

**Rhondda Cynon Taf LDP  
Reg15 Pre-Deposit Consultation: Welsh Assembly Government Response**

<b>P1 - Prepared in accordance with the Delivery Agreement including the CIS</b>	
<b>Comments</b>	<b>Suggested Actions</b>
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case.	N/A

<b>P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p>We note that:</p> <ul style="list-style-type: none"> <li>- Para 3.5 advises that SA/SEA was undertaken between January &amp; April 2006, identifying key strategic problems, objectives and issues for sustainability.</li> <li>- The SA/SEA Scoping Report (March 2006) is also referenced.</li> <li>- The Preferred Strategy SA/SEA, January 2007 has been made available for comment alongside the Preferred Strategy document. We note that it makes clear that there has been appraisal so far of the LDP vision, objectives, spatial options and strategic policies and candidate site assessment methodology.</li> <li>- The Appropriate Assessment Screening has been conducted to date (Preferred Strategy SA/SEA, paras 23-25 &amp; 2.25ff); The Screening Report, Jan'07 provided in package of documents conclusions are that an appropriate assessment should be undertaken to ascertain the effect of the LDP on the integrity of one Natura 2000 site, the Blaen Cynon SAC, that RCT discuss with Cardiff CC in relation to an appropriate assessment for the Cardiff Beech Woods SAC, and that a precautionary approach be adopted in relation to Cwm Cadlan and Coedydd Nedd y Mellte SACs).</li> </ul>	N/A

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<b>C1 A land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<b>Land-use plan</b>	
- <b>Objectives</b> (4.2), <b>strategy options</b> and <b>preferred strategy</b> (5&6) appear to be broadly relevant to the area and are land-use.	N/A
<b>Policy Framework</b>	
- We note that chapter 2 of the Preferred Strategy outlines the policy framework within which the LDP is being prepared and refers to a number of the key <b>relevant plans, policies and strategies</b> (WSP, Strategy for the Heads of the Valleys area: <i>Heads - We win..</i> , SEW Regional Waste Plan, SW Regional Technical Statement for Aggregates, Community Strategy The RCT Community Plan 2004-14; also at para 6.28 the Local Transport Plan). - In addition the Draft SA/SEA Scoping Report references other national, regional and local plans, policies and programmes (its Appendix I). - The Preferred Strategy SA/SEA refers at para 2.2 to a list of relevant plans and programmes at appendix 1 – however that appendix this does not appear to have been included in the SA document.	N/A  Consider for clarity in SA/SEA document
– It is not clear from the documentation whether the Environment Strategy for Wales, Nov 2006 has had any impact on the development of the plan..	You may wish consider the Environment Strategy it vis a vis your SEA
<b>Comments:</b>	
Generally, it is considered that there needs to be a <b>clearer link</b> between the contextual background strategies and how they influence the Preferred Strategy.	Ensure that it is clear how the contextual background strategies have influenced the preferred strategy.
There is a considerable amount of <b>other sub-regional work</b> under way in which Rhondda Cynon Taf is engaged, which does not appear to be referenced e.g. SEWSPG work on housing apportionment (see comments on CE2 below). It is not clear how any of this other work has influenced or is continuing to influence the Preferred Strategy.	Ensure adequate collaborative working takes place and is transparently recorded and that it influences, and is shown to be

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	continuing to influence, the preferred strategy.
We note that <b>Heads of the Valley -Turning Heads -Strategy</b> is referenced at para 2.11 and in relation to Strategic Site 5 (Hirwaun). Para 3.8 notes the need for policy intervention to achieve balanced development; reference to the HoV Strategy would be appropriate here. As the HoV does not penetrate deeply into RCT there needs to be, besides a reference to HoV which has a committed income stream, potential relationships with complementary and committed / on-going public sector activity/investment in the rest of the County and how it is related to the Strategy.	Ensure that there is evidenced consideration of the potential relationships between HoV Strategy and complementary and committed / on-going public sector activity/investment in the rest of the County.
Paras 2.14 & 6.29 refer to the <b>Regional Waste Plan</b> . The Regional Waste Plans are currently being reviewed and the LDP will need to be developed in accord with the revised Regional Waste Plans that will be the subject of consultation later in 2007 and finalised early in 2008. The later sections of the Preferred Strategy document appear to confirm that the LDP will make adequate provision for a strategic network of waste management facilities (6.30) and a network of local waste management facilities (6.31).	Ensure that the LDP reflects the latest Regional Waste Plans.
The <b>Regional Transport Plan</b> is referred to at para 6.28; we understand that the draft RTP has recently been published by SEWTA.	Ensure that the LDP reflects the Regional Transport Plan.
It is not clear whether any consideration has been given to any <b>tourism implications</b> of the proximity to the Brecon Beacons National Park.	Ensure there is clear evidence of any consideration.
See comments at Soundness Test CE1 re sub-regional planning policy context.	

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<b>C2 It has regard to national policy.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
We note that Chapter 2 of the Preferred Strategy document refers to relevant key national policy (+ see above under Soundness Test C1).	N/A
<p><b>Infrastructure</b> (also Tests C1 and CE2)</p> <p>- National planning policy advocates that the <b>implications of infrastructure capacity and/or requirements</b> should be considered (this includes energy provision, water, sewerage, transport etc). This involves the encouragement of sites where provision exists and/or where problems can be solved and development can be phased. Therefore, the spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred strategy. This could impact on how growth will be managed throughout the plan period and therefore on how social, economic and environmental objectives for the plan area are met.</p> <p>It is not clear whether capacity exists for any of the sites in terms of infrastructure, or whether new infrastructure needs to be secured, and what the impact on delivery will be.</p>	Provide clear evidence of how the key issue of infrastructure capacity / requirements have affected the development of the Preferred Strategy and strategic site selection
<p><b>Renewable Energy</b></p> <p>- Although policy <b>SP11</b> provides positive support for renewable energy and energy efficiency, national planning policy asks that authorities consider the opportunities which may exist for encouraging <b>all forms of renewable energy</b> and the contribution which they can make towards carbon emission reduction etc.</p> <p>Whilst energy efficiency and conservation is acknowledged, further consideration could be given to ways of securing the benefits of renewable energy, energy efficiency and conservation (and other resource efficiencies/conservation such as water), particularly where large scale growth is envisaged. These issues are mentioned as potential indicators in appendix 1 but it would be useful to explore further as indicated above. (Also, see climate change comments below).</p>	Consider giving further consideration to ways of securing the benefits of renewable energy, energy efficiency and conservation particularly where large scale growth is envisaged.

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<p><b>Flood Risk</b> (also Test CE2)</p> <p>- It is not clear how the <b>appraisal of options</b> had taken into account national planning policy in relation to development and flood risk (PPW 2002 and TAN 15 2004). We note that flood risk maps were made available for the Visioning Workshops. The assumption made in relation to some of the strategic sites, which underpin the preferred strategy, is that flood risk issues need to be resolved.</p> <p>- The thrust of national planning policy is to avoid new development on the floodplain and to move away from continued reliance on engineering solutions, in recognition that risk can never be eliminated despite mitigation measures, and in recognition of climate change. Further, some forms of development will be inappropriate in certain parts of the flood plain. Flooding, therefore, is an <b>issue</b> which should inform policy choices and the tests in the TAN should have been considered in terms of appraising options and arriving at the preferred strategy.</p> <p>- Where options involve consideration of the floodplain then a broad level assessment which provides for an understanding of flooding consequences will be necessary to ensure that the <b>strategic sites</b> (and potentially <b>non-strategic sites</b>) which support the preferred option can be taken forward. It is recognised that some <b>flooding information</b> may already exist but the extent of this, and its role in informing and underpinning strategy, should be clarified and be made explicit.</p> <p>In principle, <b>strategic sites 1, 2, 3, 4, 6, 7, 8</b> are contrary to national planning policy and require robust justification in planning terms, and should at the very least be supported by broad level flood consequences assessment.</p>	<p>Provide clear evidence of how the key issue of flood risk has affected the development of the Preferred Strategy and strategic site selection.</p>
<p><b>Candidate Sites:</b> The local implications of issues such as flooding and the availability of infrastructure should be explored in the context of national planning policy objectives.</p>	<p>Provide clear evidence of how key issues have / will affect candidate sites.</p>
<p><b>Land contamination</b> (also Test CE2)</p> <p>- National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that development is not undertaken without an understanding of the risks. Contamination is acknowledged as an <b>issue</b> and dealing with it will be a necessary part of taking forward some of the <b>strategic sites</b>. The reliance on such sites suggests that some <b>evidence</b> to demonstrate that the contribution envisaged by these sites is likely to be forthcoming. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks.</p>	<p>Provide clear evidence of how the key issue of land contamination has affected the development of the Preferred Strategy and strategic site selection.</p>

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<p><b>Climate Change</b></p> <ul style="list-style-type: none"> <li>- This is identified as an issue in para 3.5 (SA/SEA) but it is not clear as to what climate change specifically means for RCT and, it follows, how it is being (or how it intends to be) addressed.</li> <li>- Comments above have already alluded to the need to consider energy efficiency, conservation and renewable energy as part of new development. The Assembly Government's current consultation package on climate change provides more information, and is particularly pertinent for RCT and its areas of major growth where there should be opportunities for local energy provision on major sites. The proposed Climate Change MIPPS states that:-</li> </ul> <p><i>"Local planning authorities should include within development plans a policy requiring major developments to reduce their predicted CO<sub>2</sub> emissions by a minimum of 10% (from the current baseline required by building regulations) through improvements to the energy performance of buildings, efficient supply of heat, cooling and power and/or on site renewable energy. The scale of development for the application of the policy and the percentage reduction selected will need to be determined locally, based on sound evidence and the need for planning policy to interact effectively with developing building control requirements."</i></p> <ul style="list-style-type: none"> <li>- The approach to strategy and choosing the strategic sites does not appear to consider the long term implications of climate change in any robust way, for example in relation to flooding and location of development (see comments above).</li> </ul>	<p>Provide clear evidence of how the key issue of climate change has affected the development of the Preferred Strategy and strategic site selection.</p>
<p><b>Settlement boundaries</b> - The flexible use of settlement boundaries in the northern strategy area as outlined in para 6.16.1 is unqualified and would be inconsistent with national policy if there is not a criteria based policy to prevent unfettered development in the countryside.</p> <ul style="list-style-type: none"> <li>- The documentation doesn't indicate the criteria under which settlement boundaries will be drawn up for the deposit plan.</li> <li>- Evidence/quantification of land availability is key, including use of council owned land in the strategy.</li> </ul>	<p>Ensure that use of settlement boundaries is founded on a clear and transparent basis.</p> <p>Ensure that the deposit plan includes a criteria based policy to prevent unfettered development in the countryside in the northern strategy area.</p>
<p><b>Community regeneration</b> - It is not clear how the relationship between the provision and location of employment land and residential land has been addressed in order promote sustainable community regeneration as advocated in para 6.36.</p>	<p>Ensure this relationship is clarified.</p>

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<p><b>Economic development in rural areas</b> - There is a need to encourage and provide guidance for those undertaking economic development in rural areas; this is not specifically mentioned in the Visions and Objectives of the Preferred Strategy document. It is considered that, despite the dominance of urban issues in this Plan area, the need to provide rural economic planning guidance tailored to deal with the forms of development considered most relevant to the county's needs and opportunities is still merited.</p>	<p>Ensure the plan provides appropriate rural economic planning policy guidance.</p>
<p><b>Built heritage:</b>  - Cadw advises that the Vision and Objectives at para 4.2 includes good general statements on the historic environment but, at this stage, is generic and does not identify the distinctiveness identified in the SA/SEA, and suggests that one way of addressing this would be to draw upon the description of the Special Historic Landscape of Rhondda in the Landscapes register.   - Paragraph 6.23 is important in recognising the potential balance. It would read more clearly if amended to 'The Strategy will play a vital role in securing an appropriate balance between protection of the natural and historic environments.'</p>	<p>Suggest consideration is given to which aspects of the built heritage would be covered in plan guidance on Design Statements (see at SP4 below).   Consider how suggested amendment to para 6.23 will affect future plan documents.</p>
<p><b>Strategic Sites (built heritage)</b>– Cadw advises that para 6.37 should include some recognition of the need to accommodate and conserve listed buildings and other historic features at the former Fernhill Colliery Site and, to a lesser extent, the Cwm Colliery and Coking Works, where the outcome of a public inquiry is awaited.  - We suggest that the LDP advise that any masterplan(s) for these sites include information on how to approach the historic environment.</p>	<p>Consider how suggested amendment to para 6.37 will affect future plan documents.   Consider in relation to masterplan requirements.</p>
<p><b>Strategic Sites (masterplans)</b> - The plan should clarify where masterplans will be necessary in relation to strategic sites identified.</p>	<p>Consider in relation to masterplan requirements.</p>
<p><b>Welsh Language:</b> Para 4.2 objectives includes promotion and protection of the culture and heritage, including the (Welsh) language. At present there is no clear evidence of consideration of the Welsh language (including percentages of Welsh speakers in the County and the linguistic character of various areas) in the development of the Strategy and policy.</p>	<p>Provide clear evidence of how the issue of the Welsh language has affected the development of the Preferred Strategy.</p>
<p><b>Strategic Policies:</b></p>	

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<p><b>General Policy Drafting:</b></p> <ul style="list-style-type: none"> <li>- <b>'Support'</b> - drafting is in terms of what proposals / schemes will be 'supported'; this type of terminology (support / encouragement) is unclear and could be interpreted as implying some sort of action by the Council. For clarity, we suggest that policies should be drafted in terms of what will be permitted, acceptable or favoured (e.g. see Policies SP7 Employment Requirements, SP13 Waste &amp; SP9 Transportation).</li> <li>- <b>'It can be demonstrated that'</b> – care should be taken with the use of this phrase as in principle, it is not a requirement that an applicant should demonstrate various things (e.g. policies SP10 Built heritage).</li> </ul>	<p>Ensure clarity of policy wording in the LDP.</p>
<p><b>Policy SP1 &amp; SP2 (Locational Strategy)</b> identify the principal towns and key settlements; however, the strategic policies should provide some elaboration of what this means in relation to any development proposals.</p>	<p>Ensure there is satisfactory policy guidance in relation to the principal towns and key settlements.</p>
<p><b>Policy SP4 (Place Making)</b> – we suggest that the aspects specified in the policy need to be related to matters to be covered in any design statement to accompany appropriate planning applications.</p> <ul style="list-style-type: none"> <li>- caution over use of 'high' design requirement (here and in SP3) as national PPW requirement is for 'good' design.</li> <li>- places where quality of life is considered to be of key importance could include identified landscape and townscape.</li> <li>– item i) 'involvement of the community' is procedural rather than land-use, so should be deleted from the policy.</li> </ul>	<p>Consider these design matters.</p> <p>Delete item i).</p>
<p><b>Policy SP 5 (Housing Requirements)</b> is not necessarily consistent with the Assembly's policy on the re-use of brownfield land which states that <i>wherever possible</i> Previously Developed Land should be used in preference to greenfield sites.</p>	<p>Consider redrafting to strengthen the second sentence of the policy, or provide justification for local variation to national policy on use of previously developed land.</p>

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<p><b>Policy SP8 (Retailing and Town Centres)</b> – National planning policy requires assessment of need and application of the sequential test for proposals outside existing centres; therefore the policy needs to be amended in terms of proposals ‘adjacent to ‘ centres.</p> <ul style="list-style-type: none"> <li>- For proposals outside centres the assessment of need and application of the sequential test are standard national planning policy matters (both are included in the policy); phasing considerations is added, and further clarification would be needed in the LDP of when this would be applicable.</li> <li>- Criterion b – the need to reinforce ‘cultural identity’ appears vague; the LDP would need to clarify.</li> <li>- Criterion c – suggest ‘enhance’ rather than ‘improve’; also the LDP would need to clarify what aspects of ‘quality of the town’ are meant.</li> <li>- (The clarification to what is meant by cultural identity and quality issues could possibly be done through a design policy; see also at Policy SP11 below.)</li> </ul>	<p>Consider redrafting policy or provide justification for local variation to national policy.</p> <p>Ensure there is clarification of when phasing would be applicable.</p> <p>Ensure meaning of criteria is clear.</p>
<p><b>Policy SP10 (Built Heritage)</b> – Cadw advises that this provides a policy for the protection of the built heritage. This is welcome, given the significance attributed to the cultural environment in the Preferred Strategy. This follows from the identification, in the SA/SEA, of the cultural environment as a significant factor in the cultural identity and environmental richness of the local authority area.</p> <ul style="list-style-type: none"> <li>- It could be argued that SP10 indents a) and b) simply reiterate national policy. However, this has been identified as a key local policy and Cadw suggest it should be retained. However, it is clumsily worded at present, with the first sentence of the policy being repetitive. There is also a lack of clarity with some crossover between indents c) &amp; d), whilst the implications of indent e) are not explicit and indent g) also vague at this point. Although, flagging up important policy issues for the historic environment, SP10 needs further consideration and refinement.</li> </ul>	<p>Consider redrafting policy for clarity.</p>
<p><b>Policy SP11 (Protection of the natural environment)</b> – criterion a refers to <u>character</u> and <u>quality</u> of local landscapes and the wider countryside; the LDP will need to clarify what is meant, or reference information sources. (See above suggestion at Policy SP8 above.)</p>	<p>Ensure meaning of criterion is clear.</p>
<p><b>Policy SP13 (Waste)</b> (Page 29) suggest add to c.) 'the development of new technological initiatives' the words 'for residual waste treatment and disposal'</p>	<p>Consider suggested policy amendment.</p>
<p><b>Policy SP14 (Renewable Energy):</b> Further consideration should be given to the implications of SSA F (Coed Morgannwg) at the local level, with any proposed detail being contained in SPG. It is understood that joint research has been undertaken in relation to this issue, however, at present, the policy is vague in terms of how the LPA would resolve any tensions between the aim of national policy and what it considers to be an “unacceptable impact” at the local level; also in relation to any design policy considerations).</p>	<p>Consider giving further consideration to implications of Special Search Area F.</p>

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<b>C3 It has regard to the Wales Spatial Plan</b>	
<b>Comments</b>	<b>Suggested Actions</b>
The Preferred Strategy makes reference to the Wales Spatial Plan (WSP) in chapter 2 dealing with Policy Framework, including a summary of the work being undertaken by the South East Spatial Plan Group on the 'Strategic Development Project'; and at Appendix 3 the WSP is one of the 8 objectives against which each strategic option is tested.	N/A
Overall there appears to be a good fit between the Preferred Strategy and the existing WSP. However, the likely impact of proposed housing development on other local authorities, and in terms of regional housing markets, needs clarification (see WSP page 52 penultimate bullet-point) (see comments at soundness test CE1 regarding regional / sub-regional content & collaboration).	Ensure clarity and transparency in relation to the meshing of RCT's aspirations with those of other areas.
Overall there appears to be a good fit with emerging WSP Area work (key settlements re WSP SE work & Heads of Valleys programme). RCT will need to keep up to date with WSP area work as it develops (it is noted that RCT is well placed to do so and is represented on all key groups). The plan area has a key role in connecting to the North of the region (i.e. Heads of Valleys) and with the South (i.e. coastal belt). The Spatial Strategy should be reinforced by analysis / comment on how settlements within RCT will relate to other settlements outside RCT. (But see comments at soundness test C1 and CE1 regarding regional / sub-regional content)	Ensure clarity in relation to how settlements within RCT will relate to other settlements outside RCT.
Overall there appears to be a good fit between the locations for growth / strategic sites in the Preferred Strategy and the existing WSP; there is recognition of the pressure for development between Llantrisant and Cardiff. - RCT will need to take into account emerging thinking from the WSP SE Core Group on strategic sites. RCT need to consider housing development in the Llantrisant area and discuss with SEWTA, Cardiff and the Vale of Glamorgan regarding the scale of housing development and pressure for transport facilities. (See comments at soundness tests CE1 and CE4.)	Ensure account is taken of emerging WSP area work, and sufficient flexibility is incorporated to be able to accommodate WSP area working. Ensure appropriate consideration of housing development and associated requirements in Llantrisant area.
Overall there appears to be a good fit between the strategic policies in the Preferred Strategy and the existing WSP.	N/A

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<b>C4 – It has regard to the relevant community strategy/ies.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
Appears to do so (paras 2.17-20 regarding the RCT Community Plan 2004-14). Please advise if this is not the case.	N/A

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<b>CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p><b>Regional/ sub-regional context</b></p> <ul style="list-style-type: none"> <li>- There appears to be a lack of clarity concerning the regional / sub-regional dimension.</li> <li>- There should be clear <b>evidence of liaison</b> 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). (See comments at soundness tests C1, CE1 and CE4.)</li> </ul>	<p>Ensure there is appropriate evidence of liaison with neighbouring authorities and how RCT's aspirations / options &amp; strategy(ies) mesh with those of other areas.</p>
<p><b>Coal:</b> Para 6.33 accords with Coal MTAN2 in saying that coal resources will be safeguarded where viability or reserves can be demonstrated. MPPW requires policies to state where coal operations would not be acceptable, and why. It needs to be considered by the LPA whether or not this is a key constraint for the issues and strategy options.</p>	<p>Provide clear evidence of how the key issue of coal resources has affected the development of the Preferred Strategy and strategic site selection.</p>

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<b>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p><b>Alternatives</b>            We note that the Preferred Strategy document provides a summary of how the strategy options have been developed and then analysed to produce the preferred strategy (chapter 5 &amp; Appendix 3), including use of visioning workshops and consultations.</p>	N/A
<p><b>Evidence base - general:</b>            It is not always clear as to what evidence is being put forward to demonstrate that the preferred growth strategy can be accommodated; e.g. with regard to infrastructure, renewable energy, flood risk, land contamination, retail capacity. It is accepted that some evidence is being developed in relation to some of the strategic sites but it is not being robustly demonstrated in the Preferred Strategy document that these sites can come forward. Unless the evidence base can be demonstrated to support the strategy, the strategy is likely to be unrealisable and therefore unsound.</p>	Ensure there are clear links between the evidence base (including availability of evidence) / contextual background studies and the robustness of the Preferred Strategy and strategic sites.
<p><b>Housing &amp; Settlements:</b></p> <p><b>- population and housing figures</b> - It is not clear how the figures in paragraph 6.12 have been derived. Work is well under way to apportion the Welsh Assembly Government's figures across the authorities of South East Wales, but it is not clear if the population growth figure of 17,627 or the resulting housing requirement figure of 11,380 new dwellings, are a product of this apportionment exercise. If they are not, what alternative methods have been used to produce these figures? The new build figure of 14,850 over the plan period of 2006-2021 is drawn from the Assembly projections, but this will need to be reconciled with the bottom-up evidence provided from the local housing market assessment. Delivery of additional housing is stated to be in sustainable locations [presumably this will be informed by outcomes of the Local Housing Market Assessment] the criteria for which are stated (p.19) but <i>exclude</i> housing requirements. Assume that need for phasing will be considered.</p>	Ensure there are clear links between the evidence base (including availability of evidence) / contextual background studies and the robustness of the Preferred Strategy and strategic sites.
<p><b>- affordable housing</b> - Related to the point above, there is a lack of clarity about the provision of</p>	Ensure plan is clear in relation to any phasing proposals. Ensure that there clarity and an

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<p>affordable housing in the LDP. Paragraph 6.15 is vague in its description of how the LDP will address the affordable housing needs of the area. Policy SP6 (Affordable Housing) does not establish an overall affordable housing target (or range) for the LDP, which is a requirement of the Housing Ministerial Interim Planning Statement 01/2006 (WAG, June2006). Furthermore there is no consideration of the relationship between the overall housing requirement and the likely affordable housing requirement. Is the overall housing requirement sufficient to generate the number of affordable housing units required? We are yet to receive 2007 Local Housing Strategy but affordable housing should be a prevalent issue and we would expect the evidence base to substantiate the authority's response. There is not much coverage of how the authority will achieve the affordable figures e.g. subsidy issue, s. 106 agreements, local authority sites. The Local Housing Market Assessment will be important in strengthening the policy.</p>	<p>appropriate affordable housing target (or range).</p>
<p><b>Agricultural land</b> quality should have been factored into the decision making process; so far the Assembly Government's Technical Services Division (TSD) has carried out some agricultural land quality desk studies for the local planning authority along the M4 corridor and along the southern fringe of the coalfield where the limited amount of better land within the county is located. This information should have been fed into the SA/SEA baseline data – please advise if it hasn't.</p> <p>- TSD are content with the process you are following in relation to the candidate site methodology but may wish to discuss specific sites.</p>	<p>To note</p>
<p><b>Minerals</b></p> <p>- <b>Para 3.7 Baseline Information</b>, Key Environmental Issues (page 13): The importance of certain minerals is stated here; however there is no mention of coal.</p> <p>- If a proposed development site is in an area of <b>primary or secondary coal resources</b>, justification will be required to show that the resource is unlikely to have the potential for opencast extraction, or that the coal can be recovered in advance of the development, or that there are no suitable alternative locations for the development.</p> <p>- <b>candidate site assessment methodology</b> (Appendix 2) should incorporate minerals safeguarding, in particular coal, as a factor.</p>	<p>Provide clear evidence of how the key issue of coal resources has affected the development of the Preferred Strategy and strategic site selection.</p> <p>Suggest consider minerals safeguarding in relation to candidate site assessment methodology.</p>

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<p><b>Strategic sites</b></p> <p>- <b>site 4</b>: we note the Assembly's Planning Decision Committee refused planning permission for mixed use development at Robertstown, Aberdare; the key issue was flood risk and the proposed flood defences were considered inadequate (Decision Letter issued 14 November 2006).</p> <p>- <b>site 6</b>: we note that there are currently 2 appeals with the Assembly concerning listed building / mixed use on the Coking Works, Beddau.</p>	To note.
<p>Also see <b>topic comments</b> at soundness test C2, in particular regarding infrastructure, flood risk and land contamination.</p>	

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## CE 3 There are clear mechanisms for implementation and monitoring

Comments	Suggested Actions
<p>Targets and indicators for strategic policy monitoring are provided at Appendix 1. Consideration should be given to relationship plan objectives, and with targets and indicators to be included in the Annual Monitoring Report (AMR): see section 9.5 in the LDP Manual on developing monitoring targets and indicators and their relationship to the monitoring of the SA/SEA indicators.</p> <p><b>Appendix 1</b> - We note that the monitoring targets and indicators provide a generally clear indication of what is to be monitored for each strategic policy.</p> <p>In addition, on some specific points of detail:</p> <ul style="list-style-type: none"> <li>- policy <b>SP1</b> indicator should be the percentage of economically active by sector by ward in order to differentiate between the northern and southern strategy areas</li> <li>- policy <b>SP2</b> indicators should also be by ward to allow for differentiation with the northern strategy area</li> <li>- policy <b>SP4</b> indicator appears to have little relevance to the policy and is not considered to be appropriate</li> <li>- policy <b>SP 6</b> indicator is entirely inappropriate. The number of S106 agreements for the provision of affordable housing signed is inappropriate, is at variance with WPI indicators and is not a true reflection of the appropriateness of the policy. A more appropriate measure would be the number of affordable housing units provided, this would be necessary anyway as a measure in the AMR.</li> <li>- policy <b>SP7</b> - it would be useful if, as part of the monitoring of SP 7, a review of longstanding undeveloped employment allocations was undertaken</li> </ul>	<p>Suggest consider relationship of policy targets and indicators with plan objectives, and with targets and indicators to be included in the Annual Monitoring Report (AMR).</p> <p>Consider detailed comments on policy indicators.</p>

## Rhondda Cynon Taf LDP Reg15 Pre-Deposit Consultation: Welsh Assembly Government Response

<b>CE 4 It is reasonably flexible to enable it to deal with changing circumstances</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p><b>St Athan</b> - The recent announcement of the St Athan redevelopment by the Metrix consortium will inevitably have ramifications for RCT, particularly if there is to be improved road access off junction 34 of the M4, which lies in part in RCT. The emerging LDP will need to be adequately flexible to address this issue.</p> <p><b>M4 Junction 33 Culverhouse Cross</b> – it is not clear whether the Business Park proposals for this junction (outside RCT) have been taken into consideration (e.g. strategic site 7 Llantrisant), and whether there is sufficient flexibility in the emerging LDP to cover eventualities.</p> <p><b>Rail link</b> – it is not clear whether there has been any investigation of re-opening the rail link and whether this has informed the strategic site selection of Llantrisant.</p>	<p>Ensure that the plan is sufficiently flexible to respond to economic, WSP and other changes including delivery risks.</p>

### ADDITIONAL POINTS

- Foreword, page 3 second para – the Delivery Agreement is agreed with the Assembly Government, rather than being approved.
- App8 Bibliography: the date for LDPWales is confused, it should be Dec'05.

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