RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

LOCAL DEVELOPMENT PLAN (2006-2021)

Record of Development of Preferred Strategy

November 2007

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1.0   Introduction

The purpose of this paper is to outline the policy context and stages undertaken to prepare the Rhondda Cynon Taf Local Development Plan (LDP) Preferred Strategy. The paper details the factors and discussions that have both informed and shaped the Preferred Strategy between January–November 2006.

2.0   Development of the Preferred Strategy

The development of this Preferred Strategy was influenced by a number of important factors. These include consideration the implications of National, Regional and Local policy for the emerging LDP and the identification of the socio economic issues that have to be addressed.

3.0 Policy Context

National Policy Context

Local planning authorities are required under the Planning and Compulsory Purchase Act 2004 to undertake their functions with a view to contributing to the achievement of sustainable development.

The Welsh Assembly Government also has a duty under the Government of Wales Act 1998 to promote sustainable development in the exercise of its functions. Both the Assembly's Sustainable Development Scheme and the UK Government's strategy (DETR 1999) stress that working towards sustainable development means pursuing four broad objectives at the same time:

- Social progress which recognises the needs of everyone;
- Maintenance of high and stable levels of economic growth and employment;
- Effective protection of the environment; and,
- Prudent use of natural resources

The Assembly Government's national land use planning policies are set out in Planning Policy Wales and Minerals Planning Policy Wales supplemented by Technical Advice Notes (TANs), Circulars and Ministerial Interim Policy Statements. These include guidance in relation to areas such as renewable energy, affordable housing, and transportation.

People and Places: The Wales Spatial Plan

Local authorities in Wales must have regard to the National policy framework outlined above, as well as the Wales Spatial Plan. This document attempts to integrate the spatial aspects of national strategies, including social inclusion and economic development, health, transport and environment policy and seeks to translate into practice the Assembly's sustainable development duties.

The Wales Spatial Plan provides a framework for the future spatial development of Wales. Rhondda Cynon Taf along with the neighbouring authorities of Cardiff, Bridgend, Merthyr Tydfil, Caerphilly and the Vale of Glamorgan has been identified as part of the South East–Capital Network Zone. The vision for the Capital Network is:

"An innovative skilled area offering a high quality of life–international yet distinctively Welsh. It will compete internationally be increasing its global viability through stronger links between the Valleys and the coast and the

UK and Europe, helping spread prosperity within the area and benefiting other parts of Wales".

The strategy for the Wales Spatial Plan for the Capital Network is:

- To strengthen and reintegrate the existing system of towns and cities within South East Wales so that that area functions as a coherent urban network, and can compete internationally. Integrated transport is crucial to this; and
- To work with our partners to develop an ambitious programme of joined up regeneration action along the Heads of the Valley corridor, which will complement the upgrade of the A465. The aim of this will be to improve quality of life, retain and attract residents, and increase prosperity of the whole area focusing initially on unlocking the potential of Merthyr Tydfil and Ebbw Vale.

In order to ensure the successful implementation of the objectives of the Wales Spatial Plan for South East Wales, the Assembly Government has established an Area Officials group' to oversee and develop a series of strategic projects. The Area Officials Group is supported by a 'core group' of officers drawn from South East Wales unitary authorities, South East Wales Transport Alliance, South East Wales Planning Group, the Countryside Council for Wales and the Environment Agency. The Assembly see the development of a collaborative approach to the identification of what actions are required to enable South East Wales to function as a city region as critical to the success of the Spatial Plan.

One of the projects currently being developed by the Area Officials Group is the 'Strategic Development Project'. The project is intended to provide a regional context for the development of LDPs by providing an agreed role and function for settlements. An agreed definition of strategic sites for the area, and the identification of areas where strategic development is required.

It is anticipated that the Strategic Development Project will report during early 2007.

The position of Rhondda Cynon Taf at the heart of the Capital Network presents an opportunity for the County Borough to strengthen its strategic relationship with M4 corridor and Cardiff to the south and the A465 and Merthyr Tydfil in the north.

Heads of the Valley Strategy
Turning Heads – A Strategy for the Heads of the Valleys 2020 as the name suggests, outlines a strategy for regenerating the northern Valley areas of South East Wales. In Rhondda Cynon Taf the strategy area includes Treorchy, Treherbert, Ferndale, Mountain Ash and Aberdare. The objectives of the programme reflect those of the Wales Spatial Plan in seeking to ensure:

- An attractive and well used natural, historic and built environment;
- A vibrant economic landscape offering new opportunities;
- A well educated, skilled and healthier population;
- An appealing and coherent tourism and leisure experience, and

- Public confidence in a shared bright future

Funding under these priority themes has and will continue to result in significant investment in Rhondda Cynon Taf. During 2006 the Gateways and Greenways project resulted in environmental enhancement work being undertaken along the Cynon Valley River Park. In 2007 work began on them implementation of the Ferndale Regeneration Strategy. Once complete the strategy will result in townscape and public realm improvements.

The focus on the Heads of the Valley area will provide an excellent opportunity for the development of the northern valley area of Rhondda Cynon Taf. The dualling of the A465 in particular will significantly improve communication links to West Wales and England.

Regional Policy Context

The South East Wales Regional Waste Plan
The South East Wales Regional Waste Plan aims to achieve Landfill Directive targets by 2013 principally through maximising recycling and composting and limiting the amount of waste going to landfill. The implementation of the strategy will, however, require a wide range of new waste management facilities. The plan has been approved by the constituent local authorities, including Rhondda Cynon Taf.

The South Wales Regional Technical Statement for Aggregates
Under the provisions of Minerals Technical Advice Note 1: Aggregates, the Welsh Assembly Government have commissioned a study which considers the environmental capacity of each local authority in Wales to contribute to aggregate supplies. The Study results will inform a 5 year Regional Technical Statement to be prepared by each Regional Aggregates Working Party (RAWP). Local authorities will then be required to include appropriate policies in their development plans. A Regional Technical Statement for South Wales is accordingly being prepared by the South Wales RAWP.

Local Policy Context
The concept of 'well being' was introduced by the Local Government Act 2000 as part of the Government's wider approach to modernisation of local government. It recognises that local authorities have a greater responsibility towards their communities than simply providing the usual range of public services. It also enables them to consider how they could look beyond their immediate service delivery responsibilities to the wider economic, social and environmental well being of their area.

Councils have a duty under the Act to prepare community strategies under the Local Government Act 2000. Community Strategies should provide the overarching strategic framework for all other plans and strategies for the local authority. LDP's should express, in appropriate land use planning terms, those elements of the community strategy that relate to the development and use of land provided that they are in conformity with national and international policy and obligations.

The Rhondda Cynon Taf Community Plan 2004-14

A Better Life – Our Community Plan sets out a framework for creating a brighter future for everyone who lives and works in Rhondda Cynon Taf. The plan was developed by a range of local partners, through the Better Life Consortium during 2003/2004. The Community Plan identifies 5 key themes under which are a series of local level aims. The key themes are**:**

- Safer Communities
- Our Living Space
- Our Health and Well Being
- Boosting Our Local Economy
- Learning for Growth

The key themes identified in the Community Plan have been developed into strategies for improving the quality of life in Rhondda Cynon Taf. Each of these strategies identify a series of individual areas for action. These 'action areas' comprise a range of social, economic and environmental objectives to be addressed by the Council and its partners over the life of the Community Plan.

Whilst the focus of the LDP will not be directly on delivering the actions identified in the Community Plan strategies, it will nevertheless provide a framework that will play an important role in assisting in the delivery of many of these improvements. Of particular importance is the role the LDP will play in achieving the actions contained in the 'Our Living Space' and 'Boosting Our Local Economy' strategies.

4.0 Vision, Objectives and Indicators

Vision

The overall aim of the Rhondda Cynon Taf LDP is derived from the vision for Rhondda Cynon Taf outlined in 'A Better Life': Our Community Plan (2004 –2014). The vision for the area was developed during 2004 and was subject to extensive public consultation with a wide range of groups and individuals across the County Borough, through a specifically designed process called "Voices of the Valleys", where local people identified their priorities. It sets out a framework for creating a brighter future for everyone who lives and works here. It was developed by a range of local partners from the public, private and voluntary agencies e.g. the Police, Local Health Board and Community Groups, through the Better Life Consortium.

It is considered that the vision provides a framework for social, economic and environmental progress, which is broadly compatible with the requirements of the land use planning system. This Plan is the current 10 year strategic plan for the whole of Rhondda Cynon Taf as well as the high level strategic framework for the Council.

Objectives

The objectives of the LDP have been taken directly from the SA / SEA framework. In doing so it is hoped to ensure meaningful integration between the LDP and the SA / SEA process and, importantly, place sustainability at the heart of the plan. The objectives for the LDP are as follows: -

- Provide for the overall housing requirements through a mix of dwelling types catering for all

needs to promote integrated and thriving communities.

- Promote and protect the culture and heritage including landscape, archaeology and language
- Promote integrated communities, with opportunities for living, working and socialising for all.
- Provide an environment that encourages a healthy and safe lifestyle and promotes well being.
- Reduce the need to travel and promote more sustainable modes of transport
- Minimise waste, especially waste to landfill
- Provide for a sustainable economy
- Provide for a diverse range of job opportunities
- Promote efficient and appropriate use of minerals
- Improve, protect and enhance the landscape
- Protect and enhance the diversity and abundance of wildlife habitats and native species
- Improve, protect and enhance the water environment
- Manage the effects of climate change
- Increase the supply of renewable energy and reduce energy consumption
- Promote efficient use of land and soils

These objectives were delivered through the SA/SEA scoping process held between January– April 2006. In order to ensure a participative scoping process a workshop was held in January 2006 to provide the opportunity for stakeholders to debate sustainability issues in Rhondda Cynon Taf and what the land use planning process could do to help to address them. A further 5-week public consultation exercise was held between March–April 2006. The results of the scoping process coupled with a SA/SEA appraisal of the draft spatial strategy and preferred options paper have shaped and refined the objectives of the plan. Amendment / refinement of the objectives was undertaken by the SA/SEA working Group.

Indicators

As with the objectives of the plan, the original plan indicators were developed as part of the SA/SEA process. Indicators and targets have been identified to help monitor the sustainability effects of the LDP. Following consultation with the Welsh Assembly Government these indicators were reviewed and amended to ensure a more effective framework was established for monitoring the LDP.

The indicators were part of the SA/SEA scoping exercise and as such were subject to public consultation. Representations were received to the indicators as part of this exercise. Further amendment /refinement of the indicators was undertaken by the SA/SEA working Group.

Key Issues in Rhondda Cynon Taf

The key issues to be addressed by the Rhondda Cynon Taf LDP have been identified by making an assessment of the following:

- The results of pre deposit consultation with key stakeholders;
- The results of the Sustainability Appraisal/ Strategic Environmental Assessment Scoping Exercise; and
- A review of baseline social, economic and environmental information.

The issues identified through this process will inform directly the development of the spatial strategy for the LDP.

Pre Deposit Consultation

Pre deposit consultation undertaken between January and May 2006 has provided a clear indication of those land use issues that key stakeholders consider to be of primary importance in Rhondda Cynon Taf. These issues identified are as follows:

Transport/Infrastructure
- Poor infrastructure–difficulty of movement and congestion
- Need for better infrastructure – transport and community facilities
- Poor public transport
- Need to make better use of bus and rail

Relationship with M4/Cardiff
- The M4 corridor and relationship with RCT as a whole.
- Cardiff workers moving into south of RCT leading to development pressure in the area
- Too much development in the south of RCT could limit opportunities for the north
- Understanding the relationship between RCT & Cardiff & Heads of the Valleys
- Integration into the wider region

Employment
- Need for access to good quality employment and range of employment opportunities.
- Attracting employment to the north of the borough.

- Need to review employment land allocations and provide land for a mix of business/employment uses/
- Need to support indigenous businesses as well as attracting inward investment
- Commuting out for work figure are high-but IT could provide high quality jobs in RCT
- Need to retain wealth in the borough through reducing spending leakage
- Low skills base–need appropriate education
- Improve tourism and leisure industry job opportunities
- The relationship between health, education, employment and housing
- Economic inactivity

Housing
- Should better utilise valley floors which are allocated for employment but would provide good location for housing
- Need better mix of housing including family housing and affordable housing
- Should be more adventurous with construction techniques.
- Surplus housing stock due to out migration
- Should the upper valleys be residential and/or mixed use?
- Quality land for affordable housing
- Sewerage capacity for new development
- Brownfield vs. greenfield development – contamination, costs, ecology
- Financial resources

Rhondda Cynon Taf

- External perception of the borough needs to be improved
- Objective 1 funding–lack of ambition compared with Ireland
- Deprivation, disparity of opportunity must be tackled
- RCT must be considered as a whole and in the context of the region.
- Need to encourage people to stay and build homes
- Creating sustainable communities
- The current spatial concentration of deprivation
- Self esteem, lack of confidence, lack of optimism
- Adaptation to change–needs consistent decision making
- Education
- Links with wider strategies and delivery mechanisms
- Perception of personal safety needs to change
- Identity and attractiveness of RCT to residents and investors
- Waste management

Environment

- Need for environmental improvement/ protection to support/ promote tourism
- River quality and Rights of Way
- Protection of the environment along the M4 corridor
- Wind farms–dictated by Welsh Assembly Government–need careful location if not to make the area undesirable for tourism, home buyers and business
- Amount of land previously used for industry

- Derelict land reclamation
- Protection of the environment

Town Centres

- Out of town retail and leisure v town centre regeneration

A detailed explanation of the issues identified through the pre deposit consultation process is contained in the Rhondda Cynon Taf LDP Report of Visioning Event (March 2006).

Sustainability Appraisal/ Strategic Environmental Assessment Scoping Exercise

The Sustainability Appraisal/Strategic Environmental Assessment Scoping Exercise (SA/SEA) scoping exercise was undertaken between January–April 2006. The process identified key strategic problems, objectives and issues for sustainability. The broad issues identified were as follows:

- Climate change
- Economic development /housing provision;
- Transport;
- Protection of the landscape and biodiversity;
- Town centre vitality, and
- Cultural change

A detailed discussion of each of the broad issues identified is contained in the Sustainability Appraisal / Strategic Environmental Assessment Scoping Report (March 2006)

Review of baseline information

In order to ensure a comprehensive approach to the identification of 'issues' in Rhondda Cynon Taf a review was undertaken of a number of key documents and the evidence base. The list of documents is contained in the bibliography in **Appendix 1.**

5.0 Strategy Options and Analysis

Definition of Strategy Options

In addition to the overall context provided by national and regional guidance and the Community Plan, the following elements were considered in the context of deriving spatial strategy options: -

a)   Consultation with stakeholders, the community and consultation bodies during the process of formulating the Delivery Agreement, including invitation to identify issues for respondents to be involved in and discussions following presentations to Area Regeneration Partnerships, Town Centre Forums etc.

b)   Results of LDP Steering Group Members identifying the main issues in RCT and how they could be addressed;

c)   Review of previous Structure/Local Plan and UDP strategies.

d)   Identification of trends from emerging evidence base, including availability and past take up rates of housing, employment and retail land.

e)   Derivation of SA/SEA objectives, including a workshop held in mid January 2006.

f)   Preliminary assessment of quantity and range of candidate sites submitted as an indication of potential development interests.

g)   A Capacity Study undertaken by consultants to examine development potential in the mid and upper Rhondda Valleys.

h)   Internal discussions within the Development and Regeneration Unit to ascertain the linkages between potential strategic releases and future Convergence funding.

Initially a large number of strategy options were identified involving various permutations in terms of the potential distribution of growth. In order to facilitate more manageable workshops, and to avoid protracted discussions on site-specific issues, these were refined into the 4 broad options described below.

Trends Based Strategy

This strategy would involve a non-intervention or non-strategy scenario where development would be dominated by market forces. This would probably result in large-scale growth in the south that would reflect previous and ongoing development pressures and rates of growth. Again, if linked to past trends, development in the valleys areas would be limited in comparison.

Local Needs Strategy

By concentrating on addressing development needs of each individual settlement a dispersed form of growth would be encouraged. This would reflect previous Local Plan policies where, in broad terms, proportionate development allocations were made to reflect the size and scale of associated settlement patterns.

Consolidation Strategy

By restricting development in the south to local needs only, growth would be encouraged in the upper and lower valley areas to maximise regeneration opportunities. This strategy would reflect that which was derived through the early stages of Unitary Development Plan preparation, which puts an emphasis on major policy intervention.

Sustainable Growth Strategy

This strategy option would involve the concentration of growth in several key areas, which could potentially provide benefits of scale in terms of infrastructure improvements and enhance existing communities by provision of an appropriate mix of uses. Such sustainable and comprehensively planned growth could also assist in achieving regeneration objectives by focussing growth in locations where wider benefits are more likely to occur.

Visioning Event

In January 2006 the Council held a series of visioning events with elected members and key stakeholders to: -

- Identify issues relevant to the land use planning system, and
- Discuss the 4 spatial strategy options.

At the beginning of the visioning exercise it was emphasised that the four strategy options being explored were very broad brush and did not represent the only ways forward. The analysis of the workshops illustrates that whilst recognizing the need for a bolder growth strategy, great concern was expressed that meeting the needs of local people should be core to any strategy adopted. As a result of the visioning event a fifth strategy was defined which recognised the need for sustainable growth that encompasses and recognizes development to serve local needs.

A detailed discussion about the findings of the visioning event is contained in the Rhondda Cynon Taf LDP Report of Visioning Event (March 2006).

Consultation on results of Visioning Event

A consultation exercise was carried out in March/April 2006, which invited comments on the results of the Visioning Workshops and further comments on any other strategy options. As well as being publicised on the Council's web site, Reports and questionnaires were sent to each member of the Council's Citizen's panel and to neighbouring planning authorities.

The results of the consultation exercise indicated a broad level of support for the findings of the visioning event. A table detailing the consultation responses are attached at **Appendix 2.**

Analysis of Spatial Strategy Options

In order to ensure a rigorous approach to the identification of the preferred strategy, the spatial strategy options were tested against a number of key factors. These factors included;

- The objectives of Community Plan;
- The objectives of the Wales Spatial Plan;
- The key social, economic and environmental issues;
- Availability of Land;
- Community Support, and
- SA / SEA assessment.

The assessment matrix for each of the strategy options are contained in the Preferred Strategy 2007.

Definition of strategy areas

In order to provide a geographical context for the different socio economic factors at work in Rhondda Cynon Taf and importantly define a strategy area boundary, consideration was given to the following:

- Demographic Factors
- Housing Market, and
- Characteristics of Settlements

Demographic Factors

The population of Rhondda Cynon Taf has been subject to significant change over the last 30 years. The 1981 census showed the combined areas of Rhondda, Cynon Valley and Taff Ely as having a population of 244,800. The impact of changes in the labour market that resulted from the closure of operational coalmines during the mid 1980's meant that by 1991 the population had declined by 12,219 to 232,581. The

2001 census shows that that the population of Rhondda Cynon Taf had stabilised with a resident population of 231,946.

The apparent stability in the overall population of Rhondda Cynon Taf between 1991 and 2001 however, masks important variation in the population pattern within the County Borough. The 2001 census figures show clearly a decline in the population of 28 electoral wards and growth in the population of the remaining 24 wards. Ynysybwl is an exception to the north- south area as this as it has been subject to growth. A map attached as **Appendix 3** shows the geographical distribution of these electoral wards.

The Welsh Index of Multiple Deprivation (IMD) published in 2005 identifies multiple deprivation at small area level for the whole of Wales. The index presents deprivation as being made up 7 distinct dimensions– income; employment; health; education; housing; physical environment; access to services. The IMD shows clearly the geographical spread of deprivation in Rhondda Cynon Taf. The northern part of Rhondda Cynon Taf showed a significant presence of deprivation in terms of income, employment, health, education, housing and access to services. The southern part of Rhondda Cynon Taf showed a significant presence of deprivation in terms of the physical environment. The results of the IMD are contained in the Delivery Agreement.

Housing Market

An examination of recent house building trends in Rhondda Cynon Taf indicate clearly that there are geographical disparities in the housing market.

The replacement Mid Glamorgan Structure Plan (1991–2006) identified a dwelling requirement figures for the 3 former local plan areas as follows;

Rhondda	1,800 Dwellings
Cynon Valley	2,500 Dwellings
Taff Ely	7,400 Dwellings

The allocation for the County Borough as a whole was 11, 700 new dwellings.

An examination of the house-building rate for the period 2001 to 2006 inclusive gives a clear insight into the trend in the housing market in Rhondda Cynon Taf. Table1 illustrates house-building rates for sites of over 10 units on a local plan basis.

Table 1: House Building Rates for 2001–06

	2001	2002	2003	2004	2005	2006
Rhondda	12	13	13	7	0	33
Cynon	72	68	70	60	42	50
Taff Ely	425	399	646	433	502	200
Total	509	480	729	500	544	283

Between 2001 and 2006 a total of 3,045 dwellings were constructed in Rhondda Cynon Taf. Of these 2,605 dwellings or 85% of new dwellings were constructed in the south of the County Borough.

Characteristics of Settlements

Rhondda Cynon Taf is characterised by distinctly different topography. The north is characterised by valleys; linear settlements grown along valley floor; high density terraced housing; single employer settlement grown around mining. The South of the Borough is characterised by low-lying plateau and settlements have more open form.

Strategy Areas

Research of settlements was undertaken in order to determine a hierarchy of settlements. Further information regarding this can be found in the Preferred Strategy January 2007.

Principal Towns

Three Principal Towns were identified in the Preferred Strategy in Aberdare, Llantrisant (including the Talbot Green area) and Pontypridd. In identifying these areas characteristics, roles and functions were analysed which produced a hierarchy of settlements within the Borough. Principal Towns are those with higher order functions, they have a range of services including professional and administrative, they have a range of retail facilities, and they are accessible through a range of travel modes. The Principal Towns also acted as a transport hub to the valleys and beyond.

Key Settlements

Key settlements are geographically smaller than Principal Towns but nevertheless they play an important role in Rhondda Cynon Taf. Key settlements were identified by using the same method as Principal towns. For the purposes

of the Preferred strategy the following were identified as key settlements; Treorchy, Mountain Ash, Porth, Tonyrefail, Tonypandy, Ferndale, Llanharan and Hirwaun. Key settlements will act as a hub for regeneration and development

Strategic Sites
Strategic sites are defined as being sites of 20 hectares or more, located in close proximity to the regional transportation network and which have the potential to deliver significant benefits to the County Borough. Each of the Strategic sites identified is located in a strategic position within Rhondda Cynon Taf. Three of the sites, the former Cwm Colliery and Coking works, Mwyndy / Talbot Green and former OCC site Llanilid are located within the southern strategy area close to the M4 and within easy access of Cardiff and the wider region. The remaining five sites are in the northern strategy area, the former Phurnacite Plant, land at Robertstown/ Abernant and land south of Hirwaun are located along the A470/ A4059 corridor in the Cynon Valley with the former Fernhill Colliery and Maerdy Colliery sites, occupying strategic positions at the heads of the Rhondda Fawr and Rhondda Fach.

Strategic Sites Analysis
Each of the strategic sites was subject to a comprehensive assessment of the best mix of uses needed to achieve the largest scale and most efficient regeneration. The assessment matrix for the Strategic sites can be found in **Appendix 4.**

Non Strategic Sites
Non-Strategic sites identified in the plan were derived from the candidate site process, which is discussed below. Non-strategic sites make up the local housing, employment and retail allocations in the LDP. These sites will be developed through the life of the plan and bring opportunities for local communities in terms of new housing, more local employment opportunities and more commercial and retail activity close to existing communities.

Development of Candidate Site Assessment Methodology
- Process of identifying sites
- Consultation on Candidate Site Assessment Methodology

During the process of developing a preferred strategy Candidate sites were invited for assessment to ascertain their suitability for allocation in the Local Development Plan. The closing date for the submission of candidate sites was the 30th August 2006. The sites were divided into candidate sites which are those 3 hectares and above and settlement boundary sites, which are those below 3 hectares in size.

The candidate sites were subject to a three-stage comprehensive assessment process. The first stage involved an assessment of the physical characteristics and constraints, the second a sustainability appraisal of the site and the third a rigorous assessment by statutory bodies and infrastructure providers. The assessment of the sites also involved a site visit and assessment by the LDP Site Appraisal Sub Group, which included all key departments within the Council such as countryside and highways. This group assessed whether the

sites were suitable for inclusion in the Local Development Plan. More information regarding the Candidate site assessment process can be found in the Candidate Site Assessment Methodology 2006.

The settlement boundary sites were assessed using a similar methodology to the candidate sites, although slim-lined, as some of the criteria would not have applied.

Preferred Strategy Option
Whilst the assessment matrices identify merit in all strategies, one a clear strategy option emerged–the Sustainable Growth Strategy. The strategy is a hybrid approach combining a growth scenario linked to a local needs strategy, which reflects the needs of all communities.

The Sustainable Growth Strategy recognises that a 'one size fits all' approach to development in Rhondda Cynon Taf is not appropriate and would fail to deliver the step change necessary to regenerate the County Borough.

The Rhondda Cynon Taf LDP strategy will provide the planning framework within which the Plan's objectives, policies and proposals are to be set. The strategy has been derived having regard to the national, regional and local policy context, social, economic and environmental factors, the availability of land suitable for development and the unique characteristics of the County Borough.

It is clear from an examination of these factors that Rhondda Cynon Taf is an area of great social, economic and environmental diversity. A spatial strategy that advocates a

single approach would be inappropriate and fail to positively address the needs of the County Borough as a whole.

The preferred strategy for Rhondda Cynon Taf will therefore advocate a different approach for development in the north and in the south of the County Borough. In doing so the strategy defines and explains the role that principal towns, key settlements and strategic sites will play in achieving the spatial objectives of the plan.

The preferred strategy for the Rhondda Cynon Taf LDP is as follows: -

Development Strategy
The LDP strategy will seek to promote sustainable regeneration for the County Borough as a whole. The strategy area will divide into two distinct parts: -
- Northern Strategy Area, and
- Southern Strategy Area

Information on the designation of the strategy area can be found in the Settlement strategy. For the purposes of the LDP the Northern Strategy Area will comprise the settlements of Tonypandy, Porth, Treorchy, Treherbert, Ferndale, Tylorstown, Mountain Ash, Aberdare and Hirwaun. The emphasis in this area will be on building sustainable communities and halting the process of depopulation and decline.

The Southern Strategy Area will comprise the settlements of Pontypridd, Tonyrefail, Llantrisant, Church Village and Llanharan. In the south of the County Borough the emphasis

will be on sustainable growth that benefits Rhondda Cynon Taf as a whole.

Within these areas the strategy will recognise the important role principal towns and key settlements play in providing services of both local and county importance. Where possible, development will be focused on the principal towns and key settlements of the County Borough in order to support and reinforce the important role these centres play as places for social and economic activity. For the purposes of the LDP strategy, principal towns are defined as Pontypridd, Aberdare and Llantrisant. These towns are important hubs for activity by acting as gateways for new investment, innovation and sustainable development.

The principal towns of Aberdare and Llantrisant are areas in which significant new housing; employment and retail development will be accommodated. Topographical constraints mean that significant growth will be difficult to accommodate within the principal town of Pontypridd. The emphasis in this area will be on consolidation and redevelopment. Land for residential development to accommodate the needs of the growing population of Pontypridd will be provided in the surrounding settlements of Church Village, Llantwit Fadre and Beddau.

Key settlements are geographically smaller and less strategically significant than the principal towns, nevertheless these settlements provide important services and act as centres for commercial and community activity. For the purpose of the LDP key settlements are defined as Tonypandy, Tonyrefail, Treorchy, Mountain Ash, Porth,

Ferndale, Llanharan and Hirwaun. These key settlements will act as the focal point for growth in Rhondda Cynon Taf over the plan period.

The settlements of Llanharan and Hirwaun are presently less significant than the other key settlements identified in the strategy. These areas are however, in excellent strategic locations and are capable of assimilating significant additional residential and commercial development.

6.0   Report of Informal Consultation

Special Development Control Committee
A special meeting of the Council's Development committee was held on 29th June 2006. Members of the Committee had the opportunity to consider and debate the contents of the Preferred Strategy paper. The Committee resolved approve the strategy subject to a number of detailed comments.

LDP Forum
The LDP Forum considered and debated detailed aspects of the draft Preferred Strategy at a workshop held on the 25th July 2006. The Forum broadly welcomed the contents the approach taken in the strategy.

Details of the workshop are contained in the LDP Forum Record of Event (July 2006)

Adjoining Unitary Authorities
A series of meetings were held with adjacent local authorities. During July and August officers meet with representatives of Caerphilly CBC, Merthyr Tydfil CBC, Cardiff C&CC, Bridgend

CBC, Neath Port Talbot CBC and Vale of Glamorgan CBC to discuss cross boundary issues arising from the Preferred Strategy and emerging LDP. The dates of the meeting were as follows:

- Cardiff County Borough Council – 1st August 2006
- Caerphilly County Borough Council and Merthyr Tydfil County Borough Council- 2nd August 2006
- Neath Port Talbot – 3rd August 2006
- Vale of Glamorgan Council- 4th August 2006
- Bridgend County Borough Council- 7th August 2006

Welsh Assembly Government
In July 2006 the Council submitted the draft Preferred Strategy to the Welsh Assembly Government (WAG) for initial consideration. The Preferred Strategy was reviewed and assessed in accordance with the 10 soundness tests. Initial comments from were received in September 2006, revised comments were provided in October 2006.

Details of the comments made in respect of the LDP: Preferred Strategy document are contained in **Appendix 5.**

In accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and the guidance contained in section B6 of the Local Development Plan Manual (June 2006) the Council will not respond to individual representations.

Consideration will however, be given to the issues raised as the Council formulates the draft LDP. The Council will ensure that through the process of formulating the LDP respondents and stakeholders are fully informed of how the

comments received through the Preferred Strategy consultation have affected the policies and proposals contained in the emerging plan

7.0   Sustainability Appraisal / Strategic Environmental Assessment

The emerging LDP has been subject to an iterative sustainability appraisal/strategic environmental assessment throughout the plan making process. The following stages have informed and shaped the LDP:

- Sustainability Appraisal Workshop (January 2006)

- Sustainability Appraisal Scoping Report (March 2006)

- Preferred Strategy Sustainability Appraisal (January 2007)

In addition to the Sustainability Appraisal process the emerging LDP has also been assessed in accordance with the Habitats Regulations (The Conservation (Natural Habitats, & C.)(Amendments)(England and Wales) Regulations 2007. A Habitats Regulation Assessment screening opinion has been undertaken and was issued for consultation with the preferred strategy.

Soundness Self Assessment Test
Paragraph 4.1 of the Framework for assessing the soundness of Local Development Plan issued by the Planning Inspectorate in October 2006 requires local planning authorities to undertake a self-assessment process against

the test of soundness as they prepare their LDPs. Attached as **Appendix 6** is the self-assessment test undertaken in respect of the Preferred Strategy.

Appendices

Appendix 1- List of key documents which informed the issues in Rhondda Cynon Taf

Appendix 2- Table detailing the consultation responses of the Visioning Event

Appendix 3- A map showing the geographical distribution of the electoral wards

Appendix 4- Assessment matrix for the strategic sites

Appendix 5- Details of the comments made in respect of the LDP Preferred Strategy document

Appendix 6- Self-assessment test undertaken in respect of the Preferred Strategy

Appendix 1-

- Atkins, Mountain Ash Town Centre Regeneration Strategy (2002)

- Camlin Lonsdale et al, Porth Town Centre Regeneration Strategy (2003)

- Dulas, Rhondda Cynon Taf LDP – Renewable Energy Study (2005)

- Huggins, R, Review of Rhondda Cynon Taf Economic Regeneration Strategy (2006)

- Hyder Consulting CBC, Urban Capacity Study: Upper and Central Rhondda (2005)

- Hyder Consulting, Llantrisant Old Town Regeneration Strategy (2005)

- Hyder Consulting, Draft Tonyrefail Town Centre regeneration Strategy (2006)

- Litchfield, N, Rhondda Cynon Taf: Retail Capacity Assessment (2003)

- Office for National Statistics, 2001 Census (2002)

- Rhondda Cynon Taf, Adopted Rhondda Cynon Taf (Rhondda) Local Plan (1999)

- Rhondda Cynon Taf, Local Transport Plan (1999)

- Rhondda Cynon Taf, Adopted Rhondda Cynon Taf (Taff Ely) Local Plan (2005)

- Rhondda Cynon Taf, Adopted Rhondda Cynon Taf (Cynon Valley) Local Plan (2005)

- Rhondda Cynon Taf CBC, Community Plan: A Better Life, (2004)

- Rhondda Cynon Taf CBC, Local Housing Strategy (2004)

- Rhondda Cynon Taf CBC, Community Profile (2005)

- Rhondda Cynon Taf CBC, Boosting Our Local Economy (2005)

- Rhondda Cynon Taf CBC, Our Living Space (2006)

- Rhondda Cynon Taf CBC, LDP Delivery Agreement (2006)

- Rhondda Cynon Taf CBC, LDP SA/SEA Scoping Report (2006)

- Rhondda Cynon Taf CBC, LDP Report of Visioning Event (2006)

- Rhondda Cynon Taf CBC, Draft Candidate Sites Register (2006)

- RSP, Pontypridd Regeneration Strategy (2005)

- SEWHF, Draft Regional Housing Market Analysis (2006)

- Thomas, W, Treorchy Town Centre Regeneration Strategy (2003)

- Welsh Assembly Government, Planning policy Wales (2002)

- Welsh Assembly Government, The Wales Spatial Plan: People, Place, Futures (2005)

- Welsh Assembly Government, Welsh Index of Multiple Deprivation (2005)

- Welsh Assembly Government, Heads We Win – Heads of the Valley Strategy (2005)

- Welsh Assembly Government, Population Projections for South East Wales (2005)

- Welsh Assembly Government, Household Projections for South East Wales (2006)

- Welsh Development Agency, Joint Housing Land Availability Study (2000)

- Welsh Development Agency, Joint Housing Land Availability Study (2001)

- Welsh Development Agency, Joint Housing Land Availability Study (2002)

- Welsh Development Agency, Joint Housing Land Availability Study (2003)

- Welsh Development Agency, Joint Housing Land Availability Study (2004)

- Welsh Development Agency, Joint Housing Land Availability Study (2004)

- Welsh Assembly Government, LDP Manual (June 2006)

- Welsh Assembly Government, LDP Wales: Policy on Preparation of LDPs (December 2005 February 2006)

- Welsh Assembly Government, Planning Policy Wales Companion Guide (June 2006)

- Welsh Assembly Government, Minerals Planning Policy Wales (December 2000)

Appendix 2- Responses to the Rhondda Cynon Taff Local Development Plan LDP Visioning Exercise Questionnaire

Respondent	Representation	LPA Response
Caerphilly County Borough Council	**Q.1** No	Comments noted
	Q.2 Yes - Increasing strategic focus of policies, recognising importance of localism. Depopulation of the north and tie-in to strategies e.g. Heads of Valleys. Large scale new retail (specifically identified in conclusions) and transport (including inter-valley links) infrastructure development with implications for settlements outside county boundaries	
	Q.3 A sustainable growth strategy - Particular long term structural circumstances facing RCT and adjoining authorities in relation to deprivation of former industrial communities in constrained valley locations, with stark differences in surrounding areas – big population centres- Cardiff, Newport, Bridgend to south v no settlements to the north, requiring particular long term and comprehensive solutions likely to require involvement of Merthyr Tydfil and Breacon Beacons National Park. Recognition needed that valleys towns are not 'on the way' to anywhere as a result.	
	Q.4 Yes – Some specific local needs exist and usually it is better to improve facilities on deprived local communities than facilitate their dependence on better-developed M4 corridor. Concentrating resources on particular locations in order of priority could be co-ordinated with Caerphilly's designation of areas for consolidation, growth and regeneration	
	Q.5 Yes – Selection of growth poles to create unified and sustainable settlements with good integrated infrastructure provision rather than traditional un-coordinated coalescence of settlements, preferably based on most outlying towns in order to attract passing trade/trickle down investment to similar isolated smaller dependent villages. Such poles would have an improved chance of remaining sustainable by virtue of their own commuter hinterland and viable facilities provision (similar to growth area in Caerphilly)	
	Q.6 Yes – Environmental issues such as protecting green spaces and best quality landscapes and agricultural land need to be given high priority to prevent urban sprawl in visually attractive areas. Design issues e.g. creation of buildings, civic spaces and landmark projects can be identified for specific locations to improve physical environment, foster civic pride and improve image to inward investors	
	Q.1 Yes	

Merthyr Tydfil Borough Council	**Q.2** No	Noted. The council recognises the importance of the WSP and the Heads of the Valley Strategy and welcomes the opportunity to work with neighbouring authorities to regenerate our communities
	Q.3 The sustainable growth strategy is preferred as it provides the best opportunities for integrating economic growth, social well-being and environmental protection / enhancement	
	Q.4 Yes – Whilst the focus of this strategy is quite rightly, to meet local needs, there will inevitably be cross boundary implications of such a strategic approach	
	Q.5 No	
	Q.6 Yes – The strategy of the LDP must reflect the contents of the 'Wales Spatial Plan' and the 'Heads We Win' strategy (amongst others). Both these documents regard Merthyr Tydfil as a key hub for regeneration so coordination in strategy development between the two County Boroughs is imperative.	
Neath Port Talbot County Borough Council	**Q.1** Yes	Noted. The council recognises the importance of both the A465 and M4 corridors and will seek to shape a strategy that maximises the opportunities presented by both
	Q.2 Yes – Tourism developments may be inter related along the southern margins of the National Park. Development along the A465 corridor will have traffic, employment and community impacts on NPT area. Wind farms and open cast- cross boundary policies and strategy will be required	
	Q.3 A consolidation Strategy - From an NPT perspective a consolidation strategy for RCT may result in greater concentration of development in the A465 corridor rather than the M4 corridor, bringing benefits to the economy of the NPT area in particular the Neath and Afan Valleys	
	Q.4 As stated above there are concerns that a sustainable growth strategy may tend to encourage growth in the southern part of RCT rather than the valleys and A465 corridor. Emphasis should be given to addressing problems in these areas	
	Q.5 No	
	Q.6 No	
Cynon Valley Business Com	**Q.1** No – More importance should be directed to industrial heritage Sites to enable us to develop our tourist industry. To help us do this we should develop a more robust approach to conservation sites by strengthening para. 7-52 of the Cynon Valley Local Plan	Comments noted
	Q.2 No	
	Q.3 A sustainable growth Strategy this being the only strategy which allows future generations to benefit	
	Q.4 Yes	
	Q.5 No	
	Q.6 No comment	

Citizen Panel Member 1	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – I think it is better to maximise growth of the whole area – not just the south. To enable families to grow and stay in the area we have to consider their needs for the future as well as for today. Today's children are tomorrow's parents and employees needing homes and work to raise their children.	
	Q.4 Yes – You cannot have a successful sustainable growth strategy if you ignore the local needs. It is impossible to please all individuals in an area but an effort must be made to improve the quality of life for the majority of people whatever age they are.	
	Q.5 No	
	Q.6 Yes - I was born here and have lived here all my life; I love it and regret that two of my three sons have to work far outside the area. I now have two grandchildren who will probably also have to move away to succeed and I feel that this is such a shame. This area has so much potential please don't waste it.	
Citizen panel member 2	**Q.1** Yes	Comments noted. The council recognises the important role town centres play in our community.
	Q.2 No	
	Q.3 A sustainable growth strategy – I do not think it is fair to develop in the South only and options 1 & 2 are not forward thinking. If you are going to introduce a 15-year plan you need a strong plan to work towards.	
	Q.4 Yes – Looking at not only development but heritage links. Also proposals to look at transport links and developing town centres	
	Q.5 No	
	Q.6 Yes – Whilst it would be nice to have out of town retail I feel it would put an end to our already dying town centres. If this goes ahead what plans do you have for the empty shops in these town centres? Transport links to out of town retail parks would need to be in place – not everyone drives.	
Citizen panel member 3	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A consolidation strategy – Decline of the valleys is an important issue. Development away from the M4 corridor should be encouraged. Better infrastructure for the valleys etc. New development!	
	Q.4 No – Key locations away from transport routes	
	Q.5 No	

	Q.6 A worthwhile exercise but we must see action and this should not just be a talking shop	
Citizen Panel member 4	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A local needs strategy – to generate more facilities in the local areas	
	Q.4 Yes – to give more say to the local facilities	
	Q.5 No	
	Q.6 Yes – Access to local streets are now a health hazard due to parked cars with rubbish not being picked up. Also a danger to the public for access to the streets for emergency vehicles. More streets in and around the immediate area of Tonypandy and Llwynypia to be made a one way system	
Citizen panel member 5	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A local needs strategy – there isn't enough work for youngsters and the shops are closing down. Young people have to go out of the valleys	
	Q.4 Yes	
	Q.5 No	
	Q.6 No	
Rhondda Civic Society	**Q.1** Does a fuller, more comprehensive plan for the built environment need to be developed? Starting with a SWOT analysis perhaps. Is the model of a single centre accompanied by more out of town retail centres the best or are there strengths in the alternative multi centre community with relatively few out of town shopping centres?	Comments noted
	Q.2 No	
	Q.3 A consolidation strategy – it is the only option which explicitly addresses the issues around the population decline in the valleys which should be one of the principal issues in any 15 year plan	
	Q.4 Not as summarised - See above. "Maximising growth potential- north and south" yes we are all in favour but so are we all in favour of motherhood and apple pie: its not a policy and lacks focus. Key locations need major transport routes – yes if this reform is encouraging employment opportunities near transport links but the policy seems to be thinking rather of out of town shopping developments.	
	Q.5 No comment	

	Q.6 Yes – the emphasis on education and environment is welcome as is that of transport. There still seems to be some fluctuations in the thinking about what constitutes the Heads of the Valleys area and the A465 corridor and plans to improve linkage with the A465 should investigate a campaign to see as much as possible of the Rhondda as well as Cynon Valley included.	
Pontypridd YMCA	**Q.1** No – Probably influence if the Heads of the Valleys to areas in Cynon and Rhondda. Particularly in housing	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – This strategy provides the tools to implement a bold growth strategy that also meets local need. Transport was considered the most important and the need to plan more joined up provisions and also improved road links was essential	
	Q.4 Yes – there needs to be a sustainable growth strategy that encompasses all the complex and diverse problems. This strategy must also clearly contain a political will for change because people need to see change that will benefit their environment and personal development	
	Q.5 No	
	Q.6 The visioning workshops set me thinking of how we will proceed in the future, we need to be very proactive especially in how we see our town centres which need urgent help to counter the out of town provision less than 30 minutes from our town centres. Also we need to tackle low self esteem particularly in young people 10-18 age range and develop opportunities through usage if land that can benefit education and commerce especially social enterprise. How we use our land for recreation also was evident in the visionary workshops and the need to position housing, schools and employment near to each other	
Citizen Panel member 6	**Q.1** No – The M4 and the south of RCT appear to be the main thrust of workshops for development and communications etc with the north thought of as development for leisure activities or perhaps retail therapy. Hirwaun and Rhigos are significant land areas that can be developed to M5 stand. We will then have two corridors of linkage to business M4 for the south and M5 for the north. Please note in your conclusion you say south first north second when setting the need for improvement in transport and infrastructures, this is not equal treatment it expresses a preference for the south	Comments noted
	Q.2 No	

	Q.3 A sustainable growth strategy – if a development plan is not sustainable it will have little commitment beyond its targets and fail to consider the future	
	Q.4 Yes – if a strategy does not take into account local needs what is its purpose it is our county, our future and it is on views and needs consideration against our lives and our children's	
	Q.5 No - there does not appear in the strategy any reference to rail transport other than the general reference to transport which usually refers to the M4 or A465, yet development of connections by rail to Swansea and West Wales seems to be forgotten. Indeed mobility from South to North by rail for industry and those employed a same is a must. This transport structure was in place we need a similar strategy now	
	Q.6 Yes	
Pontypridd District Housing Association	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – see below	
	Q.4 Yes – It gives the best opportunity to provide a real and sustainable future for this county taken as a whole	
	Q.5 No	
	Q.6 Yes – The sustainable growth strategy is achievable only with a strong political will and the need to set aside individual community aspirations at the expense of the greater county good. – Not an easy matter	
Pontypridd Markets	**Q.1** Yes	Comments notes
	Q.2 No	
	Q.3 A sustainable growth strategy – need for holistic approach generating bold decision making for long term success previous parochial decisions have focused too much on needs of certain areas and not on the county as a whole.	
	Q.4 Yes	
	Q.5 No	
	Q.6 No	
Pontygwaith Regeneration Partnership LTD	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – I believe that this strategy is the correct way forward. Any other way I think will lead to stagnation and eventually to degeneration.	

	Q.4 Yes – This strategy is the only way to serve local needs. It is I believe only true strategy for the LDP.	
	Q.5 No	
	Q.6 No	
Citizen Panel Member 7	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy- I prefer this option because it has been successful in other areas outside RCT	
	Q.4 Yes –If you go to the Caerphilly area you will see for yourself, new housing improved roads, better shopping facilities, new factories, more industry, better parking, better all round	
	Q.5 No	
	Q.6 Yes – Sort the park out in Ponty out for starters. Begging for improvement	
Citizen panel member 8	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – People of RCT need to stop thinking in a blinkered parochial manner. Too much inward thinking in the past has left RCT in the mess it is in. Be bold, the area/people have a lot to offer.	
	Q.4 Yes	
	Q.5 No	
	Q.6 Yes – Elected councillors are there for the benefit of the people who put them there. They appear, and have done for too long unable to make a decision. Personal ideology prevent them from putting the area first. Look at the development of Pontypridd. It seems every town centre is being developed and still people drive past. Pontypridd as it has nothing to offer.	
Citizen panel member 9	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – the need to maximise growth, but we need to develop infrastructure.	
	Q.4 Yes I agree with the basic growth strategy, regeneration of them town centres is the best way forward.	
	Q.5 No – A revitalised economy is the only way to maintain the communities, but not to give developers to much of a free hand	

	Q.6 Yes – Amount of land used for industry (IE) ex coalmines not used. Too much housing in the South over development. Depopulation of the Valleys. Poor infrastructure and movement in the North. I have great concern about the council and some councillors. Council and the question of the environment? Will the council listen to people like me?	
Redrow Homes (South Wales)	Q.1 Yes – However some of the discussions in my group, while focused in the topics, dealt with issues that were not planning matters	Comments noted
	Q.2 No – Except all matters should focus on land use planning issues only	
	Q.3 A sustainable growth strategy – Levels of investment needs to be improved in RCT in general and specifically in some localised areas. Sustainable growth will encourage private sector investment in employment, retail, housing and leisure all of which seek to improve the quality of life and environment and this seeks to retain population levels	
	Q.4 No – If focused on "local needs" only, RCT will exacerbate the current polarised population structures; instead of seeking to attract back to the County Borough many of the young, articulate, economically active that has been lost in the past. RCT must provide for local needs, but also seek to address the needs of those that have previously moved away to seek their return.	
	Q.5 No	
	Q.6 Yes – It is recommended that new development proposals/land allocations are identified in all areas of the County Borough – but for the Rhondda / Cynon areas, those allocations must be deliverable. RCT controls much land that could come forward and the Council should commit to its delivery at the earliest time.	
Citizen panel member 10	Q.1 No – Law and order, Public transport	Comments notes
	Q.2 No	
	Q.3 A sustainable growth strategy – Without growth the area will slowly decline and die	
	Q.4 Yes – as above	
	Q.5 Yes – Transport/ roads/ rail	
	Q.6 No	
Citizen panel	Q.1 Yes	Comments noted. The council recognises the importance
	Q.2 No	

member 11	**Q.3** A sustainable growth strategy – Option 4, must be an ongoing improvement in the road structure, as an example the Porth Lower Rhondda relief road must be continued to Maerdy and future development to meet the A465. This can be achieved by a steady continual influx of finance on a long-term basis.	
	Q.4 Yes	
	Q.5 No	
	Q.6 Yes – New housing development in the Rhondda is at a premium as there is very few suitable sites, this also applies to factory buildings. I would suggest the existing housing be upgraded and modernised and existing communities be encouraged to thrive.	
Citizen panel member 12	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy- I think a steady regeneration is the way forward	
	Q.4 Yes – As above	
	Q.5 No	
	Q.6 No	
Community Housing- Housing Strategy	**Q.1** No comment	Comments noted
	Q.2 No comment	
	Q.3 A sustainable growth strategy because it allows for positive intervention and will maximise community benefit from new developments. This is the most proactive approach to development planning and will take consideration of the wider benefits that development can achieve.	
	Q.4 Yes- because of the reasons listed above	
	Q.5 No	
	Q.6 No	
Citizen panel member 13	**Q.1** Yes	Comments noted
	Q.2 No	

	Q.3 A sustainable growth strategy – RCT needs sustainable development – throughout all of RCT not just small pockets. A good transport system is essential. The image of "the valleys" needs to be improved and there has to be a reason for many of the higher achievers to remain in the valley areas – not move south	
	Q.4 Yes	
	Q.5 No	
	Q.6 Yes – Communities first development has had a great deal of money available but there seems to be very little improvement to the communities involved other than superficial. Any plan must be focused and achievable and not committees having endless meeting, great ideas and achieving little. RCT has great potential and great communities; they have been neglected for far too long, with weak leadership with no future planning. Other areas seems to be improving with far greater vision. We are also capable of moving forward.	
Citizen panel member 14	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy	
	Q.4 Yes	
	Q.5 No	
	Q.6 Yes – sorry I cannot answer in full as I was not able to attend the workshops, so I didn't hear the "for and against" discussion on the options	
Citizen panel member 15	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – the area is in great need of growth and development to give existing and new members confidence and pride in their area	
	Q.4 Yes - My hometown East Kilbride, Glasgow is one of the 6 new towns and I can identify the similarities and needs for growth. With a stronger economy managed and developed effectively, local and new people can enjoy a better standard of environment and enjoy its benefits	
	Q.5 No	

	Q.6 Yes – Use the knowledge and skills of others who have gone through the staged development process. Planned correctly accurately in bite size stages the borough has the geographical benefits to realise its potential.	
Citizen Panel member 16	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – Communities can never stand still they are either growing or decaying	
	Q.4 Yes	
	Q.5 No	
	Q.6 Yes – Local transport issues have to be addressed before further housing / industrial development can take place, it would seem that the needs of the developer are taking precedent over the needs of the current residents and that is not just my viewpoint. The Llantwit Fadre by-pass was an issue prior to the building of many thousands of houses – this is typical, cart before the horse planning (I use planning in the broadest sense of the word). There are a number of unoccupied brown field sites – Coedely in particular – where developers may be put off by the road congestion currently around the Talbot Green area preventing easy access to the M4.	
Citizen panel member 17	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy- this forth option sounds more positive in dragging the Rhondda Valleys into the 21st Century. Our transport systems are poor, as is the roads, and the railways could be run better. There is litter everywhere – fly tipping, we are forgotten in the valleys. More jobs are needed more investment, more pride in our valleys.	
	Q.4 No – other valleys over the years have had investment Aberdare for example they have a lot going for them over there. Good roads, out of town shopping (Tesco & Asda) that's without other small shops its also cleaner over there (litter wise). Our Rhondda Valleys are forgotten.	
	Q.5 Yes – In the Rhondda valleys its jobs we need, not posh new housing that no one here can afford. Look after the people that live here now, invest in them before its too late and they move away. We need an MP with the now all approach – to get more firms into the valleys. They keep saying this is a deprived area, do something about it now.	

	Q.6 Yes – I live in Treorchy I have done for most of my life. Me personally don't like housing developments around here, to me the valley has enough housing, we need to keep some places for children to play, safe places. Look after and maintain housing in the valley and keep its own style. (Keep prospect place green)	
CWMNI	Q.1 Yes – But we have been here a number if times before particularly when collieries were closed. The skills training promised did not materialise that is the main reason we have a skills shortage now. The WAG are not going to invest in transport infrastructure as they see more public opportunities elsewhere. If they were serious they would get the funding required through the EU or resort to PFI. More housing will only exacerbate the transport problem but no housing will result in further decline.	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy- without growth we stagnate- which leads to further apathy amongst the electorate. The electorate needs to see things happen and real improvements made to the environment, services etc. Improvements right across the board are required to attract people into the borough – particularly the North. Tourism will be the main saviour of RCT and too little is being done in this respect. Now we have a chance with LDP.	
	Q.4 Yes – we need more executive housing but that which is an attractive location, but close enough to services and which allows for working from home. Unfortunately the above has limited suitable land locations. As far town centres development is concerned, such development must have tourism in mind. Look at Cowbridge and the Cotswolds – be innovative. Why does the authority spend so much time on housing development and industry? It is time to develop tourism and attract companies who specialise in the field.	
	Q.5 No	

	Q.6 The LDP provides the opportunity for fresh thinking, looking clearly at the strengths and weaknesses of RCT and take action to change 'the same old things' comments that are likely to come forth from the public. Can we have a radical plan which redefines RCT and that all those in authority including AM and MP's support actively and subscribe to. Everybody talks about Rhondda beautiful scenery and mountains- what do we do to capitalise on this valuable resource – nothing. Developing Town centres should not be at the expense of other areas or we end up with an us and them mentality. I am still concerned that the issues in relation to development in the North and South of the Borough is not being addressed. There should be two features that concentrate on the needs and development in each area (north and south).	
Citizen panel Member 18	**Q.1** Yes	Comments noted
	Q.2 No	

Q.3 A sustainable growth strategy- Many spoke of the low self esteem of the population and the need to find confidence and a positive future. The population of the Rhondda Valleys is roughly half of what it once was after the first world war. There was a strong sense of pride in being a member of this close-knit community. Most of the people were housed in terraces of houses built from locally quarried stone and they were of sound construction. This also applied in other parts of Britain such as the northeastern coal mining areas and the port of Liverpool and nearby Manchester. There has been talk recently of tearing down these terraces and building new houses. Many in these areas have protested strongly about these propositions because the people do not want such changes to their way of life. Of course when built these houses had the minimum of conveniences with outside toilets and similar simple living arrangements within, but many have been brought up to date by their owners and they do not wish to be displaced and moved to a new environment. This makes sense and would be of far less cost to Councils and Government, because new roads and services would have to be provided for new housing in addition to the building of new properties.

What is of far greater importance to most people in these areas is that opportunities for employment are maximised. For the middle aged this often means new training to acquire new skills. Most would rather be earning a decent living than relying on state handouts as a matter of personal pride. The young people in school must be given wider and more sensible opportunities to acquire various skills. Not all young people have identical talents. Some bright pupils with academic skills may become accountants, solicitors, doctors or whatever, but these same people may find the simplest tasks in the home quite impossible to deal with. They then need to employ someone with other talents who may well have been in their same class in school at some time. The academic might well need his old classmate to carry out work on his house or on his car. His importance to society is every bit as valuable as the solicitors who employs him.

Q.4 The RCT Council contains many people and controls a large area. Problems encountered in the narrow Rhondda valleys differ somewhat from the wider Cynon Valley and both these areas differ considerably form those encountered in recent times by the western region of the Taff Ely district. In the past the Rhondda and Cynon valleys with their coalmines and ancillary industry contributed greatly to the general economy. In recent years the Ely valley area has taken over this roll. This has caused problems and some resentment from the people of this area because their environment and quality of life has been greatly affected by very substantial industrial and residential development. Much of this resentment is as the result of what is considered to be bad planning. It was long acknowledged that substantial development would take place here and that road improvements would have to take place. The present council and even the old Taff Ely council cannot be held responsible for this because firstly the old Glamorgan Council and later the Mid Glamorgan County Council were responsible.

Q.5 Future traffic growth has constantly been greatly underestimated by national and local government bodies. We have a number of local examples. Talbot Green lies at the very centre of local transport and traffic problems. A little more than 2 miles north of the village lies the Coedely roundabout, which is virtually the gateway to the old mining villages of Tonyrefail and Gilfach Goch. Another 3 miles or so north of this point is the entrance to the Rhondda Fawr and Williamstown. Between Coedely roundabout and Talbot Green lies the community ay Ynysmaerdy. It was between here and the entrance to Llantrisant common that much of the industrial development we have referred to first took place. The first such development on this site began when the Queen officially opened the Royal Mint in December 1969. 'Fram Filters and others soon followed'
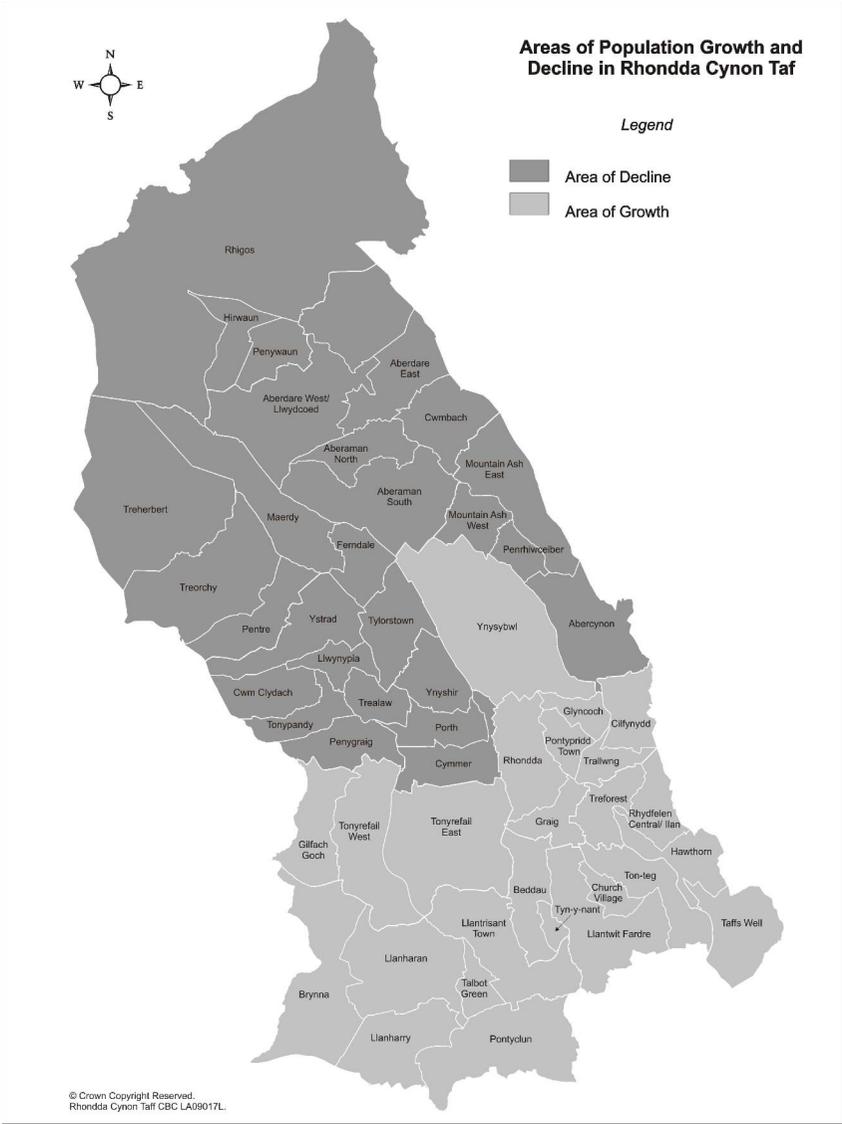
Q.6 Just 2 miles or so south of Talbot Green lies Junction 34 of the M4. Junction 33 lies 2 miles east of junction 34. The A4232 heads south from junction 33 to Culverhouse Cross on the west side of Cardiff and carries on to Cardiff Bay and beyond. Junction 34 was opened in 1983 and was a 3-lane dual carriageway. The junction 33 opened many years later. The traffic between these two junctions has had to be widened to four lanes to cope with the increased traffic flow. The inadequacy to deal with traffic flow is exactly what has happened on the Rhondda to Cardiff road (the A4119) with Talbot Green lying at the centre of these problems. The considerable development of out-of town shopping in Talbot Green began when Tesco purchased New Park Farm, which fronted onto Talbot Road in the village. They opened their original store in 1976.

Hindsight is a wonderful thing, it is an 'if only' situation. Planners and their consultants are supposed to have foresight to avoid these 'if only' situations. Work on the original Llantrisant by-pass built to enable traffic to avoid the original route through Talbot Green via Ely valley road commenced in 1969 and this by-pass opened in 1972. The A473 road from Pontypridd to Bridgend still ran from Southgate in Llantrisant through Talbot Green at this time. To cater for the increased traffic flow which would happen when junction 34 of the M4 opened work began to widen the stretch of the A4119 from Ynysmaerdy to the M4 dual carriageway. It was at this time that provision should have been made to make the junction of the A473 and the A4119 in Talbot Green a grade separated (Motorway type) one. This was bad enough but not all that much later this fault in design was to be enacted once more with the construction of the A473 by-pass. The consequences of not providing grade separated junctions at these points have been horrendous, particularly because so many more out-of town large shopping units have been opened whilst at the same time substantial housing and light industrial developments have taken place.

The responsibility for this inadequate planning must largely rest with the Welsh Office However; better and stronger representations should have been made by local Councils on behalf of their constituents in an attempt to get Government planners to see sense. There is nevertheless no excuse for the local authority planners to have allowed plans for new stores to have been passed without first insisting on a minimum number of new parking places to have been provided for both their customers and staff. There are few extra parking places for the 9 new stores built on the same site where the one previous Tesco store stood. No wonder that customers become exasperated and loose their temper when they unsuccessfully attempt to find a parking space, and get even more exasperated when they cannot even exist the site.

Of course all this has an impact on the residents of the area. Trying to enter or exit their own village is too often a problem. There are other changes, which have taken place and disabled or old people cannot easily access these new shops without transport.

Depopulation of the Valleys is a problem. Regeneration of town and village centres is an admirable concept and as one born and brought up in the Rhondda in my early years I am wholly in favour. Many do not wish to leave and if their towns and villages offer them the right facilities most will remain. This is easier said than done but proper facilities to engage the interest of both the youth and the older generations in turn are essential. Maybe the traditional butcher, green grocer etc. can no longer survive but smaller 'supermarkets may do so. Sports facilities and leisure centres are obvious requirements.

To a large extent it may be that the valleys may become forms of dormitory towns, but providing the facilities are there to provide a good quality of life then this may not be a bad thing. Many people in various parts of the country do not wish to remain in large towns or cities at night and prefer to commute from many miles away so as to enjoy what they consider to be a better life outside the city. I found it difficult to make just a few notes when confronted with the Spatial Strategy Options. Much of what I have written has dealt with Talbot Green and the problems experienced here. Yes, it is in hindsight to a degree but a growth strategy in a rapidly expending area such as this needs to be better than that which has gone before. I hope that lessons will be learned that will help this and other areas within the borough.

Dwr Cymru/ Welsh Water	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy	
	Q.4 Yes – It proposes to cover a wide range topics/functions	
	Q.5 No	
	Q.6 Yes-the need for a section of infrastructure to include water and sewerage.	
Citizen panel member 19	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – I believe planning for the future at this scale will turn the area around and long-term plan is the best way to maximise momentum. We need direction in order to stay attractive to as varied amount of people possible keeping our next generation here and attracting this is a way to achieve that.	
	Q.4 Yes- we need to be self sufficient to stop people leaving and spending elsewhere and build on what we've got and that will attract more outside interest. Local communities need to feel catered for but also that the area is now going places and able to keep as competitive as other areas.	
	Q.5 No	
	Q.6 no comment	
Citizen panel member 20	**Q.1** Yes	Comments noted
	Q.2 Yes – Non intervention strategy	
	Q.3 A sustainable growth strategy – after reading all the issues I think page 12, 13.1 explains all and I don't need to say anything	
	Q.4 Yes – As above	
	Q.5 No	
	Q.6 Yes – All the RCT area needs updating and most definitely transport i.e. the bus service in Llanharan is terrible they are either not on time or don't turn up at all. Also the heritage is most important to look after. The valley area is also very important to look after.	
Citizen panel member 21	**Q.1** Yes	Comments noted
	Q.2 No	
	Q.3 A sustainable growth strategy – the area needs a cohesive strategy for the region as a whole, so that some areas do not see improvements at the expense of neighbouring parts of the region.	

Q.4 Yes – there are strong reasons to promote this area as a good one in which to live – easy access to key cities (Cardiff and Swansea), the natural environment, strong sense of community with rising property prices in Cardiff and Swansea it should be possible to encourage migration out of these cites and into RCT.	
Q.5 No	
Q.6 No	

Appendix 3- Map showing the areas of population increase and decline in Rhondda Cynon Taf

Appendix 4- Strategic site assessment matrix

C/S ID	Site Name	The site over 20ha	The site in a strategic location	The site is compatible with the Wales Spatial Plan	The site Brownfield
Rhondda					
181	Land at Cilely Colliery, Nr Trebanog				
325	Large area of land to the west of Ynyshir, Coed Ynyshir	●			
187	Former Fernhill Colliery Site, Blaenrhondda	●	●	●	●
87	Land r/o Buckley Road, Trealaw	●			
183	Standard Tip (RH 87), Wattstown	●			
462	Maerdy Colliery Site	●	●	●	●
Cynon Valley					
443	Former Phurnacite Plant & Associated Land, Abercwmboi	●	●	●	●
275	Aberdare General Hospital		●	●	●
328	Land at Werfa Farm, Cefn Rhigos	●		●	
371	Land at Buarth y Capel, Ynysbwl	●			
Various	Tower Colliery Site	●	●	●	●
Taff Ely					
311	Ty Nant/Gwaun Miskin (East of Beddau)		●		
246	Land off Llanharry Road, south of Bryn Derwen, Llanharan				
452	Coed Ely, Tonyrefail		●		●
119	Purolite & Pant Marsh, Talbot Green		●	●	●

184	Ystrad Barwig Isaf (to west of Efail Isaf)	●			
355	Land north of Mwyndy Cemetery	●	●	●	
161	Whitehills Golf Course, Brynnau Gwynion	●			
171	East of Station Road, Church Village	●			
152	Gelli Seren West, Nr Tonyrefail	●			
110	Llwyncrwn Isaf, West of Llantrisant Road, Beddau	●		●	
122	Sony Technology Park, Nr Pencoed	●	●		
351	Land South of Heol Cynllan / At Cynllan Cottage, Llanharan	●	●		
167	East of Station Road, Church Village	●			
377	Ystrad Barwig Isaf	●			
206	Cwm Colliery Reclamation, Beddau	●	●	●	●
174	Otters Brook/Ceulan Farm, South of Railway, Pontyclun	●			
127	Trane Farm, Tonyrefail	●			
132	Cwm Coking Plant, Beddau	●	●	●	●
352	Large site north of Cefn Yr Hendy (Talbot Green/Pontyclun)	●	●	●	
118	Mwyndy Park	●	●	●	Mixture
113	Llanilid OCS	●	●	●	●

Appendix 5- Informal Comments Made In Respect Of The Draft LDP: Preferred Strategy

ORGANISATION	COMMENT
DEVELOPMENT CONTROL COMMITTEE	
Careful consideration should be given to the development of Pontypridd	Comments noted. Careful consideration will be given to the development needs of Pontypridd through the LDP process.
Amend Waste section on page 21 to read 'In order to meet capacity requirements identified in the SE Wales Regional Waste Plan, Strategic Waste sites are identified to provide for all waste management options excluding incineration, on a regional basis'.	Comments noted. Planning Policy (Wales) 2002 identifies incineration as part of the waste management hierarchy. The requested change therefore cannot be made.
Amend reference on page 24 to Aberdare Hospital to read 'Aberdare General Hospital site, which may be replaced by a new facility at Mountain Ash'	Comment noted. However planning permission for the Hospital has now been granted and the suggested amendment is no longer appropriate.
Give further consideration to potential large scale development sites within the Northern Strategy Area	Comments noted. 5 of the 8 strategic sites identified are located in the northern strategy area.
To be mindful of the overall character of an area when considering new developments	Agreed. The preferred strategy will be amended to include a policy for 'place making' which will provide a context for new development.
Amend reference on page 42 to reflect the fact that Pontypridd railway station also serves Merthyr	Comments noted. The strategy will be amended accordingly.
Amend page 63 to include reference to Cynon Valley Indoor Bowls Hall	Comments noted. The strategy will be amended accordingly.
To ensure that policies are robust enough to protect the environment and open spaces	Comments noted. The strategy will be amended to include separate policies for the built and natural environment.
Need to seek improvements in public transport provision	Comments noted. The strategy will be amended to make clear the need for improvements in public transport.
LDP FORUM	
Need to identify Principle Towns in Rhondda	Comments noted. However, the analysis of settlements undertaken in formulating the strategy suggests that there is no settlement in the Rhondda that is of sufficient scale or variety to be designated a principle town. It should be noted however that 4

	of the 8 key settlements identified in the strategy are in the Rhondda.
Synergy with other major strategies is crucial if benefits are to be maximised	Comments noted.

Pontypridd should be regarded as the 'county town'	Comments noted. This is however, a decision to be made by the Council as a whole and not the LDP.
Spatial Strategy must allow Aberdare to respond to growing threat from Merthyr	Comments noted. In recognition of the important role Aberdare can play in the northern strategy areas, the settlement has been identified as a principle town.
If Spatial Strategy to be successful, the problem of poor transportation infrastructure must be addressed	Comments noted. The strategy will provide a context for securing improvements in the transportation network in Rhondda Cynon Taf.
Nature conservation was viewed as a key priority.	Comments noted. The strategy will be amended by the inclusion of a separate natural environment policy
Traditional settlement identities should be protected	Comments noted. The strategy has been amended to include a new 'place making' policy which reflects the need to protect the identity of existing settlements.
In light of the recent planning history, it was questioned why this site had been identified as a strategic site.	Comments noted. It should be noted that for the purposes of the Preferred Strategy strategic sites have not been identified on a boundary specific basis. Exact land allocations will be subject to further consideration.
Borough must not become reliant on one or two sectors of the economy in the future	Comments noted.
Borough must be flexible in order to respond to changing circumstances	Comments noted.
Planning gain must be secured where new development will have demonstrable impacts upon existing communities.	Comments noted. It is considered that the requirements of strategic policy on community infrastructure sufficiently address this point.
SP 1 - it was suggested that not all types of development will address deprivation and that the policy should read 'will be encouraged' rather than 'will encourage'	Comments noted. The strategic policies have been amended to reflect the requirements of WAG.

SP1 - should be amended to state that 'Development proposals….will be required to contribute to appropriate forms of growth to address the problems of deprivation…' rather than 'Development proposals….will encourage appropriate forms of growth to address the problems of deprivation…	Agreed. The policy has been amended accordingly.
SP 1 - could be amended to include a requirement for new development to contribute to local housing needs	Comments noted. The strategy has been amended to include further explanation of the requirements for affordable housing.
SP 4 - should clearly state that new development should not exacerbate existing problems. Other participants felt that it was sufficient to address this issue in SP 9.	Comments noted. It is considered that these issues are addressed by the new strategic policy for 'place making' and the existing strategic policy on 'community infrastructure'.
part b). of policy SP 9 - suggested that rather than read as 'open space and play facilities' it should be amended to 'open space, play and youth facilities'	Agreed. The policy has been amended accordingly.
SP 11 - could at this stage make reference to the acceptable density of windfarm sites and could even, similar to the policy prescribing housing numbers, give an overall total for the number of windfarms that will be allowed.	Comments noted. The issues of acceptable density is a matter which will more appropriately be addressed in deposit draft LDP.
WELSH ASSEMBLY GOVERNMENT	
Soundness Test P1 - Prepared in accordance with the Delivery Agreement including the CIS	
Soundness Test P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment	
Strategic Options should be assessed through the sustainability appraisal – para 5.3 makes reference to the SA Framework but is unclear. (Para 5.5 refers to a matrix assessing the strategy options at Appendix 3). Sustainability Appraisal, including consideration of effects and mitigation, should determine the Council's choice of preferred option for consultation.	Comments noted. The strategy options have been assessed as part of the LDP process. Paragraph 5.3 of the document will be amended to clarify this point.
LDP objectives (para 4.2) should have been tested against the SA framework – (LDP Manual 5.6.7).	Comments noted. The have been tested and amended through the SA/SEA process. Details of the process are contained in the SA/SEA appraisal.

Soundness Test C1 - It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas	
Section 2 reviews a number of **relevant policies and plans** (WSP, Strategy for the Heads of the Valleys area: Heads - We win.., SEW Regional Waste Plan, Community Strategy The RCT Community Plan 2004-14). In addition the Draft SA/SEA Scoping Report references other national, regional and local plans, policies and programmes (its Appendix I). Regional Technical Statement for Aggregates – currently being produced by the SW RAWP, is not referred to in section 2, although this is referred to later at page 22.	Comments noted. The document has been amended accordingly.
See comments at Soundness Test C3 in relation to the work of the **South East Spatial Plan Group** and CE1 re sub-regional planning policy context.	Comments noted.
The **key diagram** at page 55 shows an area of the Brecon Beacons National Park as 'area not in LDP'. LDP documents should clearly indicate the RCT LDP area and make clear that the NP area is subject to a separate development plan which is the responsibility of the National Park Authority. We would suggest that all RCT LDP documents make this explicit. A reference to the Key Diagram from section 6 would have been useful for readers.	Agreed. The document and key diagram will be amended accordingly.
Objectives (4.2) and **strategy options** (5&6) appear to be broadly relevant to the area and are land-use. However, see minerals & waste topic comments at Soundness Test C2, the principle of which should be considered in relation to other LDP objectives.	Comments noted.
Soundness Test C2 **It has regard to national policy**	
Section 2 of the Paper refers to relevant key national policy (+ see above under Soundness Test C1).	
LDPW and the LDP Manual say there is no need to **repeat national planning policy** unless there is need to interpret it at local level local; draft strategic policies generally appear to follow this guide, although SP6 Town Centres is weak in this respect.	Comments noted. The strategic policy has been amended accordingly

The preferred option is translated spatially into strategic polices with SP1 & 2 being the key policies in this respect. Consideration should be given to the **identification of principle towns & key settlements** by means of a policy(ies). See also comments below relating to minerals, waste, etc.	Agreed. The strategic policies have been amended accordingly.
The LDP must provide a framework to stimulate, guide and manage change towards **sustainability** (PPW Comp Guide 2.4); (this includes **good design**). The strategic policies appear to have this focus; in particular policy SP3 Sustainable Development. Design is not specified in the polices, but is referenced in the strategy.	Comments noted. The preferred strategy has been amended to include a policy on 'place making'.
The strategic policies should be constructed in ways that will allow meaningful measurement of progress through the lifetime of the plan to enable short-term **monitoring & review**. (POS Guide 5.4)	Comments noted.
A number of policies use the terms '**encouraged/ing, supporting**'. The meaning of terms such as these should be clarified in land-use terms in the LDP if they are used; at present this is not clear from the information in this Paper, and their use should be reviewed.	Agreed. Policies will be amended accordingly.
It is preferable to have **positively worded policies** unless the policy is restrictive. Policy **SP8** Environmental Protection & Enhancement, second sentence: suggest for clarity redraft to, for example, 'Development will not be permitted if it would cause unacceptable….'. This policy currently covers protection and harm, but not improvement.	Agreed. The policy has been amended accordingly.
Policy **SP9** Community Infrastructure: suggest redraft 3rd sentence, for example, as 'Such infrastructure requirements may include:…'.	Agree. The policy has been amended accordingly.
Transport (see also under Soundness Test C3 below): - In terms of directing development the Paper indicates that it will be a 'general principle' that **locations with a choice of transportation** will be favoured. However this particular point has not been explicitly incorporated into the strategic policies. It could be argued that policy SP 2 does cover this point but we would suggest it could be built into policy SP 3 to avoid diluting the locally distinct policies SP 1 and SP 2.	Agree. The policy has been amended accordingly.
Other than the above point the transport elements of the report appear	Comments noted.

largely consistent with national policy, as required by soundness test C2.	
*Housing **(see also under Soundness Test C3 below):*** - The section on **residential development** (p19) should make clear where the figures have been derived from and the context in which they are used. The population projections for SE Wales are derived from the Assembly Government data whilst (presumably) RCT have undertaken some form of assessment for the County. It is not clear what the link is between the SE Wales figure (108,900) and RCTs figure (17,627); neither is it clear how the proposed allocation of 14,850 dwellings will be adequate to sustain the preferred strategy. This also applies to **Policy SP4** Housing Requirements.	Agreed. The strategy has been amended to include further clarification of the residential land requirements. In addition a Housing Topic Paper will be issued for public consultation that explains the statistical background to the housing requirement figures.
Further clarification about how the Council proposes to address the issue of providing **affordable homes** would be helpful. The 3rd para on page19 has laudable sentiments but gives no indication of the scale and nature of the problem nor the possible mechanisms to be used to address it.	Agreed. The strategy has been amended accordingly.
Employment (see also under Soundness Test C3 below): - There is little evidence of analysis of likely levels of growth nor is there any indication of the scale of the likely provision of employment land. It is therefore not possible to establish a context for considering the assessment of **strategic sites** on p23-24 nor **Policy SP 5** Employment Requirements	Agreed. The strategy has been amended to provide additional clarification of the employment land requirements. In addition to the preferred strategy an Employment Topic Paper will be issued for public consultation that explains the background to employment land requirement figure.
Minerals: - "Key Environmental **Issues**" (page 11) should include the need to **safeguard** important mineral resources due to the significance of minerals within RCT. These include sand and gravel resources of importance due to their relatively limited regional availability and high quality hard rock resources.	Agreed. The strategy has been amended accordingly.
Economic **objectives** (page 13) include, "Promote efficient and appropriate use of minerals". This is very general and repeats national planning policy for minerals. More positive objectives that are **specific to RCT** should be	Agreed. The strategy has been amended accordingly

adopted eg safeguarding mineral resources that occur in RCT, ensuring adequate mineral resources are allocated to meet local, regional and national needs in line with the RTS and in view of the availability of resources in the County Borough.	
The **Preferred Option** section refers to Minerals at page 22 and in particular to safeguarding of sand and gravel resources. There may well be **other aggregates** resources such as high quality hard rock resources that should be safeguarded or allocated for future working.	Agreed. The strategy has been amended accordingly
Coal**:** Coal is identified in the key examples of characteristics; listed in the SA scoping report under employment (3.4) where mineral extraction is identified as an important industry. Safeguarding is identified in the SA framework under 16.Minerals. These issues need to be considered further in assessing options	Comments noted. Economic factors were considered when the strategic option defined and assessed.
Safeguarding coal resources may conflict with other development proposals, or the prior recovery of coal may conflict with the timetable for development. Coal safeguarding should be an element in the first stage of assessment. This applies at three levels. In the assessment of areas for development - the north has most of the remaining primary resource; in the assessment for towns of development – for example Treorchy is on a secondary resource area; and for the strategic sites identified as suitable for development – for example Fernhill and the phurnacite plant are on secondary resources.	Comments noted. The location of coal resources is already being considered as part of the candidate site assessment process.
The mineral policy **SP12** should distinguish aggregates and coal – there need not be a landbank for coal	Agreed. The policy has been amended accordingly
The **transport of minerals** should be included in the context of general freight movements. Bulk movement of minerals is preferably by rail (or water).	Agreed. The policy has been amended accordingly
As well as the broader context, **stability issues** relate to areas of past mineral extraction and to the major earth moving activities linked with restoration and mineral extraction. Risk assessment is needed as a part of the plan preparation process to identify areas where such constraints exist, and where they may be so significant as to preclude development.	Comments noted. Stability issues are being considered as part of the candidate site assessment process.

Waste:Key environmental **issues** (page 11) refer to waste arisings and recycling rates; however, the more important key <u>issue</u> for the LDP is the need to make adequate provision for the large number of **new waste management facilities** as set out in the Regional Waste Plan.	Agreed. The strategy has been amended accordingly.
Social **objectives** (page 13) include: "Minimise waste, especially waste to landfill"This again is a general objective with fairly limited land use planning opportunities. There should be a more positive planning approach to the waste planning objectives that are also **more relevant** to the LDP, such as, making adequate provision for the waste management facilities in accord with the findings of the Regional Waste Plan.	Agreed. The strategy has been amended accordingly
The **Preferred Option** section refers to waste at page 21. This refers to "strategic waste sites" but should also refer to **sites for local waste management** that the LDP needs to make provision for	Agreed. The strategy has been amended accordingly
It is not clear whether the mixed uses in the **strategic sites** (at page 22 and listed in Appendix 2) include potential sites for waste management and this needs to be clarified.	Agreed. The strategy has been amended accordingly
Infrastructure (and Soundness Tests CE2) - National planning policy advocates that the **implications of infrastructure capacity and/or requirements** should be considered. This involves the encouragement of sites where provision exists and/or where problems can be solved and development can be phased. Therefore, the spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred option. This could impact on how growth will be managed throughout the plan period and therefore on how social, economic and environmental objectives for the plan area are met.	Comments noted.
Renewable Energy: - Although policy **SP11** provides positive support for renewable energy and energy efficiency, national planning policy asks that authorities consider the opportunities which may exist for encouraging **all forms of renewable energy** and the contribution which they can make towards carbon emission reduction etc.	Comments noted. The Council considers that this issues is sufficiently addressed in the existing text of the preferred strategy.

Whilst energy efficiency and conservation is acknowledged, further consideration could be given to ways of securing the benefits of renewable energy, energy efficiency and conservation (and other resource efficiencies/conservation such as water), particularly where large scale growth is envisaged. These issues are mentioned as potential indicators in appendix 1 but it would be useful to explore further as indicated above.	Agreed. The strategy has been amended accordingly
Flood Risk (and Soundness Test CE2) - It is not clear how the **appraisal of options** has taken into account national planning policy in relation to development and flood risk (PPW 2002 and TAN 15 2004). We note that flood risk maps were made available for the Visioning Workshops. The assumption made in relation to some of the strategic sites, which underpin the preferred strategy, is that flood risk issues need to be resolved.	Comments noted. Consideration of flood risk is part of the candidate site assessment process.
The thrust of national planning policy is to avoid new development on the floodplain and to move away from continued reliance on engineering solutions, in recognition that risk can never be eliminated despite mitigation measures, and in recognition of climate change. Further, some forms of development will be inappropriate in certain parts of the flood plain. Flooding, therefore, is an **issue** which should inform policy choices and the tests in the TAN should have been considered in terms of appraising options and arriving at the preferred strategy.	Comments noted.
Where options involve consideration of the floodplain then a broad level assessment which provides for an understanding of flooding consequences will be necessary to ensure that the **strategic sites** (and potentially **non-strategic sites**) which support the preferred option can be taken forward. It is recognised that some **flooding information** may already exist but the extent of this, and its role in informing and underpinning strategy, should be clarified and be made explicit.	Comments noted. Consideration of flood risk is part of the candidate site assessment process
Land contamination (and Soundness Test CE2) - National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that development is not	Comments noted.

undertaken without an understanding of the risks. Contamination is acknowledged as an **issue** and dealing with it will be a necessary part of taking forward some of the **strategic sites**. The reliance on such sites suggests that some **evidence** to demonstrate that the contribution envisaged by these sites is likely to be forthcoming. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks.	
Retailing: Policy SP6 Town Centres does little to expand upon national retail policy in PPW. The hierarchy and future roles of centres should be reflected clearly in the strategy and the strategic policies.	Agreed. The strategy will be amended accordingly.
Design: Design is not specified in the strategic polices, but is referenced in the strategy (see above re sustainability & policy SP3).	Comments noted.
Welsh Culture and Language: There is no mention in the Paper of any Welsh language & culture influences and any associated ambitions affecting future land-use in the plan area.	Comments noted
Soundness Test C3 - It has regard to the Wales Spatial Plan	
More reference could be made to the likely impact of proposed RCT housing developments on other Local Authorities.	Comments noted. This is an issue more appropriately addressed through the Wales Spatial Plan.
There will be a narrative on the role and function of key settlements included in the WSP SE work and in the HoV programme – eventually the RCT LDP would need to take account of this narrative as it will set important context for development.	Comments noted.
Eventually the WSP Area work will name key settlements across the entire SE region. There should be some 'read across' between those named as WSP SE key settlements and those named by the RCT LDP as its key settlements.	Comments noted.
RCT has a key role in connecting the North (i.e. HoV) of the region with the South (i.e coastal belt). This is partly addressed within the Spatial Strategy	Agreed. The preferred strategy has been amended according.

section but some analysis or comment on how settlements within RCT will relate to other settlements outside RCT would be useful.	
Reference is made to 'additional regeneration opportunities existing in the key centres of Pontypridd...'. Need to include this as a strategic site in the Strategic Sites list for RCT (pp.22-24 of the draft LDP)?	The regeneration of Pontypridd is dependent upon the development of a number of small non strategic sites. Designation of Pontypridd as a strategic site is therefore not appropriate..
As the WSP Area work takes shape, a definition of what constitutes a strategic site for the SE region will be produced. Therefore in RCT's LDP section on strategic sites a generic paragraph on the overall principles guiding the development of these sites would be welcome. This para could reference the key policy documents/appraisal methods used to identify chosen sites, as well as the key sustainability criteria (i.e. economic, social and environmental considerations) to be taken into account when developing the sites, with reference to the detail contained in Appendix 2 of the LDP doc. Analysis or comment on how the strategic sites relate to each other, and how they relate to the wider SE region, would also be welcome.	
SP 6 – Town centres – again there may be mention of key settlements in RCT coming from the emerging SE Area work. Mention of these in the section on town centre regeneration would be welcome. A little more detail under SP 6 on how town centres will be chosen (for regeneration/other projects) would be helpful.	Comments noted. The emerging South East Wales work will inform the emerging LDP.
SP 7 – Transportation – mention of the sub-regional context would be helpful, e.g. identifying transport hubs, identifying the key strategic transport links likely to benefit the wider sub-region. This is partly mentioned on p.20 of the draft LDP under the Transportation heading. However a little more detail would help feed into the emerging RTP for SE Wales.	Agreed. The preferred strategy has been amended accordingly.
Soundness Test C4 - Has regard to the relevant community strategy/ies.	
Appears to do so (paras 2.16-18, & Appendix 3 Options Assessment Matrix question 1). Please advise if this is not the case.	Comments noted
Soundness Test CE1 - The plan sets out a coherent strategy from	

which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.	
Sub-Regional Planning Policy Context: - See above Soundness Test C3 relating to the summary of the work being undertaken by the **South East Spatial Plan Group** on the 'Strategic Development Project' (para 2.8 gives no timescale for this).	Comments noted.
There should be clear **evidence of liaison** with neighbouring authorities in order to consider how the Council's aspirations/options mesh with those of other areas (especially with emerging LDPs). Soundness tests C1 and CE1 are relevant.	Extensive liaison has been undertaken with adjoining authorities and will be documented In the Preferred Strategy Topic Paper.
Soundness Test CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.	
Vision (para 4.1): with regard to the role of RCT in the WSP vision, see above at Soundness Test C3.	Comments noted.
Objectives (para 4.2): the objectives should be capable of being effectively influenced by the LDP and of being monitored. They should be tested for compatibility with the SA objectives. They could indicate through what means they will be achieved by the LDP policies.	Agreed. The preferred strategy has been amended accordingly.
Spatial Strategy Options (section 5): the Paper evidences the ongoing consideration and analysis of alternative strategies, including the Visioning Workshops and Report of Findings. App3 gives Strategy Options Assessment Matrix (para 5.5). We note that it is difficult to make out some of the Northern / Southern Strategy Area distinction on the key diagram at App5 on a black & white photocopy of the Paper.	Comments noted.
Draft Strategic Policies: See above at Soundness Test C2.	
Broad **locations** for growth and strategic **sites** are indicated (page 23ff); in relation to the identification of site selection criteria & infrastructure requirements (LDP Manual 6.3.3), a draft methodology with filtering mechanisms for assessing strategic and non-strategic sites has been prepared for consultation and a candidate sites register commenced (page	Comments noted.

25 & App2&6). However, it is not entirely clear from the text who is responsible for carrying out the assessment stages; also App6 doesn't appear to be coded which suggests there has not been any appraisal of these sites yet.	
Evidence base: initial review of existing baseline information to identify key issues (paras 3.7); + SA Report.	Comments noted.
Also see **topic comments** at Soundness Test C2, in particular regarding infrastructure, flood risk and land contamination.	
Soundness Test CE3 - There are clear mechanisms for implementation and monitoring.	
Para 4.3 refers to sustainability indicators and targets , and App1 provides a table. However, there needs to be indicators and targets specifically for the LDP strategy / objectives, not only for the SA/SEA (LDPW para 2.11).	Agreed. The preferred strategy has been amended accordingly.
Soundness Test CE4 - It is reasonably flexible to enable it to deal with changing circumstances. **(Can't be determined at this stage.)**	

Comments Resulting From The SA / SEA Appraisal Process

SA /SEA APPRAISAL	
Appraisal of Objectives	
The LDP objectives address a variety of inter-thematic issues and would be more effective in guiding sustainable development if the headings (i.e. social, economic and environmental) under which they are grouped were to be removed	Agreed. The preferred strategy has been amended accordingly.
The only potential conflicts appear between LDP objectives that refer to the construction of buildings (e.g. housing provision) and infrastructure, and environmental SA objectives, due to the lack of information regarding construction material and location. They could be improved by inserting a preference for the refurbishment of buildings to new build, the use of brownfield land, and concentrating development within existing settlements. Also beneficial would be to include a requirement for sustainable construction and management techniques. It is recommended to add SA objective 8, which deals with such issues, to the LDP objectives	Agreed. The preferred strategy has been amended accordingly
SA objective 9 seeks to protect the countryside. The equivalent LDP objectives should be expanded to that respect as it currently only refers to "landscape".	Agreed. The preferred strategy has been amended accordingly
To avoid the uncertainties about the compatibility of the economic and social LDP objectives with environmental SA objectives it is recommended to insert a references to sustainable construction/production techniques, and for supporting jobs and business in environmental protection/ innovation industries, such as recycling, pollution control, insulation etc.	Agreed. The preferred strategy has been amended accordingly
Appraisal of Strategic Policies	
SP1 – policy could receive a higher rating if a requirement to take into account local environmental and built characteristics as well as heritage.	Agreed. The preferred strategy has been amended to include a new policy that addresses this issue.
SP2 – policy could be made more explicit by explaining what is meant by 'function' and specific reference to the need to address high levels of out commuting.	Agreed. The policy has been amended accordingly.
SP3 – the policy positively progresses most of the SA objectives, but could better reflect the UK Sustainability Development Strategy through the consideration of environmental limits.	Agreed. The policy has been amended accordingly
SP4 – the policy could be amended to include reference to energy efficiency, sustainable	Agreed. The policy has been

construction and management techniques as well as a preference to re use land, buildings and materials.	amended accordingly
SP5 – the policy could be strengthened with stronger consideration of the environment.	Agreed. The policy has been amended accordingly
SP6 – the policy should be amended to include reference to energy efficiency and the use of resources.	Agreed. The policy has been amended accordingly
SP7 – the policy could perform better with environmental objectives if a requirement is added to reduce the need to travel by car and to support promote use of public transport, walking and cycling.	Agreed. The policy has been amended accordingly
SP8 – the policy attempts to address a wide range of environmental issues and the current policy wording could be interpreted in a manner that may be as effective as possible in preventing proposals with a potentially harmful effect. It is recommended to devise two separate policies, one addressing environmental concerns relating to physical appearance and cultural values, and another that deals with ecological aspects in terms of climate change and use of resources.	Agreed. The preferred strategy has been amended to include 2 separate policies.
SP9 – Policy could be expanded to enable the use of planning obligations to provide environmental benefits as positively as social ones. This would mainly relate to buildings and physical infrastructure where contributions could be required to employ sustainable, energy efficient construction and building management technology or enable the use of renewable energy sources.	Agreed. The policy has been amended accordingly
SP 10 – Policy should be amended to be more specific in promoting the avoidance of waste, recycling facilities and sustainable treatment of rest waste. A statement could be included that any further landfill site will not be permitted and that incineration should be linked to heat production if geographically possible.	Disagree. This is a matter more appropriately addressed by the Regional Waste Plan for South East Wales.
SP 11 – Take second part of the policy starting with "*where it can be demonstrated that there is no unacceptable impact upon the interests of ….*" Any short term impact on agriculture, conservation areas of ecological, wildlife and landscape importance and residential amenity would be reversed into a positive due to the long-term benefits of not burning fossil fuels, and reducing the legacy of domestic waste.	Comments noted.
SP 12- The policy has a neutral effect on social, cultural and economic SA objectives, but would positively progress those concerning the environmental aspects. The sustainability performance of the policy could be increased by requiring stricter reclamation and remedial	Agreed. The policy has been amended accordingly

| measures. The term "acceptable" ought to be defined within the policy or be qualified by adding "as defined by RCT" or "to a limit proven safe". | |

Appendix 6- RHONDDA CYNON TAF LOCAL DEVELOPMENT PLAN TESTS OF SOUNDNESS – SELF ASSESSMENT

TEST OF SOUNDNESS	SELF ASSESSMENT
Procedural Tests	
P1 Compliance on DA inc CIA	
Evidence of earlier or planned stakeholder involvement	Presentations to Area Regeneration Partnerships; visioning events; establishment of LDP Forum; LDP Forum meetings.
The approach towards eliciting further opinion	Inviting comments on consultation methods through DA process; consultation on candidate site methodology; consensus building on visioning
P2 Integration with SA/SEA	
Integration of work with SA framework	Independent assessment by consultants
Relationship to the SEA baseline	Scoping Report – translated into issues in Preferred Strategy.
Exploration of the do nothing scenario	Non intervention strategy option considered as part of process.
Consistency Tests	
C1 – Regard to relevant plans, policies relating to the area or adjoining areas	
Dialogue or collaboration with neighbouring LPAs	Invites to SA/SEA workshop. Stakeholders with regional remits invited to Visioning; Consultation on draft Strategy; SEWPG
Comparative assessments – regional trends, cross boundary inputs.	Regional groups – SEWPG, LDP Pathfinder Grp. Dialogue with WAG re WSP.
Roles and functions of places and wider geographic context	Appraisal and Schedule as part of Strategy document; work with SEWPG to inform WSP.
Interrelationships and strategy options in the round	Options tested in terms of relationships with other plans/strategies through visioning; consultations on SA/SEA
Planning policy implications of other strategies	Objectives incorporated where they relate to land use aspects including housing needs, Community Plan, Local Transport Plan, Waste plan etc
Utility capacity, transport, flood risk as strategic issues.	Special consultation bodies consulted on strategic sites; special consultation bodies and general consultation bodies are part of LDP Forum and were involved in Visioning.
C2 – Consistency with national	

planning policy	
Explanation of national policy, regard to local implications	Strategic policies linked to North (SP1) and South (SP2) Strategy areas, a policy on Place Making (SP4), and policies identifying Housing (SP4)and Employment (SP7) requirements, together with the need for Community Infrastructure provision (SP12) are examples of policies having regard to national objectives, yet will 'bite' at a local level. The need to achieve local distinctiveness and a sense of place is also emphasised in SP10(Built Heritage) and SP9 (Retailing and Town Centres).
Coverage of key national policy areas	Referred to throughout process – DA, Visioning, SA/SEA, Strategy Options, Preferred Strategy.
C3 – Regard to Wales Spatial Plan	
Implications of WSP area work	Reference to HoV Strategy, WSP and WSP Strategic Development Project.
Regard to WSP propositions and key strategies	Reference to Networked Capital Region and emerging Strategic Development Project.
C4 – Regard to the relevant Community Strategy	
CS role in developing LDP strategic overview/vision and objectives	Directly linked to vision and objectives; Community Strategy thematic group co-ordinators part of LDP Forum; also involved in Visioning process.
Scope/relevance of current community strategy content	Directly linked to overall Vision; taken into account throughout process and used to assess strategy options.
Coherence and Effectiveness Tests	
CE1 – Setting out a coherent strategy from which policies and allocations flow and compatibility with plans prepared by neighbouring authorities	
The vision and nature of objectives	Objectives compatible with geographical context and issues.
Transparency in the derivation of objectives/options	Visioning events, Forum, and SA/SEA Workshop targeting members and key stakeholders to engage representatives from as wide a cross section as possible.
Relations between plan objectives, priorities	Closely linked in strategy document to consideration of main issues/factors

Development of options from SA work	Options emerged through consideration of key issues identified during SA/SEA Scoping stage and how they could be addressed; ie baseline situation (Non Intervention); examining effects of previous strategies (Local Needs); by an assessment of the strategy which had emerged through the abandoned UDP process (Consolidation): a Sustainable Growth Strategy also emerged which looked at concentration of growth in key areas where the optimum regeneration benefits could be achieved.
Synergy/linkages between issues and options	Direct connection between addressing issues by various growth scenarios and derivation of preferred strategy option..
Capacity to deliver/achieve – risk assessment.	Linked to assessment of options and consideration of most realistic scenarios; the candidate site assessment process also examines aspects such as constraints and marketability with the assistance of information gained from urban capacity studies (e.g. N and Central Rhondda Valleys), Local Transport Plan; Retail Capacity Studies etc.
CE2 –Are the Strategy, Policies and Allocations Realistic and appropriate having considered the relevant alternatives and are they founded on a robust and credible evidence base?	
Documentation of the scope of the evidence being used	Directly linked through derivation of spatial strategy from key issues identified from evidence base. Existing documentation, Studies commissioned and data collated on a wide range of socio-economic and environmental factors as part of Evidence Base.
Conclusions from earlier work or other strategies	Linked to scenarios when identifying options, ie reviewing impact of previous Structure and Local Plans, UDP work etc.
Background spatial analysis of how places function, how they have developed over last plan period and what needs to change.	Documents and studies in Evidence Base demonstrate points; Recognition of previous trends and measures to address issues eg town centre vacancies.
Spatial manifestation of general trends Key spots in terms of demand.	Recognition of differences in development pressures between northern and southern strategy areas. Documentation/studies contained in Evidence Base.
Assessment of building needs, social requirements, settlement needs.	Assessed at macro level through strategy – more detailed work ongoing through candidate site assessment. Documents and studies in Evidence Base demonstrate consideration of need.

Review of uncommitted allocations in line with SA objectives and preferred strategy.	Being reviewed as part of site assessment process.
CE 3 – Clear Mechanisms for implementation and monitoring	
Targets and milestones relating to delivery of policies.	Monitoring of strategic policies - targets and indicators prepared for strategy policies in Appendix 1 of Preferred Strategy.
Clarity on how indicators measured and links to annual monitoring report.	Detailed schedule prepared with means of collation as part of SA/SEA process.
Clarity on how policies implemented. Where actions outside scope of LPA evidence of commitment.	Consultation with WAG, DEIN; dialogue with development interests on strategic sites proposed; utility providers on draft document and strategic allocations.
Do processes for measuring success accord with national policy guidance, best practice?	Widely accepted Indicators used in consultation with environmental bodies.
Does the Plan set out factors essential to delivery of key policy objectives?	Yes – e.g. housing targets and strategic sites to address socio economic issues such as depopulation.
CE4 – Reasonable flexibility to allow for changing circumstances.	
Does the Plan contain a framework of policies to enable the LPA to assess unforeseen circumstances?	Yes – policies in the Preferred Strategy which can allow for changing circumstances, e.g. safeguarding of mineral reserves (SP15) A range of potential options will be considered on the 8 large strategic sites through detailed Deposit Plan policies accompanied by SPG/Masterplans which can consider aspects such as phasing and mix of uses over a long term development schedule and allow for changes during Plan period.
Is the Plan so rigid it cannot respond to unexpected changes?	As the preferred strategy is a hybrid between large scale and locally based development it has a degree of flexibility in providing a wide range and choice of development options.