards primary coal resources they need to include appropriate policies, including those relating to pre-extraction, in their development plan. There is no need to indicate areas where coal operations would not be acceptable. This is a matter for the LPA to determine. This approach is not contrary to PPW Edition 10.