

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

CABINET

17 OCTOBER 2019

RHONDDA CYNON TAF LOCAL DEVELOPMENT PLAN REVIEW REPORT

REPORT OF DIRECTOR OF PROSPERITY AND DEVELOPMENT IN DISCUSSIONS WITH THE CABINET MEMBER FOR ENTERPRISE, DEVELOPMENT AND HOUSING, COUNCILLOR BEVAN

AUTHOR: SIMON GALE, DIRECTOR OF PROSPERITY AND DEVELOPMENT

1.0 <u>PURPOSE OF THE REPORT</u>

- 1.1 Cabinet agreed on the 18th of June 2019 to undertake a review of the Rhondda Cynon Taf Local Development Plan (LDP) and agreed for officers to commence work on the preparation of a formal LDP Review Report and a Draft Delivery Agreement for the revision of the LDP. These key documents were then to be presented to Cabinet, prior to seeking full Council resolution of them in the Autumn.
- 1.2 The purpose of this report is to now present the LDP Review Report, outlining the key considerations and conclusions of the review of the Plan. A number of recommendations in relation to this Review Report are presented, which if agreed, will be followed by a subsequent report that will propose the Delivery Agreement for a revised LDP.

2.0 **RECOMMENDATIONS**

It is recommended that Cabinet;

- 2.1 Approve the content and conclusion of the Rhondda Cynon Taf Local Development Plan Review Report (forming Appendix 1 of this report), which outlines the reasons for and the need to revise the Local Development Plan for Rhondda Cynon Taf.
- 2.2 Allow for the Review Report to be circulated to targeted key stakeholder bodies (such as NRW, utility companies and Planning Inspectorate Wales) in order to gain their formal comments on the content and conclusions of the report. Welsh Government have already

been involved in early stages of the preparation and content of the report, and will continue to be so.

2.3 Give authorisation to the Cabinet Member for Enterprise, Development and Housing to determine, through a delegated decision, that appropriate amendments are made to this Review Report, prior to reporting the Review Report to Council for approval.

3.0 REASONS FOR RECOMMENDATIONS

- 3.1 The LDP Review Report has been prepared following the full review of the Rhondda Cynon Taf Local Development Plan (LDP) 2006 -2021, which was adopted in March 2011.
- 3.2 The Review Report sets out the analysis of the evidence that has been gathered over the past 8 years in relation to the monitoring of the LDP, the success of its delivery and appropriateness of its policies and allocations. The conclusion of the report determines what revisions are necessary for the LDP in Rhondda Cynon Taf.
- 3.3 Firstly, the Review Report acknowledges that the end date of the current plan is 2021. A key source of information for the review is the combined results of the 7 Annual Monitoring Reports of the LDP that have been prepared thus far. Further to this is the consideration of contextual changes that have taken place during the plan period that have affected its delivery or will affect its future use. These include changes in national legislation and policy. The report also outlines the contextual changes that have taken place during the plan period; these may be local or global economic conditions, changes in the various topics and further evidence base changes.
- 3.4 The Review Report concludes that there is a need to prepare a full revision of the Rhondda Cynon Taf LDP.
- 3.5 It is considered that all areas of review have been covered and although not statutory, it is recommended that consultation takes place with key stakeholders on the Review Report. These will include, but not be limited to NRW, utility providers such as DCWW, gas and electricity providers, Cadw and the Planning Inspectorate. There will not be a general public consultation. These bodies may indicate some appropriate small amendments to the report.
- 3.6 There are pressing timelines to begin preparations of the revision of the Plan. It is therefore necessary to request that the Cabinet member has delegated powers to agree any subsequent amendments that may arise as a result of the consultation; prior to presenting the report to Council.

4.0 BACKGROUND

- 4.1 The LDP sets out the aims, vision and objectives for the future of the County Borough, a spatial development strategy and a land use planning policy framework to enable its successful delivery. The LDP has formed the basis for decisions on new development in the County Borough, (excluding the area within the Brecon Beacons National Park) since 2011, with the plan having an end date of 2021.
- 4.2 Following the adoption of the LDP, the Council has a statutory obligation to keep all matters under review that are expected to affect the development of its area. This is primarily undertaken by the preparation of the Annual Monitoring Reports (AMRs) of the LDP. These reports consider the success, progress and delivery of the core policies and allocations in the LDP, in relation to their specific targets and indicators. It also encapsulates the results of ongoing, annual surveys for the LDP topic areas, any updates of the evidence base and the analysis of contextual changes that may affect the Plan i.e. national legislation and policy, local and wider economic conditions or development pressures.
- 4.3 The results of the AMR monitoring between 2011 and 2019, provide an interesting and varied picture of development in Rhondda Cynon Taf. The most notable findings indicate that:
 - During the LDP plan period, a considerable total of 6,299 houses have been built in RCT. Of these, 4,543 of them have been built since the plans' adoption. The figure for 2016-2017 of 716 dwellings was the highest number of completions since the adoption of the LDP. This was from a low of 357 in 2012, and has gone back down to 386 completions in the past year.
 - There have been 1,214 affordable houses completed during the plan period and 1,006 since the adoption of the LDP in 2011. The figure for 2016-2017 of 248 was the highest number of affordable housing completions since the adoption.
 - Over 13,000 houses have been permitted by the Council since 2006, and 9,192 since 2011. The year with the highest number of permissions was 2015/16, with 2,264 dwellings approved.
 - The overall vacancy rate for Principal Town and Key Settlement retail centres for 2018/19 is 12.37%. This is 2.27% above the UK average vacancy rate, which stood at 10.1% in October 2018 but better than the Welsh average of 13.6% for the same period.

- Of the total 98ha of employment allocations, only 4.63ha has been granted planning permission since the adoption of the LDP. However, permissions for a range of new employment developments have been given on over 27 hectares of land throughout RCT during this time.
- The major Church Village bypass was constructed during the plan period, and the Aberdare bypass extension scheme and the dualling of the A4119 at 'Stinkpot Hill' are progressing towards planning application stage.
- Major works have been completed on the Talbot Green bypass, including further lanes and signalled junctions at the Mwyndy Cross roundabout. The Mountain Ash southern cross valley link construction is nearing completion. The Llanharan bypass scheme is progressing towards planning application stage.
- To date, 10 of the 35 highways, park and ride, rail and cycle network schemes have been completed while a further 4 have been partially completed.
- The total permitted waste management capacity stands at 9.95 hectares, equating to 79.6% of the lower capacity requirement or 45.9% of the higher capacity requirement as set out in the Regional Waste Plan.
- To date, in the Northern Strategy Area, 19 allocations have either been implemented, subject to planning consent or part of the allocation has been permitted. This equates to 42% of all 45 Strategic Site, residential, employment, retail and transportation allocations.
- In the Southern Strategy Area 21 allocations have either been implemented, subject to planning consent or part of the allocation has been permitted. This equates to 55% of all 38 Strategic Site, residential, employment, retail and transportation allocations.
- 4.4 Although many of our allocations have been developed or benefit from planning permission, it is now accepted that there remain too many that haven't progressed as was forecast in the LDP; nor are they likely to in the remaining plan period. Further to this we have a short term housing land supply of just 1.3 years.
- 4.5 Pressure for development outside settlement boundaries has been witnessed in recent years, giving decision makers and the public less confidence in the planning system. That is not to say our important ecological, landscape and resource designations continue to be successfully protected.

- 4.6 Many of our Strategic Sites and allocations are, on brownfield sites, many of which are coal mining legacy sites that require significant land reclamation, restoration and decontamination. At the time of LDP preparation, there were still significant funding opportunities for land reclamation schemes for such sites. However, funding for land reclamation at this scale has not been readily available in recent years and this has compromised the viability if these particular sites.
- 4.7 The concept of viability of such development schemes on our allocations has come to prominence in recent years, particularly so in the weaker housing markets in the north of the County Borough.
- 4.8 The global economic recession in 2008 has clearly had a longer lasting debilitating legacy on the housebuilding industry than was expected when preparing the LDP.
- 4.9 It is, however, acknowledged that the projections and trends on which our housing requirement figures were based have also not materialised. Accordingly, there is clear need to revisit these population and household projections in order to identify a more suitable requirement for new housing going forward. Housing needs have also evolved over the plan period, with the re-evaluation of housing policies required.
- 4.10 Our employment allocations have seen very little take up, with just around 5 hectares of the 98 hectares allocated currently developed. However around 27 hectares of employment land has come forward, albeit on existing sites, which themselves are thriving with very low vacancy rates.
- 4.11 There has been mixed success with regards to retail allocations. Some sites have come forward for development, although other permitted sites have not, due to market changes during plan period. Our main town centres remain vibrant with comparably low vacancy rates. This is particularly so in relation to those having benefited from major, successful regeneration schemes; whilst those that are doing less well, are currently subject to new, targeted regeneration schemes.
- 4.12 Most of our evidence base is now over 10 years old, and the key topics of housing, retail and employment in particular need revisiting, amongst all those identified in section 4 above.
- 4.13 Based on the existing evidence base, the following studies are expected to require updating in order to inform the LDP revision process, as a minimum:
 - Retail Study
 - Sustainability Appraisal / Strategic Environment Assessment

- Housing Needs Assessment
- Local Housing Market Assessment
- Candidate Sites Assessment
- Population and Dwelling Projection Report
- Urban Capacity Study
- Employment Land Review
- Infrastructure Needs Study
- Leisure Study
- Renewable Energy Study
- Minerals Background Paper
- Open Space Assessment
- Gypsy and Traveller Accommodation Assessment
- 4.14 This is not a definitive list and additional update requirements to the evidence base may emerge when a plan revision progresses e. g viability studies.
- 4.15 The environmental impact of the plan has been monitored through the Sustainability Appraisal (SA) incorporating Strategic Environment Assessment (SEA) indicators and reported each year in the Annual Monitoring Report. The monitoring process has identified a number of opportunities for SA monitoring indicators to be updated and/or improved, as certain statutory indicators no longer apply.
- 4.16 Other contextual changes outlined in the report, include major changes that have taken place in national legislation and planning policy since the preparation of the current LDP. This has a significant effect on the baseline evidence that informs the plan, its content and principles. Significant new requirements in the Active Travel (Wales) Act, 2013, Housing (Wales) Act, 2014, Planning (Wales) Act, 2015, Wellbeing of Future Generation Act 2015, Environment (Wales) Act, 2016 and Planning Policy Wales Edition 10 along with the Welsh Language and Suds Approval Bodies indicates the need to revisit the content and principles of our LDP Strategy and policies.
- 4.17 The emergence of greater national priorities such as climate change and the low carbon economy, green infrastructure and other Wellbeing of Future Generations considerations are not appropriately addressed in the current LDP, and should now be so.
- 4.18 The review will give the Council the opportunity to recognise emerging issues and properly plan for matters such as Metro, the expanding Tourism offer in RCT and the changing nature of our town centres.
- 4.19 Full consideration is given to the opportunity to prepare Joint LDP's with any of our 7 neighbouring Local Planning Authorities, as is required through regulation. None were suitable for formal joint plans,

although opportunities will still be explored to commission joint evidence base preparation and save on resources.

- 4.20 The period the plan will cover needs to be considered as will its association with the Strategic Development Plan (SDP). Rhondda Cynon Taf have agreed to be part of and contribute to the SDP, although there are several more Local Authorities yet to do so. It is the current indicative intention that the SDP would have a plan period of between 2020 and 2040. The recent SDP reports to Council indicated an earliest adoption date of 2025. It is considered that the LDP would come into force in advance of the SDP, but sit underneath it in terms of hierarchy of plans. The emergence of the National Development Framework, and regional considerations within that, would enable for measured decisions to be made to seek to align the LDP with the emerging SDP.
- 4.21 Accordingly, it is considered that the preparation of an LDP is necessary for the County Borough in the interim period, with a shortened plan period of 10 years i.e. 2020 to 2030. This is the shortest period allowed by Welsh Government. Once the SDP is adopted, then a more streamlined LDP Lite can be prepared to sit below the SDP.
- 4.22 The Review Report considers all these matters and has concluded with a recommendation that a full revision of the LDP is required.
- 4.23 Financial considerations of these recommendations are briefly considered below in section 7 and considered in detail in the associated Draft Delivery Agreement for the revision of the LDP and its covering Cabinet Report that is written to follow this report, if agreed.

5.0 EQUALITY AND DIVERSITY IMPLICATIONS

5.1 An Equalities Impact Assessment screening exercise has been undertaken that indicates that there are no expected negative impacts on the protected characteristics and a full assessment is not required. However, the scope of the LDP will result in some of these matters being considered further, and if necessary will develop and incorporate policies that may have a positive impact on some of these characteristics.

6.0 CONSULTATION / INVOLVEMENT

6.1 The Review Report has been prepared in consultation with various internal Council departments. However, further, detailed consultation will take place following Cabinet agreement, with targeted stakeholder

bodies. There will be no public consultation on the Review Report, although the final Welsh Government approved report will be made public during the pre-deposit stage of revised Plan preparation.

7.0 FINANCIAL IMPLICATION(S)

7.1 The overall cost of the preparation of the LDP (non staffing resources) is estimated to be £600,000. Considering banked reserves and continuing budgets, there is sufficient budget to cover these costs. A further £39,233 per annum is then required to part fund an identified necessary new post in the team structure. Further budget and staffing requirements are outlined in the associated LDP Delivery Agreement Report.

8.0 LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

8.1 The LDP will be prepared in accordance with The Planning and Compulsory Purchase Act (2004), the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015), Planning Policy Wales 2018, the Planning (Wales) Act 2015 and the Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

9.0 <u>LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND</u> THE WELL-BEING OF FUTURE GENERATIONS ACT.

How the subject of the report will contribute to the delivery of the Council's Corporate Priorities?

9.1 The production of a Local Development Plan will help to deliver the Council's three main corporate priorities of building a strong economy, promoting independence and positive lives for everyone and creating neighbourhoods where people are proud to live and work. The production of this land-use plan will help to stimulate the local economy through market and social house building, as well as providing for employment and retail development across the Capital Region. Working together to shape our communities will instil a sense of pride and allow people to live and work independently, wherever they so choose. The LDP will also help to deliver the transport infrastructure that keeps the Cardiff Capital Region and Rhondda Cynon Taf working and moving, in a sustainable way that benefits current and future generations.

How the Sustainable Development principle, i.e. the five ways of working has been considered?

- 9.2 The LDP will be a key project demonstrating the 5 ways of working in action:
 - Integration the preparation of the LDP will be bring together all land use planning issues relevant at a strategic level across the Cardiff Capital Region, involving our partners, residents, visitors, employers and service providers in the formulation of the Plan.
 - Collaboration- the LDP will be a key collaboration project for the region enabling the 10 Local Planning Authorities to work together to form a Plan for the region.
 - Involvement preparation of the LDP will provide numerous opportunities to engage with our residents and customers, including the business community and ensuring that we are listening to a wide range of views to inform the plan and decision making process.
 - Prevention the LDP provides an opportunity to understand the root causes of issues and preventing them by being proactive in our thinking and understanding the need to tackle problems at source for example by undertaking needs assessments to inform our priorities.
 - Long-term the LDP will be all about planning for the future and taking a strategic approach to ensure the Cardiff Capital Region is sustainable and that we understand the future need and demand for sustainable development in the region and how that is best met.

How the subject of the report seeks to maximise the Council's contribution to seven national well-being goals?

- 9.3 The LDP will contribute to the seven well-being goals by working together with other public services and third sector organisations to improve the well-being of everybody in Wales. This new approach seeks to improve public services in a sustainable way, for the benefit of all. The SDP will help to ensure:
 - A Prosperous Wales The LDP will promote a productive, creative and low-carbon society that recognises the limits of our resources and global environment, by ensuring that our finite resources are used efficiently and proportionately. It will also help to develop a skilled, well-educated population to work within an economy that generates wealth and provides employment opportunities for all.

- A Resilient Wales The LDP will help to ensure that the region maintains and enhances a bio-diverse natural environment with healthy, functioning ecosystems that support social, economic and ecological resilience with the ability to adapt to change.
- A Healthier Wales The LDP aims to help build a society in which people's mental and physical well-being is maximised through access to green space, and helps to foster an understanding of choices and behaviours that benefit future health.
- A More Equal Wales The LDP will seek to enable people to fulfil their potential no matter what their background or circumstances. It also aims to help communities effectively tackle the loneliness and isolation that can often exist within many of them.
- A Wales of Cohesive Communities The LDP, via the placemaking principle, will help to foster attractive, safe, viable and well-connected communities that improve the well-being of all residents and visitors.
- A Wales of Vibrant Culture and Thriving Welsh Language The LDP will support a society that promotes and protects our culture, heritage and Welsh language, whilst encouraging people to participate in the arts, sport and recreation.
- A Globally Responsible Wales The LDP will contribute towards Wales being a nation which, when doing anything to improve our economic, social, environmental and cultural wellbeing; will take account of whether doing such a thing makes a positive contribution to our global well-being.

Any other national strategies the subject of the report is seeking to address.

9.4 The Planning Directorate in Welsh Government is working on the production of a National Development Framework (NDF), which will set out a 20-year land-use framework for Wales and replace the existing Wales Spatial Plan. Once the final NDF is published (anticipated September 2020), the LDP will need to be in general conformity with the aims and objectives of the NDF, sitting above the SDP, and subsequently the LDP in the development plan hierarchy within Wales.

10.0 CONCLUSION

- 10.1 Having regard to the above, it is considered necessary to recommend that Rhondda Cynon Taf proceed with the preparation of a full revision of their Local Development Plan for the period 2020 to 2030.
- 10.2 It is also necessary to allow for the Review Report to be circulated to targeted key stakeholder bodies (such as NRW, utility companies and Planning Inspectorate Wales) in order to gain their formal comments on the content and conclusions of the report.
- 10.3 Further, authorisation should be given to the Cabinet Member for Enterprise, Development and Housing to determine, through a delegated decision, that appropriate amendments are made to this Review Report, prior to reporting the Review Report to full Council to seek its approval.
- 10.4 If this is agreed, then the following Cabinet Report, presenting the revised LDP Delivery Agreement, sets out the most appropriate timetable, budget, staffing and other resources along with the proposed Community Involvement Scheme, necessary to undertake the preparation of a full revision of the LDP.

Other Information:-

Relevant Scrutiny Committee Overview & Scrutiny Committee

Contact Officer: Simon Gale

LOCAL GOVERNMENT ACT 1972

AS AMENDED BY

THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

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Background Papers

None.

Officer to contact: Simon Gale

Rhondda Cynon Taf Local Development Plan Review Report

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1Status of LDP Allocations55

1. INTRODUCTION

- 1.1. The purpose of this Review Report is to outline the findings of the full review of the Rhondda Cynon Taf Local Development Plan 2006 2021 (LDP), before giving recommendations on its conclusions.
- 1.2. The Rhondda Cynon Taf LDP was adopted in March 2011. The LDP sets out its aims, vision and objectives for the future of the County Borough, a spatial development strategy and a land use planning policy framework to enable its successful delivery. The LDP has formed the basis for decisions on new development in the County Borough, (excluding the area within the Brecon Beacons National Park) since 2011, with the plan having an end date of 31st December 2021.
- 1.3. Following the adoption of the LDP, the Council has a statutory obligation to keep all matters under review that are expected to affect the development of its area. This is primarily undertaken through the preparation of the Annual Monitoring Reports (AMRs) of the LDP. These reports consider the success, progress and delivery of the core policies and allocations in the LDP, in relation to their specific targets and indicators. It also encapsulates the results of ongoing, annual surveys for the LDP topic areas, any updates of the evidence base and the analysis of contextual changes that may affect the Plan i.e. national legislation and policy, local and wider economic conditions or development pressures.
- 1.4. The analysis of the AMR's since 2012 had not until this year raised sufficient concern to trigger a review of the LDP. Similarly, conclusions of the AMR's have recognised that there have been some identifiable changes in external conditions, national policy and legislation, within the local context alongside development pressures; but until this year, none had been considered to be of a scale that required a fundamental review of the plan.
- 1.5. However, there are a series of key matters that have now come to the fore. Firstly, although many of the sites allocated in the LDP have been developed or benefit from planning permission, it is unlikely the remainder will come forward before the end of the plan period leaving a deficit against the development targets originally set when the LDP was adopted. This deficit has started to lead to pressure for development outside settlement boundaries which in turn leads to less public confidence in the planning system. As such, there is a need to review the remaining allocations and consider whether they are still fit for purpose or need to be replaced by new more suitable and deliverable options.
- 1.6. Secondly, the accumulation of legislative changes such as the Planning Act (Wales) 2015, Well-being of Future Generations (Wales) Act 2015 and the introduction of Planning Policy Wales Edition 10 and the draft National Development Framework has led to a point where there is a need to review the strategy, policies and allocations in the current LDP, against these new national policies and principles.
- 1.7. Finally, and in association with both points above, is the fact that the LDP has an end date of 2021. We have already reached a time where the preparation of a revised plan would extend beyond this date, as Welsh Government LDP regulations

indicate that plan preparation should take 3.5 years. Regulations also state that the end date of the plan means just that, i.e. the plan's policies, allocations or designations cease to have any status from January 1st 2022. Associated with this is the overarching statutory requirement that the Local Planning Authority must prepare a plan for their area. It has therefore been determined necessary to prepare this formal LDP Review Report.

1.8. This report will outline the comprehensive findings of the review of the LDP, considering the following matters;

Section 2 will outline the key issues and evidence that informs LDP Plan Review. This includes a brief analysis of the current plan period and the consequences of its end date. It will then set out the headline outcomes of the annual monitoring of the LDP since its adoption in 2011. Finally, there is a broad analysis of all the main contextual changes that have occurred since the plan's adoption. These may have affected the plan's delivery or deemed that elements of the plan are no longer relevant.

Section 3 will contain a review of the Aims, Vision, Objectives and Strategy of the LDP. This will include an assessment of the success and delivery of these key strategic elements of the plan, including the Strategic Sites.

Section 4 will then expand on the analysis of the main topic areas, policies and allocations in the plan, giving a clear indications of their success and delivery. It will also consider any necessary evidence base updates.

Section 5 gives a brief overview of the Sustainability Appraisal, incorporating the Strategic Environmental Assessment and Habitats Regulation Assessment (HRA) Appropriate Assessment (AA) elements of the LDP.

Section 6 discusses opportunities for Joint LDP preparation, or otherwise collaborative working opportunities with neighbouring Local Authorities.

Section 7 will form the conclusions of the report.

1.9. The report has been subject to necessary internal consultation, and will subsequently be shared with focussed consultees for comment.

2. WHAT INFORMS LDP PLAN REVIEW

Background

- 2.1. This Review Report will conduct a critical analysis of the evidence that has been gathered over the past 8 years in relation to the monitoring of the LDP, the success of its delivery and appropriateness of its policies and allocations. The conclusion of the report will determine whether or not a revised LDP is necessary for Rhondda Cynon Taf, firstly acknowledging the end date of the current plan.
- 2.2. The primary source of the review will be the combined results of the 7 AMRs that have been prepared thus far. Further to this is the consideration of contextual changes that have taken place during the plan period that have affected its delivery or its future use. These include changes in national legislation and policy or maybe local or global economic conditions.

Current LDP Plan Period

2.3. The current LDP has an end date of 2021. Simply put, legislation dictates that from January 2022, the LDP will no longer be the development plan for RCT and the primary consideration in decision making in the planning process; this will also be the case for the associated Supplementary Planning Guidance. This will clearly have a major influence in determining whether to embark on the preparation of a revised LDP. We have already passed the time of enabling us to adopt a new plan before 2022, although the further advanced in its preparation we are by that time, the less time we will have without a local level planning policy void. There is significant national planning regulation, policy and guidance that would enable good planning decisions to be made. It is also considered that an advanced draft plan based on sound evidence will contribute to a more robust position to be able to make planning decisions.

Key AMR results

- 2.4. The results of the core and local output monitoring exercise, between 2011 2019, provide an interesting and varied picture of development in Rhondda Cynon Taf. The most notable findings indicate that:
 - During the LDP plan period, a total of 6,299 houses have been built in RCT. Of these, 4,543 have been built since the plan's adoption. The figure for 2016-2017 of 716 new dwellings completed was the highest number of completions since the adoption of the LDP. This was from a low of 357 in 2012, and significantly only 386 dwellings were completed in the past year (2018-2019).
 - 2. There have been 1,214 affordable houses completed during the plan period and 1,006 since the adoption of the LDP in 2011. The figure for 2016-2017 of 248 was the highest number of affordable housing completions since the plan's adoption.

- 3. Over 13,000 houses have been permitted by the Council since 2006, and 9,192 since 2011. The year with the highest number of permissions was 2015-2016, with 2,264 dwellings approved, although there were just 514 last year (2018-2019).
- 4. The overall vacancy rate for Principal Town and Key Settlement retail centres for 2018-2019 is 12.37%, which is a slight increase on the previous year's rate of 11.5% (2017-2018). This is 2.27% above the UK average vacancy rate, which stood at 10.1% in October 2018 but better than the Welsh average of 13.6% for the same period.
- 5. Of the total 98ha of employment allocations, only 4.63ha has been granted planning permission since the adoption of the LDP. However, permissions for a range of new employment developments have been given on over 27 hectares of land throughout RCT during this time.
- 6. The Church Village bypass was constructed during the plan period, although not included in the final LDP, as it was being completed toward the end of LDP plan preparation. The Aberdare bypass extension scheme and the dualling of the A4119 at 'Stinkpot Hill' are progressing well towards planning application stage.
- 7. Major works have been completed on the Talbot Green bypass, including further lanes and signalled junctions at the Mwyndy Cross roundabout. The Mountain Ash southern cross valley link construction is also nearing completion. The Llanharan bypass scheme is progressing well towards planning application stage.
- 8. To date, 10 of the 35 highways, park and ride, rail and cycle network schemes have been completed while a further 4 have been partially completed.
- 9. The total permitted waste management capacity stands at 9.95 hectares, equating to 79.6% of the lower capacity requirement or 45.9% of the higher capacity requirement as set out in the Regional Waste Plan.
- 10. To date, in the Northern Strategy Area, 19 allocations have either been implemented, subject to planning consent or part of the allocation has been permitted. This equates to 42% of all 45 Strategic Site, residential, employment, retail and transportation allocations.
- 11. In the Southern Strategy Area 21 allocations have either been implemented, subject to planning consent or part of the allocation has been permitted. This equates to 55% of all 38 Strategic Site, residential, employment, retail and transportation allocations.
- 2.5. These are the headlines statistics relating to the delivery of the allocations in the LDP. Due to the scale of the analysis and review of the LDP, these matters will be discussed in further detail in sections 3 and 4 of the report.

Contextual Changes

National Changes

Active Travel (Wales) Act, 2013

2.6. The Active Travel (Wales) Act 2013 legally requires local authorities in Wales to deliver continuous improvements to active travel routes and facilities annually, and produce maps for both existing and new/improved active travel routes. In 2017, the Council undertook a consultation exercise on an Integrated Network Map (INM) for the Rhondda Cynon Taf area. This map contains details of the proposed active travel routes that are sought to be delivered across a period of 15 years. The final version of the INM was approved by the Welsh Government in February 2018. The Council is now required to review the INM every 3 years, which will inform the revision process of the LDP.

Housing (Wales) Act, 2014

2.7. The Act received Royal Assent in September 2014 with the aim to improve the supply, quality and standards of housing in Wales. The legislation requires local authorities to produce an up to date Local Housing Market Assessment (LHMA) by April 2015, which is to be updated every two years. The Act also gives LPAs the duty to make provision for and assess the needs of Gypsy and Traveller accommodation to ensure that enough sites have been identified to accommodate these communities. RCT has submitted a Gypsy and Traveller Accommodation Assessment for 2015-2020, which has subsequently been agreed by WG. The needs of Affordable Housing and Gypsy and Traveller accommodation will be given due consideration in a LDP revision.

Well-being of Future Generations (Wales) Act, 2015

- 2.8. The Act, which received Royal Assent on the 29th April 2015, requires public bodies to consider the long term; to work more effectively with people, communities and each other; to look at problem prevention and to take a more joined-up approach. Under the Act, Local Authorities are required to publish a 'Well-being Statement' when preparing their well-being objectives in order to explain how said objectives will accomplish their goals, and how the sustainable development principle has been applied. Each year, an 'Annual Report' must also be produced to highlight the progress made in achieving the stated objectives.
- 2.9. Additionally, where the Future Generations Commissioner for Wales has made recommendations to the Local Authority, they must publish their response. The Act's seven well-being goals are as follows:
 - 1. A prosperous Wales
 - 2. A resilient Wales

- 3. A healthier Wales
- 4. A more equal Wales
- 5. A Wales of cohesive communities
- 6. A Wales of vibrant and thriving Welsh Language
- 7. A globally responsible Wales
- 2.10. It will be appropriate moving forward to consider how a revised LDP and its policies will respond to each of the 'Well-being Goals' and the Council's own 'Well-being Objectives'.

Planning (Wales) Act, 2015

2.11. The Act became legislation after receiving Royal Assent in July 2015. The Act introduces a legal basis for the preparation of new national and regional planning policy in the form of a National Development Framework (NDF) to be compiled by Welsh Ministers and a Strategic Development Plan (SDP) to be compiled by the South East Wales Local Authorities. Both the NDF and SDP will have a considerable effect on future LDP policy, which will need to be compliant with these plans. Ongoing consideration will need to be given to their progress whilst reviewing the LDP, as both the NDF and SDP are currently in their infancy. The status of LDPs in general will be affected by both the NDF and the SDP, with the LDP at the lowest tier of development plan, focussed on local level planning. RCT will also need to work in conjunction with other authorities as per the provision within the Act and consequently this will impact upon future working arrangements.

The Historic Environment (Wales) Act, 2016

2.12. The Historic Environment (Wales) Act received Royal Assent and became legislation on 21st March 2016. It establishes a framework for the protection of listed buildings and scheduled monuments. The Act provides additional and increased powers to prosecute where necessary; to halt any unauthorised works; to prevent buildings falling into a state of disrepair; to serve 'preservation notices' and to more easily permit Local Authorities to recover costs incurred. The Act led to the preparation of TAN 24 by the Welsh Government, in association with CADW, to guide decision-making at a local level. The LDP revision process will need to consider any implications caused by the Act.

The Environment (Wales) Act, 2016

2.13. The Act received Royal Assent on 21st March 2016, providing new legislation to manage the natural resources of Wales proactively and sustainably. The Act includes a new biodiversity duty that aims to aid the reversal of decline and secure the long-term resilience and future of biodiversity in Wales. The Act also tasks Welsh Ministers with setting targets to reduce greenhouse emissions and the setting of carbon budgets. It further introduces new powers to increase the amount

of materials for recycling, as well as improving the quality of materials to be recycled. With regard to biodiversity, RCT currently has policies largely compliant with the provisions in the Act, although their compliance will need to be considered as part of a revision.

Planning Policy Wales (Edition 10)

- 2.14. Planning Policy Wales (PPW) has been amended a number of times since the adoption of the LDP, with the most up-to-date edition (at the time of writing this) being Edition 10 (December 2018). This version has been vastly restructured from previous ones by the Welsh Government, to reflect the seven Well-being Goals of the Well-being of Future Generations Act. Any revision of the LDP would need to ensure that its policies are compliant with this much amended PPW.
- 2.15. Furthermore, there have been several updated, amended or wholly new Technical Advice Notes (TANs) affiliated with PPW, as set out below.
 - TAN 1: Joint Housing Land Availability Studies (January 2015)
 - TAN 4: Retail and Commercial Development (November 2016)
 - TAN 12: Design (July 2014 and March 2016)
 - TAN 20: Planning and the Welsh Language (October 2017)
 - TAN 21: Waste (February 2017)
 - TAN 22: Planning and Sustainable Buildings Removed by Welsh Government in 2014.
 - TAN 23: Economic Development (February 2014)
 - TAN 24: The Historic Environment (May 2017)
- 2.16. The new and/or updated TANs, in addition to the updated PPW, will require substantial consideration throughout the revision process, in order to ensure that any revised LDP is compliant with national planning policy.

The Welsh Language

- 2.17. Recent editions of PPW have included the requirement for LPAs to consider the likely effects on the use of the Welsh language in the sustainability appraisal of LDPs. This requirement is referenced in the Planning (Wales) Act 2015 and the seven well-being goals. PPW also encourages LPAs to include a statement on how the needs and interests of the Welsh language has been considered during plan preparation, and how many policies relating to the Welsh language interact with other policies. PPW also gives LPAs the ability to define areas in the LDP where language impact assessments would be required in respect of large developments on unallocated land. TAN 20 (October 2017) provides more detailed guidance for LPAs to consider Welsh language issues during the preparation, monitoring and review of LDPs. A comprehensive collation of evidence is therefore required through the LDP review process to determine if there is a need to formulate specific planning policy on the Welsh Language in RCT.
- 2.18. In addition, the Council now has an obligatory duty to comply with the Welsh Language Standards, established by the Welsh Government under the Welsh Language (Wales) Measure 2011. The Standards mean that the Welsh language

must not be treated any less favourably than the English language. This will therefore have budgetary implications due to the sheer volume of documents that will require translation, in accordance with the Welsh Language Standards.

National Development Framework (NDF)

- 2.19. The Planning (Wales) Act 2015 provides a statutory requirement for the Welsh Ministers to produce and keep an up-to-date National Development Framework (NDF) to replace the Wales Spatial Plan. The NDF will provide a context for the provision of new infrastructure and growth, setting out the 20-year spatial framework for land use in Wales. The framework is set for the SDP and LDP to follow beneath it. The NDF will focus on land use issues of national significance, which the planning system is able to influence and deliver.
- 2.20. A draft of the NDF is currently out to consultation. It sets out a number of high level policy requirements for RCT, primarily within a regional context. Foremost, there is a national development growth area identified across the south east Wales valleys, Cardiff and Newport region. Pontypridd is identified as a Centre of Regional Growth. The wider South Wales Metro system and Valleys Regional Park are also within RCT. Co-ordinated regeneration and investment is supported in the Heads of the Valleys area to increase prosperity and address social inequalities. An estimated housing need of 71,200 is identified for the region for the period up to 2038. Emphasis is given to seek to develop existing towns and major settlements, as opposed to developing new towns and sprawling greenfield development. The priorities, objectives and policies of the NDF will require consideration in the LDP revision process.

Longitudinal Viability Study of the Planning Process

2.21. This Welsh Government research study identifies reasons why housing allocations or commitments that were assessed as deliverable during the LDP process became stalled due to viability issues at later planning stages. The report has influenced the preparation of the Welsh Government's Development Plans Manual (Edition 3) which underwent public consultation from 7th July to 30th August 2019. The manual states that all sites submitted at the candidate site stage must now be informed by a deliverability and viability assessment. The viability and deliverability of candidate sites will require thorough consideration during the LDP revision process.

Sustainable Drainage Systems

2.22. Schedule 3 to the Flood and Water Management Act (2010) makes Sustainable Drainage Systems (SuDS) a mandatory requirement for certain development in Wales. As of 7th January 2019, SuDS are now required for all new developments of more than one dwelling or where the construction area is 100m² or more. Construction cannot begin without SuDS approval. This requirement is likely to have an effect on development, such as housing density requirements and

development viability. The preparation of new or updated policies for a revised LDP will need to consider the potential implications of SuDS.

The Categorisation of Use and Management of Change: A Planning Review

2.23. On the 31st May 2018, The Welsh Government published a report by the University of the West of England (UWE) titled 'The Categorisation of Use and Management of Change: A Planning Review'. The report scrutinises the Use Classes Order and Permitted Development Rights and assesses whether any changes are required and desirable to ensure that they remain fit for purpose as regulatory tools. It recommends the revision of the Use Classes Order and Permitted Development Rights, including recommendations to amend retail, employment, residential and sui generis use classes. It remains to be seen whether any of the recommendations will come to fruition, however the implications of this report would need to be considered during the LDP revision process.

Natural Resources Policy

2.24. Following the Environment (Wales) Act 2016, the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The NRP focuses on the sustainable management of Wales' natural resources, building on the framework of the Environment (Wales) Act. The NRP sets out three national priorities for the management of natural resources: delivering nature-based solutions; increasing renewable energy and resource efficiency; and taking a place-based approach. The NRP also sets the context for Natural Resources Wales to produce Area Statements, which includes the Rhondda Area trial, which focused on the natural assets and opportunities within the area. Natural Resources Wales are currently gathering evidence on a number of Area Statements including the South Central Area Statement, which comprises five local authorities including Rhondda Cynon Taf. Area Statements will provide a local evidence base for the sustainable management of natural resources which the council must have regard to during the LDP revision process.

TAN 23 – Economic Development

2.25. In February 2014, the Welsh Government released a new Technical Advice Note (TAN 23) covering economic development. It sought to broaden the definition of 'economic development' to encompass *any form of development that generates wealth, jobs and income* (Welsh Government, 2014, p4). TAN 23 will need to be given due consideration as part of the LDP revisions procedure. In August 2015, the Welsh Government followed this with a *Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan.*

Technical Advise Note 4 (TAN 4) - Retail and Commercial Development

2.26. In November 2016, the Welsh Government released a revised Technical Advice Note on retail and commercial development. The TAN sought to promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business. Additionally, it sought to sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness, as well as improving access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport. Greater emphasis is also placed on collaborative working between local authorities in establishing a retail evidence base and commercial strategies at a 'larger than local' level. TAN 4 will need to be given due consideration as part of the LDP revisions procedure.

Regional Changes

Cardiff Capital Region City Deal

- 2.27. The £1.2billion Cardiff Capital Region City Deal, which could transform the economies of South East Wales, was formally ratified during a special ceremony held on St. David's Day 2017. The aim of the City Deal is to create jobs and boost economic prosperity by improving productivity; tackling worklessness; building on the foundations of innovation; investing in physical and digital infrastructure; providing support for business; and ensuring that economic benefits generated as a result are felt across the region.
- 2.28. The City Deal includes funding of £734million for the South Wales Metro, of which over £500million is provided by the Welsh Government and £125million from the UK Government. As part of the Wider Investment Fund, the UK Government has provided a £375million contribution and the ten South East Wales local authorities have agreed a commitment to contribute £120million. On the 12th February 2018 the CCR Regional Cabinet comprising the ten local authority leaders approved the strategic business plan, which details how the £1.2billion 'Wider Investment Fund' will be used over the next five years, to drive actions forward. The plan specifies the regional strategic objectives of the CCR City Deal, which are: prosperity and opportunity; inclusion and equality; identity, culture, and community and sustainability. The overarching economic objectives of the City Deal are to create 25,000 new jobs and leverage £4billion in private sector investment.

Cardiff Capital Region Strategic Development Plan (SDP)

- 2.29. As with the NDF, the Planning (Wales) Act 2015 provides a legal framework for the preparation of the Strategic Development Plan (SDP). The SDP will be the middle tier of development planning covering a regional level, sitting below the NDF at a national level and above LDPs at a local level.
- 2.30. Welsh Government suggest that there is evidence to show that there are many strategic planning issues that first generation LDPs have failed to address in isolation. Consequently, those 'larger than local issues' such as housing, employment and transport infrastructure can be tackled at a strategic level to ensure they are being considered and planned for, in a comprehensive way. The Cardiff

Capital Region is committed to regional working and work is underway to set out and agree the key preparatory matters between all 10 member authorities, including boundaries, governance and content. To date, both RCT and the Vale of Glamorgan Councils have signed up to the proposed details of the SDP preparation.

South East Wales Valleys Local Transport Plan (LTP)

2.31. The LTP (2015) has been jointly produced by Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen County Borough Councils. It sets out the vision and objectives for transport in the SE Wales Valleys area and provides a short and long-term programme of interventions to work towards achieving these goals. The short-term programme sets down those schemes that are priorities for the next 5 years, up to 2020. The longer-term programme identifies aspirations up to 2030. The LTP has a status that would allow for funding opportunities from Welsh Government, Cardiff Metro, Cardiff City Deal and other future funding sources; as well as local government funding from capital, S106 or CIL sources. The LTP replaced the Regional Transport Plans.

Regional Technical Statement 1st Review, 2014

- 2.32. National planning guidance requires that the South Wales Regional Aggregates Working Party (SWRAWP), of which Rhondda Cynon Taf is a member, prepares a Regional Technical Statement (RTS) for the region. The RTS sets out specific planning guidance, aimed at ensuring the sustainable supply of aggregates in Wales.
- 2.33. The document sets out detailed calculations to determine a projected demand of aggregates in the South Wales region from December 2010 until 2036. It subsequently apportions a tonnage of aggregates that each of the 18 local authorities in the SWRAWP need to provide in the form of land-banks of permission. The RTS 1st Review replaced the original RTS of 2008, however this will be replaced by the RTS 2nd Review, which is expected to be released during next year or so. The outcomes of the RTS 2nd Review will require consideration in the preparation of LDP policies during the course of revision.

Our Valleys, Our Future: Delivery plan, 2018

2.34. This plan has been created by a ministerial taskforce in South Wales Valleys, set up by the Welsh Government in July 2016. The plan is a high-level action plan to set out the taskforce's priorities for the region. The plan's three priorities are: creating good quality jobs and providing the skills to do them; improving public services; and helping local communities. The delivery plan identifies Pontypridd/Treforest as a strategic hub 'where public money will be focused to provide opportunities for the private sector to invest and create new jobs'. The Pontypridd/Treforest hub focuses on residential, office, industrial and retail development. The implications of this document will need to be considered in an LDP review.

Local Changes

LDO for Treforest Industrial Estate

2.35. In August 2018, a Local Development Order was adopted by the Council for Treforest Industrial Estate. The LDO simplifies the planning process within the estate's boundary, by removing the need for a formal planning application for certain developments which meet the criteria. Any implications to the LDP will need to be considered.

Local Well-Being Plan

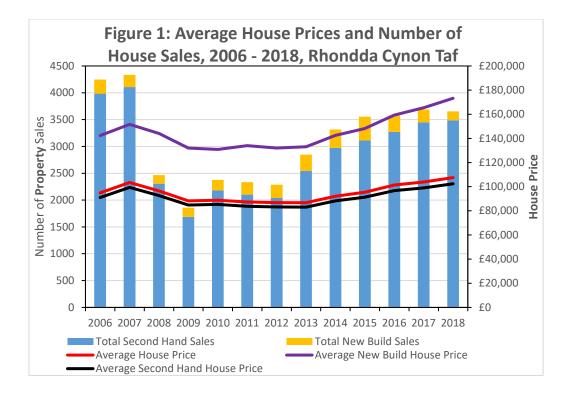
2.36. As previously stated, the Well-being of Future Generation Act makes provision for every public service board in Wales to publish a Local Well-being Plan (LWBP). The Council's Single Integrated Plan (SIP) was replaced in 2018 by the Cwm Taf Well-being Plan 2018-2023. An initial Well-being assessment was undertaken, focusing on the assets and challenges of the county borough in terms of their social, economic, environmental and cultural well-being. This assessment was used to develop a draft Well-being Plan and its associated objectives, which were publically consulted on before the adoption of the LWBP. The LWBP identifies three Well-being objectives, focusing on people's health, growing a stronger economy and helping communities thrive. A revised LDP will need to consider and comply with the LWBP.

Welsh Government 2014 Household Projections

2.37. The adopted LDP's housing land requirement of 14,385 dwellings to be delivered within the plan period was set in the context of Welsh Government's 2006 Housing Projections, which gave a principal household projection increase of 13,728 from 2006 to 2021. The most recent Welsh Government Projections are from 2014 (released in 2016) however it is considered likely that more up-to-date projections will be released during the LDP revision process. An LDP revision process will need to consider the latest Welsh Government household projections when preparing housing policies.

House Prices

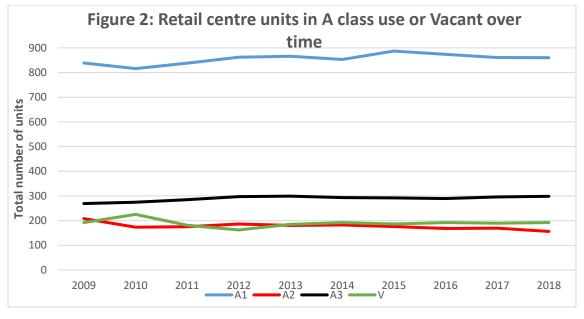
2.38. The graph below (source: Land Registry UK House Prince Index) provides information regarding the performance of the house market in Rhondda Cynon Taf from the start of the plan period 2006 to the end of 2018. Housing sales and prices fell significantly during the recession around 2009, however average house prices have recently surpassed pre-recession prices. House prices between 2009 and 2013 were generally steady, ranging between £86,000 and £89,000, though there has been a notable increase in average house prices from 2013 onwards, increasing by approximately 24%.



- 2.39. New build sales have not been affected in the same way as second hand sales, with new build sales exceeding pre-recession figures, as early as 2013, whereas second hand sales have fallen by approximately 15% from 2007 to 2018, but have still been growing consistently for a number of years.
- 2.40. Plans for the South East Wales Metro could potentially affect house prices in Rhondda Cynon Taf, and will require consideration during the LDP revision process. The implications of RCT's demographic pressures associated with an ageing population and the aspiration to retain younger people in the County will also need to be considered.

Changing trends in Retail

2.41. Figure 2 below highlights the total amount of units that are used for Class A1, A2, and A3 or are vacant, across all of RCT's retail centres. The number of vacant units have remained relatively consistent over the 10 year period. The total amount of A1 units has risen by 2.5% across 2009-2018, however they have been gradually declining in numbers since 2015. A vast number of banks have departed RCT's retail centres and this is reflected in the sharp fall in A2 units, reducing by 25% from 2009-2018, A3 units have risen in popularity, partially replacing lost A2 units, rising by 10.8% from 2009-2018. Trends such as these will need to be considered during the LDP review.



Economic Considerations

- 2.42. The impact of the global economic recession on the economy of Rhondda Cynon Taf had a significant impact on the delivery of the LDP in the immediate years post adoption. Whilst the economy is showing some signs of improvement, with both the housing and commercial markets in the County Borough experiencing some growth; the economic difficulties at the start of the plan period has inevitably had an adverse impact on the delivery of some elements of the LDP.
- 2.43. The uncertainty for investors and developers across all sectors of the plan has been well documented in the early part of the plan period. This has since manifested itself in the emergence of viability as a key consideration in the planning process. In 2016, we commissioned a reputable surveying company to assess all undeveloped allocations, which concluded that just 24 of 41 sites had a level of viability. The reasons for this include physical site constraints, topography, contamination or market locations. This matter is discussed further in the report. Additionally, many of our sites require some land reclamation to take place to allow development. Whereas at the time of writing the LDP there was significant Welsh Government Funding available for land reclamation, this has not been available since adoption of the plan.
- 2.44. The June 2016 decision to exit the European Union and the subsequent uncertainty surrounding exit negotiations are also having an impact UK-wide. The scale of these consequences however are, as yet, unknown.
- 2.45. The conclusions of this Review Report will need to consider all of these contextual changes, amongst others discussed in the detailed analysis of LDP topic areas later in this report. This is to ensure that the policies and allocations are still effective, appropriate and relevant or otherwise need to be revised.

3. <u>REVIEW OF THE AIMS, VISION, OBJECTIVES AND STRATEGY</u> OF THE LDP

3.1. LDP Aims, Vision and Objectives

- 3.1.1. The aim of the LDP strategy is to address trends that had been identified across RCT at the time leading up to LDP preparation and to set a strategic spatial vision for the future prosperity of RCT. Evidence at the time showed that areas of the County Borough with the least signs of socio-economic deprivation are likely to prosper, whilst those areas of the County Borough showing signs of the most significant socio-economic deprivation were, without intervention likely to decline further.
- 3.1.2. In the central and northern valleys, the LDP strategy sought to:
 - Halt the process of decline by stimulating growth in the housing and employment markets;
 - Remove dereliction, and
 - Support services in important urban centres.
- 3.1.3. In the south, the strategy sought to:
 - Manage growth by balancing housing and commercial development with social and environmental considerations.
- 3.1.4. In accordance with the above, the LDP provides a policy framework which:
 - Address the socio-economic balance between the north and the south of the County Borough;
 - Meet the housing and employment needs of a growing population;
 - Provide a range of quality, affordable housing;
 - Bring empty properties back into beneficial use;
 - Provide a range of employment sites to meet local need, attract inward investment and assist in diversifying the employment market;
 - Reduce out-commuting by providing a range of employment and commercial opportunities in accessible locations across Rhondda Cynon Taf;
 - Manage waste and provide recycling opportunities within the boundaries of the County Borough;
 - Protect the rich biodiversity and landscape of Rhondda Cynon Taf; and
 - Protect the cultural and built environment.
- 3.1.5. The LDP set out a vision which presented an opportunity for the spatial planning system to address the key issues and objectives identified for Rhondda Cynon Taf. The overall vision was derived from the vision outlined in the Community Strategy 'Live. Grow. Aspire. Achieve' (2010-2020) which stated that:

"Rhondda Cynon Taf will be a County Borough of opportunity. That means working together to enable individuals and communities to achieve their full potential, in terms of both their work and social life."

- 3.1.6. The plan recognised that its successful delivery relies on a range of physical, social, economic, health, educational and related initiatives. It also recognises that the spatial planning system has a fundamental role to play in the delivery of said vision.
- 3.1.7. The Objectives that are derived from this Vision are central to the LDP, being translated into the spatial framework and its policies. These are;
 - Creating sustainable, integrated and thriving communities through providing necessary housing, reinforcing the roles of the Principal Towns and Key Settlements and ensuring high quality built environment that provides opportunities for living, working and socialising for all.
 - Achieving the potential of RCT through developing a sustainable economy and providing a diverse range of jobs.
 - Enabling a better quality of life through heritage, landscape, open space and parks protection and enhancement which in turn allows for encouraging healthy lifestyles. This also includes the need to reduce travel by car.
 - Develop and protect the County Borough for future generations through protecting important countryside, seeking to manage the effects of climate change, increase renewable energy and reduce energy consumption. Also, the need to minimise waste, increase recycling and promote efficient use of land, soil and minerals through re-use and restoration.
- 3.1.8. The range of contextual changes identified in the previous section, and new iterations of the Corporate Plan alongside the period of time that has passed since the formulation of these (then) appropriate Aims, Visions and Objectives, would clearly indicate that there would be a need to reassess this section of the LDP, to determine if they are still indeed appropriate.
- 3.1.9. Furthermore, an up to date detailed analysis of the social, economic and environmental trends, statistics and other broader issues in Rhondda Cynon Taf is required, which itself would give a truer, broader indication of the appropriateness of the Aims, Vision and Objectives of the Plan.

3.2. LDP Strategy including policies CS1 and CS2

- 3.2.1. Following on from this, the LDP Strategy provides for development in locations that meet local needs, whilst promoting sustainable growth. The Strategy was derived having regard to the national, regional and local policy context, economic and environmental factors, the availability of suitable land for development and the unique characteristics of the County Borough. The Strategy provided a land use framework for the delivery of housing and services with an ambitious strategy for growth, which promoted sustainable regeneration.
- 3.2.2. For the successful implementation of the Strategy, a different policy approach needed to be taken in those areas of Rhondda Cynon Taf that were in decline and those which were experiencing growth. The core Strategy for Rhondda Cynon Taf

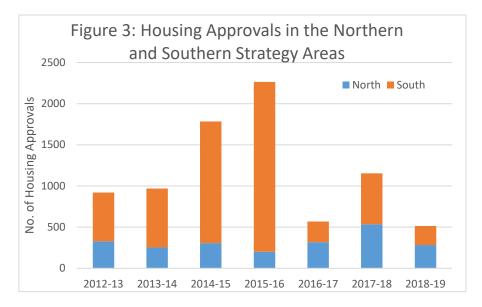
therefore advocated a different approach for development in the north and south of the County Borough.

- 3.2.3. Within the Northern Strategy Area (NSA) the LDP sought to halt the process of depopulation and decline witnessed following the demise of the coal industry. The plan aimed to create sustainable communities through the provision of housing, employment opportunities, improvements in accessibility and large-scale regeneration proposals, all the while building on the strong sense of community pride within these areas.
- 3.2.4. Within the Southern Strategy Area (SSA), the LDP focussed on sustainable growth that benefit RCT as a whole, consolidating existing settlement patterns. The SSA had witnessed significant inward investment and new housing that has transformed the local economy. The LDP principally aimed to manage residential and commercial growth in a manner that balanced the economic potential of the area with its environmental capacity.
- 3.2.5. The Strategy recognised the important role which settlements play in providing homes and services. In order to focus growth where social and economic benefits could be maximised a settlement hierarchy was created which included Principal Towns, Key Settlements and smaller settlements.
- 3.2.6. Principal Towns are defined by the Strategy as Pontypridd, Aberdare and Llantrisant (including Talbot Green). These were identified due to their location within the strategic transportation network as they are important to the promotion of regeneration in Rhondda Cynon Taf and economic growth in the wider region. Each of the Principal Towns were identified in the Wales Spatial Plan as a 'Hub Settlement'.
- 3.2.7. The Key Settlements in the Northern Strategy Area (NSA) include Tonypandy, Porth, Treorchy, Ferndale, Mountain Ash, and Hirwaun. In the Southern Strategy Area (SSA) these include Tonyrefail and Llanharan.
- 3.2.8. Large-scale Strategic Sites, which were capable of accommodating significant housing and commercial development, were identified in locations that would lead to a step change in the economy of the County Borough and maximise opportunities for sustainable regeneration; and will be discussed individually later in this section. A number of smaller, non-strategic sites throughout RCT were allocated for the development of new housing, retail and employment, to meet local needs and promote socio-economic growth.
- 3.2.9. The Plan's strategy has overall enjoyed some degree of success.
- 3.2.10. Firstly, the LDP has been successful in guiding development to those locations that support the roles of the Principal Towns and Key Settlements.
- 3.2.11. Since the adoption of the LDP in 2011, an average of 99.46% of all houses, 93.34% of all employment and 99.5% of all retail permissions granted, were in sustainable locations. Considerable success has also been achieved in determining applications on brownfield land. In all bar two years since the adoption of the plan,

permission for over half of all development has been on brownfield land, with the highest figures seen in 2014-2015 and 2018-2019 for 78% and 72% respectively.

- 3.2.12. In addition, significant regeneration projects and initiatives funded by the European Union and Welsh Government, amongst others, that have been predominantly centred in and around the Principal Town centres.
- 3.2.13. The North/South strategy has also witnessed some success, as the population of both strategy areas continues to grow steadily. There has been a healthy total of 6,299 dwellings built in the County Borough during the plan period (only surpassed by the cities of Cardiff and Newport in this time).
- 3.2.14. Of the 4,543 houses developed since 2011, 1,562 were in the NSA and 2,981 in the SSA, which is essentially in line with the allocated split between the two strategy areas. As can be seen below, the affordable homes completions also align with this balance.

Housing Delivery in the NSA and SSA									
	North			South					
Year	Total	Market	Affordable	Total	Market	Affordable			
2018-19	227	180	47	159	127	32			
2017-19	128	96	32	424	258	166			
2016-17	196	153	43	520	327	193			
2015-16	175	127	48	394	344	50			
2014-15	177	157	20	376	282	94			
2013-14	176	153	23	358	322	36			
2012-13	146	94	52	268	243	25			
2011-12	156	130	26	201	188	13			
2010-11	181	160	21	281	224	57			
Totals;	1562	1250	312	2981	2315	666			



3.2.15. Whilst the South has traditionally witnessed significantly more private investment than the north, the 2018-2019 monitoring year saw the north overtake the south in terms of housing delivery for the first time since the LDPs adoption. This is testament to a healthy housing market, particularly in the Cynon Valley, along with properties being more affordable when compared with those in the south of the County Borough.

Whilst both defined strategy areas have flourished, growth has not been witnessed on the allocations as anticipated. Of the 1,562 dwellings built in the north since 2011, just 153 have been on allocated housing sites and in the south, of the 2,981 dwellings built since 2001, 926 have been on allocated sites. There have been significant windfall sites that have contributed to housing numbers, or otherwise commitments at adoption stage. The housing topic will be considered further in later sections of this report.

3.2.16. More fundamental has been the lack of take up on Strategic Sites, employment and retail allocations. These will be discussed in detail further in later sections of this report, although again, these sectors have also witnessed considerable windfall development on non-allocated sites.

3.3. Strategic Sites

- 3.3.1. In order to promote sustainable growth within Rhondda Cynon Taf, 8 Strategic Sites were allocated in the LDP for a range of development; including large-scale residential, employment, retail and recreational purposes. These were identified in locations that could maximise the opportunities for sustainable regeneration and deliver significant benefits to the County Borough.
- 3.3.2. The Strategy was heavily reliant on the Strategic Site allocations, which have not delivered anywhere near the housing numbers or retail and employment floorspace anticipated. There are many reasons for this, which are discussed below in relation to the individual Strategic Sites.

Former Maerdy Colliery Site, Rhondda Fach, Policies CS 3 and NSA 4.

- 3.3.3. Land is allocated at the former Maerdy Colliery Site in the Rhondda Fach for the construction of 1 hectare of employment land (B1 and/or B2), visitor centre and an area of informal recreation contained in a historic landscape. Development on the Strategic Site is subject to a large-scale land reclamation scheme.
- 3.3.4. To date, the Maerdy Colliery Strategic Site has been subject to partial land reclamation. Significant public funding is required to reclaim the further elements of the site to allow final landforms for the employment allocation and recreational areas. Access to a small permitted windfarm (to the west) would need to go through the Strategic Site, which as a result would significantly improve internal access within the site. Planning obligations attached to the windfarm will also provide a significant contribution to the leisure elements of the Strategic Site. However, it remains that the site has not progressed as expected during the current plan period.
- 3.3.5. At the time of LDP preparation, there were still significant funding opportunities for land reclamation schemes for coal mining legacy sites such as this. However, funding for land reclamation at this scale has not been readily available from Welsh Government in recent years and the Council continues to explore the potential for alternative funding. The employment allocation on the site has not attracted interest, although this mirrors the minimal take up of the LDP employment land allocations across RCT.
- 3.3.6. It is considered the site will still have a strategic role in delivering wider regeneration opportunities in the north of Rhondda Cynon Taf, and particularly the upper Rhondda Fach area. Although the majority of the site has informal public access, it needs to be determined through any future revision of the LDP if and how the site could be elevated to a higher standard public recreation facility. The funding of this is also key, in particular relation to land reclamation; or whether this is still necessary. With regards to the employment allocation, a renewed employment allocation would need evidence to determine need in this area and whether alternative uses should be considered.

Former Fernhill Colliery Site, Blaenrhondda, Rhondda Fawr, Policies CS 3 and NSA 5

- 3.3.7. Land is allocated at the Former Fernhill Colliery Site for the construction of between 350 and 400 dwellings, a local retail centre and informal recreation. This development is subject to a large-scale land reclamation scheme.
- 3.3.8. Ownership of the site has changed since the initial submission and allocation of the site. New owners have been in discussion with the Council with regards to various options for its development. However comprehensive development proposals for the site, for its allocated uses, have not yet materialised. Significant upfront investment would be required in any scheme in relation to the necessary land reclamation scheme and vehicular access.

- 3.3.9. At the time of LDP preparation, there were still significant funding opportunities for land reclamation schemes for coal mining legacy sites such as this. However, funding for land reclamation at this scale has not been readily available from Welsh Government in recent years. Indeed, it is likely that the costs of this necessary land reclamation would need to be borne by the development scheme itself. The global economic recession in 2008 had a long lasting, debilitating legacy on the house building industry, than could ever have been expected when preparing the LDP. This was seen in particular in the less marketable areas of RCT, such as the northern Rhondda Fawr. Accordingly, the financial viability of the site for such a major scheme has not been achievable.
- 3.3.10. If the site was to be reconsidered for is current, primarily residential, allocated use in a future plan, then we would need to see appropriate, comprehensive evidence that the site would be viable, deliverable and necessary at this scale. It is accepted that this may be very difficult to achieve. However, it remains that the site is considered key to delivering wider regeneration opportunities in the north of Rhondda Cynon Taf. If ownership aspirations allow, evidence base may dictate alternative suitable uses that may deliver a significant level of regeneration e.g. if the open space element of the allocation was expanded upon, taking advantage of this unique setting, in association with leisure and tourism opportunities.

Former Phurnacite Plant, Abercymboi Policy CS 3, Policy NSA 6.

- 3.3.11. Land is allocated at the Former Phurnacite Plant, Abercymboi for 500 dwellings, the construction of 5.9 hectares of employment, a new primary school and an informal area of recreation that is subject to a large scale reclamation scheme.
- 3.3.12. No development of the LDP proposals have yet taken place on the Strategic Site during the plan period, although significant investment has already been made in part-remediating the site. There have been pre-application discussions between the Council and part owners of the site CPL (Coal Products Limited), with an initial master plan and brief also produced. The Coal Authority who own the other part of the site have also undertaken additional site investigation work for further decontamination requirements. It remains that significant supplementary land reclamation solutions would need to be implemented on the residential, education and informal recreation parts of the site, in order for it to then come forward. The part of the site designated for employment, on the other hand, is ready and suitable for development, although nothing has been forthcoming to date. There are also large areas of the land indicated for housing within a C2 flood risk zone.
- 3.3.13. At the time of LDP preparation, there were still significant funding opportunities for land reclamation schemes for coal legacy sites such as this. However, funding for land reclamation at this scale has not been readily available from Welsh Government in recent years. It is likely that the costs of this necessary land reclamation would need to be borne by the development scheme itself. Again, the global economic recession had a long lasting effect on the house building industry. This was seen in particular in the less marketable areas of RCT, such as the mid Cynon Valley. Accordingly, the financial viability of the site for such a major scheme

has not been achievable. However, there has been recent, welcome housing market interest in this part of RCT that may indicate future demand for the development of this site.

- 3.3.14. Parts of the LDP residential area are in the current C2 flood risk zone. Current WG policy is to prevent highly vulnerable development in C2 flood risk zones even where NRW have agreed mitigation measures.
- 3.3.15. If the site was to be reconsidered for is current, primarily residential and employment allocated use in a future plan, then we would need to see appropriate, comprehensive evidence that the site would be viable, deliverable and necessary at this scale. It remains that there would need to be significant remediation work of the major part of the site to enable this, and work is ongoing to establish the exact nature and cost of this remediation.

Land at Robertstown/Abernant, Aberdare Policy CS 3, Policy NSA 7.

- 3.3.16. Land is allocated at Robertstown/Abernant, Aberdare for the construction of 500 600 dwellings, 3.7 hectares of employment/leisure, a new primary school, medical centre and associated informal amenity space in a parkland setting.
- 3.3.17. Planning permission was granted for a supermarket on the Robertstown element of the site in 2015, although this had yet to be developed. Following this, the significant new Coleg y Cymoedd campus was constructed here, alongside a major extension to the Park and Ride facility at Aberdare train station. This itself will provide significant numbers of jobs and training opportunities. The college will also contribute to the development needs of the local population.
- 3.3.18. The Council announced in February 2018 that £2.58m of European funding had been secured towards a package of £3.93m to create modern business units on another section of the Robertstown element of the site. It is anticipated that the project will be part funded by the European Regional Development Fund (ERDF) through the Welsh Government.
- 3.3.19. The substantial hospital buildings have been demolished on the Abernant element of the site, which has since changed hands to a development facilitator who is actively seeking housing developers for the site. There has been some initial interest by various developers, although none that have extended to application stage.
- 3.3.20. Investigation of underground shallow coal workings has resulted in some concern that the remediation costs would need to be borne by the development scheme itself. However, viability assessment of the site in 2016, including all abnormal costs, indicates a viable development scheme for the site.
- 3.3.21. There has been recent, encouraging interest in the site. However, updated evidence that all elements of the site remain viable and deliverable for development needs to be forthcoming, in order to re-allocate the site in a future plan. Alongside

this, there needs to be further, firmer consideration of how the primary education need in the area relates to this site, and other development pressure in Abernant.

Land South of Hirwaun Policy CS 3, Policy NSA 8.

- 3.3.22. Land is allocated south of Hirwaun for the construction of 400 dwellings, 36 hectares of employment land, a new primary school, a retail store of 2,000m² net floor space, a medical/community centre and informal recreation contained in a landscape setting. The site is also subject to large-scale reclamation after the coal related operations have ceased.
- 3.3.23. Pre-extraction of the major coal resources from the Strategic Site has recently been completed, with ongoing infill and restoration of the site well advanced. Further discussions are in place with regards to the final formations of the plateaux for the allocated employment and open space after uses.
- 3.3.24. A permission was given for a 2,000m² retail store in the early stages of the LDP, although this has not come forward. However, numerous proposals for mixed used development have been formulated on the general location of the local centre, including elements of housing. These have not progressed to planning applications to date.
- 3.3.25. When preparing the LDP, it was our understanding from Welsh Government that the construction of the A465 dualling would have been completed by now. Delays in the earlier phases of this project has meant that this has not been forthcoming. Although there was physical scope to develop the residential area of the site prior to the dualling, the interest in the site may not have been generated without it.
- 3.3.26. If the site was to be reconsidered for its allocated uses in a future plan, then we would need to see appropriate, comprehensive evidence that the site would be viable, deliverable and necessary at this scale. There has been further indication that the A465 is programmed to begin in the near future. It is important that plans are considered to maximise the value of the public investment associated with the dualling project through the leverage of private sector development investments around the new infrastructure.

Former Cwm Colliery and Coking Works, Tyn-y-Nant, Pontypridd Policy CS3 & Policy SSA 7.

- 3.3.27. Land is allocated at the former Cwm Colliery and Coking Works for the construction of between 800 and 950 dwellings, 1.9 hectares of employment land, a new primary school and associated informal amenity space in a landscape setting. Development of the site is subject to large-scale reclamation.
- 3.3.28. There has been an approval of an outline application on the site for the demolition of the existing structures, (retention of listed tower), site remediation, land restoration and development to provide a mix of uses including 851 residential units (use class C3), a primary school and open space. This has yet to come forward.

- 3.3.29. Discussions are ongoing to seek options in how to unlock the development potential of the site, given the considerable clearance and remediation costs associated with the site.
- 3.3.30. The allocation and permitted development require both land reclamation of the tip area and clearance of the structures on the site and remediation of ground below. At the time of LDP preparation, there were still significant funding opportunities for land reclamation schemes for coal legacy tips such as this. Again, however, funding for land reclamation at this scale has not been readily available from Welsh Government in recent years. It was always intended that the costs of this necessary clearance of the site and remediation of the land would need to be borne by the development scheme itself. As previously discussed, the global economic recession in 2008 had a long lasting, debilitating effect on the house building industry, than could ever have been expected when preparing the LDP. Accordingly, the financial viability of the site for such a major scheme is more difficult to achieve, particularly given the massive upfront funding that is required.
- 3.3.31. If the site was to be reconsidered for its allocated uses in a future plan, then we would need to see appropriate, comprehensive evidence that the site would be viable, deliverable and necessary at this scale. It is perceived that this could be difficult to establish in the current financial climate, particularly if there is no external funding intervention to support the clearance and remediation of the site.

Mwyndy/Talbot Green Area Policy CS3 & Policy SSA 8.

3.3.32. Land is allocated in the Mwyndy/Talbot Green area for the construction of 500 dwellings, 15 hectares of employment land, 23,400m² of net new retail floor space, 10,000m² net of leisure space, a primary school, a library/community facility and informal amenity space in a landscape setting. This Strategic Site is divided by the River Clun corridor and the A4119 into 3 distinct development areas: employment land at Mwyndy Cross; residential land at Cefn-yr-Hendy; and retail land at Talbot Green.

Mwyndy Cross

3.3.33. Outline planning permission for about 30,000m² of B1 office development on part of this area was granted on appeal before LDP adoption, which lapsed in 2011. No reserved matters or renewals of the permission were sought, and no new planning application has been submitted for this element.

Cefn-yr-Hendy

3.3.34. An outline application was approved for 460 dwellings on the Cefn-yr-Hendy site, Mwyndy in 2017-2018. This site has however been the subject of a recent village green inquiry. Despite this, it is hoped that development will soon commence on site.

Talbot Green

- 3.3.35. Outline planning permission for a 'new town centre' has been granted on this part of the Strategic Site. Full planning permission was granted for a first phase food store and petrol station and associated infrastructure. The first section spine road off the A473 has been built for this first phase, although the retail store has not been forthcoming. We are currently considering renewal applications for these.
- 3.3.36. The employment allocation on the Mwyndy element of the Strategic Site has not attracted private interest, although this mirrors the minimal take up of the LDP employment land allocations across RCT. Although the residential market has suffered during the early stages of the LDP, it has been very unexpected that the residential allocation has not come forward at Cefn-yr-Hendy earlier in the plan period. With regards to the retail and considerable town centre allocation, this has indeed been affected by a significant contextual change in the retail world.
- 3.3.37. It is accepted that there would need to be considerable infrastructure investment to allow for a new employment site to come forward, not on a piecemeal manner. Further to this, evidence would again be needed to identify the need for the employment allocation at this location. Dependent on Village Green appeal decision, it is expected that the Cefn-yr-Hendy site will remain viable and deliverable for a suitable housing scheme. Considerable further evidence needs to be collated to determine how the town centre element of the site would be addressed in any future LDP.

Former OCC Site Llanilid, Llanharan, Policy CS3 & Policy SSA 9.

- 3.3.38. Land is allocated at the former open cast coal site in Llanharan for the construction of between 1,950-2,100 dwellings, 2500m² net retail floor space, a medical centre, a library/community facility, a new primary school and associated public open space. Access to the site is to be provided by the construction of the A473 Llanharan bypass.
- 3.3.39. To date, 243 dwellings have been built on the site, in association with a series of enabling developments. The remaining majority of the site benefits from a comprehensive 'hybrid' planning permission (full and outline) comprising of up to 1,850 dwellings and a neighbourhood centre, (including community & leisure facilities, a primary school, retail and commercial floorspace). Other elements in the proposal include highways infrastructure, strategic landscape areas and public open space.
- 3.3.40. The reserved matters for the first phase of this scheme for 216 units, has been permitted and developers are on site. The alignment options for the Llanharan bypass have been drawn up by RCT to enable this road to come forward with the phased development of the site.
- 3.3.41. In the early stages of the LDP, the owner of the former opencast went into administration and were unable to progress development here. The land was subsequently sold by the administrators to the major house builders who are currently progressing with the proposed phased development.

3.3.42. It is therefore clearly expected that the delivery of this site will continue in a very positive way over the coming years.

4. REVIEW OF LDP TOPIC AREAS AND POLICIES

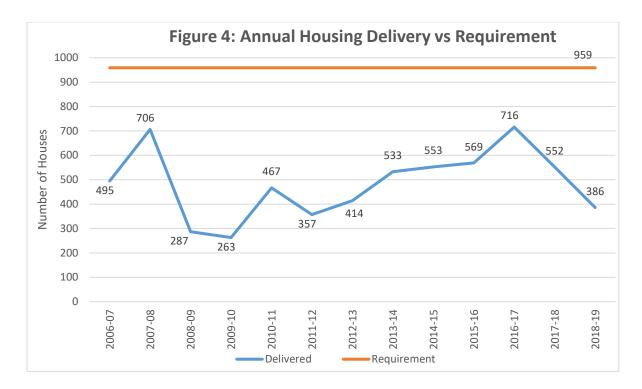
4.1. Housing

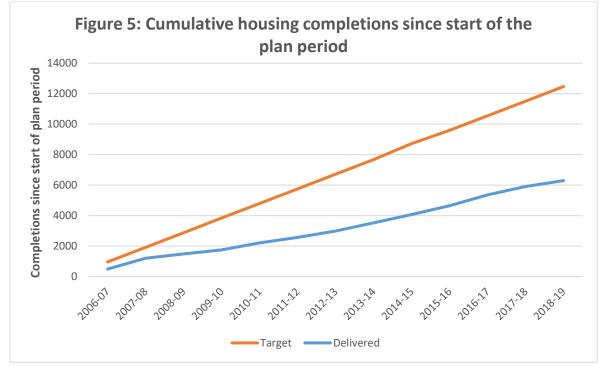
4.1.1. The topic of housing in the Local Development Plan (LDP) is arguably one of the most important individual elements of the plan, whilst its delivery is also the biggest contributor to the success and implementation of the Strategy. It is key to creating sustainable communities and in ensuring that our communities have access to a good quality homes.

Housing Requirements

Policies CS 3, CS 4, CS 5, AW 1

- 4.1.2. The preparation of the LDP determined a requirement for 14,385 new dwellings to be built in RCT throughout the plan period 2006 2021. This figure was based on the Welsh Government's National and Sub National Household Projections for Wales (2006) at local level and provided for population and household growth in Rhondda Cynon Taf. This was also reached in association with regional apportionment agreements between the 10 South East Wales Local Authorities.
- 4.1.3. The LDP allocates land and has a policy framework to meet this identified need and supply new houses in sustainable locations. Policies CS 3 and CS 4 set out that land is made available for between 5,000 5,450 new dwellings on Strategic Sites and a further 4,025 new dwellings on smaller housing allocations to meet local need. Policy AW 1 then addresses how the remaining housing numbers should be met. This includes through those sites benefiting from planning permission since the start of the plan period, the development of unallocated land within settlement boundaries and the conversion of suitable structures. This was an ambitious strategy aimed at delivering high house building rates, designed to halt the process of depopulation and to ensure stable growth in the future population.
- 4.1.4. The allocated figure allowed for the construction of 959 dwellings per year, which was an increase of 50% compared to previous build rates. In this regard, the annual delivery figure was always going to be challenging to meet.
- 4.1.5. In order to establish the success of the delivery of this housing target, it is firstly necessary to look at the annual completions of houses as identified in the AMRs.
- 4.1.6. Since 2006, the LDP has delivered a total of 6,299 new dwellings. It is clear from the table below, that the annual figure of 959 has not been met in any year since the adoption of the LDP, by a fair margin. The monitoring target in the LDP under policy CS 4 seeks that by 2021, all of the 14,385 dwellings will have been built.





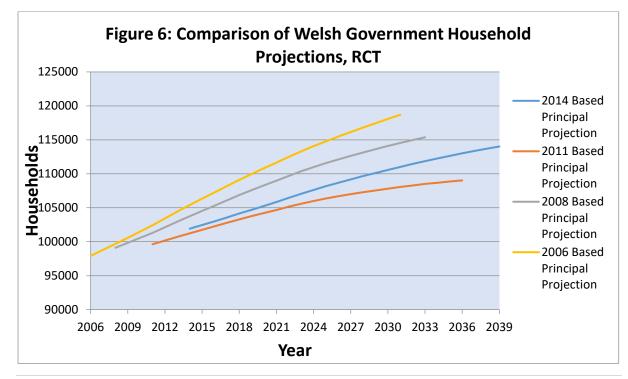
4.1.7. On one hand, with just over two years left in the plan period, it is clearly accepted that the shortfall in the housing requirement will not be met. Nonetheless, it should be acknowledged that this is a very considerable and noteworthy achievement in supplying new housing for the County Borough and for the South East Wales region. Indeed, since 2011, only Cardiff and Newport City Councils have developed more houses than RCT. Furthermore, it should be acknowledged that there has been a total of 9,192 dwellings permitted by RCT in just 8 years since the adoption of the plan.

- 4.1.8. However, what is of considerable note, is the source of the LDP housing land requirement figure. These WG projections identified that the population of Rhondda Cynon Taf would increase from 233,936 in 2006 to 248,100 in 2021. This equated to an increase from 97,916 households in 2006 to 111,644 households by 2021. These projections were however produced during a period of significant economic growth, leading to the peak of the boom in 2007 and the potential for significant in migration.
- 4.1.9. Since the LDP was adopted, there have been further projections published by the Welsh Government. These include the 2008, 2011, and 2014 projections.

Date of Projection	Population Projection Increases from
	Date to 2021
2006	233,936- 248,100
2008	234,377-242,120
2011	234,373- 237,126
2014	236,888- 239, 936

Date of Projection	Household Projection Increases from Date to 2021
2006	97,916 - 111,644
2008	98,468 - 108,991
2011	99,628 - 104,680
2014	101,916 - 105,848

4.1.10. As the tables above illustrate, the 2006 population projection estimates were significantly higher than the most recent estimates in 2014, by over 8,000. Likewise the household projections follow a similar pattern with a decrease in estimates from 2006 to 2014 by almost 6,000. For information, most recent, actual population and households in RCT in 2017 were 239,100 and 104,032 respectively.



4.1.11. Accordingly, it is clear that a fundamental element of any future revision of the LDP would require a comprehensive re-evaluation of the most up-to-date population, and associated household, projections. This would enable the identification of an appropriate and realistic housing and housing land requirement in the revised LDP. It is understood that the updated 2018 projections are soon to be published.

4.1.12. Joint Housing Land Availability

4.1.13. Planning Policy Wales and TAN 1 require that a Local Authority has a genuine 5 year housing land supply. The table below reflects the housing land supply figure since the adoption of the plan:

JHLA year	Land Supply
2019	1.3
2018	1.4
2017	1.3
2016	1.5
2015	2.4
2014	2.8
2013	4.5
2012	5.3

4.1.14. The table identifies that a 5 year land supply hasn't been achieved since 2012, one year after the adoption of the plan. The JHLA process requires that the residual method of calculation is adhered to when determining the land supply, which means that the annual shortfall of the housing target delivery has been aggregated each year to inform the annual 5 year supply. This further illustrates the need to reconsider the housing requirement figure, as it will enable the authority to determine its short-term housing land supply from a new, fair starting point, coupled with the need to extend the plan period by at least 10 years.

Delivery of Affordable Housing

Policies CS 5, AW 1, AW 3, NSA 11, SSA 12

- 4.1.15. Policy CS 5 establishes that the housing requirements identified in Policy CS 4 will be expected to contribute to established community housing need by providing 1,770 affordable units over the plan period. There was an interim target of 1,062 affordable units completed by 2015. The strategy proposed that the amount of affordable housing sought by way of planning obligations should be different in the north and south, given the viability differences. Policy NSA 11 requires the provision of 10% affordable housing on sites of 10 or more units and SSA 12 requires the provision of 20% affordable housing on sites of 5 units or more. Policy AW 3 also provides for rural exception sites, which are 100% affordable housing to be delivered in the countryside, where appropriate.
- 4.1.16. To date the AMR identifies that since the start of the plan period 1,214 affordable homes have been built. This equated to an average completions figure of 104 affordable dwellings per year. The figure has varied over the plan period, as the table below demonstrates. This figure is intrinsically linked to the delivery of market

housing and the allocations of the plan, improving as the market has improved. In order to meet the 2021 target of 1,770, a total of 556 affordable dwellings need to be delivered over the next 2.5 years.

4.1.17. Accordingly, this may be somewhat beyond a possibility, although it should be acknowledged that there has been a very successful delivery of affordable housing in RCT through the plan period.

Year	Affordable completions	Housing
2018-2019	79	
2017-2018	198	
2016-2017	248	
2015-2016	98	
2014-2015	114	
2013-2014	75	
2012-2013	77	
2011-2012	39	
2010-2011	78	

- 4.1.18. With regards to Policies NSA 11 and SSA 12, we have been very successful in ensuring the respective percentage contributions of affordable housing through the planning application process. For the most part, this has been on-site provision, although off site contributions have also come forward. It should be noted, that we have recently seen a small number of residential applications that have sought to evidence financial viability barriers to their delivery. This has resulted in requests for a reduction in affordable housing contributions, across all parts of RCT. These are often associated with particular site specific constraints.
- 4.1.19. Clearly, the significant delivery of affordable housing as set out above, has been heavily reliant on considerable investment and delivery by Registered Social Landlords, and utilisation of Social Housing Grant. Since the adoption of the plan, more innovative methods and financial support mechanisms for affordable housing delivery have been considered and are forthcoming at National and RCT level.
- 4.1.20. As such, on one hand it is deemed that the LDP affordable housing policies have been very successful in delivering affordable housing. On the other hand, as part of any revision of the LDP, and given the age of the evidence base, it is considered necessary to reconsider all affordable housing need, delivery mechanisms, requirements from private developments and all associated policies.

Delivery of allocations

Policies CS 4, AW 1, NSA 9, SSA 10

4.1.21. In order to deliver the housing requirement figure of 14,385 set under policy CS 4, policy AW 1 sets out the method by which these dwellings would be achieved. The policy identifies, under point 1, that the primary mechanism for delivering housing is via the allocations in the plan. Each strategy area has a housing allocations policy, NSA 9 in the north and SSA 10 in the south. Policy NSA 9 allocates 21 sites for 1,365 units and SSA 10 allocates 18 sites for 2,660 units, (in addition to the

Strategic Site policies discussed above). These seek to reinforce the roles of the Principal Towns and Key Settlements, as well as stimulating growth in the residential market.

- 4.1.22. To date in the Northern Strategy Area a total of 5 allocated sites have gained planning permission and construction commenced, with a further 2 gaining planning consent. Only 1 allocated residential site has been completed in the plan period so far. In the Southern Strategy Area a total of 4 allocated sites have been completed, with one other nearing completion and one partially implemented. To date 6 allocated non-Strategic Sites have planning permission and have commenced. With a further 2 having planning permission and one with a resolution to grant consent subject to section 106.
- 4.1.23. Of the 6,299 dwellings completed during the plan period, 4,543 were built since the adoption of the plan. 1,029 of these have been on allocated residential sites, with the remainder from committed or windfall sites.
- 4.1.24. The status of all allocations are shown in further detail in Appendix 1 Status of Allocations.
- 4.1.25. It can be seen from the above that the allocations in the current plan have not been delivered as expected. The global economic recession had a significant effect on the operations of the housing market in the early years of the LDP. Many sites were proposed for inclusion in the LDP at the height of the economic boom, with housing developers keen to bring them forward. Since the crash however, many have become less attractive and unviable for development. This has been indicated by the comprehensive viability assessments of all undeveloped residential allocations undertaken on behalf of RCT by recognised consultants, (GVA Bilfinger now Avison Young), in 2016. This indicated that just 7 allocations would be viable for major house builders, being fully policy compliant, to a level where land value would be sufficient for sale. This reduced along a scale to having 17 sites not viable with nil land values. That is not to say that some sites would be suitable for smaller builders. Brexit could also be a concern to investors and developers. One of the key issues of LDP revision will clearly be viability and deliverability of sites.
- 4.1.26. Although the level of house building improved up to 2016-2017, it has dipped quite significantly in the two years hence, as such, it is becoming more important to reconsider the housing land requirement, market demand, as well as land supply issues; and importantly whether there are suitable allocations remaining to meet these demands.

Residential Density Policies

Policies NSA 10 and SSA 11

4.1.27. Planning Policy Wales Edition 10 advocates the efficient use of land. The LDP contains two density policies NSA 10 and SSA 11. NSA 10 requires proposals for residential development to have a minimum density level of 30 dwellings per hectare and SSA 11, 35 dwellings per hectare. Both policies give allowances for lower density levels where there is justification. The table below identifies the average density achieved on allocated sites over the plan period.

Year	North (30 required)	South (35 required)
2012	32.4	31
2013	33.3	34.3
2014	29.89	26.73
2015	No allocations	19
	permitted	
2016	No allocations	37
	permitted	
2017	22.32	24.73
2018	No allocations	24.2
	permitted	
2019	No allocations	No allocations
	permitted	permitted
Average	29.475	28.565

4.1.28. It can be seen that on average the allocations in the Northern Strategy Area are meeting the target density, albeit some years there have been no permissions on allocated sites and therefore the monitoring target may not be as accurate a picture as it could be. In the Southern Strategy Area, whilst some years the 35dph has been achieved the average density on allocated sites is somewhat below the target. During the revision of the plan it would be prudent to consider if these density levels are still appropriate, particularly in the south where the target has been missed by a margin.

Gypsy and Travellers

Policies AW 15 and SSA 26

- 4.1.29. Policy AW 15 seeks to provide a criteria-based policy for use in consideration of Gypsy and Traveller sites, in line with the 2007 study. Although the Council was confident that the allocation of Beddau Caravan Park would meet the needs identified in the study, it was felt prudent to keep the requirement under review and to have a policy in place to consider any new proposals. Since then, a subsequent study has been undertaken and is due to be renewed in 2020.
- 4.1.30. To date, the allocation at Beddau has been seen to be sufficient to meet the identified need in the LDP. There have been applications for sites for individual families in the north of the County Borough during the plan period, however. Any LDP revision will need to be based on the most up-to-date evidence regarding the requirements for the Gypsy and Traveller communities across all of RCT and accord with most up-to-date national policy and guidance.

4.2. **Employment**

Policies CS 6, AW 11, NSA 14, NSA 15, NSA 16, SSA 14, SSA 27

- 4.2.1. The LDP strategy recognised that in order to address some of the serious socioeconomic issues facing Rhondda Cynon Taf, a progressive approach was necessary for the development of land for employment purposes. Consequently, the LDP allocated employment within the County Borough to meet both a local and regional need. This approach was intended to maximise the opportunity for largescale inward investment, whilst simultaneously ensuring continued growth in the local employment sector.
- 4.2.2. The LDP and its associated Employment Land Review (ELR) recognised that RCT had a healthy supply of employment land. It was however determined that the existing supply was insufficient to provide for future needs in terms of meeting the demand for micro-businesses; the type of employment sites and units available; and the quality of office space, including town centre provision.
- 4.2.3. RCT has also had to contend with the demise of the traditional manufacturing sector (on which large sections of the local population have traditionally relied) alongside the rise of the tertiary (service) sector. The valleys areas bear a physical legacy from the 1980s with many traditional 'large box' industrial sites witnessed throughout the Borough, particularly within the Rhondda and Cynon Valleys. The ELR 2007 determined that such sites would be difficult to adapt to the needs of the modern economy.
- 4.2.4. In order to deliver on the aims and objectives of the strategy, the LDP allocated a total of 98ha of employment land to meet the identified need. 51 hectares of strategic employment land was allocated on Strategic Sites to meet a regional need and 47ha on local allocations. 51ha of the 98ha total were allocated over two Strategic Sites, Land South of Hirwaun (36ha) and Land at Mwyndy/Talbot Green (15ha); neither of these allocations have received consent to date. The remaining 47ha were local allocations, split between the Northern and Southern Strategy Areas, with Ferndale/Highfields (8.38ha), North of 5th Avenue (4.17ha), the former Mayhew Chicken Factory (2.88ha) and Cae Mawr Industrial Estate (3.6ha) in the north, and Coed Ely, Tonyrefail (14.32ha) and South of Gellihirion Industrial Estate (1.47ha) in the south.
- 4.2.5. Of the total 98ha of employment allocations, only 4.63ha has been granted planning permission since the adoption of the LDP. Firstly, 4.17ha received permission for a sustainable waste resource recovery and energy production plant at North of 5th Avenue, Hirwaun (NSA 14.2). Then 0.16ha of Class B1 received permission on a 4.14ha mixed-use development site on Ferndale/Highfields (NSA 14.1) and 0.3ha received permission for Class B1/B2/B8 units on Coed Ely, Tonyrefail (SSA 14.1). The 4.17ha site at North of 5th Avenue, Hirwaun (NSA 14.2) is the only allocation to have been built within the plan period.
- 4.2.6. LDP monitoring, however, indicates that permissions for a range of new employment development have been given on over 27 hectares of land throughout RCT. This is primarily on existing industrial estates, through redevelopment or vacant land. This indicates a considerable level of development, albeit not on allocated sites.

- 4.2.7. The Council has a total of 730.99ha within its employment land bank, which is inclusive of the 98ha of allocations. The other 632.99ha is made up of existing industrial estates and individual units, comprising a total of 100 sites hosting circa 1,669 units. The average vacancy rate for 2019 is just 6.95%. There is also a total of 54ha of undeveloped land within these existing sites.
- 4.2.8. The main policy for protecting the non-allocated, existing employment sites and units for their employment use is policy AW 11; recognising that employment sites can be a scarce resource that are difficult to replace once lost. There are however appropriate criteria setting out allowances for changes of use.
- 4.2.9. The LDP recognises that the Valleys areas and the Rhondda in particular, are so constrained by the dense built form and topography that limited opportunities exist to introduce new industrial sites or business premises to these areas. Therefore, two policies were included in the Northern Strategy Area to supplement and support policy AW 11. Policy NSA 15 seeks to protect small employment sites, defined as 0.5ha or below (although many are considerably smaller), recognising the contribution that these sites make to the local economy. Meanwhile, policy NSA 16 provides for the redevelopment of vacant or redundant industrial sites. Policy NSA 16 concedes that certain sites are unsuited to the needs to the modern economy and will therefore permit employment-led mixed-use development.
- 4.2.10. Policy AW 11, alongside the associated NSA employment policies (NSA 15 & 16) have had a degree of success in retaining employment sites and units for employment purposes, in both strategy areas.
- 4.2.11. Some of the larger units have however come under increasing pressure for leisure (Class D2) uses. There are often insufficient or unsuitable properties for leisure facilities such as gyms, children's play zones and dance studios within or on the fringes of town centres. As such, this issue will need to be scrutinised as part of the LDP revisions procedure.
- 4.2.12. Policy SSA 27 solely relates to Treforest Industrial Estate/Parc Nantgarw. The policy aims to provide flexibility in a changing market, to ensure that the industrial estate continues to play a major role in the local economy. The policy allows for other complimentary uses including Class A and Class D to operate alongside traditional Class B uses and other appropriate Sui Generis uses. The policy has been very successful in allowing the estate to evolve, thrive and meet the needs of the modern economy, whilst keeping overall vacancy rates reasonably low.
- 4.2.13. Further to this, on the 8th August 2017, the Treforest Industrial Estate and Parc Nantgarw Local Development Order (LDO) was adopted by the Council. The LDO simplifies the planning process within the estate's boundary, by removing the need for a formal planning application for certain developments. Given that the LDO is now in place within Treforest Industrial Estate, it would need to be assessed whether a specific policy governing Treforest Industrial Estate/Parc Nantgarw is actually necessary. This issue will be given further consideration as part of the LDP revisions procedure.

- 4.2.14. Employment policies within the LDP have achieved mixed success over the plan period. Rhondda Cynon Taf has nonetheless been very successful in continuing to attract inward investment to its existing employment sites. Firstly, this has been seen in relation to low vacancy rates of existing units. Secondly, there have been many new units built on undeveloped or redeveloped areas of existing employment sites.
- 4.2.15. It is however evident that the employment allocations have failed to deliver the projected 98ha of identified 'need' in the Employment Land Review, within the LDPs evidence base. There are potentially a number of reasons for this, including the size and location of the allocations, the amount of employment land and operational sites currently within the County Borough, as well as the desire for existing units. Further, the land allocated may have been too costly to redevelop, without significant investment for the initial infrastructure required, rendering development unviable. It is also fair to say that the global economic recession has had a significant impact on the delivery of most of our employment land allocations. The need for such significant allocations were identified prior to the recession. For example, the significant Welsh Government offices at the Mwyndy, Talbot Green Strategic Site were expected to be developed during the preparation of the LDP, although this did not progress following the recession.
- 4.2.16. As part of the LDP revisions procedure, due consideration needs to be given to the employment strategy, policies and allocations. Any new Employment Land Review will need to determine the appropriate level of new employment allocations and the level and type of protection required for existing sites.
- 4.2.17. In February 2014, the Welsh Government released a new Technical Advice Note (TAN 23) covering economic development followed by a Practice Guidance *Building an Economic Development Evidence Base to Support a Local Development Plan* in 2015. Both of these documents, amongst other sources, will help form the new evidence base for employment in any LDP revision. Any ELR will also need to take account of past trend in relation to previous developments and permissions within the County Borough, since the adoption of the LDP.

4.3. Retail and Town Centres

Policies CS 7, AW 11, NSA 7, NSA 8, NSA 17, NSA 18, NSA 19, SSA 8, SSA 9, SSA 15, SSA 16, SSA 17

- 4.3.1. The strategy for retail and town centres within the LDP sought to reduce the leakage of retail expenditure from RCT to the wider region; to strengthen the role of retail centres in the Principal Towns and Key Settlements; and to provide retail development intended to meet local need in sustainable locations. A suite of policies and allocations were developed in order to meet these objectives, which overall have had mixed success.
- 4.3.2. In 2007, Nathanial Lichfield & Partners undertook a retail capacity study for the County Borough, which indicated a quantitative need for 2,507m² net convenience and 21,770m² new comparison goods retail floorspace over the plan period. These figures were in addition to committed sites.

- 4.3.3. The LDP has a total retail allocation of between 34,400m² 36,400m², which comprises all of the local and strategic retail allocations. In the Northern Strategy Area, 950m² (net) was allocated locally at Oxford Street, Mountain Ash, whilst 2,000m² (net) was allocated on the Hirwaun Strategic Site. In the Southern Strategy Area, local allocations included 5,500m²/3,500m² (net) on land adjacent to Pontypridd Retail Park, on the fringes of the town centre and 2,000m² (net) on land east of Mill Street, Tonyrefail. Strategic Allocations included 2,000m² (net) of retail as part of a much larger residential development at Llanilid and 23,400m² (net) of retail, as part of the new town centre development on the Mwyndy/Talbot Green Strategic Site.
- 4.3.4. The Council granted permission for a Sainsbury's supermarket on the land adjacent to Pontypridd Retail Park (SSA 15.1) in February 2011. The application was for a Class A1 food store (7,717m²) with ancillary restaurant/café and petrol station; the store opened in July 2012.
- 4.3.5. Other retail allocations have received mixed success since the adoption of the LDP. In the Northern Strategy Area, permission was granted in 2014-2015 on allocation NSA 17.2 at the land south of Hirwaun, for a supermarket. Despite the permission, the market for retail has changed significantly in recent years, with the development highly unlikely to come forward, at least in the short-term, as the scale of the development is simply too large. Further, the allocation at Oxford Street, Mountain Ash has not received permission for retail. Instead, the allocation is to be turned into a car park, with permission to increase the number of spaces secured in April 2019.
- 4.3.6. In the Southern Strategy Area, retail development on Llanilid (SSA 15.2) was granted in January 2016, as part of the larger redevelopment of the site. Further, an application for a total of 763m² comprising 484m² of Class A1 and 279m² of Class A3 has been approved subject to condition at land east of Mill Street, Tonyrefail (SSA 15.3). Additionally, an application was approved on the Mwyndy/Talbot Green Strategic Site for a new town centre in December 2014, with a renewal for the extension currently being determined. A Sainsbury's supermarket also secured permission on the site, whilst an application is also being determined for a new large Class A1 store with a number of smaller retail units also included on the site.
- 4.3.7. Furthermore, another 5.88 hectares of land has gained permission for retail development on windfall sites since the adoption of the plan. This would indicate that the changing retail market has evolved and delivered in the County Borough.
- 4.3.8. It is accepted that the pre-recession retail forecasts changed with the onset of the global economic recession. The recession ultimately caused a paradigm shift in the local market, whereby large retail stores became less viable and desirable, giving rise to smaller supermarkets and discount food outlets. Consequently, although many retail allocations have secured permission, the majority have simply proved too difficult to deliver in the current climate. Given the significance of these changes, the Council will need to assess whether the approach taken to retail is correct, going forward. This will include taking account of past trends in relation to

permissions and developments within the County Borough, since the adoption of the LDP. The evolution in the retail market has been borne out by the recent emergence of increasingly popular smaller supermarkets, such as Aldi, Lidl and Farm Foods. Additionally, a number of other discount stores have also come to prominence, selling a wide variety of food products. Further, there has been a far greater dependence on internet shopping, which has affected both the high street and wider retail industry immensely. All of these issues will be looked at in further detail, as part of the LDP revisions procedure.

- 4.3.9. The Council annually monitors all defined retail centres within the retail hierarchy, alongside the retail parks within the County Borough. This is undertaken to ascertain the vacancy rates and to monitor the centres' performance, as well as seeking to ensure appropriate and continued support for the Principal Towns and Key Settlements, in line with LDP Strategy. Monitoring is undertaken annually each October, thus ensuring a consistent methodology and baseline with all ten authorities in the South East Wales region. RCT's Principal Towns are however monitored on a quarterly basis to give a clearer indication of their health and performance. In October 2018, the overall vacancy rate for the Principal Towns and Key Settlements was 12.37%, which is 2.27% higher than the UK average of 10.1% (Springboard, October 2018). When compared with the Welsh (whole of Wales) average vacancy rate of 13.6%, Rhondda Cynon Taf was however 1.23% lower overall (Springboard, October 2018).
- 4.3.10. The main mechanism for protecting retail units within defined town centre boundaries is policy AW 11. The policy seeks to protect retail units for retail purposes, by way of (typically) a 12-month marketing period to prove that the property is no longer required for that particular use. The policy recognises that the defined retail centres are vital to the communities that they serve, providing convenience shopping in accessible locations, within walking distance of large sections of the community. The LDP sought to protect and improve the retail centres via regeneration initiatives and the provision of new shops in appropriate locations. The policy recognises that certain retail units will inevitably become redundant over time, which can have a detrimental impact on the amenity and appearance of an area. Therefore, the policy attempts to provide flexibility by allowing for the consideration of appropriate, alternative uses, whilst ensuring that suitable evidence is submitted to demonstrate that a unit is no longer required for retail purposes.
- 4.3.11. Policy AW 11 has experienced some success in retaining retail units for retail purposes in both strategy areas. Certain units, including units within the primary retail frontages, have however come under increasing pressure for Class D2 leisure uses. Planning Policy Wales 10 and the associated Technical Advice Note on Retail and Commercial Development (TAN 4) advocate the 'town centres first' principle, whereby a sequential approach should be taken to retail, commercial and other complimentary uses to ensure they are located sustainably within town centres. There are often insufficient units within or on the fringes of town centres that are suited to leisure proposals. As such, this issue will need to be carefully scrutinised as part of the LDP revisions procedure.

- 4.3.12. The strategy has also increasingly enjoyed success in locating retail development in sustainable locations that support the roles of the Principal Towns, Key Settlements and Local and Neighbourhood Centres, in line with policies NSA 18, NSA 19, SSA 16 and SSA 17. Other than in 2012, (when it was 96%), 100% of all retail development approved was within a sustainable location that supported the defined retail centres.
- 4.3.13. Although data for the Principal Towns and Key Settlements remains positive, there is inevitable leakage, particularly to Cardiff, which saw a major expansion in their retail offer with the opening of St David's 2 in October 2009. The global economic recession and prolonged austerity measures have also affected retail delivery and buoyancy in RCT to a degree, although it is acknowledged that the market within the area has changed significantly since the adoption of the LDP.
- 4.3.14. Further, national guidance has also evolved since the preparation of the LDP, particularly through Technical Advise Note 4 (TAN 4) Retail and Commercial Development, 2016. The TAN sought to promote accessible, viable and vibrant retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business.
- 4.3.15. Greater emphasis is also placed on collaborative working between local authorities in establishing a retail evidence base and commercial strategies at a 'larger than local' level. Although not previously, in itself, considered to be a reason to trigger a review of the LDP, TAN 4 will need to be given due consideration as part of the LDP revisions procedure.
- 4.3.16. All of the issues encountered will need to be looked at in detail as part of the LDP revisions procedure. New retail studies will need to be compiled for the evidence base of the revised plan, in order for the Council to assess its approach to retail, going forward.

4.4. **Transportation**

Policies CS 8, NSA 20, NSA 21, NSA 22, NSA 23, SSA 18, SSA 19, SSA 20, SSA 21

- 4.4.1. The LDP's Transport policies aim to deliver major road schemes, cycle network improvement, park and ride provision, and rail network and station improvements. Alongside this is the objective to promote more sustainable forms of transport throughout RCT, and reduce the need to travel through the development of new services in accessible locations.
- 4.4.2. Policy CS8 identifies 4 strategic road schemes and 3 strategic transport corridor management schemes across RCT. Three of the road schemes were informed by the outline and draft South East Wales Transport Alliance (SEWTA) Regional Transport Plan of 2007 and 2008, with the final version published in 2010. This is a joint local government alliance project between 10 South East Wales Local Authorities, and identified schemes for the period 2008-2023. These included the Gelli/Treorchy relief road, the Ynysmaerdy to Talbot Green relief road and the A4059 Aberdare bypass extension. CS 8 also identifies the Welsh Government

A465 Head of the Valley dualling between Hirwaun and the border with Merthyr Tydfil CBC.

- 4.4.3. The major Church Village bypass was constructed during the plan period, although not included in the policy, as it was being completed during the end of LDP plan preparation. The Aberdare bypass extension scheme and the dualling of the A4119 at 'Stinkpot Hill' are progressing well towards planning application stage.
- 4.4.4. Other schemes identified through strategy area policies, to improve the strategic highway network in RCT, include the Mountain Ash southern and northern cross valley links, the upper Rhondda Fach relief road, the Llanharan bypass and Talbot Green Bypass dualling. There are then a series of rail network and station improvements, park and ride/park and share provision and many cycle network improvements.
- 4.4.5. Major works have been completed on the Talbot Green bypass, including further lanes and signalled junctions at the Mwyndy Cross roundabout. The Mountain Ash southern cross valley link construction is nearing completion. The Llanharan bypass scheme is progressing well towards planning application stage.
- 4.4.6. To date, 10 of the 35 highways, park and ride, rail and cycle network schemes highlighted across policies NSA 20 to NSA 23 and SSA 18 to SSA 21 have been completed while a further 4 have been partially completed or a total of 40%. Detailed analysis of the success of these policies are shown in Appendix 1.
- 4.4.7. The Active Travel (Wales) Act 2013 makes provision for local authorities to deliver year on year improvements in active travel routes and related facilities, and produce maps for both existing and new/improved active travel routes and related facilities. In preparing transport policies for any LDP revision, regard must be had towards any new or amended proposals for active travel routes and facilities in the integrated network maps.
- Furthermore, the replacement Local Transport Plan 2015 for the period up to 2030, 4.4.8. for a revised area of the 5 South East Wales Valleys Authorities, identifies short term (up to 2020) and medium/long term (up to 2030) Active Travel Network schemes. 14 of the 30 'short term programmes' and 12 of the 15 'medium and longer term aspirations' in RCT are included in the adopted LDP. These 'medium and longer term aspirations', which are not recognised in the LDP include the development of a bus rapid transit scheme across the key settlements along the heads of the Valleys corridor, in addition to a number of Park and Ride/Share facilities near the A470, and junction improvements at the Castell Mynach/A4119 junction. Some of the schemes comprising the 'short term programmes', which aren't recognised in the LDP include several bus stop and bus station upgrades, a new Park and Ride at Treforest Industrial Estate to serve a wide catchment area including Tonteg and Church Village, and a footway to link Llantrisant with Beddau. The schemes outlines in the LTP will be taken into account during the LDP revision process.
- 4.4.9. In support of the Well-being of Future Generations (Wales) Act (2015), PPW (Ed. 10) promotes a sustainable transport hierarchy. The hierarchy prioritises walking

and cycling, and public transport above the use of private vehicles. While this does generally align with policy AW 2 of the adopted LDP, PPW introduces consideration for Ultra Low Emissions Vehicles (ULEV), which are ranked between public transport and other private motor vehicles. Any LDP revision will therefore have to reconsider an approach to these new principles and requirements.

4.4.10. Further strategic LDP transportation allocations may come forward in accordance with the South East Wales Metro, which includes the potential for further expansion of the Robertstown Park and Ride scheme and other new stations and station improvements along its route. In addition, as patronage is expected to increase with Metro proposals, the existing facilities are likely to reach capacity within the next two years. The park and ride provision at Taffs Well is complete and as Taffs Well is recognised as a key node in the transport network, further enhancements are envisaged as part of the Metro/City Deal.

4.5. **Waste**

Policy CS 9

- 4.5.1. The LDP Waste policy, CS 9, was derived from the South East Wales Regional Waste Plan 2008 (RWP). The RWP used land-take based calculations to estimate that the total land area required in Rhondda Cynon Taf for new regional and sub-regional waste facilities ranged between 12.5 and 21.7 hectares (depending on the type of waste management/resource recovery facility involved).
- 4.5.2. In order to meet these capacity requirements, the adopted LDP makes land available at suitable locations for new waste management facilities, at both a regional level at Bryn Pica and Hirwaun Industrial Estate, and a sub-regional level at existing and allocated B2 employment sites.
- 4.5.3. To date, the total permitted waste management capacity stands at 9.95 hectares, equating to 79.6% of the lower capacity requirement or 45.9% of the higher capacity requirement as set out in the RWP. No further waste management capacity has been permitted since the 2015-2016 AMR. Notwithstanding this, annual monitoring has consistently considered that waste monitoring targets and objectives are being met in every AMR since the adoption of the LDP.
- 4.5.4. PPW has been revised a number of times since the adoption of the LDP to reflect ongoing changes in national planning policy and guidance. Such changes include the publication of TAN 21 *Waste* (2017) and a set of sector plans related to the overarching waste strategy for Wales 'Towards Zero Waste', most notably the Collections, Infrastructure and Markets (CIM) Sector Plan (2012). RWP requirements have since ceased to apply in respect of planning policy matters, and PPW no longer requires their further revision. The CIM Sector Plan moves away from the RWP approach of land-take based calculations, and towards a methodology focussing on the need for waste management facilities considering future capacity.
- 4.5.5. PPW requires development plans to demonstrate how national policy and the CIM Sector Plan (in addition to any updated position adopted in the waste planning

monitoring reports and any form of waste management priorities relevant to its local area) have been considered in the preparation of LDP policies. Given that policy CS 9 was based on a now out-of-date and obsolete RWP, an LDP revision will need to examine how the policy takes account of the changes to national planning policy and the CIM Sector Plan's movement away from land-take based calculations.

4.6. Minerals

Policies CS 10, AW 14, SSA 25

- 4.6.1. The LDP's Minerals policies were prepared in the context of the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (2008) and Mineral Planning Policy Wales. The LDP's minerals policies have met and exceeded their monitoring target every year since the adoption of the LDP by maintaining a 10-year land supply.
- 4.6.2. The Planning Authority's position on minerals is updated by the RTS, which is reviewed approximately every 5 years, as required by national guidance (MTAN 1). This is in order to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales.
- 4.6.3. The RTS identified a potential land-bank shortfall of permitted aggregate reserves, and accordingly, Policy SSA 25 identifies a Preferred Area of Known Mineral Resource on land adjacent to Craig yr Hesg quarry, Pontypridd. A full application for the phased extraction of 10 million tonnes of sandstone aggregate at a western extension to this existing quarry, is currently being considered by the Council. Should this be approved, this would significantly improve RCT's land-bank.
- 4.6.4. The RTS 1st Review (2014) sets an annual apportionment for primary aggregates of 0.69 million tonnes per year, or 17.25 million tonnes over 25 years for Rhondda Cynon Taf. This identified a potential shortfall in the latter part of a longer-term revised LDP plan period, which is to be considered as part of the LDP revision. The RTS 2nd Review is however expected to be published in the near future and will provide further updated directions regarding the apportionment required by RCT.
- 4.6.5. Additionally, LDP policy AW 14 safeguards coal resources, among other resources, from development that would unnecessarily sterilise them or hinder their extraction, as was required by national planning policy at the time. In general, this policy has been considered in many applications, although in reality, these have typically been on sites where the minerals have already been sterilised by surrounding development.
- 4.6.6. One major note with regards to safeguarding, is the UK and Welsh Government's energy policy to remove coal from energy generation. PPW (Ed. 10) now advises that coal resources no longer require safeguarding, while proposals for opencast, deep-mine development or colliery spoil disposal should not be permitted. Any LDP revision will require further consideration regarding whether the safeguarding of coal resources can be justified any longer.

4.7. Environment

Policies AW 7, AW 8, AW 10, NSA 13, NSA 24, NSA 25, NSA 26, SSA 22, SSA 23,

- 4.7.1. The LDP strategy recognises that the natural environment of Rhondda Cynon Taf has seen considerable changes over the past 30 years. As the presence of heavy industry has subsided the visual and wildlife qualities of the Borough have been able to thrive. The Northern Strategy Area of the County Borough boasts exquisite landscapes and biodiversity, whilst the south is characterised by undulating hillsides and Vale fringe.
- 4.7.2. The strategy recognises that there is considerable pressure on these characteristics, particularly in the south and therefore seeks to strike a balance between development and the protection of the natural environment. The strategy is based on providing high-level protection for important features, as well as providing a basis for positive policies on issues such as design, conservation and amenity provision. The environment topic is a theme that is crosscutting through a number of polices. The topic will be looked at as a whole but a commentary of some of the specific environmental policies are discussed below.
- 4.7.3. Policy AW 8 Protection and enhancement of the Natural Environment. This policy is the main environmental protection policy in the LDP.
- 4.7.4. The policy seeks to preserve and enhance Rhondda Cynon Taf's natural heritage by protecting it from inappropriate development. The policy specifically protects SINCs, RIGs and other locally designated sites, in addition to protecting important features of the landscape and nature conservation. The policy also makes provisions for mitigation measures and appropriate survey work, although the Council's Ecologist usually advises on such requirements.
- 4.7.5. It is considered that this policy has been broadly successful in protecting the features that it identifies. The AMR identifies that few SINCs have been lost to development and where they have, in the vast majority of cases, they have secured mitigated measures. In consultation with the Council's Countryside team, and in particular the Council's Ecologist, it is considered that overall, given that AW8 is the key ecology policy in the plan, it has worked well. The Countryside team indicate that it would be beneficial to expand upon the enhancement element of the policy, and mentioned that additional wording concerning mitigation may prove useful.
- 4.7.6. Although the policy is working well, inevitably since the LDP was adopted, these natural features have continued to evolve, with SINCs inevitably experiencing net gains and losses. The Council's Ecologist continues to monitor such designations, in particular SINCs. It is therefore necessary that any changes to these local designations are reflected in the LDP revisions procedure. This may require changes to Appendix E of the LDP and the proposals map.

4.8. Green Wedges

Policies NSA 24 and SSA 22

- 4.8.1. Green Wedges will be reconsidered to ensure that they are still appropriate in a local context and in line with the requirements within Planning Policy Wales (Edition 10).
- 4.8.2. PPW specifically states that Green Wedges should be considered as part of the review and that they must be identified using sound evidence and only used in circumstances where an alternative policy mechanism, such as the settlement boundary, would not suffice. This may result in changes to policies NSA 24 and SSA 22, as well as the proposals map.

4.9. Special Landscape Areas (SLAs)

Policies NSA 25 and SSA 23

4.9.1. Special Landscape Areas are non-statutory designations, which are used to define local areas of high landscape importance. PPW states that there should be good reason to apply these designations where it is believed that normal planning policies cannot provide the necessary protection. In order to establish that the SLA's designated in the plan are still necessary and appropriate they need to be considered as part of the revision. It should be noted that the designations were identified following a regionally agreed criteria based format. It is not considered that there have been any significant changes to the fundamental characteristics of these landscapes over the plan period.

4.10. Land Reclamation

Policies NSA 27 and SSA 24

4.10.1. The LDP's land reclamation policies identify land where land reclamation schemes are necessary in order to ensure the long-term stability of the land or to prepare the land for future development. At the time of LDP preparation, funding for such schemes were frequently available. Since the global economic recession, however, Welsh Government funding grants for land reclamation schemes have been far more stringent and difficult to obtain, causing the Council to explore the potential for private funding. To date, 60% (3 out of 5) of the land reclamation schemes in the Southern Strategy Area and 14.3% (1 of 7) in the Northern Strategy Area, have been complete. Any future LDP revision must assess potential funding opportunities when considering sites requiring land reclamation.

4.11. **Other Policy Considerations**

Development Management

Policies AW 2, AW 5, AW 6, AW 10

4.11.1. These policies ensure that development is situated within sustainable locations, and are acceptable in terms of amenity, design, public health and accessibility standards. The policies are generally considered to be working effectively, though some amendments will be required in order to better reflect changes in national planning policy as discussed in section 2.

Planning Obligations

Policy AW 4

4.11.2. Policy AW 4 lists the ways in which planning obligations (in the form of contributions) may be sought for development proposals where appropriate, in order to assist with the provision of efficient infrastructure and mitigate any potentially detrimental impacts that may occur as a result of development. The policy has been successful in ensuring that planning obligations are agreed and contributions are being received. In 2014, the Council adopted a CIL Charging Schedule in accordance with national legislation, which changed the ways we could ask for Section 106 contributions. A revised LDP will therefore need to consider the rewording of this policy in order to accommodate CIL requirements more clearly. Furthermore, an LDP revision will need to consider the most effective method of providing infrastructure to support development, carry out appropriate infrastructure planning accordingly, and consider any changes to CIL.

Renewable Energy

Policies AW 12 and AW 13

- 4.11.3. The LDP's renewable energy policies are considered to be performing effectively in accommodating and aiding the delivery of renewable energy. Since the adoption of the LDP in March 2011, roughly 331 MW of renewable energy capacity has been granted permission to develop (excluding renewable energy with permitted development rights). The vast majority of the capacity is delivered through wind farms, and 94 wind turbines are currently operating within Rhondda Cynon Taf. The next highest generator of renewable energy in Rhondda Cynon Taf is solar energy, contributing approximately 54 MW. Energy from waste facilities also account for a small proportion of the total renewable energy capacity that has been granted in the Borough.
- 4.11.4. However, several contextual changes have occurred effecting renewable energy since the adoption of the LDP, which will require consideration through the LDP revision process. For example, a consultation draft of the National Development Framework (NDF) identifies priority areas for solar and/or wind energy at a regional scale, and includes vast amounts of Rhondda Cynon Taf. Furthermore, the Welsh Government published an updated Renewable Energy Toolkit for Planners in 2015, which will also require consideration during the LDP revision process and the LDP's renewable energy evidence base will accordingly require updating.

Development in the Settlement Boundary

Policies AW 3, NSA 1, SSA 13

- 4.11.5. Policies NSA 12 and SSA 13 allow for housing development within the defined settlement boundaries in the Northern and Southern Strategy Areas respectively, subject to other criteria.
- 4.11.6. Policy NSA 12 also gives some allowance for housing to be built outside of the settlement boundary, provided that the development is adjoining the settlement boundary among other criteria. To date, 38 dwellings have been permitted outside

the settlement boundary that accord with policy NSA 12. Policy AW 3 appears to function effectively, with 30 affordable dwellings developed.

Building Conversions

Policies AW 7, AW 9, NSA 13

4.11.7. Policy NSA 13 sets out criteria to convert large buildings for residential use in the Northern Strategy Area, while policy AW 9 considers the reuse of buildings outside the settlement boundary for residential, employment, community or tourisms uses. Policy AW 7 protects sites of architectural and historical merit, in addition to protecting public open space, allotments, public rights of way, bridleways and cycle tracks, from inappropriate development. The policies are functioning effectively, helping to mitigate the chance of dereliction, while also contributing to housing delivery, as approximately 305 dwellings in the Northern Strategy Area have been permitted through change of use applications since the adoption of the LDP. Policy AW 9 may require amending to improve clarity regarding replacement dwellings in the countryside, to reflect national policy more accurately.

4.12. Future LDP Evidence Base Requirements

- 4.12.1. In order to reflect the contextual and evidence base changes that have occurred since the adoption of the current LDP in 2011, as previously discussed in section 2, an LDP revision will require a more up-to-date evidence base, in order to inform the preparation of new and updated LDP allocations and policies.
- 4.12.2. Based on the existing evidence base, the following studies are expected to require updating, in order to inform the LDP revision process, as a minimum:
 - Retail Study
 - Sustainability Appraisal/Strategic Environment Assessment
 - Housing Needs Assessment
 - Local Housing Market Assessment
 - Candidate Sites Assessment
 - Population and Dwelling Projection Report
 - Urban Capacity Study
 - Employment Land Review
 - Infrastructure Needs Study
 - Leisure Study
 - Renewable Energy Study
 - Minerals Background Paper
 - Open Space Assessment
 - Gypsy and Traveller Accommodation Assessment
 - Viability
- 4.12.3. This is not a definitive list and additional update requirements to the evidence base may emerge when a plan revision progresses.

5. <u>SUSTAINABILITY APPRAISAL INCORPORATING THE</u> <u>STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS</u> <u>REGULATION ASSESSMENT (HRA) (APPROPRIATE</u> <u>ASSESSMENT (AA)).</u>

The Sustainability Appraisal (SA) incorporating Strategic Environment Assessment (SEA)

- 5.1. The SA/SEA is a statutory requirement of the LDP preparation process. An SA seeks to evaluate any predicted social, environmental and economic objectives and effects of the LDP, whilst an SEA considers the impact of the plan on the environment. The process also identifies the scope for mitigating any potential adverse effects.
- 5.2. The SA/SEA is fundamental to ensuring that policies in the LDP promote the sustainable development principles reflected in national planning policy. The SA/SEA was an iterative process throughout the preparation of the adopted LDP where the plan's proposals and policies were developed, assessed, refined and chosen.
- 5.3. When the plan was written, a scoping exercise was undertaken which sought to identify the key sustainability issues that are relevant for the LDP to consider in RCT. Baseline information and relevant plans and programmes were reviewed to ensure that there was a wider understanding of the baseline situation. This information was updated in 2008, two years after it was compiled. From this baseline information, key sustainability issues and opportunities for the LDP and the SA were identified.
- 5.4. Since the adoption of the plan the environmental impact of it has been monitored through the SA/SEA indicators and reported each year in the Annual Monitoring Report. The monitoring process has identified a number of opportunities for SA monitoring indicators to be updated and/or improved, as certain statutory indicators no longer apply.

SA MONITORING				
Targets		Resu	lt	
SA 1	Housing			
SA 2	Culture and Heritage			
SA 3	Communities			
SA 4	Health			
SA 5	Economy			
SA 6	Employment			
SA 7	Transport			
SA 8	Built Environment			
SA 9	Landscape			
SA 10	Biodiversity			
SA 11	Water			
SA 12	Climate Change			

SA MON	SA MONITORING				
SA 13	Energy				
SA 14	Land and Soils				
SA 15	Waste				
SA 16	Minerals				
SA 17	Air Quality				

- 5.5. The results of the monitoring process indicate that the targets in respect of the vast majority of the sustainability indicators are ongoing, being met or exceeded (annotated in green), a minority of SA targets are not currently being achieved but the situation can be ameliorated without immediate intervention or sufficiently progressed not to require direct intervention (annotated in amber). The results also show that an indicator for minerals needs to be redefined (annotated in white) as it does not give the appropriate information required to assess the target. Further SA 8 and part of SA 13 are also annotated in white, as the Code for Sustainable Homes no longer applies.
- 5.6. In light of the many, significant contextual changes that have occurred since the adoption of the LDP (as set out in section 2 above), the baseline environmental, social and economic information of the SA/SEA requires review..

Habitats Regulation Assessment (HRA) (Appropriate Assessment (AA))

- 5.7. Required under the European Directive, The HRA/AA is required to identify any impacts of a land-use plan together with other plans and projects on European protected sites. During the development of the adopted LDP, the Plan was required to undergo a Habitats Regulations Assessment (HRA) in January 2010. If an HRA/AA identifies any potential negative impacts, options should be explored regarding alternatives or appropriate mitigation. If these negative impacts cannot be avoided or mitigated then a judgement against Imperative Reasons of Overriding Public Interest (IROPI) will be made.
- 5.8. The HRA/AA for the RCT LDP concluded that it would be unlikely that the LDP, with appropriate avoidance or mitigation measures, would cause a significant effect on the integrity of the Blaencynon SAC, alone or in combination with the other plans and programs. The HRA will need to be reconsidered as part of the revision of the LDP. Again, a full review of the HRA needs to be undertaken as part of the LDP revision process.

6. <u>OPPORTUNITIES FOR JOINT PLAN MAKING AND</u> <u>COLLABORATIVE WORKING</u>

6.1. During this review process, the Council has considered possible opportunities to prepare Joint LDPs with its neighbouring authorities;

Bridgend

6.2. Bridgend County Borough Council have recently published their Preferred Strategy for their revised LDP. As such, it is considered that Bridgend have progressed too far for Rhondda Cynon Taf to explore the possibility of a joint plan. Despite the timings being incompatible, there may be an opportunity to prepare joint evidence on certain topics.

Caerphilly:

- 6.3. The Caerphilly County Borough Council LDP has an end date of 2021. A review was triggered back in 2013, with a revised Deposit LDP prepared and put out to public consultation; although this did not progress to a further stage. Accordingly, we have been in discussion with our colleagues in the Caerphilly CBC Planning Policy team to discuss the potential for joint plan preparation or other joint working opportunities.
- 6.4. Although we share a large physical boundary, links between our communities are less strong. Primarily, public interaction between the two authorities are through the transport corridors leading to the A470 at Abercynon and Nantgarw, mostly to continue to Cardiff; although it is acknowledged that there would be some daily cross boundary employment movements. Otherwise, the main communities are well aligned to principal towns in their respective authorities. Development pressures and opportunities are also physically detached, particularly residential, although again, major employment areas around Treforest, Nantgarw and Caerphilly town are in relative close proximity. Both Local Authorities have individual issues and pressures in their relationship with Cardiff.
- 6.5. Caerphilly are unlikely to be in a position to start the formal preparation of a revised LDP until mid-2021, which is somewhat later than RCT intends. Furthermore, in terms of the strategic objectives of either plan, there is little certainty to show that we would align as authorities at this point in time. Our recent progress on Strategic Opportunity Areas show that RCT Council is very much focussed on major housing and employment development opportunities and the benefits associated with them. Nevertheless, we are not currently in a position to determine how a revised LDP Strategy would look, or what other new factors may inform it, further to the current LDP Strategy e.g. tourism, location, balance and size of sites, let alone what is most appropriate for Caerphilly.

6.6. Accordingly, it was determined that a Joint LDP is not appropriate, although we will continue to explore joint evidence base and joint working options and endeavour to save resources through such collaboration.

Cardiff

6.7. On the 28th January 2016, Cardiff adopted their Local Development Plan 2006-2026. Cardiff are not currently in the process of review and as such, the timings of plan-preparation are incompatible with the aspirations of Rhondda Cynon Taf County Borough Council.

Merthyr Tydfil

6.8. Merthyr Tydfil County Borough Council held their examination in public throughout June and July 2019, with the final session concluding on the 22nd August. Merthyr Tydfil, being very close to the adoption of their revised LDP, do not align with Rhondda Cynon Taf's prospective timetable for plan preparation. Consequently, it will not be possible to pursue a joint venture with this authority.

Vale of Glamorgan

6.9. The Vale of Glamorgan Council's current LDP has an end date of the 31st December 2026. The Council are not currently considering a review of their plan and as such, there is no opportunity to pursue joint working in this regard.

Brecon Beacons National Park Authority

6.10. The Brecon Beacons National Park Authority commenced review of their Local Development Plan in December 2017. The authority are currently at the Preferred Strategy stage and have progressed too far to pursue a joint plan with Rhondda Cynon Taf. Additionally, it is acknowledged that the national park are facing vastly different issues and pressures in comparison with RCT, which would likely make pursuing a joint plan incompatible.

Neath Port Talbot

- 6.11. Neath Port Talbot Council's LDP has an end date of 2026, with the Council not currently pursuing a review of their plan. Furthermore, in terms of regional planning, Neath Port Talbot fall within the South West region whereas RCT fall within the South East. As such, it is not possible to engage in joint working with Neath Port Talbot for these reasons.
- 6.12. Although the potential to prepare joint plans does not exist at present, there is nevertheless an opportunity to work collaboratively with neighbouring authorities to update key areas of the evidence base. The LDP Pathfinder Group, known as the South East Wales Strategic Planning Group (SEWSPG), has already begun facilitating joint regional work to form key LDP evidence base studies. To date, these studies cover topics including housing and population, employment, gypsy

and traveller accommodation, and candidate site assessments. Rhondda Cynon Taf will continue working as a member of SEWSPG, and will use such regional joint work to inform the preparation of the LDP revision. Furthermore, regional approaches to certain topic evidence base were agreed in preparing the previous LDP, which some may still be relevant e.g. Special Landscape Area and SINC identification.

7. <u>CONCLUSIONS</u>

- 7.1. It is considered that this report has set out a very comprehensive review of the current RCT LDP. This conclusion will now determine, firstly, whether there is indeed a need for a revision, and if so, whether a short-form or full revision is appropriate and secondly, the most appropriate plan period for the revised LDP.
- 7.2. Section 2 of this report sets out what key factors inform the LDP review. Firstly, this raised the fundamental point that the current plan has an end date of 2021. Regulations dictate that the current LDP and its Supplementary Planning Guidance will no longer have any decision-making status or powers after this date. This would result in the County Borough having a planning policy vacuum from this point on.
- 7.3. The multiple contextual changes outlined in section 2, further emphasises the major changes that have taken place in national legislation and planning policy since the preparation of the current LDP. This has a significant effect on the baseline evidence that informs the plan, its content and principles. Significant new requirements in the Well-being of Future Generation (Wales) Act and subsequently Planning Policy Wales (Ed. 10), along with the emergence of the National Development Framework, indicates the need to revisit the content and principles of our Strategy and policies.
- 7.4. The emergence of greater national priorities such as climate change and the low carbon economy, green infrastructure and other Well-being of Future Generations considerations are not appropriately addressed in the current LDP, and should now be so; if we as a Council are to ensure we are undertaking our responsibilities, as we should.
- 7.5. The key outcomes of the monitoring of the delivery of the LDP, along with the detailed monitoring of it through sections 3 & 4 of the report, indicate some very noteworthy and positive results.
- 7.6. During the plan period, a very significant 6,299 dwellings have been built, of which 1,214 were affordable. A total of more than 13,000 dwelling have also received permission over this period, indicating a very buoyant housing market, albeit seeing a major dip following the global recession in 2008. At the time of writing the LDP, it was not anticipated that the legacy of this recession would last as long as it did, nor the particular outcomes it has had in Rhondda Cynon Taf. It should however be noted that just 1,079 dwellings have been completed on allocated housing sites to date.
- 7.7. The issue of viability of housing sites was not as prevalent during the preparation of the LDP as it has become in recent years. Further assessment and evidence gathering in this respect has indicated that many of our remaining undeveloped housing allocations are unviable.
- 7.8. The considerable Welsh Government funding that was available for land reclamation during plan preparation, was the key to unlocking many of our Strategic

Sites. The closure of such funding streams has meant that those sites have not come forward.

- 7.9. Our current short-term housing land supply is just 1.3 years, which is something that the current suite of allocations cannot address, whilst its requirement is causing the authority concerning consequences. We are witnessing ever increasing numbers of planning applications outside settlement boundaries, which are more difficult to determine consistently, whilst this then gives decision makers and the public less certainty in the planning system.
- 7.10. It is, however, acknowledged that the evidence on which our housing requirement figures were based have also since been proven to be incorrect. Accordingly, there is clear need to revisit these population and household projections in order to identify a more suitable requirement for new housing going forward. Housing needs have also evolved over the plan period, with the re-evaluation of housing policies required.
- 7.11. Our employment allocation have seen very little take up, with just below 5 hectares of the 98 hectares allocated currently developed. Despite this, around 27 hectares of employment land has come forward, albeit on existing employment sites, which themselves are thriving with very low vacancy rates.
- 7.12. There has been mixed success with regards to retail allocations. Some sites have come forward for development, although other permitted sites have not, predominantly due to market changes during plan period. Our main town centres remain vibrant with comparably low vacancy rates. This is particularly so in relation to those that have benefited from major regeneration schemes; whilst those that are doing less well, are currently subject to new, targeted regeneration schemes.
- 7.13. Similarly, the strategic and major roads schemes are seeing some success, although overall delivery will not happen within the remaining plan period.
- 7.14. With this in mind, it is evident that there are considerable numbers of allocations that are clearly not going to come forward during the remaining plan period. There is sufficient evidence to show that many of our allocations, in many topic areas, are not viable or deliverable.
- 7.15. Most of our evidence base is now over 10 years old, and the key topics of housing, retail and employment in particular need revisiting, amongst all those identified in section 4 above.
- 7.16. Considering the results of the delivery of the LDP allocations, along with the appropriateness of policy content in light of national policy advancement, it is difficult to determine whether the LDP Strategy, as a whole, is now still appropriate. Further analysis of the County Borough in terms of its social, economic and environmental characteristics needs to be considered further, in light of changes since the preparation of the plan from 2005. The proposals, policies and allocations to meet the requirements of the strategy, along with the LDP's Aims, Visions and Objectives beyond it, also need to be reconsidered.

- 7.17. There is also the consideration of the future plan period and its association with the Strategic Development Plan (SDP). Rhondda Cynon Taf have agreed to be part of and contribute to the SDP, although there are several more Local Authorities yet to do so. It is the current (indicative) intention that the SDP would have a plan period of between 2020 and 2040. The recent SDP reports to Council indicated an earliest start date of 2025.
- 7.18. It is considered that the LDP would come into force in advance of the SDP, but sit underneath it in terms of hierarchy of plans. The emergence of the National Development Framework, and regional considerations within that, would enable for measured decisions to be made to seek to align the LDP with the emerging SDP.
- 7.19. Accordingly, it is considered that the preparation of an LDP is necessary for the County Borough in the interim period, with a shortened plan period of 10 years i.e. 2020 to 2030. This is the shortest period allowed by Welsh Government. Once the SDP is adopted, then a more streamlined LDP Lite will sit below the SDP.
- 7.20. Accordingly, it seems the clear solution is to undertaken a full revision of our LDP. Briefly noting that the scale of the changes that need to be discussed are of far greater a scale than could be accommodated through the short-form revision option. It would be the most appropriate solution to begin this full revision as soon as is practicably possible, as is set out in the Draft Delivery Agreement for the revised LDP.

Status of LDP Allocations						
Northern Strategy Area						
Policy	Location	Allocation Type	Delivery Period Expected	2016-2017 Status Update		
Strategic	Sites					
NSA 4	1 Former Maerdy Colliery Site, Rhondda Fach	Strategic Site	2018-2021	Planning permission granted for new access as part of wind farm proposal with significant investment in leisure elements secured through S.106.		
NSA 5	2 Former Fernhill Colliery Site, Blaenrhondda	Strategic Site	2014-2017	Pre-application discussions have been ongoing for minor development on various parts of the site.		
NSA 6	Former Phurnacite Plant, Abercwmboi	Strategic Site	2014-2017	Ongoing pre-application discussions since 2016-2017. An initial master plan and brief for the site have been produced.		
NSA 7	3 Land at Robertstown / Abernant, Aberdare	Strategic Site	2010-2013	 Robertstown: outline planning permission was granted on 31/03/15 for a supermarket. Permission granted for a college campus and the development is now complete on the employment/ leisure element of the site. Discussions with the landowner are ongoing. The Council announced in February 2018 that £2.58m of 		
				European funding has been secured towards a package of £3.93m to create modern business units on the Robertstown Strategic Site. It is anticipated that the project will be part		

				funded by the European Regional Development Fund (ERDF) through the Welsh Government.
NSA 8	Land South of Hirwaun	Strategic Site	2018-2021	Planning permission granted with s106 agreement for a supermarket and access improvements.
				It is anticipated that the site will come forward for housing in advance of the dualling of the A465. Additionally, the opencast operations have ceased and a plateau is being created to accommodate future employment development. Works are still ongoing.
Housing				
NSA 9.1	Land South of Rhigos Road, Hirwaun.	Housing	2014-2017	No proposals further to the LDP.
NSA 9.2	Land East of Trenant, Penywaun.	Housing	2018-2021	An outline application was received at the end of March 2018 for 93 dwellings. The application was approved in the current monitoring year (June 2018).
NSA 9.3	Land South East of Llwydcoed Community Centre.	Housing	2010-2013	The Council are in ongoing discussions concerning access to the site.
NSA 9.4	Site including the old brick works, old dairy and tipped land rear of Birchwood, Llwydcoed	Housing	2010-2013	The site is complete.
NSA 9.5	Tegfan Farm, Potters Field, Trecynon.	Housing	2014-2017	No proposals further to the LDP. Interest has however been expressed in the site and the Council will work with the interested party to try and bring the site forward.

NSA 9.6	Land at Nant y Wenallt, Abernant Road, Abernant.	Housing	2010-2013	No proposals further to the LDP.
NSA 9.7	Land bordered by Cefnpennar Road and Phillip Row, Cwmbach.	Housing	2014-2017	No proposals further to the LDP. Early pre-application discussions have however taken place.
NSA 9.8	Dyffryn Row, Cwmbach.	Housing	2014-2017	A planning application has been approved for the first phase of the development (5 dwellings), with two units constructed.
NSA 9.9	Remainder of Ynyscynon Farm, Cwmbach.	Housing	2018-2021	Outline planning application for 77 dwellings on 3.29 hectares has been approved subject to completion of a section 106 agreement. The outstanding appeal on this site has been determined and the site should now progress subject to a reserved matters application.
NSA 9.10	Land to the end of Godreaman Street, Godreaman.	Housing	2010-2013	Permission has been granted for 42 eco-homes on the site, with construction expected to commence shortly.
NSA 9.11	Gwernifor Grounds, Mountain Ash.	Housing	2010-2013	The proposal has been implemented.
NSA 9.12	Land rear of Maerdy Road, Maerdy.	Housing	2018-2021	No proposals further to the LDP.
NSA 9.13	Land at Gwernllwyn Terrace, Tylorstown.	Housing	2018-2021	No proposals further to the LDP.
NSA 9.14	Site off Fenwick Street, Pontygwaith.	Housing	2018-2021	No proposals further to the LDP.
NSA 9.15	Old hospital site and school playground, Treherbert.	Housing	2018-2021	An application was refused on the 12.09.2017 as it was considered unacceptable in planning terms.

NSA 9.16	Site at the end of Mace Lane, Treorchy.	Housing	2018-2021	A draft development brief has been prepared. No proposals further to the LDP.
NSA 9.17	Site off Cemetery Road, Treorchy	Housing	2018-2021	Interest has been shown in the site although there have been no proposals further to the LDP.
NSA 9.18	Hospital Site, Llwynypia.	Housing	2014-2017	A new Section 73 application to renew the consent has been granted, along with an updated Section 106 agreement.
NSA 9.19	Land at Park Street, Clydach Vale.	Housing	2018-2021	No proposals further to the LDP.
NSA 9.20	Land at Dinas Road / Graig Ddu Road, Dinas	Housing	2018-2021	No proposals further to the LDP.
NSA 9.21	Land at Catherine Crescent, Cymmer.	Housing	2018-2021	No proposals further to the LDP. The site passed to new owners in the last few years.
Employmer	nt/Retail			
NSA 14.1	Ferndale & Highfield Industrial Estate, Maerdy.	Employment	2018-2021	Outline planning permission granted for a mixed-use scheme, including employment, in May 2016.
NSA 14.2	North of Fifth Avenue, Hirwaun Industrial Estate,	Employment	2018-2021	Full planning permission for a 'sustainable waste resource recovery and energy production park' granted 21/12/10.
	Hirwaun.			Development commenced in the 2015-2016 monitoring period and is ongoing.
				An application for the amended second phase of Enviroparks was received in February 2018.

NSA 14.3	Land at Former Mayhew Chicken Factory, Trecynon.	Employment	2018-2021	No proposals further to the LDP, although pre-application enquiries for mixed-use development have been made.
NSA 14.4	Cae Mawr Industrial Estate, Treorchy.	Employment	2018-2021	Hybrid planning application for full permission for a supermarket and outline permission for B1/B2/B8 development was withdrawn 09/10/14. Pre-application discussions are ongoing.
NSA 17.1	Land at Oxford Street, Mountain Ash.	Retail	2018-2021	The site received permission in the 2018-2019 monitoring year for additional car parking spaces within the Guto square area of Mountain Ash.
NSA 17.1	Strategic Site 5: Land South of Hirwaun	Retail	2018-2021	Planning permission granted with s106 agreement for a supermarket and access improvements.
All Other A	llocations			
CS8a1	The Gelli /Treorchy Relief Road	Transport		
CS8a3	The A4059 Aberdare Bypass Extension	Transport		
CS8a4	A465 Abergavenny/Hirwaun Dualling	Transport		
NSA 20.1	Mountain Ash Southern Cross Valley Link	Transport		This scheme is included in the SE Wales Valleys LTP. Planning permission was secured for an east-west highway link via an upgraded junction on the A4059. Construction commenced in 2017 with the main road bridge starting in the Summer of 2018.

NSA 20.2	Upper Rhondda Fach Relief	Transport	No proposals further to the LDP.
	Road		This scheme is included in the SE Wales Valleys LTP.
NSA 20.3	Mountain Ash Northern	Transport	No proposals further to the LDP.
	Cross Valley Link		This scheme is included in the SE Wales Valleys LTP.
			Reviewed as part of the development of the southern link. However, following completion of the WeITAG process, the southern link was prioritised for delivery.
NSA 21.1	Strategic Site 5: Land South of Hirwaun; (P&R)	Transport	Park and Ride provision included within Cynon Gateway scheme; also included in the SE Wales Valleys LTP.
NSA 21.2	Land south of Ty Trevithick, adjacent to A470, Abercynon; (P&R)	Transport	No proposals further to the LDP.
NSA 21.3	Expansion of existing park and ride facilities, Robertstown. (P&R)	Transport	Development proposal as included in LDP complete - potential for further expansion as patronage is expected to increase with Metro proposals for service enhancements. The existing facilities are likely to reach capacity within the next few years.
NSA 22	Rail Network and Station Improvements Hirwaun.	Transport	No proposals further to the LDP. This scheme is included in Network Rail's Welsh Route Study and has been subject to the GRIP process (Governance in Rail Investment Projects).
			The extension of the passenger rail line from Aberdare to Hirwaun, and construction of a new station, forms part of the proposed future development of the Cardiff Capital Region 'City Deal' metro project.

NSA 23.1	The Rhondda Community Route Network	Cycle Routes	A cycle route along the Rhondda Fawr is included in the SE Wales Valleys LTP and the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
			The development of a cycle route along the Rhondda Fawr is closely linked to the proposed re-opening of the disused rail tunnel linking Blaencwm (RCT) with Blaengwynfi (Neath Port Talbot).
			In conjunction with The Rhondda Tunnel Society, the first stage of the WeITAG process has commenced. This process will assist in the preparation of an eventual business case for re-opening the tunnel.
			In tandem, a feasibility study is being undertaken into the possible alignment of the new cycle route between the entrance to the tunnel and Porth.
			A section of the planned route along the Rhondda Fawr, between Gelli Industrial Estate and the Rhondda Sports Centre in Ystrad was constructed in 2017 – 2018. It was funded by the Safe Routes in Communities initiative.
NSA 23.2	The Cynon Valley Cycle Route	Cycle Routes	Phase 3 of this scheme is included in the SE Wales Valleys LTP - 'filling the missing gaps' along route.
			The Council's Active Travel Integrated Network Map, approved by the Welsh Government in February 2018, includes proposals to improve sections of the existing route to meet current active travel standards – identified following an audit. It also includes proposals for new sections of route, including a link to the proposed re-opening of the disused Abernant Rail Tunnel.

			Design work has commenced as part of this scheme.
NSA 23.3	The Heads of the Valley Cycleway & links to Hirwaun Industrial Estate	Cycle Routes	Implementation of a route is complete. However, there is potential for further enhancements linked to the proposed A465 dualling between Hirwaun and Dowlais.
			The Council's Active Travel Integrated Network Map, approved by the Welsh Government in February 2018, includes proposals to improve sections of the existing route to meet current active travel standards.
NSA 23.4	Pontygwaith to Maerdy	Cycle Routes	This scheme is included in the SE Wales Valleys LTP.
			A proposal to extend the Rhondda Fach Community Route from Pontygwaith to Maerdy is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
			A feasibility study is being undertaken into the construction of the cycle route along the alignment of the former railway. The proposal has been the subject of a public consultation exercise. The feedback is being analysed before this scheme is further progressed.
NSA 23.5	Cwmaman to Aberaman	Cycle Routes	This scheme is included in the SE Wales Valleys LTP.
			The proposal to construct a new route between Cwmaman and Aberaman is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
NSA 23.6	Lady Windsor to Llanwonno	Cycle Routes	No further development proposals beyond LDP proposals.
			Proposal to improve sections of the route to meet current active travel standards is included in the Council's Active Travel

				Integrated Network Map, which was approved by Welsh Government in February 2018.
NSA 27	Land Reclamation Schemes	Land Reclamation		The following schemes are complete: Aberaman colliery land reclamation scheme (NSA 27.1).
NSA 28	Coleg Morgannwg, Trecynon	Education		The development of the new College at Robertstown has led to the closure of this campus at Trecynon, meaning that the allocation is no longer required. The site has instead been granted permission for 87 dwellings, which will be reported on in the 2019-2020 monitoring year.
Southern S	Strategy Area			
Policy	Location	Allocation Type	Delivery Period Expected	Status
Strategic S	ites			
SSA 7	Former Cwm Colliery and Coking Works, Tyn-y-Nant, Pontypridd.	Strategic Site	2014-2017	Outline planning permission for demolition of structures, retention of listed towers, site remediation, land restoration and development to provide a mix of uses including 851 residential units, primary school, revised access arrangements, car and cycle parking, servicing, structural landscaping, formation of public spaces and associated infrastructure, and public realm works was granted on 30/12/14.
SSA 8	4 Mwyndy / Talbot Green Area	Strategic Site	2014-2021	Talbot Green: outline planning permission was granted on 24/12/14 for a new town centre comprising: a 10,801sq m gross food store; petrol filling station; 35,522 sq m gross retail floor space; 600 sq m gross cafe space; 1,000 sq m financial/professional service space; 2,390 sq m gross food

				and drink space; 1,400 sq m gross office space (Class B1); 750 sq m gross Class D1 space; cinema; hotel; 64 dwellings; car parking; access, re-profiling of land, landscaping and flood alleviation works.
				A section 73 application to vary the condition to allow for additional time for the submission of reserved matters for the town centre was submitted at the end of 2017. The application is currently pending a decision.
				Full planning permission was granted on 27/11/13 for phase 1 of the above, comprising a supermarket, service yard, car park, petrol filling station, customer access road and access from A473. Implementation is underway.
				An outline application for 460 dwellings, a primary school, a local centre and open space has been granted permission during 2017-2018
				Mwyndy: No proposals further to the LDP have taken place on the employment element.
SSA 9	Former OCC Site, Llanilid (part)	Strategic Site	2010- 2013	Planning permission approved including a section 106 16/07/15 of a hybrid planning application for outline permission for comprehensive development comprising: up to 1,850 dwellings; neighbourhood centre to include community /leisure facilities, medical centre primary school, retail /services/food and drink floor-space; B1 office/commercial floor-space; drainage, services, transport and highways infrastructure, strategic landscape areas and public open space and full permission for spine road and access onto A473, drainage and development plateaus to serve the first phase of development. In March 2019, the reserved matters application for the first phase of Parc Llanilid cleared Committee. The final decision

				was dispatched in April 2019, which was for 216 dwellings and will be reported upon further in 2019-2020.
Housing				
SSA 10.1	Cefn Lane, Glyncoch.	Housing	2014-2017	No proposals further to the LDP.
SSA 10.2	Trane Farm, Tonyrefail.	Housing	2010-2013	Resolution to grant outline planning permission.
SSA 10.3	Collenna Farm, Tonyrefail.	Housing	2014-2017	Historic planning permission remains extant.
SSA 10.4	Bryngolau, Tonyrefail.	Housing	2014-2017	No proposals further to the LDP.
SSA 10.5	Site of the former Hillside Club, Capel Hill, Tonyrefail.	Housing	2014-2017	Outline planning permission was renewed in May 2014. Pre- application discussions were held in early 2018 with an application expected to follow.
SSA 10.6	Land east of Mill Street, Tonyrefail.	Housing	2014-2017	An application was submitted in March 2018 for the retail element of this site (A1/A3). Proposed works include the road, which it is anticipated will facilitate the housing element of the site. The application was approved in the 2019-2020 monitoring year and will be reported upon further.
SSA 10.7	Land at Gwern Heulog, Coed Ely.	Housing	2010-2013	Outline permission for residential development of the whole site (132 dwellings) and full permission for 54 dwellings were both granted 22/03/13. A Reserved Matters application for 74 dwellings was also approved on the 27.01.2016. To date, 91 dwellings are complete, with the remaining 33 under construction.
SSA 10.8	Land rear of Tylcha Wen Terrace, Tonyrefail.	Housing	2018-2021	No proposals further to the LDP.

SSA 10.9	Land part of Tylcha Ganol Farm, south of Mill Street, Tonyrefail.	Housing	2018-2021	No proposals further to the LDP.
SSA 10.10	Land east of Hafod Wen and North of Concorde Drive, Tonyrefail.	Housing	2014-2017	No proposals further to the LDP. Discussions with the landowner have however taken place recently.
SSA 10.11	Land south of Brynna Road, Brynna.	Housing	2010-2013	Pre-application discussions have been held but the site is constrained by lack of sewer capacity.
SSA 10.12	Land east of Dolau County Primary School, Bridgend Road, Bryncae	Housing	2010-2013	Development complete in 2014-2015.
SSA 10.13	West of Llechau, Llanharry.	Housing	2014-2017	Development complete in 2014-2015.
SSA 10.14	Penygawsi, Llantrisant.	Housing	2010-2013	No proposals further to the LDP.
SSA 10.15	Land south of Brynteg Court, Beddau.	Housing	2010-2013	Development is complete.
SSA 10.16	The Link Site, Pen-yr- Eglwys, Church Village	Housing	2010-2013	No proposals further to the LDP. There has however been recent interest in the site.
SSA 10.17	Glyntaff Farm, Rhydyfelin.	Housing	2014-2017	Part of site (15 dwellings) is implemented. Remainder of site (65 dwellings): no proposals further to the LDP.
SSA 10.18	Land south of The Ridings, Tonteg and east of Station Road, Church Village.	Housing	2010-2013	Phase II of the scheme witnessed the completion of 168 dwellings.
Employmen	nt/Retail			

SSA 14.1	Coed Ely, Tonyrefail.	Employment	2018-2021	A Reserved Matters application has been approved for the layout of highway works, which will serve the site/individual plateaus alongside the erection of a B1/B2/B8 unit.
SSA 14.2	Land south of Gellihirion Industrial Estate, Pontypridd.	Employment	2018-2021	No proposals further to the LDP.
SSA 15.1	Land adjacent to Pontypridd Retail Park. Either for comparison goods sales or for convenience goods sales	Retail	2018-2021	Proposal is complete.
SSA 15.2	Strategic Site 8: Former OCC Site, Llanilid, Llanharan.	Retail	2018-2021	Planning permission approved including a section 106 16/07/15 of a hybrid planning application for outline permission for comprehensive development comprising: up to 1,850 dwellings; neighbourhood centre to include community /leisure facilities, medical centre primary school, retail /services/food and drink floor-space; B1 office/commercial floor-space; drainage, services, transport and highways infrastructure, strategic landscape areas and public open space and full permission for spine road and access onto A473, drainage and development plateaus to serve the first phase of development.
SSA 15.3	Land east of Mill Street, Tonyrefail.	Retail	2018-2021	An application was submitted in March 2018 for the retail element of this site (A1/A3). Proposed works include the road, which it is anticipated will facilitate the housing element of the site. The application was approved during the 2019-2020 monitoring year and will be reported upon further in next year's AMR.

CS8a2	The Ynysmaerdy to Talbot Green Relief Road	Transport	
SSA18.1	A473 Llanharan Bypass	Transport	This scheme is included in the SE Wales Valleys LTP.
			WeITAG Stages 1 and 2 Reports have been completed and an initial public consultation exercise undertaken over the proposed route and junctions.
SSA 18.2	A473 Talbot Green Bypass Dualling	Transport	Enhancements to key junctions are ongoing.
SSA 19	Rail Network and Station Improvements	Transport	 Various schemes included in the second National Transport Plan for Wales. A new station to serve the projected growth of employees working in Trefforest Industrial Estate has been proposed, located to the south of the existing station which would close. New rail operator (Transport for Wales) is taking forward this proposal. Under new rail franchise, TfW is also embarking on a major programme of station improvements across its network, including within RCT. Improvements cover the upgrade of facilities and provision of step free access.
SSA 20	Park and Ride/Park and Share Provision	Transport	Expansion of the park and ride facility at Taffs Well has been completed. Further expansion is envisaged with the Metro/Capital Region City Deal proposals and construction of the associated new rolling stock depot.

			 The SE Wales Valleys LTP contains proposed schemes to increase capacity at Pontyclun and Trefforest stations, which are likely to reach capacity within the next few years. Site investigations have been undertaken at Pontyclun to determine location and cost of accommodating underground rail service apparatus. There is also pressure at Llanharan station - feasibility work is ongoing to identify potential for expansion of park and ride facilities. Current proposals for a new transport interchange at Porth, as part of the town centre regeneration strategy, will see an eventual increase in the park and ride capacity.
SSA 21.1	Treforest Connect 2	Cycle Routes	Complete. Requirements of the Active Travel (Wales) Act 2013 may identify new route proposals.
SSA 21.2	Extension of Connect 2 scheme to Pontypridd	Cycle Routes	Complete. Proposal to improve sections of the route to meet current active travel standards is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
SSA 21.3	Maesycoed to Porth	Cycle Routes	Complete. Proposal to improve sections of the route to meet current active travel standards is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
SSA 21.4	Glyntaff to Nantgarw	Cycle Routes	Complete.

			 Proposal to improve sections of the route to meet current active travel standards is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018. A study is being undertaken to examine the construction of a new active travel route and links beyond Nantgarw and into Trefforest Industrial Estate.
SSA 21.5	Trallwn to Cilfynydd	Cycle Routes	This scheme is included in the SE Wales Valleys LTP. Proposal to improve sections of the route to meet current active travel standards is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
			A number of alternative route options have been drawn-up and are being considered which minimise use of the highway within Trallwn.
SSA 21.6	Pontypridd to Tonyrefail via Llantrisant	Cycle Routes	Construction has started on the remaining section, near Cross Inn, which will provide a continuous active travel route between Pontypridd and Llantrisant.
SSA 21.7	Gyfeillion to Llanwonno	Cycle Routes	No further development proposals beyond LDP proposals. Proposal to improve sections of the route is included in the Council's Active Travel Integrated Network Map, which was approved by Welsh Government in February 2018.
SSA 24	Land Reclamation Schemes	Land Reclamation	The following schemes have been completed: Coed Ely reclamation aftercare scheme, Tonyrefail Albion lower tips land reclamation scheme, Cilfynydd

			Cefn-yr-Hendy land reclamation scheme, Miskin
SSA 26	Land at Beddau Caravan Park	Housing	Proposal is implemented.