

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
3.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:		
Policy:				Map:						Issue: Policy Omission						
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The LDP should contain a generic policy to facilitate the development of telecommunications infrastructure in accordance with national guidance in TAN19.	
2 3	Representation text	
	We would suggest that within the Local Development Plan there should be a concise and flexible telecommunications policy. This should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;	
	Proposals for telecommunications development will be permitted provided that the following criteria are met: -	
	(i)the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;	
	(ii)if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;	
	(iii)if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.	
	(iv)If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.	
	When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.	
4 5	Changes sought	
	Inclusion of policy for telecommunications development similar to that suggested in Q4. above.	
9 7	Why no previous Representation	
	Do not appear to have received copy of preferred strategy, but commented upon Infrastructure Questionnaire in March 2008.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It will provide a policy as previously described in accordance with relevant national guidance.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

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4.D1			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:						Site:								PEX Session:	
Policy:				Map:				Issue:							
Summary:		-----													

47.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.22, para.3.5						Site:								PEX Session:	
Policy:				Map:				Issue: Vision & Objectives							
Summary:		-----													

Item Question

Representation Text

2 3 Representation text
A mix of dwelling types and thriving communities should also contribute to making good places to live, responding to context & character and local distinctiveness.

4 5 Changes sought
As Q3

Item Question

Reply

Soundness Tests

13 8 C2 Test? Does not have regard to national policy?

Yes

14 8 C3 Test? Does not have regard to Wales Spatial Plan?

Yes

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

Yes

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47.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.27, para.4.19				Site:										PEX Session:	
Policy:				Map:										Issue: Core Strategy	
Summary:															

Item	Question	Representation Text
2 3	Representation text All development must be well designed, sustainable and inclusive.	
4 5	Changes sought As Q3	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

47.D3			<input type="checkbox"/>	O	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047				Site:										PEX Session:	
Policy: AW 5				Map:										Issue: Design	
Summary:															

Item	Question	Representation Text
2 3	Representation text 1) The orientation of the building should maximise solar gain, while avoiding overheating. 2) EcoHomes has been replaced by the code for sustainable homes. (Refer MIPPS Draft) All development must be well designed, sustainable and inclusive.	

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47.D4			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.049						Site:									PEX Session:
Policy: AW 6				Map:				Issue: Design							
Summary:															

Item Question	Representation Text	
2 3 Representation text AW 6 (6) Public art should be integrated into the built form/townscape as appropriate.		
4 5 Changes sought As Q3		
Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

47.D5			<input type="checkbox"/>	O		M			<input type="checkbox"/>						
Document: Deposit Draft, p.049						Site:									PEX Session:
Policy: AW 6				Map:				Issue: Design							
Summary:															

Item Question	Representation Text	
2 3 Representation text AW 6 (5) The quality of built form must be a high standard if design throughout the Authority, not just at key locations.		
4 5 Changes sought As Q3		
Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

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59.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.062							Site:			PEX Session:						
Policy: AW 15				Map:			Issue: Minerals									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The statement that no coal extraction will be permitted within 500 metres of settlement conflicts with Policy CS10 which encourages the working of mineral resources prior to development and does not allow for the other exceptions identified in the recent Minerals TAN on coal.	
2 3	Representation text	
	Policy CS10 encourages the pre-working of minerals prior to development taking place. Policy AW15 conflicts with this in that it does not permit the extraction of coal within 500m of settlements. It is in the nature of development that it is likely to be adjacent to settlements. This exception is permitted by the recent MTAN on coal. Other exceptions are set out in the MTAN including where the working of coal would permit land reclamation to take place. Policy AW15 should allow for these exceptions.	
4 5	Changes sought	
	Policy AW15 should be amended with respect to coal extraction to permit extraction prior to development and to take into account the other exceptions permitted by the MTAN on coal, including where coal extraction would enable land reclamation to take place.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The changes will ensure consistency both within the Plan and with National Policy Statements. The Plan as a whole will be more coherent and effective.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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100.D1			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:		
Policy:				Map:						Issue: Vision & Objectives						
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Support for LDP Objective 5.	
2 3	Representation text Overall, FIT is pleased with the draft Plan with LDP Objective 5, Policy AW 6 and Policy AW 7 (and their supporting comments) recognising the role of recreational space in improving physical and mental health and wellbeing and helping to ensure there is sufficient provision and protection.	

100.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.049						Site:								PEX Session:		
Policy: AW 6				Map:						Issue: Design						
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Qualified support for policy AW 6.	
2 3	Representation text Overall, FIT is pleased with the draft Plan with LDP Objective 5, Policy AW 6 and Policy AW 7 (and their supporting comments) recognising the role of recreational space in improving physical and mental health and wellbeing and helping to ensure there is sufficient provision and protection.	

Policy AW 6 states that new developments must meet FIT standards on playing space provision. While pleased to see our recommendations adopted, ideally, FIT would prefer to see an Open Space Assessment conducted, taking into account the supply of and demand for different types of open spaces and local standards developed, as recommended in the new TAN 16 which was released at the beginning of February 2009. Is it possible to conduct and incorporate such an Assessment before the Plan is finalised? It is mentioned that one of the key aims of the new Local Development Plan system is to monitor and review plans so perhaps there will be an opportunity to incorporate an Assessment at a later stage if not ready for the first version?

With regard to FIT's recommendations contained within the document 'Planning and Design for Outdoor Sport and Play', as the title suggests, these refer only to space for outdoor sport and play and not open space in general and its many forms. FIT uses the term 'outdoor playing space' to encapsulate land for outdoor sport and play. Point 10 under Policy AW6 refers simply to 'open space' and then the supporting comments under 5.33 refer to 'formal playspace'. For clarity and consistency, perhaps the same term such as 'outdoor playing space' should be used. Further, the term 'formal' should not be used in isolation because there are also 'informal' spaces particularly for play that form an important contribution to the overall provision of 'outdoor playing space'.

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100.D3			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052						Site:								PEX Session:	
Policy: AW 7				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1	Issue Summary Support for policy AW 7.	
2	Representation text Overall, FIT is pleased with the draft Plan with LDP Objective 5, Policy AW 6 and Policy AW 7 (and their supporting comments) recognising the role of recreational space in improving physical and mental health and wellbeing and helping to ensure there is sufficient provision and protection. FIT welcomes Policy AW 7 as it will help to protect, maintain and enhance provision of public open space including playing space. Point 1 refers to development being permitted only if there is a surplus of such facilities. Surpluses can only be accurately determined through an assessment of supply compared against demand as in the Open Space Assessment mentioned above. FIT standards are a helpful baseline but they cannot ensure supply is meeting demand. Could there be a commitment included to investigate supply and demand? FIT is pleased to read point 3 of Policy AW 7 (particularly when compared to the similar point under 11.1.11 in Planning Policy Wales) as it clear in ensuring that only development that improves facilities will be permitted. FIT has not had the opportunity to review thoroughly all the sites proposed for development and checked whether any recreational spaces may be under threat. FIT trusts however that any proposals have complied with Policy AW 7 before being approved.	

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107.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 688//SSA 10.10		Hafod Wen \ Concorde Drive, Tonyrefail		Amend site boun		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The strategic housing allocation site includes land of national importance for nature conservation notified as a Site of Special Scientific Interest	
2 3	Representation text The strategic housing allocation site should not include land notified as a Site of Special Scientific Interest	
4 5	Changes sought The removal of the the land of national importance for nature conservation notified as a Site of Special Scientific Interest from this strategic housing allocation site	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It would bring it into line with Planning Policy Wales, TAN 5 (1996) and TAN5 Consultation draft (January 2006)		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	

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107.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 680//SSA 10.2		Trane Farm, Tonyrefail		Amend site boun		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary A strategic housing allocation site should not include land notified as a Site of Scientific Interest.	
2 3	Representation text The land notified as a Site of Scientific Interest should be removed from the strategic housing allocation area.	
4 5	Changes sought The land notified as a Site of Scientific Interest should be removed from the strategic housing allocation area.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Because it will be in line with Planning Policy Wales, TAN 5 (1996), and TAN 5 consultation draft (January 2006)		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

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116.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046							Site:			PEX Session:						
Policy: AW 4				Map:			Issue: Planning Obligations									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary There is no specific reference to water supply and sewerage infrastructure.	
2 3	Representation text No reference to water supply and sewerage which are a fundamental pre-requisite of Water & Sewerage Undertaker's Capital Programme are on fixed on 5 yearly cycles then it reasonable for developer to fund the essential improvements by way of planning obligations. Additional Information: Page 46 Policy AW4 Community Infrastructure & Planning Obligations We support this Policy but request the inclusion of 'water and sewerage infrastructure' to the list provided. These are material considerations in the planning process and are relevant to development proceeding. As a Statutory Water and Sewerage Undertaker, we always try to ensure that sufficient infrastructure exists for domestic developments. However, where such facilities may be deficient, Capital Investment under our 5 year Investment Plans usually remedy the problem. Our planned investment is dictated by our Regulators, Ofwat and the Environment Agency in terms of the funding received, the environmental standards and the timing of our planned Regulatory investment. Therefore there may be instances where developers' needs may not coincide with the timing of our planned investment, in particular where "lead in" times are required. The use of Planning Obligations can enhance the quality of development and enable proposals to go ahead which might otherwise be refused. Where development will create a need for extra facilities, in advance of an Undertaker's Regulatory investment, it may be reasonable for developers to meet or contribute towards the cost of providing such facilities.	
4 5	Changes sought Include new number 13 for 'Water and sewerage infrastructure'.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Water and sewerage are material considerations and relevant to include in planning obligations.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

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116.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.031			Site:			PEX Session:									
Policy: CS 2			Map:			Issue: Strategy Areas									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Sustainable communities rely on key components such as provision of infrastructure services (portable water and sewerage).	
2 3	Representation text No reference to water supply and sewerage which are a fundamental re-requisite of a development taking place. Additional Information: Page 31 Policy CS 2 Development in the South We fully support this Policy in promoting sustainable communities. However, a key component of sustainable communities is the provision of utility infrastructure, in particular water supply and sewerage. These services are an essential component of modern day living and safe and reliable water supplies and efficient foul drainage are all too often taken for granted for development. The ability to service new development is a prerequisite of the development taking place. PPW states that the planning system has an important part to play in ensuring that the infrastructure on which communities and businesses depend on is adequate to accommodate proposed development. Accordingly, for this policy, under sub point 8, we request a slight amendment to make reference to utility infrastructure. The full point to read - promoting and enhancing transport and other infrastructure services to support growth and investment.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Water supply and sewerage are material considerations and are considered relevant for development proceeding		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

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116.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030				Site:										PEX Session:	
Policy: CS 1				Map:										Issue: Strategy Areas	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Sustainable communities rely on key components such as provision of infrastructure services (portable water and sewerage).	
2 3	Representation text No reference to water supply and sewerage which are a fundamental pre-requisite of a development taking place. Additional information: Page 30 CS1 Development in the North We fully support this Policy in promoting sustainable communities. However, a key component of sustainable communities is the provision of utility infrastructure, in particular water supply and sewerage. These services are an essential component of modern day living and safe reliable water supplies and efficient foul drainage are all too often taken for granted for development. The ability to service new development is a prerequisite of the development taking place. PPW states that the planning system has an important part to play in ensuring that the infrastructure on which communities and businesses depend on is adequate to accommodate proposed development. Accordingly, for this policy, under sub point 8, we request a slight amendment to make reference to utility infrastructure. The full point to read - promoting and enhancing transport and other infrastructure services to support growth and investment.	

4 5	Changes sought Amend point 8 to include 'transport and other infrastructure'	
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Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Water supply and sewerage are material considerations and are considered relevant for development proceeding		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

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116.D4			<input type="checkbox"/>	S		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:							PEX Session:		
Policy: CS 11				Map:				Issue: Climate Change							
Summary:															

Item Question

Representation Text

2 3 Representation text
Managing surface water at source should be a prerequisite of planning to minimise risk of flooding . We fully support this Policy.

116.D5			<input type="checkbox"/>	S		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.045						Site:							PEX Session:		
Policy: AW 2				Map:				Issue: Design							
Summary:															

Item Question

Representation Text

2 3 Representation text
Additional Information
Page 45 Policy AW2(9) Sustainable Locations

We are pleased that point 9 is included within this policy as water and sewerage services must be taken into account for new development. Where development is allocated, this provides a statutory water and sewerage undertaker with a degree of certainty that the site will be developed and these can be built into planned investment programmes. For unallocated sites, it is very difficult to plan ahead and therefore developers should understand that improvements to infrastructure may be required at their own expense, if no Regulatory investment is planned by the undertaker.

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138.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090, para.6.97 - 6.100		Site: 775//NSA 25.7		Rhondda Fawr Northern Cwm		Amend site boun		PEX Session:							
Policy: NSA 25		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The submission site should be deleted from the Special Landscape Areas designation.	
2 3	Representation text The site falls within a special landscape desingation made under the provisions of policy 25.7. The site, which is comprises urban fringe land and is partially enclosed by existing urban development, does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the Special Landscape Area designation made under the provisions of policy NSA 25.7.	
9 7	Why no previous Representation Harmers has only recently been instructed in relation to this site, however the extent of special landscape designations was not known until the Deposit Plan stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing and an amendment to the settlement boundary. The need to ensure that there is an adequate extent, range and choice of housing sites wich are deliverable, particularlry in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of Special Landscape Areas.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site:				Settlement Boun		PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary should be amended to include the site edged in red on the attached plan under the provisions of policy NSA 12.		
2 3	Representation text	
it is submitted that the settlement boundary should be amended to include the site edged in red on the attached plan. Related submissions have been made that this site should be allocated for housing. The amendment would comprise a logical revision to that currently shown on the proposals map and would rationalise the settlement boundary in this location. The site relates well to existing development, adjoining existing development to the north, east and south. The allocation of this site would comprise a logical rounding off of this part of Blaenrhondda.		
4 5	Changes sought	
The settlement boundary in Blaenrhondda should be amended to include the site shown edged in red on the attached plan under the provisions of policy NSA 12.		
9 7	Why no previous Representation	
Harmers has only recently been instructed in relation this site. However, the proposed development would be compatible with the Council's proposals for Blaenrhondda.		
21 11	Why attend Examination?	
This submission is related to additional representations requesting the allocation of this site for housing and its deletion from a Special Landscape Area. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of settlement boundaries.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
The allocation of the site shown on the attached plan for housing and the related inclusion within the settlement boundary would help meet housing needs in Blaenrhondda. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Blaenrhondda is available to meet short term housing need. Further, the site comprises a logical rounding off of this part of the settlement. The inclusion of this site within the settlement boundary and its allocation for housing would make the plan's policies more robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077, para.6.44 - 6.45							Site:		New Site			PEX Session:				
Policy: NSA 9				Map:			Issue: Housing Allocation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged in red on the attached plan should be allocated for residential development, with a substantial proportion to comprise affordable housing, under the provisions of policy NSA9.	
2 3	Representation text	
	It is submitted that the site is suitable to accommodate residential development, with substantial proportion to comprise affordable housing. The site relates well to existing and proposed built up limits and would comprise a logical rounding off of this part of Blaenrhondda and rationalise the limit of development in this locality. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide a substantial proportion of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development, including a substantial proportion of affordable housing, under the provisions of policy NSA 9.	
9 7	Why no previous Representation	
	Harmers has only recently been instructed in relation to this site but the allocation would be compatible with the Council's proposals for Blaenrhondda.	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs, including those of affordable housing is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Blaenrhondda is available to meet short term housing need. Further, the site comprises a logical rounding off of this part of the settlement within logical boundaries and relates well to existing development. The site would help address both general and affordable housing needs, is appropriate for housing development and its allocation would make the LDP's policies more robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D4			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113, para.6.176 - 6.179		Site: 818//SSA 22.4		Llanharan, Llanharry & Pontyclun		Amend site boun		PEX Session:							
Policy: SSA 22		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The submission site should be deleted from the green wedge designation.	
2 3	Representation text The site falls within an extensive green wedge designation between Llanharry, Llanharan and Pontyclun made under the provisions of policy 22.4. The allocation of this site for development and its deletion from the green wedge would not lead to the coalescence of settlements.	
4 5	Changes sought The site should be deleted from the Green Wedge designation made under the provisions of policy SSA22.4.	
9 7	Why no previous Representation Harmers has only recently been instructed in relation to this site, however the extent of the green wedge designations was not known until the deposit Plan stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing and an amendment to the settlement boundary. The need to ensure that there is an adequate extent, range and choice of housing sites, which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs, including those of affordable housing, is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of Green Wedges.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the green wedge would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D5			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:		Deposit Draft, p.108, para.6.157 - 6.158			Site:				Settlement Boun		PEX Session:				
Policy:		SSA 13			Map:				Issue: Settlement Boundary						
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The settlement boundary should be amended to include the site edged in red on the attached plan under the provisions of policy SSSA 13.	
2 3	Representation text It is submitted that the settlement boundary should be amended to include the site edged in red on the attached plan. Related submissions have been made that this site should be allocated for housing. The site relates well to existing built up limits, adjoining existing development on three boundaries. The amendment would comprise a logical change to the settlement boundary in this locality.	
4 5	Changes sought The settlement boundary should be amended to include the site shown edged in red on the attached plan under the provisions of policy SSA 13.	
9 7	Why no previous Representation Harmers has only recently been instructed in relation this site. However the proposed development would be compatible with the Council's strategy to identify Llantrisant/ Talbot Green as a Principal Town.	
21 11	Why attend Examination? This submission is related to additional representations requesting the allocation of this site for housing and its deletion from a green wedge. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of settlement boundaries.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of the site shown on the attached plan for housing and the related inclusion within the settlement boundary would help meet housing needs in Llantrisant / Talbot Green. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Tyle Garw is available to meet short term housing need. Further, the site comprises a logical settlement extension. The inclusion of this site within the settlement boundary and its allocation for housing would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D6			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149		Site:								New Site		PEX Session:			
Policy: SSA 10		Map:								Issue: Housing Allocation					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The site edged in red on the plan should be allocated for residential development, with a substantial proportion to comprise affordable housing, under the provisions of policy SSA10.		
2 3	Representation text	
It is submitted that this site is suitable to accommodate residential development, with a substantial proportion to comprise affordable housing. The site relates well to existing and proposed built up limits and would comprise a logical settlement extension of this part of Tyle Garw. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide a substantial proportion of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.		
4 5	Changes sought	
The site should be allocated for residential development, including a substantial proportion of affordable housing, under the provisions of policy SSA10.		
9 7	Why no previous Representation	
Harmers has only recently been instructed in relation to this site but the allocation would be compatible with the proposed identification of Llantrisant/ Talbot Green as a Principal Town.		
21 11	Why attend Examination?	
The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs, including those of affordable housing, is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Tyle Garw is available to meet short term housing need. Further, the site comprises a logical extension to this part of the settlement. The site would help address affordable housing needs, is appropriate for housing development and its allocation would make the LDP's policies more robust and more compliant with national policy.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090, para.6.97 - 6.100		Site: 774//NSA 25.6		Cwm Orci		Amend site boun		PEX Session:								
Policy: NSA 25		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The submission site should be deleted from the Special Landscape Area designation.	
2 3	Representation text The site falls within a special landscape designation made under the provisions of policy 25.6. The site, which adjoins existing urban development, does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the special landscape area designation made under the provisions of policy NSA 25.6.	
9 7	Why no previous Representation Harmers has only recently been instructed in relation to this site, however, the extent of special landscape designations was not known until the Deposit plan satge.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing and to a settlement boundary amendment. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing need is one which is fundamental to the soundness of the LDP and is an issue which should be considered at examination rather than by written representations. The same applies to the identification of Special Landscape Areas.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D8			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079, para.6.55 - 6.61		Site:		Settlement Boun		PEX Session:									
Policy: NSA 12		Map:		Issue: Settlement Boundary											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary should be amended to include the site edged in red on the attached plan under the provisions of policy SSA12.		
2 3	Representation text	
It is submitted that the settlement boundary should be amended to include the site edged in red on the attached plan. Related submissions have been made that this site should be allocated for housing. The amendment would comprise a logical revision to that currently shown on the proposals map and would rationalise the settlement boundary in this location. The site relates well to existing development, with. The allocation of this site would comprise a logical rounding off of this part of Treorchy.		
4 5	Changes sought	
The settlement boundary in Treorchy should be amended to include the site shown edged in red on the attached plan under the provisions of policy NSA12.		
9 7	Why no previous Representation	
Harmers has only recently been instructed in relation this site. However, the proposed development would be compatible with the Council's strategy to identify Treorchy as a key settlement.		
21 11	Why attend Examination?	
This submission is related to additional representations requesting the allocation of this site for housing and its deletion from a Special Landscape Area. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of settlement boundaries.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
The allocation of the site shown on the attached plan for housing and the related inclusion within the settlement boundary would help meet the housing needs in Treorchy. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Treorchy is available to meet short term housing need. Further, the site comprises a logical rounding off of this part of the settlement. The inclusion of this site within the settlement boundary and its allocation for housing would make the plan's policies more robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D9			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077, para.6.44 - 6.45		Site:								New Site		PEX Session:			
Policy: NSA 9		Map:								Issue: Housing Allocation					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged in red on the attached plan should be allocated for residential development, with a substantial proportion to comprise affordable housing, under the provisions of policy NSA 9.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate residential development, with a substantial proportion to comprise affordable housing. The site relates well to existing and proposed built up limits and would comprise a logical extension of this part of Treorchy. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide a substantial proportion of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development, including a substantial proportion of affordable housing, under the provisions of policy NSA 9.	
9 7	Why no previous Representation	
	Harmers has only recently been instructed in relation to this site but the allocation would be compatible with the proposed identification of Treorchy as a key settlement.	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs, including those of affordable housing, is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Treorchy is available to meet short term housing need. Further, the site comprises a logical extension of this part of the settlement. The site would help address affordable housing needs, is appropriate for housing development and its allocation would make the LDP's policies more robust and be compliant with national policy (SIC)		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D10			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090, para.6.97 - 6.100		Site: 774//NSA 25.6		Cwm Orci		Amend site boun		PEX Session:							
Policy: NSA 25		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The submission site should be deleted from the special landscape area designation.	
2 3	Representation text The site falls within a special landscape designation made under the provisions of policy 25.6. The site, which is substantially enclosed by existing urban development, does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the special landscape area designation made under the provisions of policy NSA 25.6.	
9 7	Why no previous Representation Harmers has only recently been instructed in relation to this site, however, the extent of special landscape designations was not known until the Deposit plan stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of Special Landscape Areas.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's polices more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
138.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079, para.6.55 - 6.61							Site:		Settlement Boun PEX Session:							
Policy: NSA 12				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The settlement boundary should be amended to include the site edged in red on the attached plan under the provisions of policy NSA 12.	
2 3	Representation text	
	It is submitted that the settlement boundary should be amended to include the site edged in red on the attached plan. Related submissions have been made that this site should be allocated for housing. The amendment would comprise a logical revision to that currently shown on the Proposals Map and would rationalise the settlement boundary in this location. The site relates well to existing development, with only one boundary not adjoining existing development. The allocation of this site would comprise a logical rounding off of this part of Treorchy.	
4 5	Changes sought	
	The settlement boundary in Treorchy should be amended to include the site shown edged in red on the attached plan under the provisions of policy NSA 12.	
9 7	Why no previous Representation	
	Harmers has only recently been instructed in relation to this site. However, the proposed development would be compatible with the Council's strategy to identify Treorchy as a key settlement.	
21 11	Why attend Examination?	
	This submission is related to additional representations requesting the allocation of this site for housing and its deletion from a Special Landscape Area. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. The same applies to the identification of settlement boundaries.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The allocation of the site shown on the attached plan for housing and the related inclusion within the settlement boundary would help to meet housing needs in Treorchy. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Treorchy is available to meet short term housing need. Further, the site comprises a logical rounding off of this part of this part of the settlement. The inclusion of this site within the settlement boundary and its allocation for housing would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
138.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.077, para.6.44 to 6.45							Site:		New Site			PEX Session:					
Policy: NSA 9				Map:				Issue: Housing Allocation									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
The site edged in red on the attached plan should be allocated for residential development, with a substantial proportion to comprise affordable housing, under the provisions of policy NSA 9.		
2 3	Representation text	
It is submitted that this site is suitable to accommodate residential development, with a substantial proportion to comprise affordable housing. The site relates well to existing and proposed built up limits and would comprise a logical rounding off of this part of Treorchy. The allocation would rationalise the limit of development in this locality. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide a substantial proportion of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.		
4 5	Changes sought	
The site should be allocated for residential development, including a substantial proportion of affordable housing, under the provisions of policy NSA 9.		
9 7	Why no previous Representation	
Harmers has only recently been instructed in relation to this site but the allocation would be compatible with the proposed identification of Treorchy as a key settlement.		
21 11	Why attend Examination?	
The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Treorchy is available to meet short term housing need. Further, the site comprises a logical rounding off of this part of the settlement within logical boundaries. The site would help address affordable housing needs, is appropriate for housing development and its allocation would make the LDP's policies more robust and more compliant with national policy.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
156.D1			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060				Site:				PEX Session:							
Policy: AW 14				Map:				Issue: Minerals							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Safeguarded areas for coal	
2 3	Representation text As the leading coal producing company in Wales, we are pleased to see the incorporation of safeguarded areas for coal, according as it does with Minerals Technical Advice 2 (Coal).	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
231.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.106				Site: 696//SSA 10.18		Gelliwion Reclamation, Pontypridd		Delete Site		PEX Session:							
Policy: SSA 10				Map:		Issue: Housing Allocation											
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Inappropriateness (sic) of site	
2 3	Representation text The site is: -On a steep incline -Is a spoil site reclaimed -Has poor access -The area cannot sustain additional houses through lack of adequate infrastructure e.g. school expansion	
4 5	Changes sought Site not included for residential development but designed as leisure area	

Item	Question	Reply	Soundness Tests
11 8	P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The designation for residential development does not acknowledge the potential problems of access infrastructure or possible ground contamination		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079		Site: 57/52 Tremains Pub Park Road rear						PEX Session:							
Policy: NSA 12		Map:		Issue: Settlement Boundary											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Site at rear of Tremains Pub, Park Road, Cwmparc		
2 3	Representation text This site has been abused regularly by quad and mountain bikers. Its development as a residential area would be welcomed. However, it lies above colliery workings an might be unstable. It gives off methane gas and is regularly monitored.		
4 5	Changes sought Develop for housing - not apartments		
6 6	Candidate Site Ref No 52		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

255.D2			<input type="checkbox"/>		W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.052		Site: 50/45 Ynyswen Infants School opp						New Site		PEX Session:					
Policy: AW 7		Map:		Issue: Design											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Site opposite Ynyswen Infants School, Treorchy		
2 3	Representation text The ward members recommend this site be retained and developed as a play area for both schools I.e. Ynyswen Infants and Ynyswen Welsh Primary.		
6 6	Candidate Site Ref No 45		
Item	Question	Reply	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D3			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052		Site: 398/402 Prospect Green, Prospect Place							New Site		PEX Session:					
Policy: AW 7		Map:							Issue: Design							
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Prospect Green, Prospect Place, Treorchy	
2 3	Representation text The Authority has already agreed to the retention of this Site as 'PUBLIC OPEN SPACE'. We strongly support local residents' application its designation as a 'VILLAGE GREEN'.	
6 6	Candidate Site Ref No 402	

Item	Question	Reply	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D4			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.083		Site: 54/49 Cae Mawr Industrial Estate									PEX Session:					
Policy: NSA 16		Map:							Issue: Employment							
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Proposed residential development on CAE MAWR INDUSTRIAL ESTATE, TREORCHY	
2 3	Representation text This site has always been designated as an Industrial one. We have pressed, constantly, for its re-development for employment, and oppose residential, or a mixed of residential and industrial use.	
6 6	Candidate Site Ref No 49	

Item	Question	Reply	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 668//NSA 9.18		Cemetery Road, Treorchy		Delete Site		PEX Session:					
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Residential Development of site off Cemetery Road, Treorchy		
2 3	Representation text Until recently there was an Amenity Site at the top of Cemetery Rd. It has been closed, but efforts are being made to have it reopened. It is a cul-de-sac, and on one side is the busy Cemetery; and at the base of the steep hill is an undertaker's and Chapel of Rest. There is already a problem of vehicle movement, and adding 80 houses to the existing estate will render conditions hazardous.		
4 5	Changes sought Retain and develop the site as an open area.		
6 6	Candidate Site Ref No 46		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D6			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052										Site: 58/53 Alison House Community Facility adj			New Site		PEX Session:	
Policy: AW 7				Map:				Issue: Design								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary LAND ADJACENT TO ALISON HOUSE COMMUNITY FACILITY CWMPARC, TREORCHY	
2 3	Representation text This one-time, little used, DAY CENTRE was CLOSED AND Has been replaced by a thriving YOUTH CENTRE. The land around the building was designated for development as a ADVENTURE Playground. We strongly support such a facility	
6 6	Candidate Site Ref No 53	

Item	Question	Reply	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
255.D7			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079										Site: 52/47 Crichton Street			Delete Site		PEX Session:	
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Development of Site at Crichton Street, Treorchy.	
2 3	Representation text This site has proved to be a most useful parking facility in this narrow one-way street. It is close to the main highway and is at the entrance to the Ynyswen Industrial Estate. It is a busy area. At this moment 6 vehicles are parked on it. We urge its retention for parking.	
4 5	Changes sought Retain for parking.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
258.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 30/22		Heol Llechau				New Site		PEX Session:			
Policy: NSA 9				Map:						Issue: Housing Allocation					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	I believe that concerns regarding access could be well overcome as the topography would be on no concern considering the flatness of the land in question.	
2 3	Representation text	
	The development of the site would enable young people in the area will be able to live in modern homes.	
4 5	Changes sought	
	I believe that the Deposit Plan should be allocated for housing development.	
6 6	Candidate Site Ref No	
	22	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
297.D1			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039				Site: 733//CS 9.2		Hirwaun Industrial Estate				PEX Session:					
Policy: CS 9		Map:		Issue: Waste Management											
Summary:															

Item	Question	Representation Text
1	2 Issue Summary	Objection to Strategic Waste site identified at Hirwaun
2	3 Representation text	<p>We consider that the Proposed Strategic Waste Site CS 9.2 at Hirwaun Industrial Estate would have a negative impact on the special features of Brecon Beacons National Park. This is primarily due to the size of the Strategic Waste Site as it encompasses all of Hirwaun Industrial Estate.</p> <p>We are aware that the area was included in the Regional Waste Plan 1st Review as potentially available land as it is allocated as a 'B2 Employment and Major Industry Site'. However, as sites within the National Park Boundary were excluded from the search we consider that a site in such close proximity to the Park should have regard to the Special Qualities. The scale of the site does not reflect this along with any potential emissions associated with waste management facilities.</p>

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
306.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, para.1.47						Site:			PEX Session:							
Policy:				Map:				Issue: Introduction & Context								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Changes to the statement regarding mineral safeguarding.	
2 3	Representation text BACKGROUND ON THE COAL AUTHORITY The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on coal mining. The Coal Authority set up a new Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to the Coal Authority in terms of policy making relate to: • the safeguarding of coal as a mineral in accordance with the advice contained in Planning Policy Wales, Minerals Planning Policy Wales and MTAN2 in Wales; and • ensuring that future development is undertaken safely and reduce the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in Planning Policy Wales, Minerals Planning Policy Wales and MTAN2 in Wales. Surface Coal Resources and Prior Extraction You will be aware that the Rhondda Cynon Taf area contains coal resources which are capable of extraction by surface mining operations. This information is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence. The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required. The changes which The Coal Authority would like to see in relation to mineral safeguarding are: The list of National Policy should include reference to the new MTAN2 on Coal	
4 5	Changes sought The list of National Policy should include reference to the new MTAN2 on coal.	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, para.2.7						Site:			PEX Session:						
Policy:				Map:			Issue: Key Issues								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Key Environmental Trends	
2 3	Representation text The list of Key Environmental Trends needs to also include reference to the majority of the County Borough being located on the coal resource, with substantial mining legacy being present. To reflect the full range of spatial planning issues that are present within the County Borough.	
4 5	Changes sought The list of Key Environmental Trends needs to also include reference to the majority of the County Borough being located on the coal resource, with substantial mining legacy being present. To reflect the full range of spatial planning issues that are present within the County Borough.	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
306.D3			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040						Site:								PEX Session:	
Policy: CS 10				Map:				Issue: Minerals							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary Safeguarding and prevention of sterilisation of Minerals.		
2 3	Representation text The Coal Authority supports the safeguarding and prevention of the sterilisation of minerals, including coal, through this policy.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
306.D4			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.058							Site:			PEX Session:							
Policy: AW 12				Map:			Issue: Renewable Energy/Wind farms										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Sterilisation of mineral resource.	
2 3	Representation text Whilst noting the National Policy position that windfarms are a temporary land use, The Coal Authority is concerned about the sterilisation effect that such renewable energy development has on mineral resources including coal. The lifespan of such development is for around 25 years, which is a substantial period, it is also likely that such use of land is likely to be renewed in the future, making them effectively new permanent land uses. Such windfarms cover an extensive area, this has the potential to sterilise substantial areas of economically viable mineral resource, consequently in making decisions on such developments the policy considerations should include the effect of mineral sterilisation, and whether it is possible or practical to encourage prior extraction of the mineral resources. The Coal resources under Wales are a vital resource for the future energy security for the UK.	
4 5	Changes sought An appropriate reference to encourage the prior extraction of coal resources in advance of development in accordance with the MTAN2 paragraph 42 To ensure that coal resources are safeguarded and prevented from unnecessary sterilisation in line with the advice in paragraph 13 of Minerals Planning Policy Wales and paragraphs 34 to 43 of MTAN2.	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059						Site:			PEX Session:						
Policy: AW 13				Map:			Issue: Renewable Energy/Wind farms								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Sterilisation of mineral resource.	
2 3	Representation text Whilst noting the National Policy position that windfarms are a temporary land use, The Coal Authority is concerned about the sterilisation effect that such renewable energy development has on mineral resources including coal. The lifespan of such development is for around 25 years, which is a substantial period, it is also likely that such use of land is likely to be renewed in the future, making them effectively new permanent land uses. Such windfarms cover an extensive area, this has the potential to sterilise substantial areas of economically viable mineral resource, consequently in making decisions on such developments the policy considerations should include the effect of mineral sterilisation, and whether it is possible or practical to encourage prior extraction of the mineral resources. The Coal resources under Wales are a vital resource for the future energy security for the UK.	
4 5	Changes sought An appropriate reference to encourage the prior extraction of coal resources in advance of development in accordance with the MTAN2 paragraph 42 To ensure that coal resources are safeguarded and prevented from unnecessary sterilisation in line with the advice in paragraph 13 of Minerals Planning Policy Wales and paragraphs 34 to 43 of MTAN2.	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D6			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.056				Site:				PEX Session:							
Policy: AW 10				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Safeguarding of minerals.	
2 3	Representation text The Coal Authority supports the safeguarding and prevention of the sterilisation of minerals, including coal, through this policy.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060							Site:			PEX Session:						
Policy: AW 14				Map:			Issue: Minerals									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Safeguarding of Minerals & Policy Omission Minerals.	
2 3	Representation text	
	The Coal Authority wishes to see all coal resources, Primary, Secondary and Tertiary safeguarded consistently across the whole of the UK. Given the changing energy markets and the issues of energy security for the Country, the Coal Authority considers that Primary, Secondary and Tertiary coal resources are likely to be potentially economically viable over the coming plan period and as such should be safeguarded to prevent their unnecessary sterilisation. The approach pursued by Rhondda Cynon Taf appears to be broadly in line with the new MTAN2, but will need to be reconsidered in light of the publication of this new guidance, in particular the four stage approach set out in paragraph 34 to 43 of MTAN2. MTAN2 requires local development plans to identify:	
	<ul style="list-style-type: none"> • Areas where coal operations would not be acceptable (see paragraphs 26 to 31 of MTAN2); • Buffer zones around existing and proposed coal extraction operations (see paragraphs 32 to 33 of MTAN2) • Areas of coal resource to be safeguarded (see paragraphs 34 to 43 of MTAN2) • Areas of Past, present and future coal mining (see paragraph 228 of MTAN2, the Coal Authority considers this should be the coalfield polygon supplied to the County Borough previously). It is important to remember that there is no requirement to remove the areas where coal working is not acceptable or any sort of separation distance around settlements or designations from the areas safeguarded.	
4 5	Changes sought	
	To reflect the advice set out in MTAN2. Policies should also set out the principle considerations against which new coal proposals should be considered, as paragraph 44 of MTAN2 requires, and the preference for prior extraction as paragraph 42 requires.	
9 7	Why no previous Representation	
	We were not consulted.	
21 11	Why attend Examination?	
	Attendance at the Examination is felt to be necessary to present the case for these issues, to explain and debate with participants and the Inspector the relevancy and importance of the case proposed.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7														

306.D8

O

I

M

Document: Deposit Draft, p.062

Site:

PEX Session:

Policy: AW 15

Map:

Issue: Minerals

Summary:

Item Question

Representation Text

1 2 Issue Summary
Community Amenity Protection Buffer Zones.

2 3 Representation text
The Coal Authority considers that this policy represents an inflexible policy tool which does not reflect the advice set out in MTAN2. Such rigid application of set distances around settlements will lead to the sterilisation of substantial amounts of coal resources across Wales. In a joint study undertaken by the BGS and the Coal Authority, the application of a rigid 500m distance around settlements will lead to the sterilisation of some 50% of the surface coal resource in South Wales. As this policy is currently written it could be utilised to prevent the land remediation proposed on a number of the key strategic sites on the edge of settlements, and it may also prevent constraints being removed from land allocated for new development, in terms of dealing with land instability and mining legacy prior to their beneficial reuse in terms of new development.

4 5 Changes sought
This policy should be reconsidered in light of the advice set out in paragraphs 26 to 31 and paragraphs 49 to 54 of MTAN2. The policy should allow for a more flexible approach as MTAN2 alludes to in the advice in paragraphs 49 to 54, allowing for circumstances such as where this will bring about land remediation, or it is for overriding significance for regeneration, employment and local economic reasons.

9 7 Why no previous Representation
We were not consulted.

21 11 Why attend Examination?
Attendance at the Examination is felt to be necessary to present the case for these issues, to explain and debate with participants and the Inspector the relevancy and importance of the case proposed.

Item Question

Reply

Soundness Tests

13 8 C2 Test? Does not have regard to national policy? Yes

19 8 CE4 Test? Not flexible to deal with changing circumstances? Yes

20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan
It does not have regard to national policy.
It is not reasonably flexible to enable it to deal with changing circumstances.
The policy fails to recognise the flexible approach advocated in MTAN2.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan? Yes

7 7 Previous Representations? Did you make any previous representations on this issue during the Cons No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
306.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.23, para.10							Site:			PEX Session:							
Policy:				Map:				Issue: Vision & Objectives									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Coal Mining Legacy.	
2 3	Representation text As you will be aware, the Rhondda Cynon Taf area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities. Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface, including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur. The Coal Authority has records of over 178,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. It is estimated that as many as 2 million properties of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas needs to take account of the coal mining legacy issues. The principal source of guidance is Planning Policy Wales and MTAN2, which sets out the Policy and best practice on how to safely treat unstable ground. Within the wider County Borough there substantial numbers of recorded mine entries and numerous other coal mining related hazards spread right across the plan area. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters warrant investigation by the Local Planning Authority to ensure sites allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy is a minerals related development it is important that new development delivered through the Welsh LDP, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.	
4 5	Changes sought The Coal Authority would wish to see objective No.10 reworded slightly to reflect the fact that unstable land may be present on a number of sites, and that restoration and regeneration of such sites which not only tackle dereliction but also land instability. The Coal Authority would wish to see the objective reworded as follows: "Promote the efficient and appropriate use of land, soil and minerals throughout the County Borough by maximising the use of land, promoting the reuse and restoration of derelict and unstable land and buildings and the safeguarding of resources of local, regional and national importance where they occur in Rhondda Cynon Taf." To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.	
9 7	Why no previous Representation We were not consulted.	
21 11	Why attend Examination? Attendance at the Examination is felt to be necessary to present the case for these issues, to explain and debate with participants and the Inspector the relevancy and importance of the case proposed.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
13	8	C2 Test? Does not have regard to national policy?													Yes
19	8	CE4 Test? Not flexible to deal with changing circumstances?													Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan													
It does not have regard to national policy.															
It is not reasonably flexible to enable it to deal with changing circumstances.															
To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No

306.D10 S W M

Document: Deposit Draft Site: PEX Session:

Policy: Map: Issue: Core Strategy

Summary:

<i>Item Question</i>										Representation Text					
1	2	Issue Summary													
Chapter 4, Strategic Sites, Principal Town Growth Areas & Key Diagram.															
2	3	Representation text													
The Coal Authority supports the general thrust of the LDP strategy which includes the identification of a number of strategic sites which will help to tackle mining legacy within the County Borough for the benefit of local communities. For general information mining legacy issues are present at the following strategic sites and locations:															
Principal Town Growth Areas															
Pontypridd & Llantrisant – Substantial scale of mining legacy.															
Aberdare – Some mining legacy issues are present.															
Strategic Sites															
Former Maerdy Colliery Site; Former Fernhill Colliery Site; Robertstown/Abermant; Land south of Hirwaun/Penywaun; Cwm Colliery & Coking Works Site & Former Llanilid OCC Site – Substantial scale of mining legacy.															
Former Phumacite Site & Mwyndy/Talbot Green – Some mining legacy issues are present.															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030						Site:			PEX Session:						
Policy: CS 1				Map:		Issue: Strategy Areas									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Development in the North.	
2 3	Representation text The Coal Authority considers that this policy could be improved by referring to the issue of remediation within the policy, given that this is at the heart of the overall strategy approach of the LDP. The policy could be reworded as follows: "3. Ensuring the removal AND REMEDIATION of dereliction by promoting the reuse of under used and derelict land and buildings;"	
4 5	Changes sought The policy could be reworded as follows: "3. Ensuring the removal AND REMEDIATION of dereliction by promoting the reuse of under used and derelict land and buildings;"	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
306.D12			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032				Site:										PEX Session:	
Policy: CS 3				Map:										Issue: Strategic Sites	
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary Strategic sites.		
2 3	Representation text The Coal Authority supports this policy.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
306.D13			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.032							Site:			PEX Session:							
Policy: CS 3				Map:			Issue: Strategic Sites										
Summary:																	

Item	Question	Reply	Soundness Tests	Tick box Replies
1 2	Issue Summary Strategic sites.			
2 3	Representation text The Coal Authority considers that the policy should include reference to the positive benefit that remediation will make to these strategic sites when they are brought forward.			
4 5	Changes sought The Coal Authority would suggest the following amended wording: "4.38 The location and scale of these sites presents an opportunity for significant new development AND REMEDIATION to take place across the County Borough..."			
9 7	Why no previous Representation We were not consulted.			
13 8	C2 Test? Does not have regard to national policy?	Yes		
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.			
3 4	Seek changes? Any changes to be made to the Plan?	Yes		
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D14			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040						Site:								PEX Session:	
Policy: CS 10				Map:				Issue: Minerals							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Minerals.	
2 3	Representation text The Coal Authority considers that the policy should include reference to the need to ensure ground stability as part of appropriate restoration for mineral sites.	
4 5	Changes sought The Coal Authority would suggest the following amended wording: "4. Ensuring that adequate restoration and aftercare measures are incorporated TO PREVENT FUTURE PUBLIC SAFETY OR LAND INSTABILITY ISSUES ARISING."	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D15			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047						Site:			PEX Session:						
Policy: AW 5						Map:			Issue: Design						
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Design & Placemaking.	
2 3	Representation text The Coal Authority would suggest the following amended wording: "13. The development reflects and enhances the cultural heritage of Rhondda Cynon Taf AND ADDRESSES THE LEGACY OF ANY FORMER USES INCLUDING IN REALTION TO GROUND STABILITY."	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances. To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.		

Item	Question	Reply	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D16			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.056						Site:			PEX Session:						
Policy: AW 10				Map:			Issue: Environment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Supports [AW 10] but would require inclusions within the justification text.	
2 3	Representation text The Coal Authority supports this policy.	
4 5	Changes sought The following wording is suggested for inclusion within the justification text for this policy: "It is important that new development delivered through this LDP, recognises the issues raised by former mining uses and how they can be positively addressed through new development. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. The strategy of this LDP is focussed on tackling such issues for the benefit of local communities."	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances. To comply with guidance set out in Planning Policy Wales paragraphs 13.9.1 and 13.9.2, together with advice set out in paragraphs 188, 227, 228 and 253 of MTAN2.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D17			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.067		Site: 1//NSA 4 0STR Maerdy Colliery						PEX Session:							
Policy: NSA 4		Map:		Issue: Strategic Sites											
Summary:															

Item Question	Representation Text
1 2 Issue Summary Former Maerdy Colliery site.	
2 3 Representation text The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

306.D18			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.069		Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda						PEX Session:							
Policy: NSA 5		Map:		Issue: Strategic Sites											
Summary:															

Item Question	Representation Text
1 2 Issue Summary Former Fernhill Colliery site.	
2 3 Representation text The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D19			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:			PEX Session:						
Policy: NSA 12				Map:		Issue: Settlement Boundary									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Housing Development Within and Adjacent to Settlement Boundaries

2 3 Representation text
The Coal Authority supports the recognition within this policy of the issue of land instability and adequate remediation.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan? No

306.D20			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.091						Site:			PEX Session:						
Policy: NSA 27				Map:		Issue: Environment									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Land Reclamation Schemes.

2 3 Representation text
The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan? No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D21			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.103		Site: 8//SSA 9 0STR OCC Llanilid							PEX Session:							
Policy: SSA 9		Map:			Issue: Strategic Sites											
Summary:																

Item Question

Representation Text

1 2 Issue Summary
Former OCC site, Llanilid.

2 3 Representation text

The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

306.D22			<input type="checkbox"/>	S		M				<input type="checkbox"/>						
Document: Deposit Draft, p.108		Site:							PEX Session:							
Policy: SSA 13		Map:			Issue: Settlement Boundary											
Summary:																

Item Question

Representation Text

1 2 Issue Summary
Housing Development Within and Adjacent to Settlement Boundaries.

2 3 Representation text

The Coal Authority supports the recognition within this policy of the issue of land instability and adequate remediation.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
306.D23			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.115				Site:				PEX Session:							
Policy: SSA 24				Map:				Issue: Environment							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Land Reclamation Schemes.	
2 3	Representation text The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
306.D24			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft							Site:			PEX Session:						
Policy:				Map:			Issue: Appendix 1									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Allocations.	
2 3	Representation text The Coal Authority welcomes the opportunity to make these comments, we are of course willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of its concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on any future documents.	
4 5	Changes sought The Coal Authority considers that it may be prudent to indicate that most of the sites allocated within the LDP may need a ground stability report undertaken which includes consideration of the issues of mining legacy, this would help ensure that the issue was brought to the attention of readers of the LDP.	
9 7	Why no previous Representation We were not consulted.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It does not have regard to national policy. It is not reasonably flexible to enable it to deal with changing circumstances. To accord with the guidance in paragraph 253 of MTAN2		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
306.D25			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.098				Site: 6//SSA 7 0STR Cwm Colliery				PEX Session:							
Policy: SSA 7				Map:				Issue: Strategic Sites							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary Former Cwm Colliery & Coking Works Site.		
2 3	Representation text The Coal Authority supports the positive impact that land remediation will bring to this site and the positive contribution its redevelopment will bring to the County Borough.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
319.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site:						Settlement Boun		PEX Session:			
Policy: NSA 12				Map:						Issue: Settlement Boundary					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We wish the settlement boundary to be extended beyond the immediate perimeter of the rear of St Winifred's Church in Wales in Penywaun to include a proposed site for a strategic improvement of physical infrastructure, namely a new integrated services building.	
2 3	Representation text	
	For the past two years, WAG's Department for the Economy & Transport have been consulting with the local community regarding the need for a new building which would address deep-rooted issues of poor access to services and high levels of economic inactivity in Penywaun, officially the 2nd most deprived political ward in Wales. The building would house a mixture of service delivery and enterprise initiatives. The site that has been under investigation is the plot marked by the hatched orange area on the attached plan, which allows for parking and landscaping in addition to the area required for the building itself. The building would be a landmark for regeneration in the area and will be one of very few facilities to house conferences within easy reach of the new A465 Heads of the Valleys route. There is no comparable site within the local community and this prominent project will have a significant positive impact upon the social and economic wellbeing of Penywaun for years to come.	
4 5	Changes sought	
	We wish to see the settlement boundary as indicated by the orange hatched area on the attached plan.	
9 7	Why no previous Representation	
	We were unaware of the process for consultation until very recently.	
21 11	Why attend Examination?	
	We wish to attend the examination to present the evidence which we believe would contribute to the cumulative evidence base as mentioned in CE2. Awareness of the proposed development in Penywaun, substantiated by professional feasibility studies and draft Business Plan proposals will, we hope, add weight to our representation. This would show the potential benefits to the community which will be lost unless the settlement boundary is expanded to allow plans for the new building to go through due planning processes and, hopefully, become a landmark regeneration project for Penywaun.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	CE2 The ongoing deliberations with officers of the Welsh Assembly Government's Department for the Economy & Transport have not been considered in the drawing up of the proposed settlement boundary. Years of work will have been wasted if the current boundary remains, and expectations of the community to see improved health, education and economic regeneration services will be dashed.		
	CE4 To the best of our knowledge, the interests expressed within this representation do not conflict with any other proposed use for the land outlined. Therefore, expanding the settlement boundary would not interfere with other elements of the LDP but would open up possibilities for potentially substantial development which, as it stand, will be excluded.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
467.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075		Site: 5//NSA 8 0STR Hirwaun/Penywaun						PEX Session:							
Policy: NSA 8		Map:		Issue: Strategic Sites											
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Objection to policy NSA 8.	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3	Representation text													
		3.1 The area shaded green and designated open space and marked Opencast Workings on the Indicative Concept Plan for Land South Of Hirwaun is an acceptable and desirable use of the land.													
		3.2 The County Borough Council acknowledges that its officers have been in consultation with Tower Colliery Ltd regarding future use of the land in question. It must therefore be stated that any use of the land, other than mentioned in 3.1 above, and particularly opencast mining, is seen as a return to an era which allowed for dust and noise pollution. Despite advances in technology, and the conditions that could be imposed on the contractors, the prevailing winds that are funneled up the Neath valley and cross the ridge down on the Hirwaun and Rhigos villages will carry dust particles and noise pollution across the Hirwaun Common. These types of pollution resulting from opencast mining operation are already evident in Merthyr Tydfil and are the subject of complaints by residents.													
		3.3 The transportation of mined coal will cause additional pressure on the local road system. The alternative form of transportation would be by rail (see para., 6.3 below). Tower Colliery is no longer producing coal but since production at the colliery ceased, the railhead is now being used to transport coal from Aberpergwm Colliery and also to transport stone from Penderyn Quarry. The rail track through the valley (approx. 12 miles) is single track that is also used for passenger services up the valley as far as Aberdare. The track is in poor condition and speed restrictions are imposed on all rail traffic. It is unlikely that extra trains could be accommodated to cater for the transportation of opencast coal.													
		4.1 The area shaded lilac and designated for Employment and marked Opencast Workings on the Indicative Concept Plan for Land South Of Hirwaun is unacceptable and considered to be totally unjustified.													
		4.2 The Hirwaun / Rhigos Industrial Estate is directly opposite the site shaded lilac and is a much larger site.													
		4.3 The Hirwaun / Rhigos Industrial Estate has been partially redeveloped with smaller industrial units, many of which remain empty.													
		4.4 Some existing buildings have been converted to accommodate current usage requirements. Other large buildings have been demolished as an alternative to maintenance costs for empty buildings.													
		4.5 There is adequate land for future development for employment in the form of existing empty small units, empty large units and unused land on the estate.													
		4.6 Any significant increase in employment sufficient to justify the use of the opencast workings shaded lilac would cause extreme problems with road traffic in and around the area (see para.)													
		5.1 Policy NSA 8 Land South Of Hirwaun is considered to be unacceptable and ill-conceived.													
		5.2 Para. 6.38 (LDP p75) refers to discussions with Tower Colliery on the future use pf land after coal-related operations have ceased. There are no proposals in the LDP that mention future operations by Tower Colliery.													
		5.3 Para. 6.42 (LDP p75) refers to a 'New Hirwaun Centre' to include retail, commercial and community facilities. The only land indicated on the Indicative Concept Plan (LDP p76) to the south of Hirwaun is shown as 'Medium Density Residential'.													
		5.4 Whatever the land shaded orange is used for it will be detrimental to the existing village. Any retail, commercial or community activity will be too far away from the centre of the village to be used by villagers and it will become an area of empty premises within a short time of development. It is difficult enough to maintain small retail units successfully on residential developments when the units are central to the development. It is more usual for such premises to become empty and subsequently vandalised when they are situated away from the main village.													
		5.5 Para 6.42 also refers to the development of 1,000 dwellings on the site, 400 of which are to be constructed during the plan period (2006-2021). The construction of such a large number of dwellings separated from the main village by a dual carriageway and a bypass road (a former 3-lane trunk road) will necessitate at least 2 access roads in the form of underpasses or fly-overs. These 'entrances' to the retail, commercial or community areas will not be conducive to pedestrians, especially older persons.													
		5.6 The site is bordered and separated from the village by the bypass road on the northern side and the mountain on the southern side, and the site itself is divided by the dual carriageway. The effect of these natural constraints on the free passage of the community will not encourage a feeling of integration in the village. Furthermore, unless more access points are provided for the site (for 1,00 dwellings), a community of this size with one way in and one way out will soon become a problem area.													
		5.7 The infrastructure of the village will not sustain such an increase in population. The approval of a recent planning application for almost 250 dwellings on the opposite side of the village will already													

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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cause further disruption to traffic flow and put the existing infrastructure at risk.

6.1 Policy NSA 8 (para. 6.43, p75) states that no more than 75% of the development shall be completed before the New Hirwaun Centre and education proposals are completed. The current infrastructure is inadequate for the needs of the present size of the village. A recent outline planning consent for almost 250 new dwellings will add to the problems. It is inconceivable that 75% of future development propose din the LDP can be considered without significant improvements to the current infrastructure.

6.2 Apart from the social aspect, from a road network consideration, it is unrealistic to consider any serious development within the designated area for residential development (shaded orange) until the dualling of the A465 Heads Of The Valleys Road is completed and this is unlikely to happen before the expiry of the Plan in 2021. The present 3-carriageway A465 HOV Road is already used to capacity during daytime traffic and any additional use due to either private or commercial traffic will create more difficulties in the local road network.

6.7 In the introduction to the Hirwaun Village Study undertaken by Nathaniel Lichfield & Partners (April 2008), [it] states:

"Hirwaun has accommodated a relatively large amount of residential development in recent years in relation to its modest size, but this has no been replicated in an increased provision of local services and facilities. The result has been an inability to adequately serve the needs of the community and the surrounding villages."

6.8 The proposals in the LDP do practically nothing to address this criticism.

467.D2 O W M

Document: Deposit Draft, p.088

Site: 753//NSA 22.1 Aberdare to Tower Colliery Line

PEX Session:

Policy: NSA 22

Map:

Issue: Transportation

Summary:

Item Question

Representation Text

1 2 Issue Summary

Practicality of reuse of mineral railway.

2 3 Representation text

6.3 Policy NSA 22 (para. 6.88, p88) mentions that the freight line between Aberdare and Hirwaun is effectively redundant. This line is still in daily use and is used for transporting coal sources from Aberpergwm Colliery in Glynneath and shipped from Tower Colliery railhead. Stone from Penderyn Quarry is also shipped from its railhead. Whilst the shipping of stone is possibly a short-term prospect, it is understood that shipping of coal is likely to be a longer-term operation. Tower Colliery management openly admit to the intention to opencast mining on land owned by the company. Whatever means of transporting the coal is used, neither the road nor rail network is capable of coping with the probable demand.

6.4 Policy NSA 22 also refers to station improvements at Hirwaun station. Hirwaun station has been demolished many years ago, and a new station would have to be constructed. Presumably this would also include a park and ride facility. Recent residential planning approvals have prohibited the possibility of any development of railway facilities on the southern side of the track. The land on the northern side of the track falls within the Brecon Beacons National Park Authority area, and that Authority has proposals for the land adjacent to the track (the former Brickworks site). Unless there is collaboration between the two Authorities for a unified approach to the area, it is difficult to imagine any development of a new railway station.

6.5 It must also be mentioned that until the closure of the line, the track extended into the centre of the Hirwaun Industrial Estate. The use of the existing available space on the Hirwaun I E and the restoration of the track for passenger services directly into the estate could reducer the volume of passenger and goods traffic on the local road network.

6.6 This would be a far more sensible option than creating an area for employment referred to in para. 4.1 above.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060						Site:			PEX Session:						
Policy: AW 14			Map:			Issue: Minerals									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Aggregate safeguarding/buffer zone	
2 3	Representation text The 200 meter buffer zones cited within Policy AW are the suggested minimum within contained with MIN TAN1, without any justified discussion or assessment as to whether these are suitable in all cases. For example, Forest Wood Quarry which straddles the administrative boundaries of the Vale of Glamorgan and RCT has a 400 meter buffer zone around the part of the quarry that lies within the Vale of Glamorgan.	
4 5	Changes sought Further clarification on the reasoning for the 200 meter buffer zones to support justification in Policy AW 14 should be considered.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
471.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.035							Site:			PEX Session:							
Policy: CS 6				Map:			Issue: Employment										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Cross boundary issues associated with DTA St Athan new development proposals within Llanharan/Talbot Green.	
2 3	Representation text The Vale of Glamorgan Council supports RCT's Deposit Draft LDP housing allocations within the areas on Llantrisant/ Talbot Green and Llanharan area, as this has the potential to alleviate development pressures that the Vale of Glamorgan may experience as a result of the DTA St Athan Development. Development within the southern strategy area in close proximity to DTA St Athan may place additional pressure on infrastructure within the Vale of Glamorgan. Consequently whilst the Council is supportive of the development within the southern strategy area, it would like to be reassured that such cross boundary issues associated with development within the areas of Llantrisant/Talbot Green and Llanharan have been examined and/or are given further considerations at the planning application stage. Also see comments in relation to proposed cycle way improvements Policy SSA 21.	
4 5	Changes sought Include reference to cross boundary consultation with adjoining authorities as part of the planning application process to identify potential cross boundary issues.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047			Site:			PEX Session:									
Policy: AW 5			Map:			Issue: Design									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The appropriateness of the Eco Homes Standard and site thresholds.	
2 3	Representation text The Vale of Glamorgan Council generally supports the aims of the policy. However, the Council would like to highlight that Eco-Homes has now largely been superseded by the Code for Sustainable Homes (CSH), and in Wales the WAG require all homes that are funded by social housing grant to meet this code. The adoption of the CSH would be consistent with the aims of Policy CS11, criteria A 1, since in terms of energy efficiency Code level 1 is some 10% higher than current building regulations. Similarly, the adoption of Code Level 3 within the policy would be on par with Eco Homes Very Good target. Moreover it is likely that the WAG will be adopting the CSH and making applicable to all new dwellings as is the case in England. Therefore its adoption within RCT LDP will ensure that this policy remains relevant for the life of the plan The CSH is applicable to all new homes irrespective of the number of dwellings proposed, and as such the 10 dwellings site threshold is considered inappropriate, and therefore should be required for all new dwellings.	
4 5	Changes sought Amend policy to require level 3 Code for Sustainable Homes for all new housing irrespective of site capacity.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039				Site:								PEX Session:			
Policy: CS 9				Map:				Issue: Waste Management							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Strategic waste management facilities- clarification of the capacity of the strategic sites identified within C S9.	
2 3	Representation text The Vale of Glamorgan supports the identification of sites for the development of regional waste sites. However it is unclear within the policy and supporting text as to whether the 2 sites identified are of sufficient size to meet the land requirements identified within the South East Regional Waste Plan, or the extent to which these two sites contribute towards the overall 21.7 hectares required.	
4 5	Changes sought The inclusion of the number of hectares available at these locations within policy CS9 would provide clarification on the extent to which other B2 and B8 sites will be relied upon to meet the 21.7 hectares.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.057						Site:			PEX Session:						
Policy: AW 11				Map:			Issue: Employment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary There is potential for conflict to arise between meeting the LDPs requirement for the provision of land for waste management facilities and employment land supply.	
2 3	Representation text Ensure consistency with Policy CS9 by making reference to waste management facilities on existing employment sites.	
4 5	Changes sought Consider measures that will ensure that the development of existing B2 and B8 sites would not prejudice the Council's ability to meet its land use requirements for waste management facilities.	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113						Site:								PEX Session:	
Policy: SSA 21				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Cross boundary cycle network.	
2 3	Representation text The Vale of Glamorgan Council has aspirations to develop a north-south cycle route that utilises the disused railway line between Aberthaw and Pontyclun. Whilst elements of the track have been affected by development, there remains scope to provide a cycle route and this has been included in the Council's feasibility study for the extension of the National Cycle Network through the Vale of Glamorgan. Therefore the Council request that this route be afforded consideration in the RCT Deposit Draft Local Development Plan and where appropriate seeks opportunities to enhance this route within the boundary of RCT.	
4 5	Changes sought Include Pontyclun to Aberthaw cycle route within Policy SSA21 and its identification on the proposals map as a cross boundary cycle route.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D7			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033							Site:			PEX Session:						
Policy: CS 4				Map:			Issue: Housing Requirement									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary LDP Housing Requirement.	
2 3	Representation text The Vale of Glamorgan Council supports the housing provision identified within Policy CS4, which is consistent with the apportionment process undertaken by SEWSPG.	
4 5	Changes sought No change	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.034				Site:								PEX Session:			
Policy: CS 5				Map:								Issue: Affordable Housing			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Affordable housing target.	
2 3	Representation text Policy CS5 identifies a target for the provision of 3000 affordable dwellings during the LDP period, whereas the Council's Local Housing Market Assessment identifies a need to provide 4,350 units over the next 5 years. Whils it is accepted that it would be difficult for the LDP to meet this affordable housing need over the next 5 years, this need could be met if this was set over the entire plan. Again this may not meet all the affordable housing needs of RCT, but it will show that the plan seeks to address current known needs. Based on the LDP target to provide 990 dwellings per annum based on the current affordable housing target. This could be achieved by reducing the site thresholds cited within Policies NSA 11 and SSA 12.	
4 5	Changes sought Consider setting the LDP affordable housing target to address current shortfalls.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D9			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114				Site:								PEX Session:			
Policy: SSA 23				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Special Landscape designation- Talygarn Surrounds	
2 3	Representation text The identification of the Talygarn Surrounds Special Landscape Area (SLA) (23.2) is supported. This generally compliments the proposed Vale of Glamorgan Ely Valley and Ridge Slopes SLA. However the Council have identified a number of minor discrepancies within the Vale of Glamorgan which warrant further investigation. Therefore, as part of the work on the Vale of Glamorgan LDP the Council will examine this and provide ECT with this information if it shows that these designation cross administrative boundaries.	
4 5	Changes sought No change required.	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D10			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:	
Policy:				Map:				Issue: Core Strategy							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The Vale of Glamorgan Council considers that the LDP core strategy represents a logical approach for the management of development that will address the issue and opportunities found within the north and south of the authority.	
4 5	Changes sought The Vale of Glamorgan Council supports the LDP core strategy	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan No change required		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
471.D11			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft														Site: PEX Session:		
Policy:				Map:			Issue: Core Strategy									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The Vale of Glamorgan Council considers that the LDP core strategy represents a logical approach for the management of development that will address the issues and opportunities found within the north and south of the authority.	
2 3	Representation text The Vale of Glamorgan Council considers that the LDP core strategy represents a logical approach for the management of development that will address the issues and opportunities found within the north and south of the authority.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

476.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.035														Site: PEX Session:		
Policy: CS 6				Map:			Issue: Employment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary In looking at employment sites, Treforest Industrial Estate should not be overlooked.	
2 3	Representation text In looking at employment sites, Treforest Industrial Estate should not be overlooked as it is a key employment site within RCT.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
476.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112						Site:			PEX Session:						
Policy: SSA 19				Map:			Issue: Transportation								
Summary:															

Item	Question	Reply	Soundness Tests
1 2	Issue Summary Additional Railway Station at Glyncoch.		Representation Text
2 3	Representation text A new railway station should be earmarked for Glyncoch.		
4 5	Changes sought The inclusion of a new site, for Glyncoch Railway Station.		
9 7	Why no previous Representation [blank]		
13 8	C2 Test? Does not have regard to national policy?	Yes	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Environmental and transport policies should dictate that an additional railway station is placed at Glyncoch.		
3 4	Seek changes? Any changes to be made to the Plan?	Yes	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
476.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.112				Site:					New Site		PEX Session:					
Policy: SSA 20				Map:				Issue: Transportation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary A new park and ride facility should be provided at the Goods Yard Car Park in Pontypridd.	
2 3	Representation text A new park and ride facility should be provided at the Goods Yard Car Park in Pontypridd in order to achieve an integrated transport policy where the bus station, car park and train station are in the same area.	
4 5	Changes sought The inclusion of a new park and ride site.	
9 7	Why no previous Representation [blank]	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Environmental and transport policies suggest that an integrated transport approach ought to be addressed in Pontypridd.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
476.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106						Site:								PEX Session:	
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Housing within Treforest, brown field sites and the Graig.	
2 3	Representation text In respect of new housing, it is suggested that steps are taken to utilise empty multiple occupation housing within the Treforest area and also that brown field sites are used within the Treforest area before green sites are used elsewhere within the county. Further, that the Graig area of Pontypridd is protected from large scale new housing development as it is already over developed.	
4 5	Changes sought A move from the use of green field sites to brown field sites, better use of empty properties in Treforest and a restriction on large scale future development within the Graig area of Pontypridd.	
9 7	Why no previous Representation [blank]	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Housing should be on brown field sites where possible.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?		
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
476.D5			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109		Site: 702//SSA 15.1 Land adjacent to Pontypridd Retail Park							PEX Session:							
Policy: SSA 15		Map:			Issue: Retail											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Brown Lenox Site and Pontypridd as a whole.	
2 3	Representation text The 'Brown Lenox' site ought to be changed so that it is mixed retail and leisure. It should also be recognised that development is urgently needed within Pontypridd Town Centre.	
4 5	Changes sought A change of use for the land at Brown Lenox.	
9 7	Why no previous Representation [blank]	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan More leisure facilities are required within Pontypridd which is line with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
476.D6			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.038							Site:			PEX Session:							
Policy: CS 8				Map:			Issue: Transportation										
Summary:																	

Item	Question	Reply	Soundness Tests
1 2	Issue Summary Cross Valley Link.		Representation Text
2 3	Representation text Consideration ought to be given to a cross valley link road from the A470 to the area between Pontypridd and Glyncoch to ease traffic congestion in the area.		
4 5	Changes sought New cross-valley link road.		
9 7	Why no previous Representation [blank]		
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It improves road links.		
3 4	Seek changes? Any changes to be made to the Plan?	Yes	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
480.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047							Site:			PEX Session:						
Policy: AW 5				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	<p>Many thanks for the opportunity to comment on the RCT local development plan 2006-2021. From the detail provided the proposals do not appear to have any significant impact on the service delivered by the South Wales Fire and Rescue Service. There are however a few areas of Community and Fire Safety which we would like to highlight:</p> <ul style="list-style-type: none"> 1 - domestic sprinklers 2 - sprinklers in schools 3 - access [in housing estates]. <p>In conclusion, I would like to offer the services of members of my staff to assist at design stage of any proposed Local Authority property capital spending programme and would welcome the opportunity to meet with you at any time to discuss this further.</p>
2	3 Representation text	<p>1. Domestic Sprinklers</p> <p>In relation to the areas designated for residential development we request that the provision of Domestic Sprinklers be considered as a requirement in all new build houses and flats. During 2008, there were 6 accidental fire deaths in the South Wales Fire and Rescue Service area. Research has shown that sprinkler systems are the most effective way of dealing with a fire, and there have been no deaths from fire in a fully sprinklered building in over 100 years.</p> <p>The provision of sprinklers in residential premises is in line with the Legislative Competence Order from the Welsh Assembly Government, initiated by Ann Jones (AM) in 2007, which proposes that a sprinkler system be installed in all new domestic dwellings.</p> <p>2. Sprinklers in Schools</p> <p>Over the past 5 years, there has been 938 fires in schools in the South Wales Fire and Rescue Service area, with 148 of these occurring in the Rhondda Cynon Taff area. I am sure you share our view that a school fire not only causes damage to the contents, loss of pupils work and the building structure it also strips the community of a valuable resource and focal point.</p> <p>In order to ensure we have sustainable communities we believe sustainable buildings need to be constructed, therefore we strongly recommend the installation of sprinklers in all new built schools and schools undergoing major refurbishments.</p> <p>3. Access</p> <p>As a Fire & Rescue Service we are concerned that newly designed housing estates are being developed in accordance with the Manual of Streets, produced by the Department for Transport. Within the document it suggests that the road widths for fire pumping appliances can be reduced to 2.75m. As a Service we currently experience difficulty in accessing emergency incidents, often due to insufficient clearance between parked vehicles and we feel that any further reduction in road widths will only exasperate the situation.</p> <p>We therefore strongly recommend that any proposed road widths comply with the current Building Regulations which states that the minimum road width should be 3.7m.</p>

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
566.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 685//SSA 10.7		Gwern Heulog, Coed Ely		Delete Site		PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We wish to see SSA 10.7 (Land at Gwern Heulog, Coedely), excluded from the Local Development Plan	
2 3	Representation text	
	Tonyrefail Community Council would like to object to the inclusion of SSA10.7 on the grounds of 'Intrusion into Open Countryside' in an area that has already seen a lot of development. Also 'Access and Egress' - the increased traffic from a further development, both in the construction and afterwards by the new residents would would put an increased burden on an already dangerous access point and would have a detrimental affect on the lives of the existing residents.	
4 5	Changes sought	
	Would like to see SSA 10.7 removed from the Local Development Plan as a 'Housing Development Site '	
9 7	Why no previous Representation	
	The Members of the Community Council at that time noted the contents of the 'Preferred Strategy' and made no representation.	
	However, the current Members wish to make an Objection to SSA10.7 of the 'Local Development Plan'.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It would be beneficial not to develop SSA10.7 for the aesthetics of the area through saving 3 green fields and also the safety of the residents with less traffic using Gwern Heulog and the surrounding area.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
580.D1			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.116						Site: 705//SSA 26		Graig-yr-Hesg Quarry, Pontypridd						PEX Session:	
Policy: SSA 26				Map:				Issue: Minerals							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary Possible future extension of Graig-Yr-Hesg Quarry	
2	3 Representation text The 200 meter buffer zones as stated in Policy AW 14 e) and Policy AW 15 b). The identified area is extremely close to the local school and residents of Glyncoch and I would be keen to know if in fact the school grounds and areas such as Orchard Drive are within the zone. Craig Yr Hesg is listed on page 133 (67) as one of the 'Sites of Important Nature Conservation & Local Nature Reserves' I would question that the proposals planned would compromise the designation of this area. Policy AW 10 - Environmental Protection & Public Health which covers issues such as 1) Air pollution 2) Noise pollution and 6) Land instability. I have dealt with concerned constituents over the past year regarding the monitoring procedure already in place with regard to unacceptable levels of dust pollution in Garth Avenue. Although I have had assurances that a more regular maintenance regime will be put in place I am concerned that the extension proposals will further exacerbate the situation. Policy AW 4 - Community Infrastructure. I am told there is already an inadequate infrastructure for the transportation of minerals. Future Highways Safety is a major concern for this area, not least how the Authority would monitor and enforce necessary action needed. I am aware of the importance of the extraction of mineral resources and I have in fact visited Craig Yr Hesg Quarry. However, I would be keen to explore the possibilities of further activity on the existing site without extending.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
580.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary		
	I am writing in support of the proposal to move the proposed boundary line around Penywaun to include the area behind the site of St Winifred's Church in Wales		
2 3	Representation text		
	The reason for this request is to include a site for a strategic community enterprise building in Penywaun. Local community representatives have been working with the Welsh Assembly Government's Department for the Economy and Transport in this connection, and feasibility and business development plans already are underway.		
	The current boundary exludes this site, and I am concerned that this may have a highly detrimental effect upon the community and local economic prospects.		
4 5	Changes sought		
	A small change to the current boundary area, which I understand has no impact upon any other proposed use, would include this proposed site for development.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
580.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052						Site:				New Site		PEX Session:			
Policy: AW 7				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Objection to non-allocation of land for open space under AW 7.	
2 3	Representation text Open Land at Coed-y-Cwm, Ynysybwl, nr. Pontypridd Consultation on LDP - page 53, para. 5.47 - open spaces You will be aware that the bulk of the land mentioned above is privately owned, with a small portion owned by the Authority. A few applications have been made and subsequently refused due to, amongst other things, density. You will be aware of the strong feeling of local residents for keeping this area a green space. Whilst I acknowledge the complexities of this, given that the land is in private ownership, I believe it is the view of residents that this area should be kept as open land, in accordance with the paragraph numbered above. For the record, as I have stated on other occasions, I would like to declare an interest as a resident of Coed-y-cwm.	
4 5	Changes sought Open Land at Ffordd-y-bedol, Coed-y-Cwm, Ynysybwl, nr. Pontypridd: this area should be kept as open land.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
609.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Maerdy Communities First are requesting that the settlement boundary NSA12 be re-drawn to reflect the boundary of the new woodland scheme (now known as Coedwig Fach Y Maerdy) and improvements to Edward Street and Springfield Road	
2 3	Representation text	
	The above scheme is a community project that was undertaken by Maerdy Regeneration Ltd with many partners including the Council and the Forestry Commission. Please see enclosed map. The scheme is the subject of legal agreement between the Ltd company and the landowners - RCT CBC	
4 5	Changes sought	
	New settlement boundary as shown on enclosed map	
9 7	Why no previous Representation	
	Not a strategic issue	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The bulk of the work on Edward Street, Springfield and the new woodland was completed in April 08. The work was undertaken after many years of hard work by local people and partnership organisations. Over 500k has been invested by Heads of the Valleys and European Objective One. The current boundary is not therefore realistic and credible		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
688.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.093							Site:			PEX Session:						
Policy: SSA 1				Map:			Issue: Principal Towns & Key Settlements									
Summary:																

Item Question **Representation Text**

2 3 Representation text

Dear Director, (Sheila Davies), I was unable to get to the local exhibition in the YMCA but I can see and read about it elsewhere (sic) and I cannot see that I could object to all the hard efforts that has gone into these plans over so many years and, we, the old ones, who really objected on the Park (Ynysangharad War Memorial Park) can hardly object to any plan now.

The reports to me from those who viewd (sic) it in the YMCA are positive but both of us know that not all will be smooth riding, and costs are still an unknown factor and difficulties will arise.

The attempt to put some artwork at the entrance near the YMCA, the stainless steel objecst (sic) are really too small to make any impact on visitors.

Any single piece of artwork must be clearly seen and large at the entrance, and at the end, to have nay impact and its success would be assured if one could advertise these glories on any brochure. You cannot say; Come to Pontypridd to see the Stainless Steel Arches and seats as they leave no impact whatsoever nor the attempts at a "Son et Lumieir" on the old bridge, a waste of precious money.

The Brown Lenox (sic) Site is a disgrace and let us hope the plans are not "Pie in the Sky".

One thing for sure is; "If Morrisons had won then youour (sic) task would have been made easier and you could have got on with the town much earlier. That's my belief, perhaps not yours. There were too many rogue elements against Morrison's.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
689.D1			<input type="checkbox"/>	C	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 725//CS 8.a2						Gelli / Treorchy Relief Road			PEX Session:				
Policy: CS 8				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The issue is not with the policy itself, but the route identified on the associated Map.	
	The route does not reflect the Inspectors recommendation, accepted by the council, to the Rhondda Local Plan 1994 - 2006	
2 3	Representation text	
	The inspector's report into the Rhondda Local Plan 1994 - 2006 recommended alternative routes be investigated (recommendation 7.13). Over the intervening years there has been no evidence this has been done and the current proposed route is exactly the same as that in the previous plan. My original objection submitted to the inquiry could still be used with only minor modifications.	
	Relevant Documentation	
	Written Representation no 360 to the Rhondda Local Plan Written Statement 1994 - 2006 TR2.1 (P67)	
	Rhondda Local Plan Inspectors Report March 1996 P59 & P60. Policy TR2, TR2.1 Inspectors conclusions 7.10 7.12 and recommendation 7.13	
	Rhondda Local Plan (Including Waste Policies), Proposed Modifications, List of Modifications Intended to be made by the Planning Authority July 1997 Mod No 7.4 Policy or Paragraph No. 7.3.5	
	Rhondda Local Plan (Including Waste Policies), Proposed Modifications, Statement of Decisions of Rhondda Cynon Taff County Borough Council in Respect of Representations Received to the Proposed Modifications to the Deposit Plan November 1997. Rep No 11	
	List of Modifications Intended to be made by the Planning Authority July 1997 Mod No 7.4 Policy or Paragraph No. 7.3.5	
4 5	Changes sought	
	The previous Inspectors Report acted upon.	
9 7	Why no previous Representation	
	The representation is in respect of the route no the policy itself and therefore not appropriate at that stage.	
21 11	Why attend Examination?	
	It was necessary before and I see no reason why it should not be now, particularly as Rhondda Cynon Taff County BC took an inordinate time to respond and had great difficulty grasping many of the issues raised during the inquiry. Both in my written submission and at the Examination.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed route requires the road to contain a 1:6 gradient, or a major earthwork and therefore is not practicable in its present form. The Inspector's Report into the Rhondda Local Plan 1994 to 2006 appears to have accepted this and suggested alternatives were investigated. This latter action does not appear to have been carried out.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
<i>Item Question</i>										<i>Reply</i>			Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?														Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit														No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

735.D1

O

W

M

Document: Deposit Draft, p.106

Site:

New Site

PEX Session:

Policy: SSA 10

Map:

Issue: Housing Allocation

Summary:

<i>Item Question</i>		Representation Text
1	2	Issue Summary [Residential development of] the Vicarage and land adjoining, Llantwit Fardre, Upper Church Village.
2	3	Representation text It is submitted that the land shown edged red on the attached plan is suitable for residential development and should be included in policy SSA 10.
4	5	Changes sought Identification of the land shown edged red on the attached plan for housing development.
9	7	Why no previous Representation [blank, as is Q8, Q9, Q10, Q11 & Q12]

<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?													Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons												No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
735.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 419/423		St John the Baptist Church		New Site		PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	[Residential allocation of] the former churchyard, St. John The Baptist's Church, Tonyrefail.	
2 3	Representation text	
	It is submitted that the land shown edged red on the attached plan is suitable for residential development and should be included in policy SSA 10.	
4 5	Changes sought	
	Identification of the land shown edged in red on the attached plan for housing development.	
6 6	Candidate Site Ref No	
	423.	
9 7	Why no previous Representation	
	[blank, as are Q8 to Q12]	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
735.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106						Site:						New Site		PEX Session:	
Policy: SSA 10					Map:										
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary [Residential development of] land adjoining the vicarage, Llantwit Fardre, Upper Church Village		
2 3	Representation text It is submitted that the land shown edged red on the attached plan is suitable for residential development and should be included in policy SSA 10.		
4 5	Changes sought Identification of the land shown edged in red on the attached plan for housing development.		
9 7	Why no previous Representation [blank, as are Q8 to Q12]		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
750.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft				Site:								PEX Session:			
Policy:				Map:								Issue: Policy Omission			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The University of Glamorgan plays a key economic and social role within the County Borough and has plans to improve its performance and its estate. This needs to be recognised in the plan which is currently silent on this issue. A new policy is recommended for inclusion to make it clear that appropriate development by or for the University will be supported.
2 3	Representation text	<p>30. There are two approaches which could be adopted to achieve this. The first would be to broadly repeat the approach contained in the adopted TELP. This would see the same land identified on the TELP proposals map (an extract of this is attached at the end of this report as Appendix B1) and a new policy introduced to sit either within the Core Strategy Section, the Area Wide Policies or the Southern Area section of the plan. Our preference would be for the policy to sit within the Area Wide Policies – to reflect the potential the University has for all residents of the County Borough.</p> <p>31. The wording of the policy would recognise the importance and potential of the allocated sites for University purposes or development. We would be happy to discuss the wording of the policy with you (in the run up to adoption of the plan), although the following is offered to start this process:</p> <p>“Policy AW16 – The University of Glamorgan</p> <p>Proposals for development and activity associated with the University of Glamorgan (including new teaching, research and student accommodation together with ancillary activities and facilities) will be permitted (on the sites identified on the proposals map), where the development:</p> <ol style="list-style-type: none"> 1. has a clear and demonstrable link to the University and its strategy 2. meets the key development control tests of Policy AW2 3. meets the relevant tests of Policy SSA1”
4 5	Changes sought	Amend the LDP to include a policy and land allocations specific to the University of Glamorgan. See Q3.
9 7	Why no previous Representation	The University had expected current policy and support (as set out very clearly in the Taff Ely Local Plan) to be broadly continued in the new Local Development Plan.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Please see accompanying report.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
750.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft				Site:										PEX Session:	
Policy:				Map:										Issue: Policy Omission	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The University of Glamorgan plays a key economic and social role within the County Borough and has plans to improve its performance and its estate. This needs to be recognised in the plan which is currently silent on this issue. A new policy is recommended for inclusion to make it clear that appropriate development by or for the University will be supported.
2 3	Representation text	32. The second option would be to include a generic policy on the University (again within the Area Wide Policies) which simply records the plan's general support for the University's plans and initiatives (subject of course to the plan's other tests) but which does not require the allocation of specific sites. The text of this policy (which could keep the number and title used [see below]) could be relatively straightforward. In fact the same wording could be used with the bracketed text ("on the sites identified on the proposals map") simply removed. It may be appropriate or helpful to clarify that priority will be given to proposal on the University's existing campus' or land. "Policy AW16 – The University of Glamorgan Proposals for development and activity associated with the University of Glamorgan (including new teaching, research and student accommodation together with ancillary activities and facilities) will be permitted (on the sites identified on the proposals map), where the development: 1. has a clear and demonstrable link to the University and its strategy 2. meets the key development control tests of Policy AW2 3. meets the relevant tests of Policy SSA1"
4 5	Changes sought	Amend the LDP to include a generic policy which supports the University of Glamorgan's plans and initiatives. Please see accompanying report.
9 7	Why no previous Representation	The University had expected current policy and support (as set out very clearly in the Taff Ely Local Plan) to be broadly continued in the new Local Development Plan.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		Please see accompanying report.

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
752.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 660//NSA 9.10		Godreaman Street, Godreaman		Delete Site		PEX Session:					
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I object to the housing allocation policy in the plan.	
2 3	Representation text I object to this proposed housing site because, development of this land for residential housing will cause or exacerbate unacceptable road safety and environmental consequences, leading to loss of amenity to nearby residents in terms of: Road safety, traffic hazards, noise & pollution levels, visual amenity, loss of trees and landscaping, loss of wildlife.	
4 5	Changes sought I would like the site to be removed as a housing allocation. Possible alternatives may include conservation and/or low key leisure amenity (for example, park or playground) for the community and visitors, but would need to be small scale to eliminate or minimise the unacceptable environmental consequences outlined in Question 3.	
9 7	Why no previous Representation I was not aware at the time of the proposed plan for this land.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The removal of the land from the residential development, will eliminate the loss of amenity. The insertion of a low key alternative, would offer some extended use of the land, while avoiding the significant road safety and environmental issues mentioned.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.045			Site:			PEX Session:									
Policy: AW 2			Map:			Issue: Design									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The box on page 45 contains a number of criteria that define sustainable locations. Number 5 states that:- (Sustainable locations) - Are not within the Zone C floodplain unless it can be justified on the grounds that:- a) It is necessary to assist the regeneration of a principal town or key settlement, or where development involves a large brownfield site b) The potential consequences of a flooding event have been considered and found to be acceptable in accordance with national guidance We object to this part of the policy on the grounds that, if flood risk issues are able to be alleviated as part of an acceptable Flood Consequences Assessment, and the land in question is suitable for a particular development in all other aspects, it should not be a requirement that the land has to be brownfield land or necessary to assist in the regeneration of a principal town or key settlement. There might be circumstances where Criterion A does not apply, but the development of a site would be beneficial to an area, if the flood risk issue could be removed. The policy as it stands is restrictive and inflexible.	
2 3	Representation text We believe the policy as proposed places an unnecessary restriction to the potential development on sites that are within Zone C flood risk areas. The policy states that of the site in question does not assist with the regeneration of a principal town or key settlement, or does not involve a large brownfield site, it would not be considered appropriate even if all the risks to flooding could be alleviated appropriately. As such, the policy ignores the possibility that a site in a Zone C flood risk area might provide major benefits to the locality in some other manner than set out by the criteria in Part A of this policy, if the risks to flooding could be alleviated and it was allowed to be developed. There doesn't seem to be any logic to the policy as it stands, as surely if a site could be developed for an acceptable land use in planning terms and the risks of flooding could be alleviated appropriately, the other criteria listed would merely represent an unnecessary barrier and restriction to regeneration that could prove beneficial to the area concerned. In light of the above, we object to the inclusion of Part A within this section of Policy AW2.	
4 5	Changes sought Part A of Section 5 of Policy AW2 which states - "a) It is necessary to assist the regeneration of a principal town or key settlement, or where development involves a large brownfield site" should be removed as it is unnecessarily restrictive.	
9 7	Why no previous Representation These particular proposals did not appear in the Preferred Strategy consultation	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE4 We believe the policy as it stands Contravenes Soundness Test CE4 as it is unnecessarily restrictive and does not provide the Council with enough flexibility to allow for development as described within our representation above. Implementing the changes within this representation would help restore maximum flexibility to the policy and hence satisfy this Soundness Test.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.043				Site:								PEX Session:			
Policy: AW 1				Map:								Issue: Housing Requirement			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Paragraph 5.6 discusses the land supply to accommodate the dwelling requirement figure. We believe there is insufficient flexibility within the land supply to deliver the dwelling requirement.	
2 3	Representation text	
	We believe there needs to be greater flexibility provided within the land supply in order to ensure the housing requirement figure is capable of being delivered. At present, the dwelling requirement and land supply figures are identical, which suggests that even if just one site failed to come forward, the Council could fail to deliver their dwelling requirement. Our concerns on this issue are also compounded by the housing supply within the Northern Strategy Area. Not only is the proposed dwelling requirement for the area higher than that which has been delivered in recent years, but many of the sites suffer from severe constraints which might cause problems when it comes to delivery. There are also a number of sites within the supply that are contained within categories 3(i) and 3(ii) of the Joint Housing Land Availability Study, which might also result in problems associated with delivery.	
	We do not wish to predict whether or not individual sites will come forward over the plan period, but we do believe that considering these issues, the Council should include a certain amount of flexibility within the land supply, in order to ensure the LDP is able to successfully deliver the housing requirement as proposed.	
4 5	Changes sought	
	Additional sites should be allocated for housing development within the County Borough, preferably sites that have minimal constraints, in order to increase the flexibility of the land supply, and help to ensure the LDP is able to deliver the dwelling requirement figure over the plan period. The HBF understands that an acceptable figure for such flexibility is 10%, which is in accord with the contingency allowance set within the development plan of other local authorities in Wales. Therefore, in terms of figures, a suggested land supply figure would be 14850 units + 10% of total = 16335 units.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE4		
	The land supply given within this policy does not make sufficient allowance for an alternative strategy, if a site (or a number of sites) allocated failed to come forward for development as proposed. If this transpires, the Council could fail to meet their proposed dwelling requirement for the LDP period. As such, the policy is not reasonably flexible to enable it to deal with changing circumstances and therefore contravenes Soundness Test CE4. Implementing the changes within this representation would help to ensure this Soundness Test is met.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046			Site:			PEX Session:									
Policy: AW 4			Map:			Issue: Planning Obligations									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We are concerned with the fact that the policy does not take account of development viability and does not recognise that the accumulative requirements of planning obligations will have an effect on land values and might render a development unviable unless a proper analysis of the impact of each policy is undertaken.	
2 3	Representation text	
	The HBF is concerned that this policy does not take account of development viability and does not recognise that development viability will be a critical factor in determining whether or not the extent of planning obligations required can be delivered on a particular development site. It is essential that each Council department has sufficient knowledge of the site in question, in order to determine whether or not their planning obligation requirements will have a negative impact on development viability. It is also essential that each Council has its priorities in place in terms of policy prioritisation, so that each department is fully aware of policy obligation. Even though it might not be the case that one single policy has a negative effect on viability, the accumulative requirements of other planning obligations policies might be enough to render a development unviable unless a proper analysis of the impact of each policy is undertaken. Therefore, it is vital that the Council makes clear which policy objectives would override other policy objectives if collectively they could not all be supported from land values. Policy AW4 must address this very real issue if it is to be sound and successful in delivering its objectives alongside the wider need to improve the supply of all forms and tenures of homes.	
	It is also essential that policies are sufficiently flexible to cop with changing circumstances and market conditions. The current market situation and the effects of the credit crunch are a clear example of the need for this, and we believe this policy should recognise the need to be flexible when requiring planning obligations in order to ensure the development concerned remains viable and deliverable.	
4 5	Changes sought	
	The Policy should make clear the Councils priorities in terms of its policy objectives, in order to set out the policy hierarchy to be applied where land values will not support the requirements of every policy obligation.	
	The Policy should make clear that any proposed planning obligations will take full account of their impact on development viability, before they are imposed on developers.	
	The Policy should make clear that any policies included within the plan that request specific planning obligations are based on evidence that takes full account of their impact on development viability. Reference to this work should also be included within the policy	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan Soundness Test CE2
<p>This policy does not take account of the need to consider development viability when setting out the requirements for planning obligations. Development viability will be a critical factor in determining the deliverability of a development site and the planning obligations set out within this policy might have an impact on this if their requirements cannot be supported from land values. This issue is not recognised by this policy and therefore we believe any requirements resulting from the criteria listed within this policy contravenes Soundness Test CE2 and implementing the changes within this representation would help to satisfy this Soundness Test.</p> <p>Soundness Test CE4</p> <p>This policy does not take account of the need to be flexible when requiring planning obligations. The policy does not recognise that variations in market conditions could have an impact on development viability, which in turn could have an impact on the Council's ability to secure planning obligations. The Policy also does not recognise the possibility that planning obligations might have a detrimental impact on development viability if they cannot all be supported from land values. The policy needs to be flexible enough to respond to these issues. As a result, we believe this policy contravenes Soundness Test CE4 and implementing the changes within this representation would help to satisfy this Soundness Test.</p>																
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047						Site:			PEX Session:						
Policy: AW 5				Map:			Issue: Design								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Within the first box under part B - Sustainable Design, criterion 3 states that "Residential schemes of 10 or more units achieve as a minimum the Very Good Eco-Homes (or equivalent) target" We object to this policy as it does not accord with policy CS11 - Climate Change	
2 3	Representation text We object to this policy as it does not accord with policy CS11, where the requirement is for development proposals to reduce their predicted C02 emissions by a minimum of 10%. The policy is confusing and does not accord with the requirements set out by other policies in the Plan.	
4 5	Changes sought Suggested Changes Criterion 3, under part B of the policy should be changed to reflect Policy CS11 or removed.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C1 This policy contravenes Soundness Test C1 as it does not accord with Policy CS11 and therefore does not have regard to other policies within the Plan. Making the changes within this representation would help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.049			Site:			PEX Session:									
Policy: AW 6			Map:			Issue: Design									
Summary:															

Item	Question	Representation Text
1	2	Issue Summary
<p>Criterion 10 under Policy AW 6 states that - "(Developments will be supported where) Open space is provided in accordance with the Fields in Trust Standards". We object to this requirement as it does not accord with National Guidance in form of TAN 16.</p>		
2	3	Representation text
<p>We object to this policy as it does not accord with National Guidance. Paragraph 2.7 of TAN 16 (2006) states that PPW does not prescribe particular standards of open space provision, but states that these standards should be based upon the findings of an Open Space Assessment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The TAN goes on to state that an Open Space Assessment should allow local authorities to develop standards that reflect local distinctiveness and should include:</p> <p>Quantitative elements (whether new provision is needed for the area)</p> <p>Qualitative component (against which to measure need for enhancement of existing facilities)</p> <p>An accessibility component (to whom and how is the provision accessible to the local community) (TAN 16 - paragraph 2.7)</p> <p>The TAN does mention the Fields in Trust Benchmark Standards, but states that these standards will be helpful for local authorities in formulating their own local standards for provision. The TAN also states that local planning authorities should ensure that an Open Space Assessment has been completed as an important part of the LDP preparation process, as this will provide them with the opportunity to identify the quantity and quality of open spaces for the economic, social and environmental benefits they bring to communities. (TAN 16 - paragraphs 2.9, 2.24 and 2.29)</p> <p>Even though the Council has undertaken a green space and open space/play area assessment, the result of these assessments are based on the CCW Greenspace Toolkit and the NPFA (now Fields in Trust) standards. The assessments are a quantitative appraisal of the number of greenspace/open spaces/play areas available within the County Borough and the proximity of the population to these spaces. They do not relate to the guidance within TAN 16, which describe the extent to which the assessment was subject to public consultation, which is a further requirement of the new guidance.</p> <p>We acknowledge the work already done by the authority in determining quantitative deficiencies in open space, however, without undertaking an appropriate Open Space Assessment it will be difficult to ascertain the actual nature of any deficiencies identified. That is, the reason for a perceived deficiency in certain types of open space may be the result of many factors such as, a lack in demand for certain sporting activity, in which case the provision of more land or monies to upgrade certain facilities would do nothing to alleviate the problem. An appropriate Open Space Assessment is a crucial factor in deciding these aspects and also in assuming the level of responsibility any new developments might have in ensuring any deficiencies are not exacerbated. It is also important that this be done at a local level in order to give a true picture of the level of deficiency, or otherwise, across the authority. Furthermore, if an appropriate Open Space Assessment had been undertaken, it is likely that the policy would contain local standards of provision for each area, rather than a borough wide standard that is based solely on the Fields in Trust Benchmark Standards.</p> <p>In addition to these concerns, there is nothing within the policy that describes how development viability will be considered when implementing any prescribed standard. It is essential that this important issue is considered when creating planning obligation policies, because such policies might have an adverse impact on the viability of the development concerned. Even though it might not be the case that one single policy has a negative effect on viability, the accumulative requirements of other planning obligations policies might be enough to render a development unviable unless a proper analysis of the impact of each policy is undertaken.</p>		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
4	5			Changes sought											
Suggested Changes															
Criterion 10 under Policy AW 6 should be justified by an appropriate Open Space Assessment as required by TAN 16 or removed.															
The policy should include information to state that where it is required, the impact of its requirements on development viability will be taken into account and certain dispensation will be allowed where these requirements cannot be supported by land values. This will include taking into consideration all other planning obligations, as well as development costs.															

9	7			Why no previous Representation											
These specific proposals were not available for comment within the Preferred Strategy consultation.															

Item	Question	Reply	Soundness Tests
13	8	C2 Test? Does not have regard to national policy?	Yes
17	8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes
19	8	CE4 Test? Not flexible to deal with changing circumstances?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C2	
We believe this policy does not have regard to National Guidance and therefore contravenes Soundness Test C2. Implementing the changes within this representation would help to ensure this Soundness Test is met.			
Soundness Test CE2			
We believe this policy is not based on a sound and credible evidence base and therefore contravenes Soundness Test CE2. Implementing the changes within this representation would help to ensure this Soundness Test is met.			
Soundness Test CE4			
This policy is not sufficiently flexible to deal with any future change in circumstances, as it does not recognise that it might have a negative effect on the viability of future developments, and therefore contravenes Soundness Test CE4. Implementing the changes within this representation would help to ensure the Soundness Test is met.			

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
929.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.034						Site:								PEX Session:	
Policy: CS 5				Map:				Issue: Affordable Housing							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

The important issue of viability has not been considered when setting the affordable housing target.

Policy CS5 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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2 3 Representation text

This policy states that approximately 3000 dwellings will be provided over the plan period. Paragraph 4.47 states that the Local Housing Market Assessment has identified a need for affordable housing, however, National Guidance states that assessments of housing need are just one of the mechanisms to be used in setting the affordable housing target.

National guidance (Tan 2, 2006) on the creation of affordable housing policy states that LDPs must identify a target for affordable housing based on evidence within the LHMA. The TAN goes on to state that "the target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought." (TAN 2, page 7 paragraph 9.1). Considering this statement, it is abundantly clear that TAN 2 requires the affordable housing target itself to take account of the availability of public subsidy and developer contributions that can be realistically sought.

In addition to this, the TAN goes on to state that when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability. This may involve making informed assumptions about the levels of finance available for affordable housing and the type of affordable housing to be provided. (TAN 2, page 8, paragraph 10.4). In this context, it is clear that TAN 2 requires local authorities to take account of site viability when setting thresholds and targets and in doing so, they should make informed assumptions about the levels of finance available.

Furthermore, National Guidance relating to the creation of Affordable Housing Delivery Statements is also clear about the need for the local authority to consider viability when setting the affordable housing target. Paragraph 1.24 states that targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and on the likely levels of finance available for affordable housing, including both public subsidy such as Social Housing Grant and the level of developer contribution that could reasonably be secured. The guidance goes on to make the important point that such a viability calculation is equally relevant in a buoyant or a depressed market. Even though this guidance is directly related to the creation of Affordable Housing Delivery Statements, it reflects the requirements of the WAG in terms of the appropriate creation of affordable housing policy, which is consistent with the nature of this representation.

Within paragraph 4.48, the Council recognises that trying to deliver the maximum need for affordable housing, as identified within the Local Housing Market Assessment, would impact significantly on the operations of the housing market and the process of regeneration. As such, the Council has therefore adopted a target of approximately 3000 units (or roughly 20% of the total units) to be secured via developer contribution. However, even though we recognise the Council is trying to adopt a flexible approach, we believe the important issue of development viability has not been properly taken account of. The Council has assumed, and rightly so, that a 90% affordable housing target would impact significantly on housing delivery, however, there is no evidence to show what effect the suggested target of approximately 20% would have on housing delivery. National Guidance requires local authorities to prove that percentage targets set for affordable housing are economically viable and will not jeopardise the delivery of housing sites or the creation of sustainable communities by their implementation. We accept that an up-to-date local housing market assessment can justify a 'need' for affordable housing, but it is vital that this total need is balanced carefully with what can actually be delivered on the ground. National Guidance states that local authorities should do this, by making informed assumptions about the levels of finance available for affordable housing and ensuring the targets set do not have an adverse impact on development viability.

In the case of many housing sites within the authority, particularly brownfield sites, there will be many constraints which could require significant costs to overcome and there is no evidence to suggest this has been taken into account when setting the affordable housing target. In addition to this, there will also be a raft of additional planning obligations required when developing a site, all of which need to be justified by the Council on the basis of their ability to be implemented. In all cases, their impact on development viability will be a key aspect of whether or not the affordable housing policy can be implemented as proposed. It is clear from the requirements of the affordable housing policies proposed for the Northern and Southern areas of the County Borough, that when each planning application is submitted, the Council will request a maximum affordable housing targets relevant to that policy, until the developer can prove they are not viable. If this is the case, then the Local Authority must have evidence to prove the requested affordable housing target is viable and deliverable for that particular site, before it is adopted within planning policy and imposed as a requirement for that development. Again, this is supported by National Guidance, where it states in Appendix 3 of the Affordable Housing Delivery Statement Guidance that when meeting the needs of affordable housing, the policy should "clearly demonstrate that the delivery figure is achievable".

These comments are even more pertinent given the current economic climate and the effects of the credit crunch. These issues have had a severe effect on the housing building industry in Wales and finances are critical to our members at present. This important issue is recognised by the WAG and by National Guidance on the creation of AHDSs. Without taking into account the importance of the financial situation our members and other housing developers find themselves in at present, the LDP runs the risk of becoming a barrier to the delivery of affordable housing. As stated above, National Guidance requires the affordable housing target itself to reflect an assessment of economic viability of land for housing in the area concerned and there is nothing within the draft Deposit LDP or background papers to suggest that any viability assessments have been undertaken to support it.

In this context and considering the information above, we believe the affordable housing policy CS5 should be based on sound evidence relating to development viability, to ensure that the affordable housing target is realistic in terms of what can actually be delivered. Affordable housing secured via Section 106 agreement is dependent solely on the entire housing site being delivered. If the financial

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l SA/SEA</i>	<i>NO FRTHR EVID. Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
														<p>viability of a development site in its entirety does not stack up, there remains a serious risk of the development site not coming forward, which will effectively quash any proposals to deliver affordable housing on the site in question. This would render the LDP completely ineffective as a tool to deliver an increased amount of affordable housing, which is the whole ethos behind the purpose of Policy CS5.</p> <p>Appeal Decision Blyth Valley Borough Council - 29/07/2008</p> <p>The Federation would also like to draw attention to the above appeal by Blyth Valley Borough Council against the quashing by Collins J of a policy in part of the development plan for the borough of Blyth Valley in North-East England. Blyth Valley Council had adopted their Core Strategy, within which was a policy requiring 30% affordable housing on developments over 10 units. The policy was successfully challenged by the respondents and the appeal dismissed on the grounds that (amongst other things) the policy did not contain an appropriate assessment of development viability. The appeal also stated that it was not sufficient to base the evidence for the policy on assessments of need alone.</p> <p>In addition to this, the appeal decision stated that a policy which requires developers to prove an affordable housing target is viable after it has been adopted is 'legally flawed', as it assumes a presumption that the policy is sound. In this respect, the Planning Act allows for no such presumption either way when setting planning policies and it is for the Inspector to decide whether or not a planning policy is sound at an Inquiry, based the evidence provided.</p> <p>Even though this appeal decision is related to the English planning system and PPS3, the requirement to undertake a viability assessment is also relevant with respect to guidance provided under our planning system (as described above). In this context, the HBF has been advised by the Planning Inspectorate that they are aware of the Blyth Valley judgement and the principles of law set out in that judgement apply equally in Wales. They also stated that Inspectors examining LDPs will have regard to this judgement.</p> <p>In addition to this, the Planning Inspectorate commented that the WAG are already prompting local authorities to have a robust evidence base to support the identification of whatever percentage of affordable housing they include in their LDP policies. The inspectorate indicated that the WAG has referred to viability testing to ensure that not only can sites/general provision be delivered but that any percentage set out in the LDP is deliverable. The Inspectorate went on to comment that, as the Inspector's Report is binding he/she will need sufficient certainty to arrive at a conclusion regarding soundness having regard to the tests that apply to LDPs set out in national guidance. Viability testing of the percentage level set in the LDP, taking into account economics over the plan period, will be essential to demonstrate delivery.</p> <p>Considering the above, we believe the results of this appeal discussion could have a marked effect on decisions related to the soundness of affordable housing policies within forthcoming LDPs.</p> <p>Policy Prioritisation</p> <p>The Council should make it clear whether or not affordable housing is always the first claim on available land value. If this is the case, then in order to be sound the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands. There is a distinct possibility that, particularly in the context of a lower land value world for the foreseeable future, the accumulation of policy obligations is likely to have implications for the affordability of other planning contributions. As such, the Council must make clear within the draft Deposit LDP that this policy would override other policy objectives if collectively they could not all be supported from land values. The LDP must address this very real issue if it is to be sound and successful in delivering its objectives alongside the wider need to improve the supply of all forms and tenures of homes.</p>
4	5			Changes sought										<p>The affordable housing target of within Policy CS5 must be justified, as required by national guidance, to prove that it would not have an adverse impact on development viability. If affordable housing is a council priority, the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.</p>
9	7			Why no previous Representation										<p>These particular proposals were not present within the Preferred Strategy consultation.</p>

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Soundness Tests
13	8 C2 Test? Does not have regard to national policy?	Yes	
17	8 CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
18	8	CE3 Test? No clear mechanisms for implementation and monitoring?														
Yes																
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C2														
<p>We believe Policy CS5 contravenes Soundness Test C2 as it does not take account of National Guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE2</p> <p>We believe Policy CS5 contravenes Soundness Test CE2. We believe that the levels of finance available for the delivery of affordable housing, particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE3</p> <p>We believe the policy contravenes Soundness Test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development concerned. Implementing the changes within this representation will help to satisfy this Soundness Test.</p>																
<i>Item</i>	<i>Question</i>														<i>Reply</i>	<i>Tick box Replies</i>
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
929.D8			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.078						Site:								PEX Session:	
Policy: NSA 11				Map:				Issue: Affordable Housing							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

The important issue of viability has not been considered when setting the affordable housing target within Policy NSA11. Even though the Council states that the 25% target has been chosen to reflect viability issues, there is no evidence to justify why this percentage has been chosen and the effect is it likely to have on developments in the Northern Strategy Area.

The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes.

Policy NSA11 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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2 3 Representation text

This policy states that provision of 25% affordable housing will be sought on sites of 30 units or more. In addition to this, the policy states that on sites under 30 units, contributions will be sought for the reuse / rehabilitation of existing older housing stock in the County Borough. We believe the issue of development viability has not been properly considered when setting the requirements for this policy.

National guidance (Tan 2, 2006) on the creation of affordable housing policy states that LDPs must identify a target for affordable housing based on evidence within the LHMA. The TAN goes on to state that "the target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought." (TAN 2, page 7 paragraph 9.1). Considering this statement, it is abundantly clear that TAN 2 requires the affordable housing target itself to take account of the availability of public subsidy and developer contributions that can be realistically sought.

In addition to this, the TAN goes on to state that when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability. This may involve making informed assumptions about the levels of finance available for affordable housing and the type of affordable housing to be provided. (TAN 2, page 8, paragraph 10.4). In this context, it is clear that TAN 2 requires local authorities to take account of site viability when setting thresholds and targets and in doing so, they should make informed assumptions about the levels of finance available.

Furthermore, National Guidance relating to the creation of Affordable Housing Delivery Statements is also clear about the need for the local authority to consider viability when setting the affordable housing target. Paragraph 1.24 states that targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and on the likely levels of finance available for affordable housing, including both public subsidy such as Social Housing Grant and the level of developer contribution that could reasonably be secured. The guidance goes on to make the important point that such a viability calculation is equally relevant in a buoyant or a depressed market. Even though this guidance is directly related to the creation of Affordable Housing Delivery Statements, it reflects the requirements of the WAG in terms of the appropriate creation of affordable housing policy, which is consistent with the nature of this representation.

Within paragraph 6.49, the Council recognises that there will be development viability issues in the Northern Strategy Area and states that the target figure of 25% affordable housing has been chosen to reflect these viability issues. However, even though the Council states that development viability is the reason they have chose the figure of 25%, there is nothing within the LDP or background papers relating to any work that was undertaken to arrive at this figure and the Council has provided no evidence to describe what effect the 25% target is likely to have on development viability. Paragraph 6.50 states that the number of units sought may be reduced where it is clearly demonstrated that a site's location, the presence of abnormal development costs or other individual circumstances of the development, would result in the development not being economically viable with the above contribution threshold. However, the paragraph also states that Council will require evidence to support any proposed reduction in the provision of affordable housing. This implies that the Council believes it is the developer's responsibility to provide this evidence and we believe this is not consistent with National Guidance. As described above, National Guidance requires local authorities to prove that percentage targets set for affordable housing are economically viable and will not jeopardise the delivery of housing by their implementation. The HBF and its members are more than willing to assist the Council in trying to build the evidence base for affordable housing policy with a view to arriving at a workable policy solution, however, we believe it is unfair and contrary to National Guidance to require the developer to undertake this work in order to provide the Council with the evidence base and justification for its own policies. It is clear from paragraph 6.50, that when each planning application is submitted, the Council will request the maximum affordable housing target of 25%, until the developer can prove it is not viable. However, we believe in order to justify this course of action, the Local Authority must have evidence to prove the requested affordable housing target is viable and deliverable for that particular site, before it is adopted within planning policy and imposed as a requirement for that development. Again, this is supported by National Guidance, where it states in Appendix 3 of the Affordable Housing Delivery Statement Guidance that when meeting the needs of affordable housing, the policy should "clearly demonstrate that the delivery figure is achievable".

In terms of development viability and housing delivery, there are many development sites within the Northern Strategy Area, particularly brownfield sites, that will require large scale remediation works before any development can take place. This information is provided within the policy allocations within this LDP chapter. This work is likely to result in significant additional costs which will need to be absorbed by land values, which is a problem in itself as described by the allocation policies within the Northern Strategy Area. In addition to this, there will also be a raft of additional planning obligations required when developing a site, all of which need to be justified by the Council on the basis of their ability to be implemented. In all cases, their impact on development viability will be a key aspect of whether or not the affordable housing policy can be implemented as proposed and there is no evidence to suggest any of this has been taken into account when setting the affordable housing target.

These comments are even more pertinent given the current economic climate and the effects of the credit crunch. These issues have had a severe effect on the housing building industry in Wales and finances are critical to our members at present. This important issue is recognised by the WAG and by National Guidance on the creation of AHDSs. Without taking into account the importance of the financial situation our members and other housing developers find themselves in at present, the LDP runs the risk of becoming a barrier to the delivery of affordable housing. As stated above, National Guidance requires the affordable housing target itself to reflect an assessment of economic viability of land for housing in the area concerned and there is nothing within the draft Deposit LDP or background papers to suggest that any viability assessments have been undertaken to support it.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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In this context and considering the information above, we believe the affordable housing policy NSA11 should be based on sound evidence relating to development viability, to ensure that the affordable housing target is realistic in terms of what can actually be delivered. Affordable housing secured via Section 106 agreement is dependent solely on the entire housing site being delivered. If the financial viability of a development site in its entirety does not stack up, there remains a serious risk of the development site not coming forward, which will effectively quash any proposals to deliver affordable housing on the site in question. This would render the LDP completely ineffective as a tool to deliver an increased amount of affordable housing, which is the whole ethos behind the purpose of Policy NSA11.

Appeal Decision Blyth Valley Borough Council - 29/07/2008

The Federation would also like to draw attention to the above appeal by Blyth Valley Borough Council against the quashing by Collins J of a policy in part of the development plan for the borough of Blyth Valley in North-East England. Blyth Valley Council had adopted their Core Strategy, within which was a policy requiring 30% affordable housing on developments over 10 units. The policy was successfully challenged by the respondents and the appeal dismissed on the grounds that (amongst other things) the policy did not contain an appropriate assessment of development viability. The appeal also stated that it was not sufficient to base the evidence for the policy on assessments of need alone.

In addition to this, the appeal decision stated that a policy which requires developers to prove an affordable housing target is viable after it has been adopted is 'legally flawed', as it assumes a presumption that the policy is sound. In this respect, the Planning Act allows for no such presumption either way when setting planning policies and it is for the Inspector to decide whether or not a planning policy is sound at an Inquiry, based the evidence provided.

Even though this appeal decision is related to the English planning system and PPS3, the requirement to undertake a viability assessment is also relevant with respect to guidance provided under our planning system (as described above). In this context, the HBF has been advised by the Planning Inspectorate that they are aware of the Blyth Valley judgement and the principles of law set out in that judgement apply equally in Wales. They also stated that Inspectors examining LDPs will have regard to this judgement.

In addition to this, the Planning Inspectorate commented that the WAG are already prompting local authorities to have a robust evidence base to support the identification of whatever percentage of affordable housing they include in their LDP policies. The inspectorate indicated that the WAG has referred to viability testing to ensure that not only can sites/general provision be delivered but that any percentage set out in the LDP is deliverable. The Inspectorate went on to comment that, as the Inspector's Report is binding he/she will need sufficient certainty to arrive at a conclusion regarding soundness having regard to the tests that apply to LDPs set out in national guidance. Viability testing of the percentage level set in the LDP, taking into account economics over the plan period, will be essential to demonstrate delivery.

Considering the above, we believe the results of this appeal discussion could have a marked effect on decisions related to the soundness of affordable housing policies within forthcoming LDPs

Policy Prioritisation

The Council should make it clear whether or not affordable housing is always the first claim on available land value. If this is the case, then in order to be sound the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands. There is a distinct possibility that, particularly in the context of a lower land values and substantial remediation cases of some sites in the Northern Strategy Area, the accumulation of policy obligations is likely to have implications for the affordability of other planning contributions. As such, the Council must make clear within the draft Deposit LDP that this policy would override other policy objectives if collectively they could not all be supported from land values. The LDP must address this very real issue if it is to be sound and successful in delivering its objectives alongside the wider need to improve the supply of all forms and tenures of homes.

The policy also states that on sites under 30 units, contributions will be sought for the reuse / rehabilitation of existing older housing stock in the County Borough. Again, there is nothing within the policy or subsequent paragraphs to state that viability will be accounted for with this requirement. As described at length above, it is essential that development viability is considered when setting out requirements within planning obligations policies in order to ensure the policies are justified and capable of implementation in order to realise their intended purpose.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4 5	Changes sought														
The affordable housing target of within Policy NSA11 must be justified, as required by national guidance, to prove that it would not have an adverse impact on development viability.															
The effect on development viability must also be properly considered within the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes. Information on this should be included within the policy.															
If affordable housing is a Council priority, the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.															
9 7	Why no previous Representation														
These particular proposals were not present within the Preferred Strategy consultation.															

<i>Item Question</i>	<i>Reply</i>	Soundness Tests
13 8 C2 Test? Does not have regard to national policy?	Yes	
17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
18 8 CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C2		
We believe Policy NSA11 contravenes Soundness Test C2 as it does not take account of national guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this Soundness Test.		
Soundness Test CE2		
We believe Policy NSA11 contravenes Soundness Test CE2. We believe that the levels of finance available for the delivery of affordable housing, particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.		

<i>Item Question</i>	<i>Reply</i>	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site:								PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Criterion 1 of Policy NSA12 states that - "the proposed development does not adversely effect the provision of open space." We object to this criterion as the term Open Space has not been defined by the policy and the policy is not backed up by an Open Space Assessment as required by National Guidance	
2 3	Representation text	
	There is nothing with the policy to describe what is meant by the term 'open space'. As the Council will appreciate, the term 'open space' could have a plethora of different meanings and therefore must be explained before it is included within this policy. As it stands the policy is vague and could be applied to many different pieces of land, which have little or no justification to warrant their protection.	
	In addition to this, if the term 'open space' is meant in the context of what is described within TAN 16, we would make the following comments. TAN 16 states that open space provision should be based upon the findings of an Open Space Assessment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The open space assessment should allow local authorities to develop standards that reflect local distinctiveness and should include:	
	<input type="checkbox"/> Quantitative elements (whether new provision is needed for the area)	
	<input type="checkbox"/> Qualitative component (against which to measure need for enhancement of existing facilities)	
	<input type="checkbox"/> An accessibility component (to whom and how is the provision accessible to the local community) (TAN 16 - paragraph 2.7)	
4 5	Changes sought	
	Suggested Changes	
	The term "open space" Criterion 1 under Policy NSA12 should be explained in order to provide certainty in terms of the areas of land the policy intends to protect. At present, the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection.	
	If the term 'open space' is meant in the context of what is described within TAN 16, then the requirements of the policy should be justified by an appropriate Open Space Assessment as required by TAN 16 or removed.	
8 7	Previous Representation No	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan Soundness Test C2
<p>If the term 'open space' within Policy NSA12 is meant in the context of what is described within TAN 16, we believe this policy does not have regard to National Guidance as it is not justified by an appropriate Open Space Assessment as described by TAN 16. In this respect, the policy would contravene Soundness Test C2 and implementing the changes within this representation would help to ensure this Soundness Test is satisfied.</p> <p>Soundness Test CE2</p> <p>he term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such we believe it is not based on a sound and credible evidence base and therefore contravenes Soundness Test CE2. Implementing the changes within this representation would help to ensure this Soundness Test is satisfied.</p> <p>Soundness Test CE3</p> <p>The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such, the circumstances relating to the implementation of this policy are not clear and therefore it contravenes Soundness Test CE3. Implementing the changes within this representation would help to ensure this Soundness Test is satisfied.</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D10			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041			Site:			PEX Session:									
Policy: CS 11			Map:			Issue: Climate Change									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We believe the policy requiring each development to reduce carbon emissions by 10% must include a clear and workable viability safeguard to ensure the policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it might cause a detrimental impact on development viability.	
2 3	Representation text	
	It is fundamentally important that a clear and workable viability safeguard is written into the policy, to ensure the policy is viable, implementable and deliverable. We believe that without proper mechanisms within the policy for consideration of the economic viability of future housing developments in RCT, the Council might not be able to implement the policy as proposed. This would therefore render the policy inadequate and unsound. These comments are even more pertinent in light of the current economic climate and the effect it is having (and will continue to have) on the housebuilding industry in Wales. It is essential that policies are sufficiently flexible to cope with the changing circumstances, clear in terms of their guidance and purpose, and realistic in terms of their application. Without such characteristics any policies adopted will impede, rather than accelerate the realisation of the objective they are designed to achieve.	
	In addition to a general viability safeguard in the policy, the Council should make it clear whether carbon efficiency is a priority and would always be the first claim on available land value. If this is the case, then in order to be sound the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands. There is a distinct possibility that, particularly in the context of a lower land value world for the foreseeable future and in certain areas of the County Borough, the accumulation of policy obligations is likely to have implications for the affordability of other planning contributions. As such, the Council must make clear within the draft Deposit LDP that this policy would override other policy objectives if collectively they could not all be supported from land values. The LDP must address this very real issue if it is to be sound and successful in delivering its objectives alongside the wider need to improve the supply of all forms and tenures of homes.	
4 5	Changes sought	
	We believe Policy CS11 must be based on a robust and credible evidence base which thoroughly researches the viability of the policy proposals and the potential impact the proposals might have on the delivery of housing.	
	Policy CS11 must include a clear and workable viability safeguard to ensure the policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it would cause a detrimental impact on development viability.	
	Policy CS11 must also include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not be supported from land values.	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				Soundness Test CE2											<p>We believe the policy contravenes Soundness Test CE2 as the policy does not contain information regarding the potential effect it might have on the viability of housing developments in RCT. As such, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE3</p> <p>We believe the policy contravenes Soundness Test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development concerned. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE4</p> <p>We believe the policy contravenes Soundness Test CE4 as it does not include sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability. Implementing the changes within this representation would help to satisfy this Soundness Test.</p>
				<i>Item Question</i>											<i>Reply</i>
				3	4										Seek changes? Any changes to be made to the Plan?
															Yes
				7	7										Previous Representations? Did you make any previous representations on this issue during the Cons
															No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:						PEX Session:			
Policy: CS 11						Map:			Issue: Climate Change						
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The second box on page 41 labelled "B) Adapting to direct and indirect impacts of climate change through:" has the following paragraphs to which we object:- 2. Managing flood risk through incorporating measures in design and construction to reduce the effects of flooding, including sustainable drainage systems (SUDS) and flood resilient design for infrastructure and property 3. Requiring new development to reduce the demand for water through recycling rainwater and grey water recycling;	
2 3	Representation text We object to these requirements as in many cases Statutory Undertakers such as Welsh Water are not willing to adopt design solutions such as SUDS and Grey Water Recycling Systems. The Council must liaise with Statutory Undertakers to ensure that any requirements within their LDP Policies are consistent with the policy stance of the relative statutory body – in this case Welsh Water. We also object to these requirements due to the fact that it might not be appropriate to incorporate such measures on all development and the policy should recognise this.	
4 5	Changes sought The requirements set out within these paragraphs need to be consistent with the policy stance of Welsh Water or they should be removed. The requirements must include a recognition that these solutions might not be appropriate on all developments and should allow for the flexibility to accommodate such situations.	
9 7	Why no previous Representation These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2 We believe the policy contravenes Soundness Test CE2 as the proposals might not be acceptable to the Statutory Undertaker that will eventually adopt the solutions required. As such, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test. Soundness Test CE4 We believe the policy contravenes Soundness Test CE4 as it is not sufficiently flexible enough to allow for situations where the requirement of these solutions would not be appropriate for the particular development. Implementing the changes within this representation would help to satisfy this Soundness Test.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047, para.5.28			Site:			PEX Session:									
Policy: AW 5			Map:			Issue: Design									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Paragraph 5.28 states that "The requirement to achieve a minimum of a Very Good standard in both BREEAM and EcoHomes will be monitored and may be increased as technologies improve." We object to the wording within the paragraph as it does not accord with Policy CS11 and does not give any regard to development viability.	
2 3	Representation text	
	We object to this policy as it does not accord with policy CS11, where the requirement is for development proposals to reduce their predicted CO2 emissions by a minimum of 10%. The policy is confusing and does not accord with the requirements set out by other policies in the Plan.	
	We object to the wording within this paragraph as there is no mention of development viability and how the increase in standards will affect viability. It is fundamentally important that viability is considered and that a clear and workable viability safeguard is included within this paragraph, to ensure the requirements are viable, implementable and deliverable. These comments are even more pertinent in light of the current economic climate and the effect it is having (and will continue to have) on the housebuilding industry in Wales. It is essential that requirements within development plans are sufficiently flexible to cope with the changing circumstances, clear in terms of their guidance and purpose, and realistic in terms of their application. Without such characteristics any requirements set out will impede, rather than accelerate the realisation of the objective they are designed to achieve.	
4 5	Changes sought	
	Suggested Changes	
	The wording within paragraph 5.28 relating to the requirement for developments to achieve Ecohomes Very Good, should be changed to reflect the requirements of Policy CS11 or removed.	
	Paragraph 5.28 must include information to state that a robust and credible evidence base will be used to justify any increase in standards, which thoroughly researches the viability of the policy proposals and the potential impact the proposals might have on the delivery of housing.	
	Paragraph 5.28 must state that a clear and workable viability safeguard will be applied to any requirements for improved energy/environmental standards within residential developments, to ensure the related policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it would cause a detrimental impact on development viability.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy Consultation.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan Soundness Test C1
<p>The wording in this paragraph contravenes Soundness Test C1 as it does not accord with Policy CS11 and therefore does not have regard to other policies within the Plan. Making the changes within this representation would help to satisfy this Soundness Test.</p> <p>Soundness Test CE2</p> <p>We believe the wording within this paragraph contravenes Soundness Test CE2 as it does give sufficient regarding to the potential effect the requirements might have on the viability of housing developments in RCT. As such, the requirements are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE4</p> <p>We believe the wording within this paragraph contravenes Soundness Test CE4 as it does not include provision for sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability. Implementing the changes within this representation would help to satisfy this Soundness Test.</p>																
<i>Item Question</i>															<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052, para.5.44						Site:			PEX Session:						
Policy: AW 6				Map:			Issue: Design								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary This paragraph states that "The Council will also require that development proposals for the 8 Strategic Sites demonstrate how the interests of Welsh culture and where appropriate language have been integrated into proposed schemes." We believe this paragraph does not accord with the policy context set out by the deposit LDP and is very vague and needs further explanation.	
2 3	Representation text The Council has stated within the paragraph that there is no requirement for a Welsh language policy, with which we agree. However, the paragraph then goes on to set out a requirement for language and culture to be integrated within the development of the 8 strategic sites, and there is no explanation why the Council believe this is necessary, nor is there any information pertaining to what this requirement actually means. We believe the requirements set out within this paragraph are not consistent with LDP policy, as there is no actual policy to reinforce these particular requirements. We also believe the requirements are very vague and need further explanation in terms of their meaning and how the Council envisages their delivery.	
4 5	Changes sought Suggested Changes The requirement within Paragraph 5.44 relating to the integration of the Welsh language in the development of the 8 Strategic Sites should be removed as it is not based on an LDP Policy. The requirement to take account of the interest of Welsh culture within the development of the 8 Strategic Sites is vague and needs further explanation to state how the Council expects this to be achieved and implemented.	
9 7	Why no previous Representation These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C2 We believe this policy does not have regard to National Guidance as the requirements within Paragraph 5.44 (as explained above) are not based on LDP Policies and therefore contravene Soundness Test C2. Implementing the changes within this representation would help to ensure this Soundness Test is met. Soundness Test CE3 We believe the requirements within Paragraph 5.44 (as explained above) are not clear in terms of how they will be achieved or implemented and therefore contravene Soundness Test CE3. Implementing the changes within this representation would help to ensure this Soundness Test is met.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
929.D14			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107						Site:								PEX Session:	
Policy: SSA 12				Map:				Issue: Affordable Housing							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1	2	Issue Summary
<p>The important issue of viability has not been considered when setting the affordable housing target within Policy SSA12. There is no evidence to justify why the percentage of 40% has been chosen and the effect might have on developments in the Southern Strategy Area.</p> <p>The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes.</p> <p>Policy SSA12 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.</p>		

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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2 3 Representation text

This policy states that provision of 40% affordable housing will be sought on sites of 30 units or more. In addition to this, the policy states that on sites under 30 units, contributions will be sought for the reuse / rehabilitation of existing older housing stock in the County Borough. We believe the issue of development viability has not been properly considered when setting the requirements for this policy.

National Guidance (Tan 2, 2006) on the creation of affordable housing policy states that LDPs must identify a target for affordable housing based on evidence within the LHMA. The TAN goes on to state that "the target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought." (TAN 2, page 7 paragraph 9.1). Considering this statement, it is abundantly clear that TAN 2 requires the affordable housing target itself to take account of the availability of public subsidy and developer contributions that can be realistically sought.

In addition to this, the TAN goes on to state that when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability. This may involve making informed assumptions about the levels of finance available for affordable housing and the type of affordable housing to be provided. (TAN 2, page 8, paragraph 10.4). In this context, it is clear that TAN 2 requires local authorities to take account of site viability when setting thresholds and targets and in doing so, they should make informed assumptions about the levels of finance available.

Furthermore, National Guidance relating to the creation of Affordable Housing Delivery Statements is also clear about the need for the local authority to consider viability when setting the affordable housing target. Paragraph 1.24 states that targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and on the likely levels of finance available for affordable housing, including both public subsidy such as Social Housing Grant and the level of developer contribution that could reasonably be secured. The guidance goes on to make the important point that such a viability calculation is equally relevant in a buoyant or a depressed market. Even though this guidance is directly related to the creation of Affordable Housing Delivery Statements, it reflects the requirements of the WAG in terms of the appropriate creation of affordable housing policy, which is consistent with the nature of this representation.

Paragraph 6.153, states that the target figure of 40% affordable housing has been chosen to reflect the comparative strength of the housing market. However, there is nothing within the LDP or background papers relating to any work that was undertaken to arrive at this percentage figure and the Council has provided no evidence to describe what effect the 40% target is likely to have on development viability. Paragraph 6.153 goes on to state that the number of units sought may be reduced where it is clearly demonstrated that a site's location, the presence of abnormal development costs or other individual circumstances of the development, would result in the development not being economically viable with the above contribution threshold. However, the paragraph also states that Council will require evidence to support any proposed reduction in the provision of affordable housing. This implies that the Council believes it is the developer's responsibility to provide this evidence and we believe this is not consistent with National Guidance. As described above, National Guidance requires local authorities to prove that percentage targets set for affordable housing are economically viable and will not jeopardise the delivery of housing by their implementation. The HBF and its members are more than willing to assist the Council in trying to build the evidence base for affordable housing policy with a view to arriving at a workable policy solution, however, we believe it is unfair and contrary to National Guidance to require the developer to undertake this work in order to provide the Council with the evidence base and justification for its own policies. It is clear from paragraph 6.153, that when each planning application is submitted, the Council will request the maximum affordable housing target of 40%, until the developer can prove they are not viable. However, we believe in order to justify this course of action, the Local Authority must have evidence to prove the requested affordable housing target is viable and deliverable for that particular site, before it is adopted within planning policy and imposed as a requirement for that development. Again, this is supported by National Guidance, where it states in Appendix 3 of the Affordable Housing Delivery Statement Guidance that when meeting the needs of affordable housing, the policy should "clearly demonstrate that the delivery figure is achievable".

In terms of development viability and housing delivery, there are a number of development sites within the Southern Strategy Area, particularly brownfield sites, that will require significant works before any development can take place. This information is provided within the policy allocations within this LDP chapter. It is quite possible these works could result in significant additional costs which will need to be absorbed by land values. In addition to this, there will also be a raft of additional planning obligations required when developing a site, all of which need to be justified by the Council on the basis of their ability to be implemented. In all cases, their impact on development viability will be a key aspect of whether or not the affordable housing policy can be implemented as proposed and there is no evidence to suggest any of this has been taken into account when setting the affordable housing target.

These comments are even more pertinent given the current economic climate and the effects of the credit crunch. These issues have had a severe effect on the housing building industry in Wales and finances are critical to our members at present. This important issue is recognised by the WAG and by National Guidance on the creation of AHDSs. Without taking into account the importance of the financial situation our members and other housing developers find themselves in at present, the LDP runs the risk of becoming a barrier to the delivery of affordable housing. As stated above, National Guidance requires the affordable housing target itself to reflect an assessment of economic viability of land for housing in the area concerned and there is nothing within the draft Deposit LDP or background papers to suggest that any viability assessments have been undertaken to support it.

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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In this context and considering the information above, we believe the affordable housing Policy SSA12 should be based on sound evidence relating to development viability, to ensure that the affordable housing target is realistic in terms of what can actually be delivered. Affordable housing secured via Section 106 agreement is dependent solely on the entire housing site being delivered. If the financial viability of a development site in its entirety does not stack up, there remains a serious risk of the development site not coming forward, which will effectively quash any proposals to deliver affordable housing on the site in question. This would render the LDP completely ineffective as a tool to deliver an increased amount of affordable housing, which is the whole ethos behind the purpose of Policy SSA12.

Appeal Decision Blyth Valley Borough Council - 29/07/2008

The Federation would also like to draw attention to the above appeal by Blyth Valley Borough Council against the quashing by Collins J of a policy in part of the development plan for the borough of Blyth Valley in North-East England. Blyth Valley Council had adopted their Core Strategy, within which was a policy requiring 30% affordable housing on developments over 10 units. The policy was successfully challenged by the respondents and the appeal dismissed on the grounds that (amongst other things) the policy did not contain an appropriate assessment of development viability. The appeal also stated that it was not sufficient to base the evidence for the policy on assessments of need alone.

In addition to this, the appeal decision stated that a policy which requires developers to prove an affordable housing target is viable after it has been adopted is 'legally flawed', as it assumes a presumption that the policy is sound. In this respect, the Planning Act allows for no such presumption either way when setting planning policies and it is for the Inspector to decide whether or not a planning policy is sound at an Inquiry, based the evidence provided.

Even though this appeal decision is related to the English planning system and PPS3, the requirement to undertake a viability assessment is also relevant with respect to guidance provided under our planning system (as described above). In this context, the HBF has been advised by the Planning Inspectorate that they are aware of the Blyth Valley judgement and the principles of law set out in that judgement apply equally in Wales. They also stated that Inspectors examining LDPs will have regard to this judgement.

In addition to this, the Planning Inspectorate commented that the WAG are already prompting local authorities to have a robust evidence base to support the identification of whatever percentage of affordable housing they include in their LDP policies. The inspectorate indicated that the WAG has referred to viability testing to ensure that not only can sites/general provision be delivered but that any percentage set out in the LDP is deliverable. The Inspectorate went on to comment that, as the Inspector's Report is binding he/she will need sufficient certainty to arrive at a conclusion regarding soundness having regard to the tests that apply to LDPs set out in national guidance. Viability testing of the percentage level set in the LDP, taking into account economics over the plan period, will be essential to demonstrate delivery.

Considering the above, we believe the results of this appeal discussion could have a marked effect on decisions related to the soundness of affordable housing policies within forthcoming LDPs.

4 5 Changes sought

The affordable housing target of 40% within Policy SSA12 must be justified, as required by National Guidance, to prove that it would not have an adverse impact on development viability.

The effect on development viability must also be properly considered within the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes. Information on this should be included within the policy.

If affordable housing is a Council priority, the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.

9 7 Why no previous Representation

These particular proposals were not present within the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan Soundness Test C2	
<p>We believe Policy SSA12 contravenes Soundness Test C2 as it does not take account of National Guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE2</p> <p>We believe Policy SSA12 contravenes Soundness Test CE2. We believe that the levels of finance available for the delivery of affordable housing, particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.</p>																
<i>Item Question</i>														<i>Reply</i>		Tick box Replies
3	4			Seek changes? Any changes to be made to the Plan?											Yes	
7	7			Previous Representations? Did you make any previous representations on this issue during the Cons											No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
929.D15			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:			PEX Session:						
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	Criterion 1 of Policy SSA13 states that - "the proposed development does not adversely effect the provision of open space." We object to this criterion as the term Open Space has not been defined by the policy and the policy does not backed up by an Open Space Assessment.
2 3	Representation text	<p>There is nothing with the policy to describe what is meant by the term 'open space'. As the Council will appreciate, the term 'open space' could have a plethora of different meanings and therefore must be explained before it is included within this policy. As it stands the policy is vague and could be applied to many different pieces of land, which have little or no justification to warrant their protection.</p> <p>In addition to this, if the term 'open space' is meant in the context of what is described within TAN 16, we would make the following comments. TAN 16 states that open space provision should be based upon the findings of an Open Space Assessment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The open space assessment should allow local authorities to develop standards that reflect local distinctiveness and should include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quantitative elements (whether new provision is needed for the area) <input type="checkbox"/> Qualitative component (against which to measure need for enhancement of existing facilities) <input type="checkbox"/> An accessibility component (to whom and how is the provision accessible to the local community) (TAN 16 - paragraph 2.7) <p>The TAN also states that local planning authorities should ensure that an Open Space Assessment has been completed as an important part of the LDP preparation process, as this will provide them with the opportunity to identify the quantity and quality of open spaces in their respective areas, and are a basis for providing, improving and managing spaces for the economic, social and environmental benefits they bring to communities. (TAN 16 - paragraphs 2.9, 2.24 and 2.29)</p> <p>Even though the Council has undertaken a greenspace and open space/play area assessment, the results of these assessments are based on the CCW Greenspace Toolkit and the NPFA (now Fields in Trust) standards. The assessments are a quantitative appraisal of the number of greenspaces/open spaces/play areas available within the County Borough and the proximity of the population to these spaces. They do not relate to the guidance within TAN 16, which describes the necessary steps to undertaking an appropriate open space assessment nor do they describe the extent to which the assessment was subject to public consultation, which is a further requirement of the new guidance.</p>
4 5	Changes sought	<p>Suggested Changes</p> <p>The term "open space" Criterion 1 under Policy SSA13 should be explained in order to provide certainty in terms of the areas of land the policy intends to protect. At present, the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection.</p> <p>If the term 'open space' is meant in the context of what is described within TAN 16, then the requirements of the policy should be justified by an appropriate Open Space Assessment as required by TAN 16 or removed.</p>
9 7	Why no previous Representation	These specific proposals were not available for comment within the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
17	8	CE2 Test?		Not realistic and appropiates and/or not founded on roburst and credible evidence?						Yes					
18	8	CE3 Test?		No clear mechanisms for implementation and monitoring?						Yes					
20	9	Why changes satisfy Soundness Test C2		Give details why the changes you propose will ensure that the Plan											

If the term 'open space' within Policy SSA13 is meant in the context of what is described within TAN 16, we believe this policy does not have regard to National Guidance as it is not justified by an appropriate Open Space Assessment as described by TAN 16. In this respect, the policy would contravene Soundness Test C2 and implementing the changes within this representation would help to ensure this Soundness Test is satisfied.

Soundness Test CE2

The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such we believe it is not based on a sound and credible evidence base and therefore contravenes Soundness Test CE2. Implementing the changes within this representation would help to ensure this Soundness Test is satisfied.

Soundness Test CE3

The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such, the circumstances relating to the implementation of this policy are not clear and therefore it contravenes Soundness Test CE3. Implementing the changes within this representation would help to ensure this Soundness Test is satisfied.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
967.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 456/461		Mill Street rear				New Site		PEX Session:			
Policy: SSA 10				Map:						Issue: Housing Allocation					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Inclusion of land west of Mill Street, Tonyrefail for residential development.	
2 3	Representation text	
	Planning consent was granted on 22/1/2007 for comprehensive residential development of a 2 acre site for 25 dwellings. The planning application number is 06/2272/10. I also attach a plan showing the site outlined in red to assist identification of the land.	
4 5	Changes sought	
	Inclusion of the site located off Mill Cottages, Mill Street, Tonypanyd for residential development purposes. Appendix One Section B Housing Southern Allocations should have this planning consented site listed.	
9 7	Why no previous Representation	
	Land purchased after consultation on the Preferred Strategy.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	There is full planning permission for the development of 25 dwellings and is a development site that should be included in the Policy SSA-4 for development in the key settlement of Tonyrefail. This is a brownfield site located within the settlement boundaries and satisfies Policy SSA-4 para 6.24 for supporting regeneration of vacant sites.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
967.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.096						Site:				New Site		PEX Session:			
Policy: SSA 4				Map:				Issue: Principal Towns & Key Settlements							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Inclusion of land west of Mill Street, Tonyrefail for residential development	
2 3	Representation text	
	Planning consent was granted on 22/1/2007 for comprehensive residential development of a 2 acre site for 25 dwellings. The planning application number is 06/2272/10. I also attach a plan showing the site outlined in red to assist identification of the land.	
4 5	Changes sought	
	Inclusion of the site located off Mill Cottages, Mill Street Tonypany for residential development purposes. Appendix one Section B1 housing southern allocations should have this planning consented site listed	
9 7	Why no previous Representation	
	Land purchased after consultation on the Preferred Strategy	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	There is full planning permission for the development of 25 dwellings and is a development site that should be included in the Policy SSA 4 for development in the key settlement of Tonyrefail. This is a brownfield site located within the settlement boundaries and satisfies Policy SSA 4 para 6.24 supporting regeneration of vacant sites		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041, para.4.18		Site:		PEX Session:											
Policy: CS 11		Map:		Issue: Climate Change											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	We believe the policy requiring each development to reduce carbon emissions by 10% must include a clear and workable viability safeguard to ensure the policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it would cause detrimental impact on development viability.
2 3	Representation text	It is fundamentally important that a clear and workable viability safeguard is written into the policy, to ensure the policy is viable, implementable and deliverable. We believe that without proper mechanisms within the policy for consideration of the economic viability of future housing developments in RCT, the Council might not be able to implement the policy as proposed. This would therefore render the policy inadequate and unsound. These comments are even more pertinent in light of the current economic climate and the effect it is having (and will continue to have) on the housebuilding industry in Wales. It is essential that policies are sufficiently flexible to cope with the changing circumstances, clear in terms of their guidance and purpose, and realistic in terms of their application. Without such characteristics any policies adopted will impede, rather than accelerate the realisation of the objective they are designed to achieve. In addition to a general viability safeguard in the policy, the Council should make it clear whether carbon efficiency is always the first claim on available land value. Logically it should be if addressing climate change is the Welsh Assembly Government's principal concern for achieving sustainable development (as paragraph 4.88 of the draft Deposit LDP suggests). If this is the case, then in order to be sound the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands. There is a distinct possibility that, particularly in the context of lower land value world for the foreseeable future, the accumulation of policy obligations is likely to have implications for the affordability of other planning contributions. As such, the Council must make clear within the draft Deposit LDP that this policy would override other policy objectives if collectively they could not all be supported from land values. The LDP must address this very real issues if it is to be sound and successful in delivering its objectives alongside the wider need to improve the supply of all forms and tenures of homes.
4 5	Changes sought	We believe Policy CS11 must be based on a robust and credible evidence base which thoroughly researches the viability of the policy proposals and the potential impact the proposals might have on the delivery of housing. Policy CS11 must include a clear and workable viability safeguard to ensure the policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it would cause a detrimental impact on development viability. Policy CS11 must also include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not be supported from land values.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan Soundness Test CE2
<p>We believe the policy contravenes Soundness Test CE2 as the policy does not contain information regarding the potential effect it might have on the viability of housing developments in RCT. As such, the policy is not based on a robust and credible evidence base. Implementing the changes with this representation will help to satisfy this soundness Test.</p> <p>Soundness Test CE3 We believe the policy contravenes Soundness Test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development. Implementing the changes within this representation will help to satisfy this Soundness Test.</p> <p>Soundness Test CE4 We believe the policy contravenes Soundness Test CE4 as it does not include sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability. Implementing the changes within this representation would help to satisfy this Soundness Test.</p>																
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
982.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.041, para.4.18				Site:								PEX Session:		
Policy: CS 11				Map:				Issue: Climate Change						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	The second box on page 41 labelled "B) Adapting to direct and indirect impacts of climate change through:" has the following paragraphs to which we object:-	
	2. Managing flood risk through incorporating measures in design and construction to reduce the effects of flooding, including sustainable drainage systems (SUDS) and flood resilient design for infrastructure and property.	
	3. Requiring new development to reduce the demand for water through recycling rainwater and grey water recycling;	
2 3	Representation text	
	We object to these requirements as in many cases Statutory Undertakers such as Welsh Water are not willing to adopt design solutions such as SUDS and Grey Water recycling systems. The Council must liaise with Statutory Undertakers to ensure that any requirements within their LDP polices are consistent with the policy stance of the relative statutory body- in this case Welsh Water.	
	We also object to these requirements due to the fact that it might not be appropriate to incorporate such measures on all development and the policy should recognise this.	
4 5	Changes sought	
	The requirements set out within these paragraphs need to be consistent with the policy stance of Welsh Water of they should be removed.	
	The requirements must include a recognition that these solutions might not be appropriate on all developments and should allow for the flexibility to accommodate such situations.	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultaiton.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Soundness Tests CE2		
	We believe the policy contravenes Soundness Test CE2 as the proposals might not be acceptable to the Statutory Undertaker that will eventually adopt the solutiions required. As such, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.		
	Soundness Test CE4		
	We believe the policy contravenes Soundness Test CE4 as it is not sufficiently flexible enough to allow for situations where the requirement of these solutions would not be appropriate for the particular development. Implementing the changes within this representation would help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
		No													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.045						Site:			PEX Session:						
Policy: AW 2				Map:			Issue: Design								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The box on page 45 contain a number of criteria that define sustainable locations. Number 5 states that:- (Sustainable locations)- Are not within Zone C floodplain unless it can be justified on the grounds that:- a) it is necessary to assist the regeneration of a principal town or jey settlement, or where development involves a large brownfield site b) The potential consequences of a flooding event have been considered and found to be acceptable in accordance with national guidance We object to this part of the policy on the grounds that, if flood risk issues are able to be alleviated as part of an acceptable Flood Consequences Assesment, and the land in question is suitable for a particular development in all other aspects, it should not be a requirement that the land has to be brownfield land or necessary to assist in the regeneration of a principle town or key settlement. There might be circumstances where Criterion A does not apply, but the development of a site would be beneficial to an area, if the flood risk issues could be removed. The policy as it stands is restrictive and inflexible.	
2 3	Representation text We believe the policy as proposed places an unnecessary restriction to the potential development on sites that are within Zone C flood risk areas. The policy states that if the site in question does not assist with the regeneration of a principle town or key settlement , or does not involve a large brownfield site, it would not be considered appropriate even if all the risks to flooding could be alleviated appropriately . As such, the policy ignores the possibility that a site is a Zone C flood risk area might be provide major benefits to the locality in some other manner than set out by the criteria in Part A of this policy, if the risks to flooding could be alleviated and it was allowed to be developed. There doesn't seem to be any logic to the policy as it stands, as surely if a site could be developed for an acceptable land use in planning terms and the risks of flooding could be alleviated appropriatley, the other criteria listed would merely represent an unnecessary barrier and restriction to regeneration that could prove beneficial to the area concerned. In light of the above, we object to the inclusion of Part A of this section of Policy AW2.	
4 5	Changes sought Part A of Section 5 of policy AW2 which states- "a) it is necessary to assist the regeneration of a principal town or key settlement, or where development involves a large brownfield site" should be removed as it is unnecessarily restrictive.	
9 7	Why no previous Representation These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE4 We believe the policy as it stands Contravenes Soundness Test CE4 as it is unnecessarily restrictive and does not provide the Council with enough flexibility to allow for development as described within our representation above. Implementing the changes within this representation would help restore maximum flexibility to the policy and hence satisfy this Soundness Test.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:		Deposit Draft, p.034, para.4.47 4.48 4.49 4.50			Site:										PEX Session:
Policy:		CS 5			Map:		Issue: Affordable Housing								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The viability of sites has not been considered when setting the affordable housing target. Policy CS5 must also include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not be supported from land values.	
2 3	Representation text The viability of sites has not been considered when setting the affordable housing target. Policy CS5 must also include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not be supported from land values.	
4 5	Changes sought The affordable housing target set within policy CS5 must be justified, as required by national guidance, to prove that it would not have an adverse impact on development viability, or it should be removed. The policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.	
9 7	Why no previous Representation These particular proposals were not present within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan	
				Soundness Test C2												We believe Policy CS5 contravenes SoundnessTest C2 as it does not take account of national guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this soundness test.	
				Soundness Test CE2												We believe Policy CS5 contravenes Soundness Test CE2. We believe that the levels of finance available for the delivery of affordable housing, particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy the Soundness Test.	
				Soundness test CE3												We believe the policy contravenes soundness Test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development. Implementing the changes within this representation will help to satisfy this Soundness Test.	
				<i>Item Question</i>												<i>Reply</i>	
				3	4											Seek changes? Any changes to be made to the Plan?	Yes
				7	7											Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047, para.4.81				Site:										PEX Session:	
Policy: AW 5				Map:										Issue: Design	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Within the first box under part B- Sustainable Design, criterion 3 states that "Residential schemes of 10 or more units achieve as a minimum the Very Good Eco-Homes (or equivalent) target." We object to this policy as it does not accord with policy CS11- Climate Change	
2 3	Representation text	
	We object to this policy as it does not accord with policy CS11, where the requirement is for development proposals to reduce their predicted CO2 emissions by a minimum of 10%. The policy is confusing and does not accord with the requirements set out by other policies in the plan.	
4 5	Changes sought	
	Suggested Changes Criterion 3, under part B of the policy should be changed to reflect Policy CS11 or removed.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C1		
	This policy contravenes Soundness Test C1 as it does not accord with Policy CS11 and therefore does not have regard to other policies within the plan. Making the changes within this representation would help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047, para.4.81				Site:										PEX Session:	
Policy: AW 5				Map:										Issue: Design	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Within the first box under part B- Sustainable Design, criterion 3 states that "Residential schemes of 10 or more units achieve as a minimum the Very Good Eco-Homes (or equivalent) target." We object to this policy as it does not accord with Policy CS11- Climate Change.	
2 3	Representation text We object to this policy as it does not accord with policy CS11, where the requirement is for development proposals to reduce their predicted CO2 emissions by a minimum of 10%. The policy is confusing and does not accord with the requirements set out by other policies in the plan.	
4 5	Changes sought Suggested Change Criterion 3, under part B of the policy should be changed to select Policy CS11 or removed.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test C1 This policy contravenes Soundness Test C1 as it does not accord with Policy CS11 and therefore does not have regard to other policies within the plan. Making the changes within this representation would help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
982.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.048, para.5.28						Site:			PEX Session:					
Policy: AW 5				Map:				Issue: Design						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	Paragraph 5.28 states that "The requirement to achieve a minimum of a Very Good standard in both BREEAM and EcoHomes will be monitored and may be increased as technologies improve." We object to the wording within the paragraph as it does not accord with policy CS11 and does not give any regard to development viability.	
2 3	Representation text	
	We object to this policy as it does not accord with policy CS11, where the requirement is for development proposals to reduce their predicted CO2 emissions by a minimum of 10%. The policy is confusing and does not accord with the requirements set out by other policies in the Plan.	
	We object to the wording within this paragraph as there is no mention of viability within this paragraph and how the increase in standards will affect viability. It is fundamentally important that information relating to a clear and workable viability safeguard is included within this paragraph, to ensure the requirements are viable, implementable and deliverable. We believe that without proper mechanisms for consideration of the economic viability of future housing developments in RCT, the Council might not be able to implement any policies pertaining to these requirements now or in the future. This would therefore render such policies inadequate and unsound. These comments are even more pertinent in light of the current economic climate and the effect it is having (and will continue to have) on the housebuilding industry in Wales. It is essential that policies and their requirements are sufficiently flexible to cope with the changing circumstances, clear in terms of their guidance and purpose, and realistic in terms of their application. Without such characteristics any policies adopted will impede, rather than accelerate the realisation of the objective they are designed to achieve.	
4 5	Changes sought	
	Suggested Changes	
	The wording within paragraph 5.28 relating to the requirement for developments to achieve Ecohomes Very Good, should be changed to reflect the requirements of policy CS11 or removed.	
	Paragraph 5.28 must include information to state that a robust and credible evidence base will be used to justify any increase in standards, which thoroughly researches the viability of the policy proposals and the potential impact the proposals might have on the delivery of housing.	
	Paragraph 5.28 must state that a clear and workable viability safeguard will be applied to any requirements for improved energy/ environmental standards within residential developments, to ensure the related policy is capable of implementation and provides a mechanism to allow sufficient dispensation where it would cause a detrimental impact on development viability.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Soundness test C1												The wording in this paragraph contravenes Soundness Test C1 as it does not accord with Policy CS11 and therefore does not have regard to other policies within the plan. Making the changes within this representation would help satisfy the soundness test.
				Soundness test CE2												We believe the wording within this paragraph contravenes Soundness Test CE2 as it does give sufficient regarding to the potential effect the requirements might have on the viability of housing developments in RCT. As such, the requirements are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness test.
				Soundness Test CE4												We believe the wording within this paragraph contravenes Soundness Test CE4 as it does not include provision for sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability. Implenting the changes within this representation would help to satisfy this soundness test.
<i>Item</i>	<i>Question</i>														<i>Reply</i>	<i>Tick box Replies</i>
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.050			Site:			PEX Session:									
Policy: AW 6			Map:			Issue: Design									
Summary:															

Item	Question	Representation Text
1	2 Issue Summary	Criterion 10 under policy AW6 states that- "(Developments will be supported where) Open space is provided in accordance with the Fields in Trust Standards". We object to this requirement as it does not accord with National Guidance in form of TAN 16.
2	3 Representation text	<p>We object to this policy as it does not accord with National Guidance. Paragraph 2.7 of TAN 16 (2006) states that PPW does not prescribe particular standards of open space provision, but states that these standards should be based upon the findings of an Open Space Assessment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The TAN goes on to state that an Open Space Assessment should allow local authorities to develop standards that reflect local distinctiveness and should include:</p> <ul style="list-style-type: none"> - Quantitative elements (whether new provision is needed for the area) - Qualitative component (against which to measure need for enhancement of existing facilities) - An accessibility component (to whom and how is the provision accessible to the local community) (TAN 16-Paragraph 2.7) <p>The TAN does mention the Fields in Trust Benchmark Standards, but states that these standards will be helpful for local authorities in formulating their own local standards for provision. The TAN also states that local planning authorities should ensure that an Open Space Assessment has been completed as an important part of the LDP preparation process, as this will provide them with the opportunity to identify the quantity and quality of open spaces in an area, and form the basis for providing, improving and managing spaces for the economic, social and environmental benefits they bring to communities. (TAN 16- paragraphs 2.9, 2.24 and 2.29)</p> <p>Even though the Council has undertaken a green space and open space/play area assessment, the results of these assessments are based on the CCW Greenspace Toolkit and the NPFA (now Fields in Trust) standards. The assessments are a quantitative appraisal of the number of greenspaces/open spaces/ play areas available within the County Borough and the proximity of the population to these spaces. They do not relate to the guidance within TAN 16, which describes the necessary steps to undertaking an appropriate open space assessment nor do they describe the extent to which the assessment was subject to public consultation, which is a further requirement of the new guidance.</p> <p>We acknowledge the work already done by the authority in determining quantitative deficiencies in open space, however, without undertaking an appropriate Open Space Assessment it will be difficult to ascertain the actual nature of any deficiencies identified. That is, the reason for a perceived deficiency in certain types of open space may be the result of many factors such as, a lack in demand for certain sporting activity, in which case the provision of more land or monies to upgrade certain facilities would do nothing to alleviate the problem. An appropriate Open Space Assessment is a crucial factor in deciding these aspects and also in assuming the level of responsibility any new developments may have in ensuring any deficiencies are not exacerbated. It is also important that this be done at a local level in order to give a true picture of the level of deficiency, or otherwise, across the authority. Furthermore, if an appropriate Open Space Assessment had been undertaken, it is likely that the policy would contain local standards of provision for each area, rather than a borough wide standard that is based solely on the Fields in Trust Benchmark standards.</p> <p>In addition to these concerns, there is nothing within the policy that describes how development viability has been considered when setting any prescribed standard. It is essential that development viability is considered when setting planning obligation policies, because such policies might have an adverse impact on development viability. Even though it might not be the case that one single policy has a negative effect on viability, the accumulative requirements of other planning obligations policies might be enough to render a development unviable unless a proper analysis of the impact of each policy is undertaken.</p>

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4 5	Changes sought														
	Suggested Changes														
	Criterion 10 under policy AW6 should be justified by an appropriate Open Space Assesment as required by TAN 16 or removed.														
	The policy should include information to state that where it is required, the impact of its requirements on development viability will be taken into account and certain dispensation will be allowed where these requirements cannot be supported by land values. This will include taking into consideration all other planning obligations, as well as development costs.														
9 7	Why no previous Representation														
	These specific proposals were not avalibale for comment within the Preferred Strategy consultation.														

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Soundness Test C2 We believe this policy does not have regard to National Guidance and therefore contavenes Soundness Test C2. Implementing the changes within this representation would help to ensure this soundness test is met.		
	Soundness test CE2 We believe this policy is not based on a sound and credible evidence base and therefore contravenes soundness test CE2. Implementing the changes within this representation would help ensure this soundness test is met.		
	Soundness test CE4 This policy is not sufficiently flexible to deal with any future change in circumstances, as it does not recognise that it might have a negative effect on the viability of future developments, and therefore contravenes Soundness Test CE4. Implementing the changes within this representation would help to ensure this soundness test is met.		

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.078, para.6.49 - 6.54				Site:								PEX Session:			
Policy: NSA 11				Map:								Issue: Affordable Housing			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>The important issue of viability has not been considered when setting the affordable housing target within Policy NSA11. Even though the Council states that the 25% target has been chosen to reflect viability issues, there is no evidence to justify why this percentage has been chosen and the effect is it likely to have on developments in the Northern Strategy Area.</p> <p>The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existng stock for affordable housing purposes.</p> <p>Policy NSA11 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.</p>
2 3	Representation text	<p>The important issue of viability has not been considered when setting the affordable housing target within Policy NSA11. Even though the Council states that the 25% target has been chosen to reflect viability issues, there is no evidence to justify why this percentage has been chosen and the effect is it likely to have on developments in the Northern Strategy Area.</p> <p>The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existng stock for affordable housing purposes.</p> <p>Policy NSA11 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could no tall be supported from land values.</p>
4 5	Changes sought	<p>The affordable housing target of within policy NSA11 must be justified, as required by national guidance, to prove that it would not have an adverse impact on development viability.</p> <p>The effect on development viability must also be properly considered within the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes. Information on this should be included within the policy.</p> <p>If affordable housing is a Council priority, the policy must clearly indidate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.</p>
9 7	Why no previous Representation	<p>These particular proposals were not present within the Preferred Strategy consultation.</p>

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				Soundness test C2											We believe policy NSA11 contravenes soundness test C2 as it does not take account of national guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this soundness test.
				Soundness test CE2											we believe policy NSA11 contravenes soundness test CE2. We believe that the levels of finance available for the delivery of affordable housing, particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.
				Soundness test CE3											We believe policy NSA11 contravenes soundness test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development. Implementing the changes within this representation will help satisfy this soundness test.
				<i>Item Question</i>											<i>Reply</i>
				3	4										Seek changes? Any changes to be made to the Plan?
															Yes
				7	7										Previous Representations? Did you make any previous representations on this issue during the Cons
															No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
982.D10			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.079							Site:			PEX Session:							
Policy: NSA 12				Map:			Issue: Settlement Boundary										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	Criterion 1 of policy NSA12 states that- "the proposed development does not adversely effect the provisions of open space." We object to this criterion as the term open space has not been defined by the policy and the policy is not backed up by an open space assessment as required by National Guidance.	
2 3	Representation text	
	There is nothing with the policy to describe what is meant by the term 'open space'. As the Council will appreciate, the term 'open space' could have a plethora of different meanings and therefore must be explained before it is included with this policy. As it stands the policy is vague and could be applied to many different pieces of land, which have little or no justification to warrant their protection.	
	In addition to this, if the term 'open space' is meant in the context of what is described within TAN 16, we would make the following comments. TAN 16 states that open space provision should be based upon the findings of an open space assesment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The open space assessment should allow local authorities to develop standards that reflect local distinctivness and should include:	
	- Quantitative elements (whether new provision is needed for the area)	
	- Qualitative component (against which to measure need for enhancement of existing facilites)	
	- An accessibility component (to whom and how is the provison accessible to the local community) (TAN 16- paragraph 2.7)	
	The TAN also states that local planning authorities should ensure that an open space assessment has been completed as an important part of the LDP preparation process, as this will provide them with the oppportunity to identify the quantity and quality of open spaces in an area, and are a basis for providing, improving and managing spaces for the economic, social and environmental benefits they bring to communities. (TAN 16- paragraphs 2.9, 2.24 and 2.29)	
	Even though the Council has undertaken a green space and open space /play area assessment, the results of these assessments are based on the CCW Greenspace Toolkit and the NPFA (now fields in trust) standards. The assessments are a quantitative appraisal of the number of greenspaces/open spaces/ play areas avaiable within the County Borough and the proximity of the popualtion to these spaces. They do not relate to the guidance within TAN16, which describes the necessary steps to undertaking an appropriate open space assessment nor do they describe the extent to which the assessment was subject to public consultation, which is a further requirement of the new guidance.	
4 5	Changes sought	
	Suggested changes	
	The term "open space" Criterion 1 under policy NSA12 should be explained in order to provide certainty in terms of the areas of land the policy intends to protect. At present, the policy is too vague and could be applied to many different areas of land that have little of no justification to warrant their protection.	
	If the term 'open space' is meant in the context of what is described within TAN 16, then the requirements of the policy should be justified by an appropriate open space assessment as required by TAN 16 or removed.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
17	8	CE2 Test?		Not realistic and appropiates and/or not founded on robust and credible evidence?							Yes				
18	8	CE3 Test?		No clear mechanisms for implementation and monitoring?							Yes				
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
<p>Soundness test C2 If the term 'open space' within Policy NSA12 is meant in the context of what is described within TAN 16 we believe this policy does not have regard to National Guidance as it is not justified by an appropriate open space assessment as described by TAN 16. In this respect, the policy would contravene soundness test C2 and implementing the changes within this representation would help ensure this soundness test is satisfied.</p> <p>Soundness test CE2 The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such we believe it is not based on a sound and credible evidence base and therefore contrvenes soundness test CE2. Implementing the changes within this representation would help to ensure this soundness test is satisfied.</p> <p>Soundness test CE3 The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such, the circumstances relating to the implementation of this policy are not clear and therefore it contravenes soundness test CE3. Implementing the changes within this representation would help to ensure this soundness test is satisfied.</p>															
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes?		Any changes to be made to the Plan?							Yes				
7	7	Previous Representations?		Did you make any previous representations on this issue during the Cons							No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107, para.6.152 - 6.156				Site:								PEX Session:			
Policy: SSA 12				Map:								Issue: Affordable Housing			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>The important of viability has not been considered when setting the affordable housing target within Policy SSA12. There is no evidence to justify why the percentage of 40% has been chosen and the effect might have on developments in the Southern Strategy Area.</p> <p>The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housng purposes.</p> <p>Policy SSA12 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.</p>
2 3	Representation text	<p>The important of viability has not been considered when setting the affordable housing target within Policy SSA12. There is no evidence to justify why the percentage of 40% has been chosen and the effect might have on developments in the Southern Strategy Area.</p> <p>The issue of development viability has also not been properly considered in the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housng purposes.</p> <p>Policy SSA12 must include information regarding the Council's intentions with respect to policy prioritisation, where additional requirements on development sites from other planning obligations could not all be supported from land values.</p>
4 5	Changes sought	<p>The affordable housing target of 40% within Policy SSA12 must be justified, as required by National Guidance, to prove that it would not have an adverse impact on development viability.</p> <p>The effect on development viability must also be properly considered within the requirement to seek financial contributions from developments between 5 and 30 units for the upgrade of existing stock for affordable housing purposes. Information on this should be included within the policy.</p> <p>If affordable housing is a Council priority, the policy must clearly indicate that other contributions funded from land value will need to be adjusted accordingly to ensure that development viability is not adversely affected by the combination of demands.</p>
9 7	Why no previous Representation	<p>These particular proposals were not present within the Preferred Strategy consultation.</p>

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				Soundness test C2											We believe Policy SSA12 contravenes Soundness Test C2 as it does not take account of National Guidance on the formulation of affordable housing policy. National Guidance requires local authorities to take account of site viability when setting affordable housing percentage targets and in doing so, they should make informed assumptions about the levels of finance available. The Policy as proposed has not taken these issues into account and therefore does not conform to National Guidance. Implementing the changes within this representation will help to satisfy this Soundness test.
				Soundness Test CE2											We believe Policy SSA12 contravenes Soundness Test CE2. We believe that the levels of finance available for the delivery of affordable housing particularly developer contributions, and the impact of the affordable housing percentage targets and thresholds on site viability have not been properly taken into account in setting the affordable housing policy. Therefore, the policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.
				Soundness Test CE3											We believe Policy SSA12 contravenes Soundness Test CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development concerned. Implementing the changes within this representation will help to satisfy this Soundness Test.
Item	Question											Reply	Tick box	Replies	
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
982.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.108						Site:						PEX Session:		
Policy: SSA 13				Map:				Issue: Settlement Boundary						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	Criterion 1 of Policy SSA 13 states that- "the proposed development does not adversely effect the provision of open space." We object to this criterion as the term open space has not been defined by the policy and the policy does not backed up by an open space assessment.	
2 3	Representation text	
	There is nothing with the policy to describe what is meant by the term 'open space'. As the Council will appreciate, the term 'open space' could have a plethora of different meanings and therefore must be explained before it is included within this policy. As it stands the policy is vague and could be applied to many different pieces of land, which have little or no justification to warrant their protection.	
	In addition to this, if the term 'open space' is meant in the context of what is described within TAN16, we would make the following comments. TAN 16 states that open space provision should be based upon the findings of an Open Space Assessment, which will allow local authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. The open space assesment should allow local authorities to develop standards that reflect local distinctivness and should include:	
	<ul style="list-style-type: none"> - Quantitative elements (whether new provision is needed for the area) - Qualitative component (against which to measure need for enhancement of existing facilites) - An accessibility component (to whom and how is the provision accessible to the local community) (TAN16- paragraph 2.7) 	
	The TAN also states that local planning authorities should ensure that an open space assessment has been completed as an important part of the LDP preparation process, as this will provide them with the opportunity to identify the quantity and quality of open spaces in their respective areas, and are a basis for providing, improving and managing spaces for the economic, social and environmental benefits they bring to communities. (TAN16 -paragraphs 2.9, 2.24 and 2.29)	
	Even though the Council has undertaken a greenspace and open space/ play area assessment, the results of these assessments are based on the CCW Greenspace Toolkit and the NPFA (now fields in trust) standards. The assesments are a quantitative appraisal of the number of greenspaces/open spaces/ play areas avialible within the County Borough and the proximity of the population to these spaces. They do not relate to the guidance within TAN16, which describes the necessary steps to undertaking an appropriate open space assessment nor do they describe the extent to which the assessment was subject to public consultation, which is a further requirement of the new guidance.	
4 5	Changes sought	
	Suggested Changes	
	The term "open space" Criterion 1 under Policy SSA13 should be explained in order to provide certainty in terms of the areas of land the policy intends to protect. At present, the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection.	
	If the term 'open space' is meant in the context of what is described within TAN 16, then the requirements of the policy should be justified by an appropriate Open Space Assessment as required by TAN16 or removed.	
9 7	Why no previous Representation	
	These specific proposals were not available for comment within the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
17	8	CE2 Test?		Not realistic and appropiates and/or not founded on robust and credible evidence?						Yes					
18	8	CE3 Test?		No clear mechanisms for implementation and monitoring?						Yes					
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
		Soundness Test C2		If the term 'open space' within policy SSA13 is meant in the context of what is described within TAN 16, we believe this policy does not have regard to National Guidance as it is not justified by an appropriate Open Space Assessment as described by TAN16. In this respect, the policy would contravene Soundness test C2 and implementing the changes within this representation would help to ensure this soundness test is satisfied.											
		Soundness test CE2		The term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justificacion to warrant their protection. As such we believe it is not based on a sound and credible evidence base and therefore contravenes Soundness Test CE2. Implementing the changes within this representation would help to ensure this soundness test is satisfied.											
		Soundness test CE3		the term 'open space' is not fully explained and therefore the policy is too vague and could be applied to many different areas of land that have little or no justification to warrant their protection. As such, the circumstances relating to the implementation of this policy are not clear and therefore it contravenes soundness test CE3. Implementing the changes within this representation would help to ensure this soundness test is satisfied.											
		<i>Item Question</i>												<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?												Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons												No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 622/631		Gilfach Road S.				New Site		PEX Session:			
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The former industrial site at Padfield Court was promoted under candidate site reference number 631 for the whole site, and 349 for part. This is a large Brownfield site within the settlement boundary which should have a specific allocation as a residential site.	
2 3	Representation text	
	The former Padfield Court Industrial site is a semi derelict urban site which has been the subject of a planning application for residential use. There is no extant consent on this site although there was a resolution to grant a consent approved in August 2008 , but this remains subject to call- in.	
	Policy SSA4 development in the key settlement of Tonyrefail does allow for appropriate development within the settlement boundary. The Padfield Court site extends to 5.6 hectares and as such is a large site to leave as a windfall site, without a specific allocation.	
4 5	Changes sought	
	This site at Padfeild Court should be included within Policy SSA10 as a specific housing allocation.	
6 6	Candidate Site Ref No	
	349, 631	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2		
	We believe the policy contravenes soundness test CE2 as the allocation in policy SSA10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D14			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113, para.6.179		Site: 815//SSA 22.1		Tonyrefail & Penrhiwfer		Amend site boun		PEX Session:								
Policy: SSA 22		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The green wedge as defined in policy SSA 22.1 to the north of Tonyrefail appears to be devised on an arbitrary basis to protect whatever countryside remains following the allocation of additional housing sites.	
2 3	Representation text The green wedge SSA 22.1 to the north of Gilfach Road does not fulfil the purpose of a green wedge. At paragraph 6.179 of the LDP there is reference to a Green Wedge Topic Paper which details each of these designations. This topic paper sets out the survey methodology including desk and field studies. The tabulated results of survey list the purpose of this green wedge to include; - protect vulnerable undeveloped land - protect urban form - prevent coalescence between and within settlement - protect open nature of the land. In this instance the Gilfach Goch/ Tonyrefail (Trane farm) green wedge does not adequately prevent the coalescence of the settlements. The protection of vulnerable undeveloped land and the open nature of the land have been disregarded. A large residential allocation at Trane Farm has been included in the plan despite the sensitivity of this gap between settlements. The green wedge allocation appears to be an after thought superimposed on whatever land remains rather than a true assessment of the value of the land.	
4 5	Changes sought The boundary of the green wedge allocation should be examined closely and amended as necessary to perform its function of protecting open land; vulnerable undeveloped land and the coalescence of settlements.	
9 7	Why no previous Representation These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2 We believe the policy contravenes Soundness Test CE2 as the proposed allocation and policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D15			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.183		Site: 823//SSA 23.1		Llanharry Surrounds		Amend site boun		PEX Session:							
Policy: SSA 23		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The Special Landscape Area as defined in Policy SSA 23.1 is inappropriately drawn on the eastern edge of Llanharry. The allocation includes the Elms Farm site which was excluded from the SLA Map as shown in the evidence base, No. 29 Proposals of Designation of SLA's Maps RCT 2008.	
2 3	Representation text	
	The Elms Farm site should not be included within the SLA designation for Llanharry Surrounds. The evidence base sets out at No.28 the methodology for Special Landscape Areas and at document 29 the proposals of designation of SLA's including maps.	
	These assessments do not conclude that Elms Farm makes a significant contribution to the wider landscape; the land is excluded from the proposed SLA designation as shown on Map1 Llanharry Surrounds. The Landmap process appears to consider the land to be part of the settlement of Llanharry and not open countryside.	
	The Elms Farm parcel of land is not regarded as being of landscape value sufficient to warrant its specific designation. The inclusion of this site within the SLA is not therefore based on its landscape value but more as a convenience having excluded it from the candidate site selection process and the settlement boundary of Llanharry.	
4 5	Changes sought	
	The boundary of the Special Landscape Area should be amended to exclude the Elms Farm site Llanharry from its designation.	
6 6	Candidate Site Ref No	
	268	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	
21 11	Why attend Examination?	
	Attendance at the Examination will allow for a thorough cross examination of the reasons behind this sites assessment and how the matrices have been applied.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Soundness Test CE2 We believe the policy contravenes soundness test CE2 as the proposed allocation and policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No

982.D16

O W M

Document: Deposit Draft, p.114, para.6.183

Site: 823//SSA 23.1 Llanharry Surrounds

Amend site bound PEX Session:

Policy: SSA 23

Map:

Issue: Environment

Summary:

Item	Question	Representation Text
1	2 Issue Summary	The Special Landscape Area as defined in Policy SSA 23.1 is inappropriately drawn on the northern edge of Llanharry. The housing allocation (SSA10.13). Land West of Llechau (excluding a small part of the western part fronting the road) was included in the SLA Map proposed area for designation as shown in the Evidence Base, No.29 Proposals of Designation of SLA's Maps RCT 2008.
2	3 Representation text	The Llechau West site should be included within the SLA designation for Llanharry Surrounds to accord with the findings of the evidence base sets out at No.28 The Methodology for Special Landscape Areas and at document 29 The proposals of Designation of SLA's including maps. These assessments conclude that the land West of Llechau makes a contribution to the wider landscape with the land shown as part of the proposed SLA designation on map 1 Llanharry Surrounds of the evidence base document no.29. The Landmap process appears to consider the land to be part of the wider landscape bounding open countryside. This prominent parcel of land currently forms part of a wider swath of open countryside with no defensible boundaries which logically forms part of the SLA surrounding the settlement of Llanharry.
4	5 Changes sought	The boundary of the Special Landscape Area should be amended to include the land parcel identified as SSA10.13 in the LDP as part of the Llanharry surrounds Special Landscape Area.
9	7 Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17	8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20	9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		We believe the policy contravenes Soundness Test CE2 as the proposed allocation and policy is not based on a robust and credible evidence base. Implementing the changes within the representation will help to satisfy this Soundness Test.

Item	Question	Reply	Tick box Replies
3	4 Seek changes? Any changes to be made to the Plan?	Yes	
5	6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7	7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
982.D17			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.045						Site:			PEX Session:							
Policy: AW 2				Map:				Issue: Design								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The settlement of Talygarn should be recognised as one of the smaller settlements included within the Southern Strategy Area as an adjunct to Brynsadler	
2 3	Representation text	
	We have reviewed the Housing Topic Paper and the Roles and Functions of Settlements Topic Paper to see if there is any compelling reason why a settlement boundary was not extended south of Brynsadler to include Talygarn. The former RCT (Taff Ely) Local Plan defined a settlement boundary around the settlement of Talygarn.	
	The Topic Paper Roles and Functions assesses the different settlements in Appendix 17 of the report using a local and neighbourhood centre matrix. Talygarn ranks alongside other settlements including Brynsadler with a score of 3, but unlike the former (Brynsadler) was not included within the smaller settlements category which have a settlement boundary.	
	The settlement is not so small that it can be perceived as open countryside; it has a focus around the Church and includes a sizable residential scheme at St Annes Court which could be readily extended to form a logical extension to the settlement. Talygarn is only separated from the settlement of Brynsadler by the width of a motorway bridge and in all other respects is an adjunct of Brynsadler which access to the wider range of services and facilities in Pontyclun just beyond.	
	Talygarn warrants inclusion as a smaller settlement within the LDP with an identified settlement boundary and the potential for additional expansion with a residential allocation.	
4 5	Changes sought	
	The settlement of Talygarn should be encompassed by a residential settlement boundary redefining it as a smaller settlement.	
6 6	Candidate Site Ref No	
	252	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
	We believe the policy contravenes soundness test CE2 as the allocations in policy SSA10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D18			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 253/252 M4 S., N. of St Annes Court						Settlement Boun				PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The settlement of Talygarn should be recognised as one of the smaller settlements included within the Southern Strategy Area as an adjunct to Brynsadler.
2 3	Representation text	<p>We have reviewed the Housing Topic Paper and the Roles and Functions of Settlements Topic Paper to see if there is any compelling reason why a settlement boundary was not extended south of Brynsadler to include Talygarn. The former RCT (Taff Ely) Local Plan defined a settlement boundary around the settlement of Talygarn.</p> <p>The topic paper Roles and Functions assesses the different settlements in Appendix 17 of the report using a local and neighbourhood centre matrix. Talygarn ranks alongside other settlements including Brynsadler with a score of 3, but unlike the former (Brynsadler) was not included within the smaller settlements category which have a settlement boundary.</p> <p>The settlement is not so small that it can be perceived as open countryside; it has a focus around the Church and includes a sizable residential scheme at St Annes Court which could be readily extended to form a logical extension to the settlement. Talygarn is only separated from the settlement of Brynsadler by the width of a motorway bridge and in all other respects is an adjunct of Brynsadler which access to the wider range of services and facilities in Pontyclun just beyond.</p> <p>Talygarn warrants inclusion as a smaller settlement within the LDP with an identified settlement boundary and the potential for additional expansion with a residential allocation.</p>
4 5	Changes sought	The settlement of Talygarn should be encompassed by a residential settlement boundary redefining it as a smaller settlement.
6 6	Candidate Site Ref No	252
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2		
we believe the policy contravenes soundness test CE2 as the allocations in policy SSA10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														No

982.D19

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Document: Deposit Draft, p.114, para.6.179

Site: 818//SSA 22.4 Llanharan, Llanharry & Pontyclun

Amend site bound PEX Session:

Policy: SSA 22

Map:

Issue: Environment

Summary:

Item Question

Representation Text

1 2 Issue Summary

The green wedge as defined in Policy SSA 22.4 is inappropriately drawn on the eastern edge of Llanharry. The allocation includes the Elms Farm site which is surrounded on three sides by urban development and does not meet the objectives of a green wedge.

2 3 Representation text

The green wedge as defined in Policy SSA 22.4 is inappropriately drawn on the eastern edge of Llanharry. The allocation includes the Elms Farm site which is surrounded on three sides by urban development and does not meet the objectives of a green wedge.

4 5 Changes sought

The boundary of the green wedge allocation should be amended to exclude the Elms farm site Llanharry from its designation.

6 6 Candidate Site Ref No

268

9 7 Why no previous Representation

These particular proposals did not appear in the Preferred Strategy consultation.

21 11 Why attend Examination?

Attendance at the examination will allow for a thorough cross examination of the reasons behind this sites assessment and how the matrices have been applied.

Item Question

Reply

Soundness Tests

17 8 CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?

Yes

20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan

Soundness Test CE2

We believe the policy contravenes Soundness Test CE2 as the proposed allocation and policy is not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

Yes

5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit

Yes

7 7 Previous Representations? Did you make any previous representations on this issue during the Cons

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D20			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106										Site: 269/268 Elms Farm		New Site		PEX Session:		
Policy: SSA 10				Map:				Issue: Housing Allocation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The Candidate site at Elms Farm, Llanharry has not been included as a residential allocation despite its obvious fit in physical terms and in relation to other policies of the plan.	
2 3	Representation text	
	The Candidate site at Elms Farm, Llanharry has not been included as a residential allocation despite its obvious fit in physical terms and in relation to other policies of the plan.	
	Please see Appendices attached Appendix 1 Supporting Statement Appendix 2 Sustainability Appraisal	
4 5	Changes sought	
	The site at Elms Fam, Llanharry should be listed under Policy SSA 10 as a specific housng allocation.	
6 6	Candidate Site Ref No	
	268	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	
21 11	Why attend Examination?	
	Attendance at the Examination will allow for a thorough cross examination of the reasons behind this sites assessment and how the matrices have been applied.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2		
	We belive the policy contravenes soundness test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D21			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106		Site: 691//SSA 10.13 West of Llechau, Llanharry						Delete Site		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	This allocation on land west of Llechau, Llanharry has been included as a residential site despite its prominent position in an area of open countryside on the opposite side of a busy and divisive road and away from the centre of the village and its core facilities. This is not the most appropriate or sensitive site for development in the settlement of Llanharry and the candidate site assessment did not appraise this site accurately in selecting it as the single residential allocation in Llanharry.
2 3	Representation text	This allocation on land west of Llechau, Llanharry has been included as a residential site despite its prominent position in an area of open countryside on the opposite side of a busy and divisive road and away from the centre of the village and its core facilities. This is not the most appropriate or sensitive site for development in the settlement of Llanharry and the candidate site assessment did not appraise this site accurately in selecting it as the single residential allocation in Llanharry. Please see attachments Appendix 1 - Supporting Statement Appendix 2 - Sustainability Assessment
4 5	Changes sought	The site at West Llechau is not the most appropriate selection in either sustainability or environmental terms. The site should either be deleted or retained in addition to more discrete and sensitive site at Elms farm Llanharry.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2	We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D22			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.179		Site: 818//SSA 22.4		Llanharan, Llanharry & Pontyclun		Amend site boun		PEX Session:							
Policy: SSA 22		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The green wedge as defined in Policy SSA 22.4 is inappropriately drawn on the northern edge of Llanharry where it allocates the residential site SSA 10.13. The RCT proposals of designation of special landscape area's includes this as part of the SLA and the cultural landscape aspect area of Mynydd Maendy Windfarm whose value has been assessed as outstanding (Landmap) containing the cultural essence of cultural periods from today back to prehistory. The green wedge should follow the SLA designation and protect this northern edge of the settlement.
2 3	Representation text	The green wedge as defined in Policy SSA 22.4 is inappropriately drawn on the northern edge of Llanharry where it allocates the residential site SSA 10.13. The RCT proposals of designation of special landscape area's includes this as part of the SLA and the cultural landscape aspect area of Mynydd Maendy Windfarm whose value has been assessed as outstanding (Landmap) containing the cultural essence of cultural periods from today back to prehistory. The green wedge should follow the SLA designation and protect this northern edge of the settlement. See Appendix 1 below
4 5	Changes sought	The boundary of the green wedge allocation should be amended to include the land West of Llechau, Llanharry within its designation.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2		We believe the policy contravenes soundness test CE2 as the proposed allocation and policy is not based on a robust and credible evidence base. Implementing the changes within the representation will help to satisfy this soundness test.

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D23			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106		Site: 253/252 M4 S., N. of St Annes Court						New Site		PEX Session:					
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>The candidate site off St Annes Close, Talygarn has not been included as a residential allocation in the plan despite its discrete location west of Talygarn Close and to the north of St Annes Close. The site is wedged between this recent residential scheme and the M4 motorway to the north and would form a logical rounding of to this part of the settlement.</p> <p>Talygarn is a small settlement in the south of the County Borough where a small residential allocation would complement the limited range and choice of sites. In particular it could provide one of the rare opportunities for a high quality lower density scheme which is sensitive to the existing high quality low density development.</p>
2 3	Representation text	<p>The candidate site off St Annes Close, Talygarn has not been included as a residential allocation in the plan despite its discrete location west of Talygarn Close and to the north of St Annes Close. The site is wedged between this recent residential scheme and the M4 motorway to the north and would form a logical rounding of to this part of the settlement.</p> <p>Talygarn is a small settlement in the south of the County Borough where a small residential allocation would complement the limited range and choice of sites. In particular it could provide one of the rare opportunities for a high quality lower density scheme which is sensitive to the existing high quality low density development.</p> <p>Please see Appendix 1 below</p>
4 5	Changes sought	The site to the north of St Annes Court, Talygarn should be listed under policy SSA 10 as a specific housing allocation.
6 6	Candidate Site Ref No	252
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness test CE2		
We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
															No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D24			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108			Site:			Settlement Boun			PEX Session:						
Policy: SSA 13			Map:			Issue: Settlement Boundary									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The settlement of Talygarn should be recognised as one of the smaller settlements included within the Southern Strategy Area as an adjunct to Brynsadler.
2 3	Representation text	We have reviewed the housing topic paper and the roles and functions of settlements topic paper to see if there is any compelling reason why a settlement boundary was not extended south of Brynsadler to include Talygarn. The former RCT (Taff Ely) Local Plan defined a settlement boundary around the settlement of Talygarn. The topic paper roles and functions assesses the different settlements in Appendix 17 of the report using a local and neighbourhood centre matrix. Talygarn ranks alongside other settlements including Brynsadler with a score of 3, but unlike the former (Brynsadler) was not included within the smaller settlements category which have a settlement boundary. The settlement is not so small that it can be perceived as open countryside; it has a focus around the Church and includes a sizable residential scheme at St Annes Court which could be readily extended to form a logical extension to the settlement. Talygarn is only separated from the settlement of Brynsadler by the width of a motorway bridge and in all other respects is an adjunct of Brynsadler which access to the wider range of services and facilities in Pontyclun just beyond. Talygarn warrants inclusion as a smaller settlement within the LDP with an identified settlement boundary and the potential for additional expansion with a residential allocation.
4 5	Changes sought	The settlement of Talygarn should be encompassed by a residential settlement boundary redefining it as a smaller settlement.
6 6	Candidate Site Ref No	252
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan soundness test CE2		We believe the policy contravenes soundness test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
982.D25			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, para.4.1 to 4.25			Site:			PEX Session:									
Policy:			Map:			Issue: Core Strategy									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The settlement of Talygarn should be recognised as one of the smaller settlements included within the Southern Strategy Area as an adjunct to Brynsadler.	
2 3	Representation text	
	We have reviewed the housing topic paper and the roles and functions of settlements topic paper to see if there is any compelling reason why a settlement boundary was not extended south of Brynsadler to include Talygarn. The former RCT (Taff Ely) Local Plan defined a settlement boundary around the settlement of Talygarn	
	The topic paper roles and functions assesses the different settlements in Appendix 17 of the report using a local and neighbourhood centre matrix. Talygarn ranks along side other settlements including Brynsadler with a score of 3, but unlike the former (Brynsadler) was not included within smaller settlements category which have a settlement boundary.	
	The settlement is not so small that it can be perceived as open countryside; it has a focus around the Church and included a sizable residential scheme at St Annes Court which could be readily extended to form a logical extension to the settlement. Talygarn is only separated from the settlement of Brynsadler by the width of a motorway bridge and in all other respects is an adjunct of Brynsadler which access to the wider range of services and facilities in Pontyclun just beyond.	
	Talygarn warrants inclusion as a smaller settlement within the LDP with an identified settlement boundary and the potential for additional expansion with a residential allocation.	
4 5	Changes sought	
	The settlement of Talygarn should be encompassed by a residential settlement boundary redefining it as a smaller settlement.	
6 6	Candidate Site Ref No	
	252	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
	We believe the policy contravenes soundness test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this soundness test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No

1020.D1	<input type="checkbox"/>	C	W	M	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							
Document: Deposit Draft, p.046					Site:									PEX Session:	
Policy: AW 4					Map:									Issue: Planning Obligations	
Summary:															

Item Question **Representation Text**

1 2 Issue Summary
The relationship between strategic electrical distribution circuits and areas being considered for development.

2 3 Representation text
I write in respect of the subject document and have been instructed on behalf of Western Power Distribution to make the following consultation response.

Western Power Distribution has a number of strategic electricity distribution circuits (operating at 132,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits run both underground and as overhead lines.

Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.

Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as this would then go against the requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Planning guidance and layout of developments should take this into account, with uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that existing circuits crossing the proposed development areas in the document may run both overhead and underground.

I trust the information provided is satisfactory and I look forward to receiving your confirmation of receipt of this representation in due course along with the appropriate consultation number for future reference. Should you provide any additional information please do not hesitate to contact me.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.043							Site:			PEX Session:						
Policy: AW 1				Map:			Issue: Housing Requirement									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Redrow consider the land allocation to achieve the housing figure of 14,850 is not sufficient to deliver the requirement	
2 3	Representation text	
	Redrow consider a greater proportion of smaller sites should be allocated (10-20 acre sites) for residential development. The Council currently cannot achieve its 5 year housing land supply and will continue to struggle based on the fact that the majority of new housing sites are linked to major strategic promotions, with significant constraints and costs to overcome prior to delivery.	
	Developers involved with the strategic sites will be reluctant to commence construction on these sites as the abnormal and up front costs to deliver the site will be so high. Smaller sites with less constraints and greater prospects of delivery are encouraged.	
	The delivery of more sites will also mean that the Council will have a better chance of achieving the affordable housing targets for both north and south strategic areas. The costs and constraints of the strategic sites mean that developers will dispute the affordable housing requirements as it is highly likely that the policy requirements of AW4 will restrict the viability of the sites.	
	The Council must allow for greater flexibility to achieving the 14,850 dwellings.	
4 5	Changes sought	
	Redrow recommend that the policy be amended to allow additional land to be allocated to achieve and deliver the required housing numbers.	
	A greater amount of allocation is recommended on sites adjacent to the key settlements.	
9 7	Why no previous Representation	
	The issues raised were not subject to the Preferred Strategy consultation.	
21 11	Why attend Examination?	
	Redrow want the opportunity to demonstrate how a greater housing number could be achieved.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	CE4 – Redrow believe the wording in this paragraph contravenes the soundness test CE4 as it does not include provision for sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1053.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.045							Site:			PEX Session:							
Policy: AW 2				Map:				Issue: Design									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	This policy relates to sustainable locations. Reference is made to sites within Zone C floodplain not being sustainable unless it assists in the regeneration of a principal town or key settlement, or whether the site is a large brownfield site. Redrow object to this definition.	
2 3	Representation text	
	Redrow object to this definition in the policy. The current DAM Flood maps have been proven to be inaccurate and misleading in many cases. Zone C cannot be taken for granted, and the fact that the site might initially be allocated within the flood zone does not mean that it's in a non-sustainable location. Providing a Flood Consequences Assessment can demonstrate that the site does not flood, then the site should be taken into consideration.	
	Neither Planning Policy Wales or TAN 15 state that if a site is proven not to be within the flood zone that it can only be developed if it's key to a regeneration of an area.	
	In some cases some of the most sustainable sites may be located within the flood zone, be it Greenfield or brownfield. A site in zone C might strategically be in a sustainable position, with excellent public transport, walking/cycling links, community facilities nearby and so on. The policy should not restrict the development being on brownfield land or assisting in the regeneration of an area.	
	There is no basis or justification behind the policy.	
	Redrow consider this to be a restriction on perfectly acceptable development sites being brought forward and would encourage amendments to the wording of the policy.	
4 5	Changes sought	
	Redrow recommend that part A of the section 5 "a) it is necessary to assist the regeneration of a principal town or key settlement, or where development involves a large brownfield site" should be removed from the policy.	
9 7	Why no previous Representation	
	The policy was not apparent during the preferred strategy consultation.	
21 11	Why attend Examination?	
	Redrow wish to discuss the difficulties of this policy with the Inspector	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	CE2 – The policy does not reflect national guidance and therefore does not meet the test of soundness.		
	CE4 – The policy does not meet the needs of soundness as it does not allow for flexibility in the implementation of the policy.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107				Site:								PEX Session:			
Policy: SSA 12				Map:								Issue: Affordable Housing			
Summary:															

Item	Question	Representation Text
1	2 Issue Summary	<p>Whilst the policy states that site viability has been taken into consideration, it is not clear how the 40% requirement has been derived as a result of the Council's viability considerations. Redrow believe that more evidence needs to be provided to justify this percentage and would question the scale of the requirement.</p> <p>No clear guidance has been submitted to justify the contributions for sites under 30 units and how this requirement will take into account viability of a scheme. It is likely that the abnormal costs for a smaller site will be higher as the developer will not be able to apportion the costs across a higher number of units, which could result in the scheme becoming unviable.</p>
2	3 Representation text	<p>TAN 2 requires Local Authorities to prove that percentage targets set for affordable housing are economically viable and will not prejudice the delivery of the housing sites. There is no evidence within the LDP or any of the background topic papers suggesting what work has been undertaken to get to this target provision, even though National Planning Guidance requires Local Authorities to prepare this information to support their requirement.</p> <p>The WAG's guidance on Targets for Affordable Housing in the AHDS 2007-2011 states that targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account risks to delivery and on the likely levels of finance available for affordable housing.</p> <p>Whilst the Council state that viability of development sites in the NSA is a major consideration, the AHDS suggests that the Local Authority must have gathered their own evidence to determine the level of affordable housing requirement before they set their target. This information is not evident.</p> <p>Paragraph 6.153 of the LDP suggests that the Council will require evidence to support any proposed reduction in the provision of affordable housing based on abnormal development costs or other individual circumstances of development. This statement implies that it is the developer's obligation to provide evidence to the Council as to why their requirements are making a scheme unviable, which is contrary to the guidance set out in TAN 2 and the AHDS guidance.</p> <p>Similar to the sites in the NSA, the majority of the sites identified for development are brownfield land with major constraints and up front abnormal costs on development. This will have a major impact on the delivery of general market housing, let alone the 40% affordable housing. Other policy considerations will also be impacted upon.</p> <p>The Council must clearly define which policies will take priority on each site and be willing to balance those requirements against the developer's justification for viability.</p> <p>The Council state that the 40% target has been derived as a result of the Council's viability considerations. The Council have not provided any evidence or justification on how they carried out their investigations into viability, what evidence they were supplied with regarding the sties or how they can safeguard the delivery of these sites.</p> <p>In Redrow's experience of development and economic viability of sites the 40% requirement is an unrealistic target that will not be achieved. Due to a serious element of doubt on its achievability, the Council are encouraged to reduce the provision to a level that is more realistic, which will give them a greater chance of achieving this target. Redrow would be more than happy to meet with the Council to discuss a way forward.</p>
4	5 Changes sought	<p>Redrow recommend the following amendments to the policy:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> The development and economic viability on a site by site basis should be worded within the actual policy statement, and not in supporting text 2. <input type="checkbox"/> The affordable housing target must be justified in accordance with national policy. The reference to 40% should be removed and replaced with a more realistic target.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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9	7	Why no previous Representation It was not mentioned within the Preferred Strategy															
21	11	Why attend Examination? Due to the constant change in information from the WAG and general market conditions, Redrow want the opportunity to discuss the most up-to-date position.															
<i>Item Question</i>										<i>Reply</i>		Soundness Tests					
13	8	C2 Test? Does not have regard to national policy?										Yes					
17	8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?										Yes					
18	8	CE3 Test? No clear mechanisms for implementation and monitoring?										Yes					
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan C2- Policy NSA11 contravenes C2 as it does not take account of TAN2 and AHDS. The guidance requires the policy to take into consideration the development and economic viability of a site when setting and justifying the affordable housing target. CE2 – It is not considered that the policy takes into consideration the impacts of other policies within the plan particularly AW4, and the effect these policies will have on the viability of the viability and finances available to deliver these requirements. CE3 – NSA11 contravenes CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development.															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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1053.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.078							Site:				PEX Session:						
Policy: NSA 11				Map:				Issue: Affordable Housing									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>Whilst the policy states that site viability has been taken into consideration, it is not clear how the 25% requirement has been derived as a result of the Council's viability considerations. Redrow believe that more evidence needs to be provided to justify this percentage and would question the scale of the requirement.</p> <p>No clear guidance has been submitted to justify the contributions for sites under 30 units and how this requirement will take into account viability of a scheme. It is likely that the abnormal costs for a smaller site will be higher as the developer will not be able to apportion the costs across a higher number of units, which could result in the scheme becoming unviable.</p>
2 3	Representation text	<p>TAN 2 requires Local Authorities to prove that percentage targets set for affordable housing are economically viable and will not prejudice the delivery of the housing sites. There is no evidence within the LDP or any of the background topic papers suggesting what work has been undertaken to get to this target provision, even though National Planning Guidance requires Local Authorities to prepare this information to support their requirement.</p> <p>The WAG's guidance on Targets for Affordable Housing in the AHDS 2007-2011 states that targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account risks to delivery and on the likely levels of finance available for affordable housing.</p> <p>Whilst the Council state that viability of development sites in the NSA is a major consideration, the AHDS suggests that the Local Authority must have gathered their own evidence to determine the level of affordable housing requirement before they set their target. This information is not evident.</p> <p>Paragraph 6.50 of the LDP suggests that the Council will require evidence to support any proposed reduction in the provision of affordable housing. This statement implies that it is the developer's obligation to provide evidence to the Council as to why their requirements are making a scheme unviable, which is contrary to the guidance set out in TAN 2 and the AHDS guidance.</p> <p>The majority of sites within the NSA are large brownfield sites, and it is highly likely that the 25% Affordable Housing target will not be achieved across these sites, bearing in mind the other policy requirements of the plan. These sites have significant abnormal costs associated with them, which could result in a massive shortfall in affordable housing provision as well as other policy requirements.</p> <p>The Council must clearly define which policies will take priority on each site and be willing to balance those requirements against the developer's justification for viability.</p> <p>The Council state that the 25% target has been derived as a result of the Council's viability considerations. The Council have not provided any evidence or justification on how they carried out their investigations into viability, what evidence they were supplied with regarding the sties or how they can safeguard the delivery of these sites.</p>
4 5	Changes sought	<p>Redrow recommend the following amendments to the policy:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> The policy should state the provision up to a maximum 25% affordable housing 2. <input type="checkbox"/> The development and economic viability on a site by site basis should be worded within the actual policy statement, and not in supporting text 3. <input type="checkbox"/> The affordable housing target must be justified in accordance with national policy
9 7	Why no previous Representation	<p>It was not mentioned within the Preferred Strategy</p>

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
21	11	Why attend Examination?													
Due to the constant change in information from the WAG and general market conditions, Redrow want the opportunity to discuss the most up-to-date position.															
<i>Item Question</i>										<i>Reply</i>			Soundness Tests		
13	8	C2 Test? Does not have regard to national policy?										Yes			
17	8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?										Yes			
18	8	CE3 Test? No clear mechanisms for implementation and monitoring?										Yes			
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan													
C2- Policy NSA11 contravenes C2 as it does not take account of TAN2 and AHDS. The guidance requires the policy to take into consideration the development and economic viability of a site when setting and justifying the affordable housing target.															
CE2 – It is not considered that the policy takes into consideration the impacts of other policies within the plan particularly AW4, and the effect these policies will have on the viability of the viability and finances available to deliver these requirements.															
CE3 – NSA11 contravenes CE3 as it does not take account of the problems associated with implementation where the cumulative effect of this and other policies might have a detrimental impact on land values and therefore the viability and deliverability of the housing development.															
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D5			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 690//SSA 10.12 Dolau County Primary School, Bryncae						PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	Redrow object to the policy wording requiring access to the site to be obtained from the adjoining Llanilid Strategic Site to the south.
2 3	Representation text	Redrow have been in negotiations with RCT Highways officer Souren Zeinali for the past 2 years to agree a proposed access into this site directly from the existing access from the A473. An access scheme has now been agreed with Highways Officers and a copy of an e-mail discussion from August 2008 is attached. The proposed access is not constrained by 3rd party ownership and is deliverable. Forward Planning Officer's comments that the existing access is not suitable as a principle means of access are not justified and were not subject to discussion with the Highways Department prior to the publication of the plan. A copy of the approved access drawing is attached. The proposed access can easily accommodate the anticipated level of development from the site. It is not considered appropriate to have to secure access through the Llanilid Strategic Site as there are 3rd party issues to overcome, which in turn will restrict the deliverability of the site. Redrow have an agreed access scheme from the A473.
4 5	Changes sought	Redrow want the following wording removed from the policy/site reference: "The existing access from the A473 between "Greenacre" and "Ibiscus" is not suitable as a principal means of access, but should be used for pedestrian access. Access will need to be obtained from the adjoining Llanilid Strategic Site to the south."
9 7	Why no previous Representation	The proposed site access was not an issue for discussion/consultation during the Preferred Strategy.
21 11	Why attend Examination?	Redrow wish to discuss access proposals further with the Inspector.

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		Policy CE4 - Redrow believe the wording in this paragraph contravenes the soundness test CE4 as it does not include provision for sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability.

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response		
7	7																Previous Representations? Did you make any previous representations on this issue during the Cons	No

1053.D6 O I M

Document: Deposit Draft, p.077 Site: 651//NSA 9.2 East of Trenant, Penywaun PEX Session:

Policy: NSA 9 Map: Issue: Housing Allocation

Summary:

Item	Question	Representation Text
1 2	Issue Summary	
	Redrow object to the proposed housing number for NSA9.2 (Land East of Trenant, Penywaun) of 100 units.	
2 3	Representation text	
	Whilst Redrow fully support the allocation, there is concern that the proposed housing figure will act as a restriction to the proposed development.	
	Redrow do not consider the figure to be realistic target and would suggest the figure is increased to 150.	
	There is an opportunity to bring forward a fairly large housing site in the NSA, and Redrow would propose that the figure is increased to reflect a possible increase in density. By allocating more housing this could also allow significant coverage to overcome and major viability constraints that could come forward on the site.	
4 5	Changes sought	
	Redrow would propose increasing the overall housing number to 150.	
6 6	Candidate Site Ref No	
	288	
21 11	Why attend Examination?	
	Redrow want the opportunity to present the case for increased level of density to the Inspector.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	CE4 – Redrow believe the wording in this paragraph contravenes the soundness test CE4 as it does not include provision for sufficient flexibility in order to allow for certain dispensation in situations where the requirements set out might have an effect on development viability.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 109/104		Cwm Farm						New Site		PEX Session:		
Policy: NSA 9				Map:						Issue: Housing Allocation						
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary		
	Redrow consider candidate site 104 Cwm Farm, Aberdare should be allocated for residential development. Please treat this consultation as an alternative site proposal.		
2 3	Representation text		
	Cwm Farm is a 20 acre self contained greenfield site located on the south west boundary of Aberdare. Please see attached plan.		
	This site has good access provision direct from Monk Street. Previously, Forward Planning Officers raised concern that the site had access constraints which prohibited the delivery of the site.		
	However, Redrow have investigated who owns the access road and have developed an access solution, in conjunction with RCT Highways officers. These discussions are on-going, but are based on the attached highways drawings. The design is based on the site accommodating over 100 dwellings.		
	It is proposed to carry out improvements to the existing access road and develop a direct and improved Public Transport, cycle and footpath link into Cwm Dare Country Park, which in turn will increase the number of visitors into the park.		
	In comparison to rival sites in Aberdare, the site is gently sloping and there are no constraints on development. Redrow control the land and intend on developing as soon as practicable.		
	The fact that the site is so well contained means that the visual impact of the proposed development is minimal. The development would only be visible from the immediate boundaries of the site. Redrow would propose to preserve as many of the existing trees as possible and incorporate them into the scheme, thereby creating a rural feel to the proposal.		
	The site is in a sustainable location, with good pedestrian/cycle links to Aberdare town centre. Redrow intends on improving the town centre link to the site and country park. Redrow will also enhance the public transport network as part of our overall development proposals.		
4 5	Changes sought		
	Redrow recommend Cwm Farm, Aberdare to be allocated for residential development in the emerging LDP. There are valid planning reasons as to why this site could be brought forward for development sooner than other candidate sites. The site is controlled by Redrow who can secure the delivery of the site for the Council. The fact it's a greenfield site with no constraints makes it an even more attractive proposal.		
6 6	Candidate Site Ref No		
	104		
21 11	Why attend Examination?		
	Redrow want the opportunity to fully discuss the proposals for the site during public examination.		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				<p>CE2 – The proposed allocations do not take into account the development viability of the proposed candidate sites and where appropriate the plan should consider allocating greenfield sites in Aberdare, should it be considered that they would represent a more logical development approach. Implementing the changes within this representation would assist in ensuring this soundness is met.</p> <p>CE4 - The policy contravenes CE4 as it is not sufficiently flexible enough to allow for situations where the viability of a site clearly results in that site not coming forward. The majority of allocations in Aberdare are on brownfield land and the deliverability of these sites is questionable. Therefore, it is not considered that the policy is flexible to accommodate the fact that sites may not be viable proposals.</p>											
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041							Site:			PEX Session:						
Policy: CS 11				Map:			Issue: Climate Change									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>Redrow are concerned that the policy is too stringent and offers no flexibility. This raises concern as to the impact of the policy on the viability of the site.</p> <p>Redrow also want to ensure that the reference to reducing carbon emissions in planning policy, when the new building regulations for Wales may take these into consideration.</p> <p>The reference to sustainability criteria in conjunction with any site within TAN 15 is an issue, as they're not normally linked.</p>
2 3	Representation text	<p>Redrow appreciate that emerging guidance on climate change will force developers to amend the current approach to housing development. However, the company is anxious that the likely requirements of the emerging new building regulations will creep into planning policy when it is not required to do so. All developers will have to comply with the new regulations, regardless of whether they will be included in planning policy.</p> <p>The policy needs to make reference to site viability and must take into account the impact of the climate change requirements on the site bearing in mind policy CS5 and AW4. The policy makes no reference what so ever at this stage. Unless the viability provision is provided for in the policy, it is questionable whether the aims of the policy can be delivered therefore it is unsure whether the policy is sound.</p> <p>Sites within TAN 15 might be the more sustainable sites for development, and it is hoped that this will have already been taken into consideration under the site assessment procedure. It is not considered that reference to a sustainability criteria is required to further justify the site.</p>
4 5	Changes sought	<p>Redrow recommend that reference to the reduction in CO2 emissions is removed.</p> <p>Once again, it is considered that reference needs to be made to the site viability process and how the policy must relate to CS5 and AW4, otherwise the numerous policies will conflict with each other which could result in a reduction in the number of site's being delivered.</p>
21 11	Why attend Examination?	<p>Climate change is a crucial issue for the construction industry and emerging policy will soon be issued. Redrow want the opportunity to discuss its impact with the Inspector.</p>

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan	
				CE1											– It is not considered that the policy takes into account other relevant policies within the plan.	
				CE2											– The policy disregards CE2 as it doesn't take into account the potential impact of the requirements of the policy on the viability of a site and its ultimate delivery.	
				CE3											– There are no clear mechanisms for the delivery of this policy and how its implementation, along with other policies will affect the viability of the site.	
				CE4											– The policy is too stringent and does not offer the flexibility needed to accommodate the additional, conflicting policies of the plan which in turn will affect the viability of the site.	
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D9			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.034								Site: 109/104 Cwm Farm		PEX Session:					
Policy: CS 5				Map:				Issue: Affordable Housing							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Redrow are concerned with the fact that the policy does not take account of development viability and the impact of affordable housing (along with other planning obligations) could render a development unviable.	
2 3	Representation text	
	Redrow has serious concerns that the policy makes no reference to development viability. In paragraph 4.50 the LDP states that securing affordable housing must be carefully balanced against other requirements contained in the Plan, nowhere does it mention the impact on the viability of a development.	
	The viability of the site will have an impact on the Council being able to deliver the aspirations of the LDP on each site.	
	The accumulative impact that affordable housing and other planning obligations will have on viability could result in numerous sites not coming forward, which would mean the LDP acting more as a restriction on development instead of being a facilitator of development.	
	The LPA must also ensure that the provision of affordable housing on site is delivered when the applicant/developer can clearly demonstrate when it would be most suitable to provide the element of affordable housing, in accordance with a viable development programme for the site. Policies CS6 and AW4 must be clearly linked to ensure that the policies do not conflict with each other, thereby preventing the delivery of a site.	
	The 3000 figure may well be indicative, but the nature of the allocated sites (ie large brownfield sites) mean that this target is not an achievable one and the soundness of the plan is surely questionable.	
	The policy will have to be flexible in its implementation and all parties must show a willingness to share information on site viability. The council in some cases must decide whether affordable housing should be taking priority over the requirements of policy AW4.	
4 5	Changes sought	
	The policy should clearly state that any requirement for affordable housing will take into consideration the impact on development viability, prior to issuing any request for the provision on the applicant.	
21 11	Why attend Examination?	
	Redrow consider this lack of attention to viability to be one of the biggest concerns with the LDP and would appreciate the opportunity to attend the examination to express the concern	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	C2 – TAN 2 (2006) states that any requirement for affordable housing must take into account the site's viability, so that there is every chance that the permission can actually be implemented.		
	CE4 – There is no flexibility in the policy to allow for site viability to be taken into account. The policy dismisses viability on all counts and only relates to balancing against other policy requirements contained in the plan.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

1053.D10

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Document: Deposit Draft, p.031

Site:

PEX Session:

Policy: CS 2

Map:

Issue: Strategy Areas

Summary:

<i>Item Question</i>		Representation Text
1	2	Issue Summary The Policy is missing reference to a key settlement.
2	3	Representation text Redrow want the policy amended as it's not considered that it reflects the aim of the Preferred Strategy.
4	5	Changes sought Policy CS2, 2.3 – Policy to be re-worded to include reference to Llanharran, in conjunction with other key settlements. More emphasis on the importance of Llanharran is required under the core policy.

<i>Item Question</i>		<i>Reply</i>	Soundness Tests
14	8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan C3 – Llanharran will play a key role in the regional success of Bridgend and Llantrisant, as identified within the WSP. It is not considered that the policy adequately reflects the aims of the WSP.	

<i>Item Question</i>		<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D11			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030						Site:			PEX Session:						
Policy: CS 1				Map:			Issue: Strategy Areas								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The policy is missing reference to a key settlement.	
2 3	Representation text Redrow want the policy amended, as it is not considered that it truly reflects the aim of the Preferred Strategy	
4 5	Changes sought Policy CS1 – 1.4 – Redrow want the policy re-worded to include reference to Hirwaun regeneration, a swell as Aberdare, Mountain Ash, Ferndale & Treorchy. More emphasis on Hirwaun is required under the Core Policy.	
9 7	Why no previous Representation No, Redrow have secured an allocation on land they control (NSA 9.2), but now wish to see more emphasis on Hirwaun in the CS1 policy. Redrow consider the regeneration of Hirwaun to be just as important as the regeneration of Aberdare.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D12			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047						Site:								PEX Session:	
Policy: AW 5				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Redrow object to part B, criteria 3 of this policy which states that "Residential schemes of 10 or more units achieve as a minimum the Very Good Eco-Homes (or equivalent) target". Redrow consider this policy to be too restrictive and contrary to policy CS11 on Climate Change.	
2 3	Representation text	
	Redrow accept that emerging guidance will require homes to be built to a certain standard. However, the policy criteria suggested by the Council for the quality of these homes will restrict the development and design quality of the sites.	
	This additional criteria will add significant development cost onto the scheme and would seriously question the development viability of a site.	
	The criteria is contrary to policy CS 11, where the requirement is for residential development proposals to reduce the CO2 emissions by a minimum of 10%.	
4 5	Changes sought	
	Redrow suggest the removal of criteria 3 (under part B), or that the policy is re-worded to reflect policy CS11 and takes into account the development viability of a scheme.	
9 7	Why no previous Representation	
	The proposals set out under this policy were not available for comment during the Preferred Strategy consultation.	
21 11	Why attend Examination?	
	Climate Change is a major issue for developers and want to discuss the impact of the policy at inquiry	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Redrow consider the policy does not have regard to other policies within the plan (in particular CS11). Should the Council carry out the necessary changes, then this may satisfy the test of Soundness.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1053.D13			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047, para.5.28							Site:			PEX Session:						
Policy: AW 5				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Redrow raise concern as to the necessity to produce an Energy Statement	
2 3	Representation text Whilst Redrow accept that emerging guidance will require development proposals to produce details of the energy efficiency of buildings, Redrow would dispute when these reports are actually required. For an outline planning application a developer is unlikely to have produced a final layout for the site, and will not commit to doing so until the outline application is approved. It would be completely unfair to ask a developer to commit to something at outline stage which could result in the development proposals not being fulfilled. The current 1APP forms do not request the submission of this report as part of their submission checklist either. The impact of the Energy report on the viability of the site must be taken into consideration and the Council must be seen to be flexible that if the energy requirements are so restrictive that it prohibits the development and viability of the site.	
4 5	Changes sought Redrow would recommend that on an outline application this requirement is posed as a planning condition stating that the report must be submitted with a reserved matters application. A full application should have the report submitted as part of the application.	
9 7	Why no previous Representation This issue was not raised as part of the Preferred Strategy	
21 11	Why attend Examination? Redrow are concerned that the implementation of this policy could have significant impact on the viability of a scheme and would appreciate the opportunity to discuss the matter with the Inspector.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan CE4 – The policy is not sufficiently flexible to take into consideration the different stages of the planning process, and the fact that emerging guidance could supersede what has already been approved. It does not recognise that it might have a negative impact on the development viability of the site.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1053.D14			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.046							Site:				PEX Session:						
Policy: AW 4				Map:				Issue: Planning Obligations									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	Redrow are concerned that the policy makes no reference what so ever to development viability and the cumulative impact of the community infrastructure and planning obligations on potential land values and the delivery of potential development sites.	
2 3	Representation text	
	The policy states that requests for contributions will be carefully balanced and will only be requested where they are reasonable, realistic and necessary. Unfortunately, it is not considered that this is wording is sufficient for AW4 and the policy needs to go further to take into account land values and viability.	
	National guidance states that the viability of a site must be taken into consideration when preparing and implementing planning policy. Redrow do not feel that national guidance has been given adequate consideration in the preparation of this policy.	
	The Council must accept the significant costs now placed on developers to bring sites forward and must accept that the viability of development sites is now a material consideration in the planning application process as it will affect the delivery of their housing sites.	
	In working with developers the Council needs to make clear which obligations would be more relevant to each site. This will provide the developer with a clear idea of what to has to be taken into account on each site.	
	The Council must be willing to accept that some policy objectives must be foregone or relaxed to an extent that it does not prevent development coming forward, and this must be catered for in the policy.	
4 5	Changes sought	
	The wording of the actual policy itself needs to say that the development/economic viability must be taken into consideration on a site by site basis.	
9 7	Why no previous Representation	
	The policy was not subject to the Preferred Strategy consultation.	
21 11	Why attend Examination?	
	Redrow are concerned with the impact of this policy on development viability and want the opportunity to discuss up-to-date supporting documentation at inquiry.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	C2 – The policy ignores the requirements of national guidance and does not therefore meet the test of soundness.		
	CE4 – The policy does not allow for various circumstances on each site to be taken into consideration and needs to set priorities		

REPRESENTATION DETAIL by: Representation No

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Item Question										Reply		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No					

1055.D1 O W M

Document: Deposit Draft, p.077, para.3 Site: 652//NSA 9.3 South East of Llwydcoed Community Centre Delete Site PEX Session:

Policy: NSA 9 Map: Issue: Housing Allocation

Summary:

Item	Question	Representation Text
1	2 Issue Summary	This proposed site access has been refused twice by the highways department and once by the N.A. Wales Inspector on Highway & Pedestrian Safety (See attached letter)
2	3 Representation text	Please read attached letters ref (SIC) to Corner House, St on access and also the problems that would occur (SIC) if access would be through the Community Centre & football ground.
4	5 Changes sought	I would like to see the site (No.226) removed from the LDP on safety grounds to highway & pedestrian safety as advised (SIC) by your highway dept and N.A.W. Inspector (See attached letters).

Item	Question	Reply	Soundness Tests
10	8 P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12	8 C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19	8 CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20	9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	Because it would be safer with less traffic using the narrow roads at Corner House St, Exhibition Row & community centre as a build up of traffic would be to the detriment of highway safety.	

Item	Question	Reply	Tick box Replies
3	4 Seek changes? Any changes to be made to the Plan?	Yes	
5	6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7	7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1306.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site:						New Site		PEX Session:			
Policy: NSA 9				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary Former allotment site, Rhigos Road, Treherbert, to be allocated for residential development.	
2	3 Representation text As such I formally write to register my objection to its proposed deletion. It is appreciated that in allocating residential sites, careful consideration has to be taken of the deliverability of the sites proposed. It is accepted that this site has benefited from (sic) a housing allocation for a number of years and this period of inactivity may be a deciding factor in its proposed removal. However from discussions with the previous owner I understand that there were mitigating circumstances preventing its then development. The previous landowner spent much of his time abroad and was unaware of the planning status of the site until late 2006, following this period he has worked consistently to overcome the barriers preventing development, none more so than the issue of Vacant Possession (VP). Over the period of the last two years he successfully negotiated the extinguishment of all allotment licences and paddock licences to enable the proposed sale of the land to proceed unencumbered. To this end I understand that RCT Council were extremely helpful in relocating many of the genuine allotment holders. I am also aware that in recent months numerous discussions have taken place with the Planning and Highway departments and feedback in respect of these have been positive. I further understand that a proposed access point has been agreed in principle (subject to the required formal transport assessment) and the attached HAS layout (Plan 2) based on a full topographical survey, demonstrates the development potential of this site. A walkover ecology survey which highlighted no barriers to the overall development of the site and a further stage 2 assessment is being undertaken presently (this is also likely to confirm the suitability of site for residential development). In undertaking my due diligence prior to purchasing the site I'm extremely confident that there are no insurmountable barriers preventing beneficial development: -The site is not in the flood plain -A phased programme of knotweed eradication is in its final spraying season -All services including drainage are located at the entrance to the site (costings for connections have been received and allowed for). -The site is not contaminated It is hoped that the above and attached information demonstrates the deliverability of this site and provides sufficient evidence for you to consider including the site within your housing projection figures. Whilst I appreciate that the site will remain within the settlement boundary and the proposed deletion of the residential allocation will not ultimately preclude the land being developed, I genuinely feel that a commitment shown by RCT in allocating the site in the LDP will give the required comfort to intended developers to commit to a comprehensive residential application and move the scheme forward in a quicker time scale. Given the current economic downturn I feel that retaining the allocation is intrinsic to any development strategy. As you may be aware I have successfully facilitated the development of numerous sites within RCT (Llwydcoed Brickworks to name but one) and with your assistance I see no reason why I cant move this site forward and bring new development to Treherbert and open up what I see as a key entrance site.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1316.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.054										Site: 403/407 Smith's Avenue/Mount Road			PEX Session:		
Policy: AW 8				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Object to the designation of land at Cefn Rhigos as part of SINC 1- Coed Wernhir		
2 3	Representation text Site of important Nature Conservation (SINC)1- Coed Wernhir On behalf of our client we object to the designation of the land at Cefn Rhigos as a Site of important Nature Conservation (SINC)1 - Coed Wernhir. Within the Cynon Valley Local Plan (Adopted 2004) the land is not designated for any nature or environmental conservation, and whilst further survey work may have been undertaken by the Local Planning Authority as part of the LDP process the designation of the land as a SINC was not apparent until the publication of the Draft Deposit Plan and Constraints Map in February 2009. Whilst the LPA has identified the land as a potential SINC and undertaken their own research due to the timing of the consultation, between February and March, it is not reasonable for our client to undertake a full and appropriate survey of the land during the consultation period as a result of seasonal requirements. Supporting paragraph 5.55 of Policy AW8- Protection and enhancement of the Natural Environment does state that the Council have prepared Supplementary Planning Guidance on Nature Conservation which provides detailed criteria for site designation. However this document has not been placed on consultation in conjunction with the Draft Deposit Plan. Therefore, on behalf of our client we reserve the right to provide a detailed response to the designation of the land at Cefn Rhigos as a SINC as part of the Supplementary Planning Guidance, and that until that consultation has taken place and that our client has had the opportunity to respond we consider the designation as premature and unsound.		
4 5	Changes sought We request that due to the inappropriate seasonal constraints to providing a response to the designation of the land as part of SINC 1 that the land be removed from the Constraints map and Appendix 1 as its designation as a SINC is premature and that its appropriateness be examined through the Supplementary Planning Guidance process.		
6 6	Candidate Site Ref No 407		
9 7	Why no previous Representation No indication that land would be designated as a SINC.		
Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan Amplification of Tests
<p>The designation of the land at Cefn Rhigos as SINC 1 has not undergone sufficient consultation and that it relies upon the adoption of a future SPG which is yet to be placed on consultation. The designation of the land as a SINC 1 is both premature and not realistic as it is not founded on an even evidence base, in that our clients, due to seasonal constraints have been unable to directly respond.</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1316.D2			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054				Site: 405/409		New Inn Public House				PEX Session:					
Policy: AW 8				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text	Soundness Tests
1 2	Issue Summary Object to the designation of land at Cefn Rhigos as part of SINC 3- Nant Fforch		
2 3	Representation text Site of important Nature Conservation (SINC)3- Nant Fforch On behalf of our client we object to the designation of the land at Cefn Rhios as a Site of Important Nature Conservation (SINC) 3- Nant Fforch Within the Cynon Valley Local Plan (adopted 2004) the land is not designated for any nature or environmental conservation, and whilst further survey work may have been undertaken by the Local Planning Authority as part of the LDP process the designation of the land as a SINC was not apparent until the publication of the Draft Deposit Plan and Constraints Map in February 2009. Whilst the LPA has identified the land as a potential SINC and undertaken their own research due to the timing of the consultation, between February and march, it is not reasonable for our client to undertkae a full and appropriate survey of the land during the consultation period asa result of the seasonal requirements . Supporting paragraph 5.55 of policy AW8 - Protection amd enhancement of the natural environment does state that the Council have prepared Supplementary Planning Guidance on Nature Conservation which provides detailed criteria for site designation. However this document had not been placed on consultation in conjunction with the Draft Deposit Plan. Therefore on behlaf of our client we reserve the right to provide a detailed response to the designation of the land at Cefn Rhigos as a SINC as part of the Supplementary Planning Guidance, and that until that consultation has taken plance and that our client has had the opportunity to responded we consider the designation as premature and unsound.		
4 5	Changes sought We request that due to the inappropriate seasonal constraints to providing a response to the designation of the land as part of SINC 3 that the land be removed from the constriants map and Appendix 1 as its designation as a SINC I spremature and that its appropriatness be examined through the Supplementary Planning Guidance process.		
6 6	Candidate Site Ref No 409		
9 7	Why no previous Representation no indication that land would be designated as a SINC		
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan Amplification of Tests
<p>The designation of the land at Cefn Rhigos as SINC 3 has not undergone sufficient consultation and that it relies upon the adoption of a future SPG which is yet to be placed on consultation.</p> <p>The designation of the land as a SINC 3 is both premature and not realistic as it is not founded on an even evidence base, in that our clients, due to seasonal constraints, have been unable to directly respond.</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Consultation?	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1316.D3			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.054		Site: 404/408 Smith's Avenue/Mount Road rear							PEX Session:						
Policy: AW 8		Map:			Issue: Environment										
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Object to the designation of land at Cefn Rhigos as part of SINC 3- Nant Fforch	
2 3	Representation text Site of important Nature Conservation (SINC) 3- Nnat Fforch On behalf of our client we object to the designation of the land at Cefn Rhigos as a Site of Important Natire Conservation (SINC) 3- Nant Fforch. Within the Cynon Valley Local Plan (adopted 2004) the land is not designated for any nature or environmental conservation, and whilst further survey work may have been undertaken by the Local Planning Authority as part of the LDP process the designation of the land as a SINC was not apparent until the publication of the Draft Deposit and Constraints map in February 2009. Whilst the LPA has identified the land as a potential SINC and undertaken their own research due to the timing of the consultation, between February and March, it is not reasonable for our client to undertake a full and appropriate survey of the land during the consultation period as a result of the seasonal requirements. Supporting paragraph 5.55 of policy AW8- Protection and Enhancement of the Natural Environment does state that the Council have prepared Supplementary Planning Guidance on Nature Conservation which provides detailed criteria for site designation. However this document had not been placed on consultation in conjunction with the draft deposit plan. Therefore, on behalf of our client we reserve the right to provide a detailed response to the designation of the land at Cefn Rhigos as a SINC as part of the Supplementary Planning Guidance, and that until that consultation has taken place and that our client has had the opportunity to respond we consider the designation as premature and unsound.	
4 5	Changes sought We request that due to the inappropriate seasonal constraints to providing a response to the designation of the land as part of SINC 3 that the land be removed from the Constraints Map and Appendix 1 as its designation as a SINC is premature and that its appropriateness be examined through the Supplimentary Planning Guidance process.	
6 6	Candidate Site Ref No 408	
9 7	Why no previous Representation No indication that land would eb designated as a SINC.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				The designation of the land at Cefn Rhigos as SINC 3 has not undergone sufficient consultation and that it relies upon the adoption of a future SPG which is yet to be placed on consultation. The designation of the land as a SINC 3 is both premature and not realistic as it is not founded on an even evidence base, in that our clients, due to seasonal constraints, have been unable to directly respond.											
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1318.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040							Site:	PEX Session:							
Policy: CS 10				Map:		Issue: Minerals									
Summary:															

Item Question

Representation Text

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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2 3 Representation text

Policy CS10: Minerals

Hanson welcomes the underlying principle of Policy CS10 in terms of ensuring a continuous supply of minerals, maintaining a 20 year land bank, and safeguarding future resources. However, these strategic objectives are not followed through into proposals in terms of the specific means of realising the objectives (reference Local Development Plans Wales [LDPW] 2005, para 2.10) and Mineral Planning Policy Wales (MPPW, para 14). In addition, the LDP does not establish a clear mechanism for implementing the strategy (LDPW para 4.35, CE3). The purpose of the strategic policies of the LDP is to promote an "overall vision" which addresses the "unique economic, environmental and social characteristics, opportunities and issues of the area". Having established the vision, the LDP should define the means of achieving them, with "a transparent guide to what will be achieved by the implementation of the plan" (LDPW para 2.10). In essence, and consistent with similar advice in Planning Policy Statement 12 (England) the LDP should include a 'delivery strategy' which should set out how much development is intended to happen where, when, and by what means it will be delivered, with clear arrangements for managing the delivery of the strategy (ref PPS 12 para 4.1). These principles are referred to in LDPW as the need to set key targets, and to give a clear indication of how the policies will be implemented, by whom, and when (para 2.11).

A specific requirement of the LDP is that it should include "allocations of land" (para 2.8 (iv)). The advice continues by noting that the strategy should indicate the locations for specific types of substantive development, and (only) where it is not possible to identify allocations to meet the identified needs of the area (should) criteria based policies be used to set the framework for assessing any unforeseen proposals (para 2.14). It further notes that by identifying sites for development, an Authority demonstrates how the vision and strategy of the plan will be implemented in practical terms (para 2.16).

MPPW provides additional advice on the identification of areas for future mineral working which, although at the time was linked to the preparation of UDPs, nevertheless remains relevant to the identification of areas in LDPs. This confirms that "policies and proposals in development plans should make clear where mineral extraction should, or is most likely to, take place. This approach brings a high degree of certainty to all. These should be clearly identified on a proposals map, and should take the form of:

- Specific sites where mineral resources of commercial significance exists, and where any planning applications which come forward for those sites are likely to be acceptable in planning terms;
- Preferred areas which will be areas of known resources with some commercial potential, and where planning permission might reasonably be anticipated; or
- Areas of search where it is likely that some sites will be appropriate for mineral extraction depending on economic and/or environmental circumstances. Areas of search will define broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain. Within these areas, it is likely that appropriate mitigation measures can overcome all environmental effects. Within areas of search, planning permission could be granted to meet a shortfall in supply should specific sites, preferred areas or extensions to existing sites identified in the plan not come forward. It will not usually be appropriate for an Authority to identify only areas of search in a plan: full justification for adopting such an approach would be needed." (reference para 14).

This context and advice provides a basis for assessing the approach of Core Strategy Policy 10 of the draft LDP, and whether it provides a sound basis for ensuring that the objective of a "continuous supply of minerals" can be achieved and delivered in practical terms.

In that context it is disappointing to note that the draft LDP does not identify specific sites or preferred areas in the conventional way advocated by MPPW, but rather seeks to safeguard the entirety of the sandstone resources (ref CS10)(2) and AW14.2). This is not only contrary to the advice in MPPW, but the safeguarding of the entirety of the resource is not even consistent with the identification of a broad 'area of search', which itself is deemed by MPPW to be inappropriate in isolation of the identification of other specific sites or preferred areas. Moreover, the identification of the full sandstone resource is largely academic given that paragraph 5.84 confirms that the Pennant Sandstone covers approximately 70% of the surface area of RCT. Such 'safeguarding' does not provide a specific means of delivery in terms of the objectives of Policy CS 10.

It is also noteworthy that the policy contrasts markedly with strategic policies relating to other land use and development topics which, inter alia, define strategic development sites and development assumptions and requirements e.g. Policies CS3, CS4, CS6, CS7 and CS9. There is no sound reason to adopt a different approach for minerals.

It is noted that Policy SSA26 identifies a preferred area of known mineral resource at Craig-yr-Hesg Quarry, but for reasons explained in response to that policy, the terminology used is confused, and as a result, the policy does not provide the means of delivery which is required of the Plan.

The Minerals Core Strategy should therefore assess the quantum of existing permitted reserves and future requirements for the plan period and beyond, and use this evidence base to identify specific sites, preferred areas and areas of search as appropriate. This approach would be designed to meet the identified requirements and bring the "high degree of certainty to all" which is required by the

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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process (ref MPPW para 14). Such an outcome would also “make development control decisions less complicated and more transparent” (LDPW para 2.4).

As drafted, Policy CS10 makes a commitment to a 20-year landbank of permitted reserves, but without (i) an assessment of the current level of reserves; (ii) the extent of additional reserves which may be required to meet any deficit; (iii) a commitment to allocating land for future mineral extraction to ensure the delivery of the strategic objective; (iv) the need to ensure that a minimum 10 year landbank of crushed rock is maintained during the entire plan period (for consistency with Minerals Technical Advice Note 1: Aggregates (MTAN1) para 49); or (v) a recognition of a national importance of the high specification stone available at Pennant Sandstone quarries, which is identified as a ‘special case’ in MTAN1, para 42, and the need to ensure the continued availability of supply in a real way. This is not achieved by a simple blanket policy to protect all resources of Pennant Sandstone without any attention to the means by which supplies from that overall resource might be secured.

The LDP confirms that it seeks to reflect a number of strategies produced by the Welsh Assembly Government and other regional bodies, including the Regional Technical Statement for Aggregates 2007, which it notes has been formulated as a guide to individual Local Authorities in the formulation of the LDP policies “and allocations” (ref LDP para 1.34). The RTS notes that in RCT there is currently only one operating limestone quarry and one operating sandstone (high PSV quarry). The recommendations for RCT are that “early consideration should be given to the need to allocate additional reserves likely to be required in the latter part of the 15-year landbank period” i.e. within the 20-year LDP period). It further notes that in preparing LDPs, consideration should be given to other factors that may be relevant to ensuring an adequate supply of aggregate (a key objective of Policy CS10), including

- The technical capability of one type of material to interchange for another.
- The relative environmental cost of substitution of one type of material by another.
- The relative environmental effects of changing patterns of supply.
- Whether adequate production capacity can be maintained to meet the required supply.

Importantly, the advice emphasises that “in preparing local development plans, planning authorities need to take these factors into account in determining whether resource allocations are required. (Para 4.17, Box 1).

Notwithstanding the above advice, there is no evidence that such issues have been considered in the preparation of the LDP, and this is reinforced by the absence of any firm allocations for future mineral extraction within the LDP plan period. The absence of allocations is compounded by Policy CS10 6, and the proposed introduction of “community amenity protection buffer zones” which is the subject of a separate objection. However, for reasons explained in response to Policy AW15, item 6 of Policy CS10 which refers to community protection zones should be deleted.

4 5 Changes sought

Hanson accordingly suggests that Policy CS10 should be revised as follows:

“The Council will seek to contribute to the regional and national demand for a continuous supply of materials, without compromising environmental and social issues, by;

1. Maintaining a minimum 10 year landbank of crushed rock throughout the Plan Period to 2021,
2. Safeguarding mineral resources, including coal, hard rock and sand and gravel, taking into account the range and extent of resources and environmental, planning and transportation considerations. Particular account needs to be taken of the UK importance of Pennant Sandstone resources, which are a special case, and the need to identify areas for potential future extraction to ensure the continued availability of this nationally important high quality aggregate.
3. (As currently drafted).
4. (As currently drafted).
5. Promoting efficient usage, minimising production of waste, and promoting alternatives to primary land won aggregates, taking account of the technical capability of alternative materials to substitute for primary aggregates [consistent with the advice in Box 1, p.79 of the RTS]
6. Delete.

In addition, and for consistency with the reference to ‘safeguarding mineral resources’ in point 2 above, the supporting paragraph 4.81 should delete reference to “nationally important” mineral resources, unless the phrase is qualified by making additional reference to the “nationally important” quality of the Pennant Sandstone Resources.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
6 6	Candidate Site Ref No														
411															
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a									Yes					
13 8	C2 Test? Does not have regard to national policy?									Yes					
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth									Yes					
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?									Yes					
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3 4	Seek changes? Any changes to be made to the Plan?									Yes					
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit									Yes					
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons									Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1318.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060							Site:			PEX Session:						
Policy: AW 14				Map:			Issue: Minerals									
Summary:																

Item Question **Representation Text**

2 3 Representation text
Policy AW14: Safeguarding of Minerals

The policy as drafted is seeking to combine separate issues relating to (i) safeguarding of minerals and (ii) buffer zones around existing and potential sites. These are separate topics, which are dealt with separately in national guidance (reference 'safeguarding' MPPW para 13, and 'buffer zones' MTAN1 para 70 and MPPW para 40). Further confusion arises from the principle of establishing a buffer zone outwards from identified mineral resources, which is inferred from policy AW14, and the separate but different community amenity protection buffer zone which is suggested to be defined outwards from settlements.

Policy AW14 also contrasts with a more logical earlier version of the draft LDP (as submitted to the Coordinating Development Control Committee 17 September 2008) which identifies sandstone and limestone buffer zones around the existing quarry in a manner consistent with the advice in MTAN1 (reference previous draft LDP Policy AW61), and a separate policy for the safeguarding of sand and gravel resources (AW 63). At that time, there was no blanket policy seeking to protect all hard rock resources (now included as AW14 .2 and 3) which, as noted in response to CS10 is fairly meaningless in terms of the effect on the deliverability of the strategy. Moreover, the wording of policy AW14.2 and 14.3 is illogical in defining the full geological coverage of the deposit, but also a 200m buffer zone from undefined areas. As drafted, it can only sensibly relate to a narrow 200m strip of land around the geological outcrop of Pennant Sandstone and Carboniferous Limestone in RCT which, in practical terms, is of no consequence.

Safeguarding policies should be meaningful in defining areas of known resources, where there may conceivably be future proposals for extraction, and where the implications of sterilisation can therefore be properly considered. This is appropriate for the defined sand and gravel areas included in section AW14 a, but it is not appropriate for the substantial areas of Pennant Sandstone and Carboniferous Limestone identified on the proposals map. Moreover, a literal interpretation of policy AW14 and the supporting paragraph 5.82 is that no future development should take place on any areas covered by policy AW14b and c (and potentially d) which is clearly not appropriate.

4 5 Changes sought
Policy AW14 should therefore be revised as follows:
Policy AW 14 Safeguarding of Minerals

The mineral resources identified in 1 below shall be safeguarded from any development which would otherwise sterilise or hinder their extraction. The potential for extraction of mineral resources prior to undertaking other forms of development must be considered before development is permitted within the areas identified in 2, 3 or 4 below :

1. as drafted
2. as drafted
3. as drafted
4. as drafted
5. delete, but where item 5 can be covered by a redrafted policy AW15 (discussed separately in response to that policy).

Paragraphs 5.82 and 5.84 would need to be redrafted for consistency with such revision.

It should also be noted that paragraph 5.80 is incorrect in suggesting that the designated sites of landscape and nature conservation within the defined areas would, "in line with national policy.....prevent extraction of the minerals". There is no such national policy embargo against extraction in such areas, and this sentence of paragraph 5.80 should be deleted.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
6 6	Candidate Site Ref No														
411															
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a									Yes					
13 8	C2 Test? Does not have regard to national policy?									Yes					
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth									Yes					
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?									Yes					
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?									Yes					
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3 4	Seek changes? Any changes to be made to the Plan?									Yes					
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit									Yes					
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons									Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1318.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.062							Site:			PEX Session:							
Policy: AW 15				Map:				Issue: Minerals									
Summary:																	

Item Question **Representation Text**

2 3 Representation text

Policy AW15: Community Amenity Protection Buffer Zones

Hanson accept the principle of buffer zones, which are referred to in national mineral policy guidance (MPPW para 40, and MTAN1 para 70 and 71), but the approach of the draft LDP is not consistent with that guidance.

In essence, a buffer one should be drawn outwards from an existing mineral site and proposed/allocated mineral working to prevent sensitive development from encroaching towards the quarry, with potential adverse amenity effects on occupiers of such development. Similarly, mineral development should not encroach into the defined buffer zone drawn outwards from the quarry and, where appropriate, allocated further quarry area (reference MTAN1 para 70). The advice regarding distance is that for hard rock quarries there should be a minimum distance of 200m, measured from the edge of the execution/processing area, unless there are clear and justifiable reasons for reducing the distance (MTAN1 para 70). It is noted that the earlier draft LDP (September 2008) defined buffer zones around the existing RTC quarries, with policy wording consistent with the advice set out in MTAN1.

In contrast, draft policy AW15 seeks to introduce a new form of buffer zone, which is not based upon national guidance, and which extends outwards from settlements rather than outwards from quarries and allocated areas. Moreover, the policy does not contain any of the qualifications in para 70 of MTAN1 relating to circumstances which might allow a reduction in the separation distance. It is also noteworthy that policy AW15 is not defined on the proposals map since the practical consequence at Craig yr Hesg Quarry is that a 200m community amenity protection buffer zone would cover a substantial part of the existing quarry, and encroach into the defined preferred area (policy SSA 26, discussed in a separate objection).

If, as it is to be assumed, the policy also seeks to apply to mineral extraction at new sites, then it is similarly inappropriate since a new quarry development would need to be accompanied by a detailed EIA which would address separation distance in some detail. In the longer term, if such a new quarry were to be permitted, then a buffer zone could be established around such a quarry as part of a review of the LDP.

4 5 Changes sought

Policy AW15 as drafted should therefore be deleted, and replaced with a redrafted policy as follows:

Quarry Buffer Zones:

“ Quarry Buffer zones are identified on the proposals map at:-

1. Forest Wood Quarry;
2. Craig yr Hesg Quarry (including the identified preferred area); and
3. Hendy Quarry

Within these zones new development will be restricted to safeguard existing reserves and future resources. In considering proposals for non mineral related development within these areas, account will be taken of the potential impact on quarrying arising from the development, and the extent to which the proposals would inhibit quarrying activity.

The buffer zones have been defined based upon a distance of 200m from the outer edge of existing and potential extraction operations, within which existing mineral extraction or other sensitive uses will not be permitted unless it can be demonstrated that there are justifiable reasons why the separation distance can be reduced ”

This revised policy would clarify what is intended by the identification of Quarry (Minerals) Buffer Zones on the proposals map, which are currently not defined in the LDP.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
6 6	Candidate Site Ref No														
411															
<i>Item Question</i>														<i>Reply</i>	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a										Yes				
13 8	C2 Test? Does not have regard to national policy?										Yes				
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth										Yes				
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes				
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?										Yes				
<i>Item Question</i>														<i>Reply</i>	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?										Yes				
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>SA/SEA</i>	<i>NO FRTHR EVID. Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1318.D4			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.116		Site: 705//SSA 26						Graig-yr-Hesg Quarry, Pontypridd				PEX Session:			
Policy: SSA 26		Map:						Issue: Minerals							
Summary:															

Item Question

Representation Text

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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2 3 Representation text

Policy SSA 26: Preferred Area of Known Mineral Resources

Hanson welcomes the general principle of identifying land joining Craig yr Hesg Quarry as an area for potential future extraction. The attached briefing note (Craig yr Hesg Quarry August 2008) highlights the national importance of Craig yr Hesg Quarry in terms of the quality of stone, and confirms that additional reserves will need to be released within the LDP plan period if supplies of this important material are to be maintained.

However, the policy, as drafted, is not consistent with the advice in MPPW regarding allocations, and the 'high degree of certainty' that they bring, nor with the wider issue of 'deliverability' of the planned mineral strategy. The policy simply identifies an area of land to the northwest of the Craig yr Hesg Quarry as a 'preferred area of known mineral resource' but where:

1. the preferred area is not defined in terms of its status as an area of extraction in the plan period and, in practice, a 'preferred area of known mineral resource' is itself a vague and rather meaningless term – a 'preferred area' should mean that it is 'preferred' compared to other alternatives, with some degree of likelihood that it will be translated into a permitted reserve;
2. the preferred area designation is not consistent with the terminology used in MPPW (para 14) namely that it is an 'area of known resources..... where planning permission might reasonably be anticipated'; (Note there is a definition given in the Glossary which is consistent with MPPW, para 14]
3. there is no commitment or comment regarding the need to release the resource within the plan period;
4. no wider comments are provided on issues to be addressed as part of such a development, including attention to the quarry mineral buffer zone.

It is also noteworthy that the supporting para 6.188 cross refers to the conclusion of the Regional Technical Statement that there is a need to 'allocate' additional reserves in RCT to ensure a supply of resources over plan period, but the draft LDP does not follow this advice in terms of a specific un-ambiguous allocation.

In addition to the above, and as part of the site allocation assessment process, the Council have undertaken a 'Stage 1' and 'Stage 2' sustainability assessment of the 'candidate' extension site at Craig yr Hesg Quarry. The 'Stage 1' site assessment matrix identifies five broad issues, which have been supplemented by a further 16 point assessment. In relation to each of the broad planning issues identified in the methodology, the site performs well in terms of its suitability for allocation as a suitable quarry extension site.

The Council's 'Stage 2' site assessment includes a sustainability assessment process which examines potential levels of impact for the site. This has been undertaken in consideration of each of the sustainability objectives identified in the Council's 'Site Appraisal Framework'. In relation to these sustainability objectives, the site again performs well in terms of its potential allocation as a suitable quarry extension site. In summary, the 'Stage 2' assessment confirms the following:

- A Management Plan for the site would provide an environment that promotes wellbeing and encourages a healthy and safe lifestyle.
- The site has good pedestrian links and encourages walking, whilst being suitably located in relation to transport services.
- The development of the site would make a positive contribution to the economy.
- The quarry extension would promote the creation of a diverse range of employment opportunities within Rhondda Cynon Taf.
- The site suitably promotes the extraction of mineral reserves
- A Landscaping Scheme would protect the landscape of the site.
- A Conservation Management Plan would protect the biodiversity of the area.
- The site will promote sustainable design and reduce the need to travel for work.
- The site promotes the efficient use of land and soils.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
4	5			Changes sought											
<p>The site has therefore emerged from a detailed appraisal process as being suitable for allocation as an area for future extraction. This should be properly reflected in the LDP, where Policy SSA 26 should be revised to read:</p> <p>'Policy SSA 26: Preferred Area for Future Extraction</p> <p>Land adjacent to Craig yr Hesg Quarry, Pontypridd, is identified as a preferred area for extraction which is anticipated to be required to be released within the plan period'</p> <p>The supporting text in para 6.189 should also be revised to reflect the suggested alterations to policy AW14 and AW15 and, in view of the more positive phraseology of the revised policy SSA 26, the supporting text could usefully highlight issues which should be addressed in designing a proposal for a quarry extension within the allocated preferred area.</p>															
6	6			Candidate Site Ref No											
				411											

Item	Question	Reply	Soundness Tests
12	8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes
13	8	C2 Test? Does not have regard to national policy?	Yes
16	8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes
18	8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes
Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1322.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site: 331/332		Hazeldrive				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

I write to further my case to extend the settlement boundary to include a small area of my land, edged red on the attached plan, on the candidate site of the LDP.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3	Representation text													
<p>My family own approximately 15 acres of land in this area, showed edged blue on the attached plan, and have done since 1980. We have grazed horses on this land throughout our ownership. The land is an integral part of the countryside with various wildlife and protected trees. I do not wish to include all of my land, the land in question is about a quarter of an acre of 'in fill' ground.</p> <p>It is my intention to set up a small business of breeding, breaking -in and selling Welsh Cobs which I think would be beneficial to the local equestrian community in the current economic climate. I have put together a business plan with the help of my bank and I have their backing for this venture.</p> <p>There is only one stud farm in Rhondda Cynon Taf which is a very small business situated in Abercynon. I would have the only stud farm in the area which actually breaks-in horses to be ridden, in doing this it will prevent people from having to travel far afield, sometimes even England, to purchase the beloved Welsh Cob. This would therefore cut down on the travelling costs for those who live in the surrounding area and also on their carbon emissions.</p> <p>Royal Welsh Agricultural show is held in Built Wells attracting around 230,000 visitors every year with the famous 'Cob Day' being the busiest of the four day event, showing the popularity of this beautiful breed. I would like to breed horses to be shown in this event thus promoting my business. Any such promotion would also put Aberdare on the map within the horse society promoting visitors to the area from England and all over Wales. This will therefore help promote tourism in the Aberdare area. Small businesses will also benefit from the additional visitors to Aberdare therefore helping the local economy.</p> <p>The Welsh Pony and Cob Society (established 1904) say of the breed: - "their versatility, superior performance, hardiness and kind, loyal nature makes them the first choice of horses or pony for all. It is vital that the welsh breeds are maintained in a pure form to enable future generations to enjoy this legacy". It is for this reason that I believe it is important to breed the Welsh Cob in their birthplace, the Welsh Valleys.</p> <p>At the moment I have two horses and unfortunately cannot purchase any more as it is becoming more difficult to keep them safe due to the amount of criminal dmage suffered to the fences and gates.</p> <p>Over the last several years we have been experiencing a significant amount of criminal damage, which is reported to the police. Pleas see attached covering letter from the police along with the incident logs. Unfortunately the police gave incorrect crime reference numbers for three incidents, these were:-</p> <ol style="list-style-type: none"> 1) Horse being shot in the neck. 2) A 3m x 1m gate stolen; and 3) Being verbally abused and threatened by a man after asking him to put his dog on a lead as it was antagonising my horses. <p>A number of youths occasionally hang around under an oak tree smoking, drinking and taking drugs leaving the place littered with broken glass, empty cans and general rubbish which I pick up and take home to dispose of. The police are aware of this. Obviously this is dangerous to horses and other wildlife and I do not believe this would happen if I had a presence there. At present it is impossible for me to get my business up and running as I live some distance away from the horses and am unable to guarantee their safety.</p> <p>I have extensive experience with horses as my family has owned horses for over thirty years. I have been brought up with them and running this business on the land would not only be a dream come true for me but would enable me to share something which I am passionate about with the local community.</p> <p>It is for these reasons that I would ask you to reconsider my application to extend the LDP to include the area of land indicated previously so that I can build a home for myself and my family close to the horses. This will allow me to provide 24 hour care to my horses and help my business grow. I strongly believe that if I lived there it would add safety and security to the area in general and for my horses whilst also enabling the smooth running of my business. Living next to the horses and knowing that I could be there to protect them would enable me to purchase more horses and expand my business. Should my business be successful and expand this would mean that I would need to employ a couple of stable handds to help me on a day to day basis. This would bring jobs to the local area and again help the local economy.</p> <p>There are houses to the north, east, south and west of the land in question; therefore there is precedent for dwelling houses in the area. I believe it is only fair that this area be included within the candidate site. As you can see from the attached photograph a dwelling house would not be visible from the Dare Valley Country Park, Maerdy Mountain or surrounding areas. Should this area of land be included within the LDP and planning permission granted, any such dwelling house would be sympathetically built to fit in with its surroundings with all conditions imposed by the County Council being implemented accordingly.</p>															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1331.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.054, para.5.51		Site: 365/366		Maesyffynnon Lane/Brynfynon Close		Delete Site		PEX Session:								
Policy: AW 8		Map:		Issue:												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The inclusion of land off Maesyffynon Lane, Aberdare, within the settlement boundary of Aberdare (See attached plan of the site, omitted in red).	
2 3	Representation text	
	Please refer to attached sheet.	
	1. The Stage 1 Site Assessment indicates that the site has poor environmental value, has no protected landscape, ecological or cultural designations and would not result in the loss of agricultural land. Its inclusion as part of the SINC is therefore not essential, and its removal from the designation will not harm the integrity of that designation.	
	2. Whilst not strictly required a site sustainability assessment has been undertaken and is submitted from your attention. This demonstrates that the area is not one of which is central to the nature of the SINC.	
	3. The inclusion of the land within the settlement boundary is not considered to adversely affect the natural heritage of the area as it would not harm the SINC's management, its designated features or impact on the conservation value of the site.	
	4. The limited scale and size of the land (I.e. 0.36 hectares) and its peripheral location on the extreme edge and between existing built development of the site, ensures that its loss to the SINC is minimal	
	5. On the above basis, it is contended that the settlement boundary be varied in your report on the objections to the plan that is forwarded to the inspector.	
4 5	Changes sought	
	The land referred to (on the attached plan edged red) being included within the settlement boundary.	
6 6	Candidate Site Ref No	
	366	
9 7	Why no previous Representation	
	At this stage the details of the settlement boundary were not available.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1331.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079, para.6.61		Site: 365/366 Maesyffynnon Lane/Brynffynon Close						Settlement Boun				PEX Session:			
Policy: NSA 12		Map:						Issue: Settlement Boundary							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	The inclusion of land at Maesyffynon Lane, Aberdare (see attached plan edged red) within the settlement boundary of Aberdare.	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3	Representation text													
Please refer to attached sheet:															
<ol style="list-style-type: none"> 1. The planning history of the land shows that the site has previously been included as part of an identified settlement limit contained within an earlier Local Plan (see attached letter giving the site history) 2. It was subsequently specified as part of the route of a proposed by-pass road. 3. Both these identifications show that it has been considered more a part of the urban form than an open area of countryside. 4. The site is only 0.36 hectares in area and bounded tightly on two sides by existing residential and industrial development, both of which are shown on the proposals map as being within the settlement limit. 5. This area is infill in the truest sense of the term. 6. Policy NSA12 contains criteria for development adjoining defined settlement boundaries. It is considered that, for the reasons given below, this site would comply with these three criteria. However, the policy excludes Aberdare from this flexible integration. As a consequence this objection needs to be made to ensure that the site is included within that boundary at this point in time. 7. In respect to the criteria concerned:- <ol style="list-style-type: none"> a. the site is of a limited size that would restrict its future development to below the threshold of 10 dwellings; b. the site is bounded on two sides by the defined settlement boundary and its development would not adversely affect the amenity or character of the site or surrounding area; c. whilst the proposal forms part of a SINC, it is an extremely peripheral and enclosed area when viewed in respect to the open nature of the SINC which it forms part of (i.e. The Graig Mountain above the town centre of Aberdare). Its deletion from the SINC would in no way harm that designated area, which appears to include the site on an arbitrary basis. 8. In any event a site sustainability assessment has been undertaken and is attached for your attention. This confirms the acceptability of the developable nature of the site against the set headings. 9. The site Stage 1 Assessment indicates that the environmental quality of the land is "poor". This also appears to question its inclusion as part of the SINC. 10. This Assessment further indicates that the presence of the tyre fitting operation to the west, adversely affects the development of the site. Whilst acknowledging that it is a material consideration, good design, site layout and landscaping could acceptably ameliorate the consequences of this operation on the residential development of the site. 11. The objection raised is not one which argues that the plan is unsound but (in view of the omission of Aberdare from the exemption to Policy NSA12), one that contends that the site is so small that it does not run to the heart of the plan but, due to its enclosed location and peripheral nature, its inclusion would in no way prejudice the soundness of the plan. 12. As such it should be accommodated as part of the defined urban limit contained in the plan. On the basis of the above comments it is contended that the settlement boundary be varied in your report on the objections to the Local Development Plan this is forwarded to the inspector. 13. I would be grateful for your consideration of my comments and trust that they will be fully considered prior to your decision. 															
4	5	Changes sought													
The land referred to being included within the settlement boundary of Aberdare.															
6	6	Candidate Site Ref No													
366															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
9 7		Why no previous Representation													
		At that stage the detailed settlement boundary was not available													
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3 4		Seek changes? Any changes to be made to the Plan?										Yes			
5 6		Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7 7		Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1337.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.108		Site: 304/303			Felindre Road, St. Mary Hill			New Site		PEX Session:					
Policy: SSA 13		Map:			Issue: Settlement Boundary										
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I wish to amend my site to exclude it from the countryside	
2 3	Representation text I object to this site being in the countryside-agricult (sic)-as it is surrounded by B1-B2	
4 5	Changes sought I would like this site to be excluded from the countryside	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It would be of benefit to the Local Authority and area to be able to partly control what is built on site, however if left as in countryside it leaves it open to all sort of available applications, e.g. pig farm.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 304/303 Felindre Road, St. Mary Hill						New Site		PEX Session:					
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I would like to amend my site to exclude it from being unallocated	
2 3	Representation text I object to the site being unallocated	
4 5	Changes sought I would like the site to be excluded from being unallocated.	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It would be more beneficial (sic) for the site to be allocated for some use		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy:				Map:				Issue: Policy Omission								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I would like to amend the settlement boundary	
2 3	Representation text I believe the area would benefit with the inclusion of more tourist accomatsation (sic).	
4 5	Changes sought I would like the plant (sic) to include my site for tourist accomation (sic).	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan There are more lesure (sic) activities planned for the area so we will obviously need more tourist accmasation (sic), beb (sic), hotels, ect (sic).		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy:				Map:				Issue: Policy Omission								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I object to the site being unallocated in the plan	
2 3	Representation text I would like my site to be allocated for hotel, tourist accomodation, B & B Hotel	
4 5	Changes sought I would like to change the site from unallocated to allocated for tourist accomodation (sic) hotel - B & B hotel ect (sic)	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan There is a need foritin (sic) the area. For more tourist accomodation (sic), hotels, B & B hotel to accmadate (sic) the extra tourist for the Valleywood Site		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy: SSA 10				Map:				Issue: Housing Allocation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I object to the housing allocation in the plan SSA 10	
2 3	Representation text I would like my parcel of land to be included as an alternative housing allocation for affordable housing	
4 5	Changes sought I would like this site to be added to the housing allocation, affordable housing	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan I am surrounded by B1-B2 housing and B1 can go together, there is a need for more affordable housing, under the current economic climate and the area.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1337.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 304/303			Felindre Road, St. Mary Hill			Settlement Boun			PEX Session:				
Policy: SSA 13		Map:			Issue: Settlement Boundary										
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	I would like to amend the settlement boundary to include my site for housing. SSA 13. 'Affordable Housing'	
2 3	Representation text	
	I believe there has not been enough affordable housing allocated within the plan under the current economic climate	
4 5	Changes sought	
	I would like the settlement boundary amended	
6 6	Candidate Site Ref No	
	303	
9 7	Why no previous Representation	
	I was unaware that I could	
21 11	Why attend Examination?	
	I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	I would like the settlement boundary to include my site for housing, as it would be of no use to leave this parcel of land stand alone as agriculture with the surrounding 37H being B1-B2		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1337.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.109		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:						
Policy: SSA 14				Map:				Issue: Employment									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary I would like to amend the boundary to include my site for B1-Employment. SSA14	
2 3	Representation text I think I should be included as all the adjoining land is B1-B2	
4 5	Changes sought I would like the settlement boundary to be amended	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Part of my land is B1 so I would like the whole parcel of land to be B1		

Item	Question	Reply	Tick box Replies
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1337.D8			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.109		Site: 304/303 Felindre Road, St. Mary Hill						New Site		PEX Session:				
Policy: SSA 14				Map:				Issue: Employment						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary I object to my parcel of land not being included within the B1 allocation, SSA14 Employment	
2 3	Representation text I would like this site to be included in the B1 Employment Allocation SSA 14 as it is surrounded by B1-B2	
4 5	Changes sought I would like this site to be included in the employment allocation SSA 14	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on roburst and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The adjoining 37h is all B1-B2 it would be of benefit (sic) to have the last remaining parcel of land available as B1-B2		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy: SSA 14				Map:				Issue: Employment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I wish to amend my site to exclude it from the countryside. Existing boundary	
2 3	Representation text I object to this site being in the countryside as it is surrounded by B1-B2	
4 5	Changes sought I would like the site to be excluded from the countryside	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The whole area is B1 it would be more appropriate for it to be B1 under SSA 14		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D10			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.116		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy: SSA 27				Map:				Issue: Affordable Housing								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	I object to the site being in the agricultural, countryside. Unallocated	
2 3	Representation text	
	I would like the site to be included in the SSA 27 allocation	
4 5	Changes sought	
	I would like the site 303 to be included in the SSA 27 allocation	
6 6	Candidate Site Ref No	
	303	
9 7	Why no previous Representation	
	I was unaware that I could	
21 11	Why attend Examination?	
	I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	There is a need for a gypsy site in the local area, the site can satisfy (sic) all the needs		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D11			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.116		Site: 304/303 Felindre Road, St. Mary Hill						Settlement Boun				PEX Session:			
Policy: SSA 27				Map:				Issue: Affordable Housing							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I would like to amend the settlement boundary to include my site for SSA 27 allocation	
2 3	Representation text I belive (sic) there is not enough sites in RCT to accomadate (sic) the different gypsy-travellers. I feel the above site has all the infrastructure in place	
4 5	Changes sought I would like the settlement boundry (sic) amended.	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site needs to be amended to allow gypsy travellers to have a place outside the residential area.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1337.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.116		Site: 304/303 Felindre Road, St. Mary Hill							New Site		PEX Session:					
Policy: SSA 27				Map:				Issue: Affordable Housing								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I wish to amend my site to exclude it from the countryside	
2 3	Representation text I object to this site being in countryside as it is surrounded by B1-B2	
4 5	Changes sought I would like this site to be excluded from the countryside	
6 6	Candidate Site Ref No 303	
9 7	Why no previous Representation I was unaware that I could	
21 11	Why attend Examination? I feel by attending the examination I can put my points over clearly	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan I feel by allowing this site for gypsy travellers will relive (sic) the burdon (sic) from the Borough Council. SSA 27		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site:					New Site		PEX Session:				
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged red on the attached plan should be allocated for residential development under the provisions of policy SSA 10. The site which is currently used for gravel extraction forms part of a larger brownfield site which is identified for land reclamation in the RCT (Taff Ely) Local Plan and the land immediately to the east of the site is allocated for B1 uses following comprehensive land reclamation. The location of the site and the wider area identified for would enable the land reclamation to be carried out.	
2 3	Representation text	
	It is submitted that the site is suitable to accommodate residential development. The site is located just to the north of the current and proposed built-up limits of Llanharry. It is proposed that this site would be suitable to accommodate residential development, and that land to the south, east and west also has potential for development as part of an expanded SSA 10.13. The site has good access to local services, facilities, employment opportunities and well as public transport. The site would help meet housing needs of the Borough [sic], including local needs and could also provide an element of affordable housing. The site is available for development in the early part of the plan period, and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development under policy SSA 10.	
9 7	Why no previous Representation	
	Harmers has only recently been instructed, but it is understood that submission were not made at the PS stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Llanharry is available to meet short-term housing need. It is considered that Llanharry has potential to accommodate development beyond the level proposed in the Deposit Plan. The site and adjacent areas would comprise a logical expansion of this part of the settlement. The site is appropriate for housing development and its allocation would make the LDP policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039		Site: 395/399		The Elms, nr Forest Wood Quarry		New Site		PEX Session:							
Policy: CS 9		Map:		Issue: Waste Management											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site at The Elms, Brynsadler as shown on the attached plan should be included as an Eco Park under the provisions of policy CS 9. The eastern part of the site has been subject to tipping and is brownfield.	
2 3	Representation text	
	England Environmental wish to establish an Eco Park on the site, which would take the form of an industrial estate situated around a Materials Recovery Facility, whereby tenants of the park will either produce secondary materials or use them as feedstock in their production process. Eco Parks have been promoted by the Wales Environmental Trust and recognised by WAG in TAN 21 in recognition of their contribution to meeting the diversion requirements of the Landfill Directive. The location would accord with the Council's objectives to reduce waste going to landfill.	
4 5	Changes sought	
	The site shaded brown on the attached plan should be allocated as an Eco Park under policy CS 9.	
6 6	Candidate Site Ref No	
	399.	
9 7	Why no previous Representation	
	The employment allocations and / or facilities for recycling were not defined in the PS.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The issue of recycling and the provision of an Eco Park and employment site will contribute to the sustainability objectives of the LDP and therefore contributing to the soundness of the plan. The proposal will be compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.100		Site: 396/400		Mwyndy Quarry and adj		New Site		PEX Session:							
Policy: SSA 8		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	SSA 8 should be extended to include the land as shown on the attached plan, which is proposed for a hotel including a leisure facility / restaurant / public house. The site covers an area of 1.08 ha and is in a prime location being visible to traffic travelling along the A4119.	
2 3	Representation text	
	The inclusion of the representation site would form a logical extension to the SSA 8 allocation and contribute to providing a mix of uses, thereby making the allocation more sustainable. The site forms a much smaller area than the CS submission and excludes the areas that are subject to the TPO and the development of this area would not adversely affect the SINC designation, as this area has little nature conservation value.	
4 5	Changes sought	
	The SSA 8 designation should be extended to include the representation site as shown on the attached plan.	
6 6	Candidate Site Ref No	
	400.	
9 7	Why no previous Representation	
	The boundaries of the Strategic Site at Mwyndy / Talbot Green were not defined in the PS.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The inclusion of the site within the SSA 8 allocation will make the allocation a more realistic one, by providing a mix of uses, thereby contributing to making it a more sustainable allocation.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D4			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060, para.5.79 - 5.86										Site: 745//AW 14.5 Limestone & Sandstone Quarry Buffer			Amend site boun PEX Session:			
Policy: AW 14				Map:				Issue: Minerals								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The part of this submission which is currently included within the safeguarding zone identified under policy AW 14.5 should be excluded from it.	
2 3	Representation text	
	The part of this site, which is proposed for an Eco Park under related submissions, should be excluded from the minerals safeguarding area. The site is located on or near the fringes of the safeguarding zone and is suitable for allocation as an Eco Park. The proposed use is not a sensitive use and would not be adversely affected by mineral operations.	
4 5	Changes sought	
	That part of the submission site shown edged in red in the attached plan, which falls within the minerals safeguarding zone should be excluded from it.	
6 6	Candidate Site Ref No	
	399	
9 7	Why no previous Representation	
	The location and extent of mineral safeguarding zones were not identified until the Deposit Plan stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The allocation of the site shown on the attached plan as an Eco Park and its exclusion from the minerals safeguarding zone would help meet employment needs in this part of the Borough. The development of an eco park would be in accordance with the provisions of Core Policy CS9 which encourages a range of waste management options, including recycling and composting. The allocation of the site under policy CS9 would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D5			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183		Site: 824//SSA 23.2		Talygarn Surrounds		Amend site boun		PEX Session:								
Policy: SSA 23		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary That part of the site shown edged in red on the attached plan, which falls within the SLA should be deleted from the Designation.	
2 3	Representation text Part of the site shown edged in red on the attached plan is included as part of a Special Landscape Area designation. The site does not merit such inclusion.	
4 5	Changes sought That part of the site which falls within the Special Landscape Area designation made under the provisions of policy SSA 23.2 should be deleted from the designation.	
6 6	Candidate Site Ref No 399	
9 7	Why no previous Representation Special Landscape Area designations were not made until the Deposit Plan Stage.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D6			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109, para.6.159 - 6.160		Site: 397/401		Pantglas Farm N.		New Site		PEX Session:							
Policy: SSA 14		Map:		Issue: Employment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site in red on the attached plan should be allocated for employment development under the provisions of policy SSA 14.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate employment development. The site is located on the southern fringes of Coedely, opposite to the SSA 14.2 employment land allocation which it would complement. Together with the employment allocation, the site would comprise a logical consolidation/ extension of this part of Coedely and would rationalise the limit of development in this locality. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet the employment needs of the Borough. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for employment development under the provisions of policy SSA14.	
6 6	Candidate Site Ref No	
	401 part for residential development	
9 7	Why no previous Representation	
	Harmers has only recently been instructed and do not know whether submissions were made at the Preferred Strategy stage. However the allocation of the site for employment development would be compatible with the Council's strategy to identify Tonyrefail as a key settlement and to identify a strategic employment site at Coedely.	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of sites for employment is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The site at Coedely is available to meet employment needs. Further, the site comprises a logical expansion of this part of the settlement which complements the nearby SSA 14.2 employment allocation. The site is appropriate for employment development and its allocation would make the LDP's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1353.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.114				Site: 828//SSA 23.6		Mynydd y Glyn & Nant Muchudd Basin		Amend site boun		PEX Session:							
Policy: SSA 23				Map:				Issue: Environment									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary The site shown edged in red on the attached plan should be deleted from the special landscape Area Designation.	
2 3	Representation text The site shown edged in red on the attached plan is included as part of a Speical Landscape Area designation. The locality was not included in a Special Landscape Area in the Adopted Rhondda Cynon Taff Local Plan and the character of the land does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the Special Landscape Area designation made under the provisions of policy SSA23.6	
6 6	Candidate Site Ref No 401	
9 7	Why no previous Representation Special Landscape Area designations were not identified until the Deposit Plan stage.	
21 11	Why attend Examination? The extent of the Special Landscape Area designations is a fundamental issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's polices more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D8			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183																
Site: 823//SSA 23.1 Llanharry Surrounds																
Amend site boun PEX Session:																
Policy: SSA 23																
Map:																
Issue: Environment																
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The site shown edged in red on the attached plan should be deleted from the Special Landscape Area Designation.	
2 3	Representation text The site shown edged in red on the attached plan, together with land with land (SIC) to the east, west and south is included as part of a Special Landscape Area designation . The land was not identified in the Adopted Taff Ely Local Plan as an SLA and the character of the land, does not merit such including in landscape terms.	
4 5	Changes sought The site and land within the propsoed amended settlement boundary, shown on the attached plan should be deleted from the Special Landscape Area designation made under the provisions of policy SSA23.1	
9 7	Why no previous Representation The special landscape area boundaires and exent of this designation were not known at this stage.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site and adjacent land from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D9			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113		Site: 818//SSA 22.4		Llanharan, Llanharry & Pontyclun		Amend site boun		PEX Session:								
Policy: SSA 22		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The site and area included within the proposed amended settlement boundary should be excluded from the green wedge designation.	
2 3	Representation text This site is included in a green wedge designation between Llanharan, Llanharry and Pontyclun. It is not considered that the site and area within the proposed amended settlement boundary merits inclusion within this designation.	
4 5	Changes sought The site and area within the proposed amended settlement boundary should be deleted from the Green Wedge designation made under the provisions of policy SSA 22.4.	
9 7	Why no previous Representation Green wedges were not identified until the Deposit Plan stage.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site and area within the proposed amended settlement boundary from the Green Wedge would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1353.D10			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.109, para.6.159 - 6.160						Site: 126/121 Llanharan STW				New Site		PEX Session:		
Policy: SSA 14				Map:				Issue: Employment						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	This is a brownfield site which is suitable to accommodate employment and recycling and should be allocated for Class B2 and B8 uses under the provisions of policy SSA14.	
2 3	Representation text	
	This brownfield site, comprising the former Llanharan Sewage Treatment Works is suitable to accommodate a combination of employment and recycling uses including use classes B2 and B8. The site already accommodates residential development along the road frontage and business use within the site, including portacabins and an extensive hard surfaced area. The site has potential to accommodate further B2, B8 and recycling uses and it is submitted that the site should be allocated for employment uses. The site is located on the fringes of Llanharan and Pencoed and has reasonable access to public transport.	
4 5	Changes sought	
	The site edged in red on the attached plan should be allocated for employment purposes under the provisions of policy SSA 14.	
6 6	Candidate Site Ref No	
	121	
9 7	Why no previous Representation	
	Harmers has only recently been instructed on this site and it is not known whether submissions were made in respect of this site at this stage.	
21 11	Why attend Examination?	
	The allocation of sites for employment use is a fundamental issue which affects the soundness of the plan and is one which should be considered at examination rather than by written statement.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The allocation of this site for employment use would allow for beneficial use to be made of a brown field site, which already accommodates a range of uses. The allocation of the site is logical, appropriate and would make the LDP's policies more robust and compliant with national policy		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1353.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.113, para.6.176 - 6.179															
Site: 818//SSA 22.4 Llanharan, Llanharry & Pontyclun															
Amend site bound PEX Session:															
Policy: SSA 22															
Map:															
Issue: Environment															
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site should be excluded from the green wedge designation.	
2 3	Representation text	
	This site is included in a green wedge designation between Llanharan, Llanharry and Pontyclun under the provisions of policy SSA 22.4. The site accommodates a range of existing development including housing, a recycling facility, offices and a hard surfaced area. The site is already developed and is suitable for additional employment development. The exclusion of the site from the green wedge designation would not lead to the coalescence of settlements and it is not considered that the site merits inclusion within this designation.	
4 5	Changes sought	
	The site should be deleted from the Green Wedge designation made under the provisions of policy SSA 22.4.	
6 6	Candidate Site Ref No	
	121	
9 7	Why no previous Representation	
	Harmers has only recently been instructed on this site and it is not known whether submissions were made in respect of the site at this stage.	
21 11	Why attend Examination?	
	The location and extent of green wedge designations is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The deletion of the site from the Green Wedge would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1353.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183		Site: 823//SSA 23.1		Llanharry Surrounds		Amend site boun		PEX Session:								
Policy: SSA 23		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The alternative site should be deleted from the un-named/un-numbered Special Landscape Designation which affects this site.	
2 3	Representation text This site is included in a special landscape designation which is not referenced on the Proposals Map. The site comprises a former sewage treatment works and accommodates a range of existing buildings, uses and hard surfacing. It is not considered logical to include this site within a Special Landscape Area designation and the site does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the Special Landscape Area designation made under the provisions of policy SSA 23.	
6 6	Candidate Site Ref No 121	
9 7	Why no previous Representation Harmers has only recently been instructed on this site and it is not known whether submissions were made in respect of this site.	
21 11	Why attend Examination? The allocation of special landscape areas is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations. This submission is related to other representations requesting the allocation of this site for employment use.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1354.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site: 199/196 Werfa Lane rear				Settlement Boun		PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	On Northern site Map, I am requesting the the settlement boundry(SIC) be altered to include part of candidate site number 196, rear of Werfa Lane, Abernant, Aberdare (please see attached map)	
2 3	Representation text	
	The site is bounded on one side by existing developments and is not in open countryside. It would not have any adverse impact on the surrounding area, as this site can only have a maximum of 3 dwellings (by covenant.) Therefore it is a site of extremely low density, and does not have an area exceeding 0.3 hector. The access road would be improved either by 'passing places' (already being undertaken) or widening if necessary. Similar sites in the close vicinity have already had the settlement limits moved for development, or have been reccommended for the same in draft LDP.	
4 5	Changes sought	
	As Question 21	
	On Northern Map, I am requesting the the settlement boundary be altered to include part of candidate site number 196, rear of Werfa Lane, Abernant, Aberdare (please see attached map)	
6 6	Candidate Site Ref No	
	196	
9 7	Why no previous Representation	
	My site is not a strategic one.	
21 11	Why attend Examination?	
	I would be able to fully brief my legal and professional representative and to verbally explain my application before the inspector.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	By including my site it would give flexibility for delivering housing development targets over the term of the LDP.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1359.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.089				Site: 767//NSA 24.6		Coed y Cwm and Grovers Field		Delete Site		PEX Session:					
Policy: NSA 24		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I object to the site been allocated as a green wedge.	
2 3	Representation text In order for the site to fulfill its role as the central tourist hub of the Cynon Valley River Park (Policy NSA 26), the site should be allocated for tourism development. Full details of the representation are attached.	
4 5	Changes sought To amend the defined green wedge to exclude this site. To reinstate site 652 as a candidate site for tourism development.	
6 6	Candidate Site Ref No 652	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				See attached notes : CE1 / CE4											
				Question 9											
				Regarding Changing Circumstances (CE4) and the prominent issue of climate change, co-tourism accommodation and development have been overlooked entirely in the formation of the LDP. There are no allocations, nor candidate site applications for eco-tourism accommodation in RCT.											
				Candidate site 652 was inaccurately described and assessed as 'employment development and holiday cabins'. It was rejected on the grounds of 'not contributing towards the overall objectives and strategies of the LDP'.											
				This description and assessment bears little resemblance to the actual eco-tourism proposal put forward for the land as set out in the detailed documentation submitted to the LDP Team as representations to the preferred strategy during the consultation period in January 2007 (also enclosed herein).											
				I have been informed by the LDP Team that none of these documents regarding the River Lodge Retreat Eco-tourism project were considered when rejecting the site 'because they were not handed in in 2006'.											
				Regarding its rejection on the grounds of 'not contributing towards the overall objective and strategies of the LDP', I strongly object to this reason for rejection. The River Lodge project contributes towards the achievement of sustainable development in the region. It complies with key Assembly Government Strategies, including the Environmental Strategy for Wales (2006), Wales Spatial Plan Update (2008), and Wales: A vibrant Economy (consultation document). Through conscientious development and the promotion of clean, healthy, biologically diverse environment.											
				It complements local and regional strategies, including the Children and Young People Plan, A Better Life: Our Community Plan (2004-2014) by helping to improve the quality of life in RCT, providing access to play, leisure and sporting Activities for all; Turning Heads (2006) by offering an appealing and coherent tourism and leisure experience, and providing a good range of new jobs in tourism, and encouraging a healthier local population; and the Regional Transport Plan, by increasing opportunity, promoting prosperity and protecting the environment through the provision of facilities, employment and tourism accessed by public transport, walking and cycling routes: by reducing the demand for road travel, promoting use of a transport system that encourages healthy and active lifestyles, supporting local communities, and significantly reducing the emission of greenhouse gases and air pollution from transportation.											
				The project satisfies seven of the ten LDP Objectives (Deposit Draft pg.22-23), and 12 of the 16 Objectives as laid out in the Community Plan. Promoting integrated communities with opportunities for living, working and socializing for all; providing an environment that encourages a healthy and safe lifestyle and promotes well-being; providing for a stable economy; providing for a diverse range of job opportunities; reducing the need to travel and promoting more sustainable modes of transport; providing a high quality built environment that promotes community pride; improving, protecting and enhancing the landscape and countryside; protecting and enhancing the diversity and abundance of wildlife habitats and native species: improving, protecting and enhancing the water environment; managing the effects of climate change; increasing waste, especially waste to landfill in accordance with the findings of The Regional Waste Plan.											
				The inclusion of site 652 within the Cynon Valley River Park provides a direct opportunity to fulfill the strategy of Policy NSA 26: to 'promote public access on foot and cycle, mitigate and adopt to climate change, encourage health and wellbeing, and support heritage and tourism.											
				Core Policy CS8 Transportation: "The council will seek to reduce the need to travel by private car, support and enhance transport, walking for health, and cycling provision'.											
				Core Policy C11 Climate Change: ' ...RCT will seek to address climate change and reduce energy demand by promoting the provision of renewable energy generation from micro-generation equipment in new development; support development proposals that incorporate decentralized heating, cooling and power networks powered by renewable energy sources; and integrate nature conservation into new developments....'											
				Policy AW 12 Renewable Energy:' ...Development proposals which promote energy efficiently will be permitted where it can be demonstrated that there is no unacceptable effects on agriculture, conservation, wildlife, natural heritage and landscape importance'											

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1359.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft						Site:						New Site		PEX Session:		
Policy:				Map:						Issue: Policy Omission						
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I object to the site been allocated as a green wedge.	
2 3	Representation text In order for the site to fulfill its role as the central tourist hub of the Cynon Valley River Park (Policy NSA 26), the site should be allocated for tourism development. Full details of the representation are attached.	
4 5	Changes sought To amend the defined green wedge to exclude this site. To reinstate site 652 as a candidate site for tourism development.	
6 6	Candidate Site Ref No 652	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
				See attached notes : CE1 / CE4											
				Question 9											
				Regarding Changing Circumstances (CE4) and the prominent issue of climate change, co-tourism accommodation and development have been overlooked entirely in the formation of the LDP. There are no allocations, nor candidate site applications for eco-tourism accommodation in RCT.											
				Candidate site 652 was inaccurately described and assessed as 'employment development and holiday cabins'. It was rejected on the grounds of 'not contributing towards the overall objectives and strategies of the LDP'.											
				This description and assessment bears little resemblance to the actual eco-tourism proposal put forward for the land as set out in the detailed documentation submitted to the LDP Team as representations to the preferred strategy during the consultation period in January 2007 (also enclosed herein).											
				I have been informed by the LDP Team that none of these documents regarding the River Lodge Retreat Eco-tourism project were considered when rejecting the site 'because they were not handed in in 2006'.											
				Regarding its rejection on the grounds of 'not contributing towards the overall objective and strategies of the LDP', I strongly object to this reason for rejection. The River Lodge project contributes towards the achievement of sustainable development in the region. It complies with key Assembly Government Strategies, including the Environmental Strategy for Wales (2006), Wales Spatial Plan Update (2008), and Wales: A vibrant Economy (consultation document). Through conscientious development and the promotion of clean, healthy, biologically diverse environment.											
				It complements local and regional strategies, including the Children and Young People Plan, A Better Life: Our Community Plan (2004-2014) by helping to improve the quality of life in RCT, providing access to play, leisure and sporting Activities for all; Turning Heads (2006) by offering an appealing and coherent tourism and leisure experience, and providing a good range of new jobs in tourism, and encouraging a healthier local population; and the Regional Transport Plan, by increasing opportunity, promoting prosperity and protecting the environment through the provision of facilities, employment and tourism accessed by public transport, walking and cycling routes: by reducing the demand for road travel, promoting use of a transport system that encourages healthy and active lifestyles, supporting local communities, and significantly reducing the emission of greenhouse gases and air pollution from transportation.											
				The project satisfies seven of the ten LDP Objectives (Deposit Draft pg.22-23), and 12 of the 16 Objectives as laid out in the Community Plan. Promoting integrated communities with opportunities for living, working and socializing for all; providing an environment that encourages a healthy and safe lifestyle and promotes well-being; providing for a stable economy; providing for a diverse range of job opportunities; reducing the need to travel and promoting more sustainable modes of transport; providing a high quality built environment that promotes community pride; improving, protecting and enhancing the landscape and countryside; protecting and enhancing the diversity and abundance of wildlife habitats and native species: improving, protecting and enhancing the water environment; managing the effects of climate change; increasing waste, especially waste to landfill in accordance with the findings of The Regional Waste Plan.											
				The inclusion of site 652 within the Cynon Valley River Park provides a direct opportunity to fulfill the strategy of Policy NSA 26: to 'promote public access on foot and cycle, mitigate and adopt to climate change, encourage health and wellbeing, and support heritage and tourism.											
				Core Policy CS8 Transportation: "The council will seek to reduce the need to travel by private car, support and enhance transport, walking for health, and cycling provision'.											
				Core Policy C11 Climate Change: ' ...RCT will seek to address climate change and reduce energy demand by promoting the provision of renewable energy generation from micro-generation equipment in new development; support development proposals that incorporate decentralized heating, cooling and power networks powered by renewable energy sources; and integrate nature conservation into new developments....'											
				Policy AW 12 Renewable Energy:' ...Development proposals which promote energy efficiently will be permitted where it can be demonstrated that there is no unacceptable effects on agriculture, conservation, wildlife, natural heritage and landscape importance'											

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1359.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.090		Site: 198/195		Cilfynydd Road/Bodwenarth quarries		Delete Site		PEX Session:							
Policy: NSA 25		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary		
	I object to the site being allocated as a Special Landscape Area.		
2 3	Representation text		
	The area proposed as 'special landscape area' shows an inaccurate evaluation of what is actually there. It appears the map has been green-washed without sufficient investigation.		
	Included are two busy, working quarries, which are used for business on a daily basis; a public road; my back garden and allotments; and a close neighbours' back garden and allotment garden.		
	These areas are cross-hatched on the attached plan, and are currently and have always been within the settlement boundary.		
	I am about to put a planning application for a Care Home and Day Center on my allotments, as my family don't use them, and the site is close to all services and is suitable for elderly residents.		
	In addition to the larger, single-hatched area, this land represents the developable section of Site 195, which should be reinstated as a candidate site for inclusion in the LDP.		
4 5	Changes sought		
	Reinstatement of candidate site 195 for inclusion within settlement boundary for future development		
6 6	Candidate Site Ref No		
	195		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
<p>By disallowing (sic) this site as a candidate (sic) for discussion by the public, as to its future use, the LDP is not forward thinking and is impairing local development which is drastically needed; and rejecting a good, large site for development in an area other than Pontyclun!</p> <p>This LDP shows great imbalance in its allocation for housing development, with huge discrepancies between favoured sites such as the Costain site in Pontyclun; with virtually no provision for development for the next 15-20 years in the whole of the northern section of the Southern Strategy Area.</p> <p>Cilfynydd suffers from a distinct lack of regeneration, facilities and services currently enjoyed by neighbouring towns. Site 195 is the only feasible and reasonably large site proposed for development in the Cilfynydd area. Rejecting this site shows a distinct lack of flexibility and inability to deal with changing circumstances in relation to local need. It demonstrates a refusal to consider the growing burden on Cilfynydd's roads and the very limited housing stock and facilities offered to Cilfynydd Residents. Rejecting the site at this early stage disallows even the potential to discuss with local residents the proposed road link and development, to gauge the opinions of those most effected by the future use or disuse of the land.</p> <p>The village of Cilfynydd will have been overlooked for 55 years before the next opportunity arises to upgrade the village, in 2025.</p> <p>Including this site within the settlement boundary does not automatically give permission to develop, but provides the opportunity to plan a future beneficial development for the village as its needs grow over time.</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1359.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft				Site: 198/195		Cilfynydd Road/Bodwenarth quarries		New Site		PEX Session:					
Policy:		Map:		Issue: Appendix 1											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary I object to the site being allocated as a SINC	
2 3	Representation text The representation proposes the development of the site for housng, employment and social purposes. The proposal is supported by further detailed information.	
4 5	Changes sought Adjust the boundary of SINC 80 to exclude site 195. Include site 195 within the boundary of settlement	
6 6	Candidate Site Ref No 195	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan See attached notes		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106				Site: 326/327		House o The Trees				New Site		PEX Session:			
Policy: SSA 10				Map:						Issue: Housing Allocation					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We object to the above Policy on the basis that the submission site has not been included as a housing land allocation.	
2 3	Representation text	
	The site is contained physically by a 'defensible boundary' in the form of the road which bounds it to the south and west, and by Penrhiwfer Road to the east. To the south development is restricted by the presence of a Site of Special Scientific Interest. The site itself has no nature conservation interest despite a reason given for its rejection as a Candidate Site as "The site is a Designated SINC". The Constraints Map which accompanies the Local Development Plan documentation clearly shows the site as being outside any SSSI or SINC (Site of Importance for Nature Conservation).	
4 5	Changes sought	
	The inclusion of the site within a settlement boundary for Penrhiwfer and its allocation as a housing site.	
6 6	Candidate Site Ref No	
	327	
21 11	Why attend Examination?	
	To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The Candidate Site request has been rejected for reasons which are inaccurate. Otherwise the site is compatible with sustainability criteria identified in the Candidate Site Assessment Methodology		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079		Site: 326/327			House o The Trees			Settlement Boun			PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Policy NSA 12 is generally supported but objected to on the basis that the area to which it applies should be changed.	
2 3	Representation text NSA 12 should be extended to include Penrhiwifer However it is objected to on the basis that either the area to which it applies should be extended to include Penrhiwfer, which as highlighted above is physically linked to the urban area of Tonypanyd and the clear physical characteristics of a 'valleys' settlement, or the Northern Strategy Area boundary should be extended to include such areas which are physically related to the settlements concerned but are separated from them purely by administrative boundaries as in the case of Penrhiwfer and Edmondstown which were part of the former Taff Ely administrative area.	
4 5	Changes sought In Penrhiwfer area in Northern Strategy Area.	
6 6	Candidate Site Ref No 327	
21 11	Why attend Examination? To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Consistency and cohensiveness required in establishing strategy area boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.030				Site:								PEX Session:			
Policy: CS 1				Map:								Issue: Strategy Areas			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Policy NSA 12 is generally supported but objected to on the basis that the area to which it applies should be changed.	
2 3	Representation text	
	The northern strategy area should be extended to include areas with characteristics of 'valley' settlements such as Penrhiwfer and Edmonstown.	
	However it is objected to on the basis that either the area to which it applies should be extended to include Penrhiwfer, which as highlighted above is physically linked to the urban area of Tonypanyd and the clear physical characteristics of a 'valleys' settlement, or the Northern Strategy Area boundary should be extended to include such areas which are physically related to the settlements concerned but are separated from them purely by administrative boundaries as in the case of Penrhiwfer and Edmondstown which were part of the former Taff Ely administrative area.	
4 5	Changes sought	
	include Penrhiwfer area in Northern Strategy Area.	
6 6	Candidate Site Ref No	
	327	
21 11	Why attend Examination?	
	To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Consistency and cohensiveness required in establishing strategy area boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079		Site: 326/327 House o The Trees							PEX Session:							
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Policy NSA 12 is generally supported but objected to on the basis that the area to which it applies should be changed.	
2 3	Representation text However it is objected to on the basis that either the area to which it applies should be extended to include Penrhiwfer, which as highlighted above is physically linked to the urban area of Tonypany and the clear physical characteristics of a 'valleys' settlement, or the Northern Strategy Area boundary should be extended to include such areas which are physically related to the settlements concerned but are separated from them purely by administrative boundaries as in the case of Penrhiwfer and Edmondstown which were part of the former Taff Ely administrative area.	
4 5	Changes sought As per representations on Policies CS1 and CS2 – the areas to which policy NSA12 applies should be changed in order to include those areas which are linked to, and have similar characteristics to traditional valley areas.	
6 6	Candidate Site Ref No 327	
21 11	Why attend Examination? To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Consistency and cohensiveness required in establishing strategy area boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.113		Site: 815//SSA 22.1		Tonyrefail & Penrhiwfer		Amend site boun		PEX Session:								
Policy: SSA 22		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The inclusion of the land in the Green Wedge designation SSA 22.1 is objected to for the reasons given below.	
2 3	Representation text PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish 'defensible boundaries. The presence of the access road which physically contains the site to the south and west, should therefore form the boundary of the green wedge at this location. This would continue to maintain a viable gap between the settlements of Penrhiwfer and Tonyrefail which in any event is protected by a proposed Site of Special Scientific Interest designation.	
4 5	Changes sought Removal of the site from the proposed Green Wedge designation.	
6 6	Candidate Site Ref No 327	
21 11	Why attend Examination? To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Boundaries should be applied on a consistent basis taking account of guidance in Planning Policy Wales.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D6			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079		Site: 326/327 House o The Trees						Settlement Boun				PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The Proposals Map is objected to on the grounds of the exclusion of the House of the Trees area, including the omission site, from a settlement boundary which should be applied as a southern extension of Penrhiwfer, which it relates to physically.	
2 3	Representation text	
	The Proposals Map is also objected to on the basis that Penrhiwfer should be included in the Northern Strategy area. Strategy Area boundaries have been derived from Ward Areas which previously were within different local authorities (Rhondda and Taff Ely). Delineation of the Strategy Areas in this part of the County Borough, based purely on administrative boundaries rather than consideration of similar socio-economic and physical characteristics is considered to be unsound.	
4 5	Changes sought	
	As per representations on Policies CS1 and CS2 - the areas to which Policy NSA12 applies should be changed in order to include those areas which are linked to , have similar characteristics to traditional valley areas.	
6 6	Candidate Site Ref No	
	327	
21 11	Why attend Examination?	
	To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Consistency in applying settlement boundaries and the Northern strategy Area.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079		Site: 326/327			House o The Trees			Settlement Boun			PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The Proposals Map is objected to on the grounds of the exclusion of the House of the Trees area, including the omission site, from a settlement boundary which should be applied as a southern extension of Penrhiwfer, which it relates to physically.	
2 3	Representation text	
	The Proposals Map is also objected to on the basis that Penrhiwfer should be included in the Northern Strategy area. Strategy Area boundaries have been derived from Ward Areas which previously were within different local authorities (Rhondda and Taff Ely). Delineation of the Strategy Areas in this part of the County Borough, based purely on administrative boundaries rather than consideration of similar socio-economic and physical characteristics is considered to be unsound.	
4 5	Changes sought	
	Identification of the site within a residential settlement boundary, as a housing land allocation and as within the Northern Strategy Area.	
6 6	Candidate Site Ref No	
	327	
21 11	Why attend Examination?	
	To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Consistency in applying settlement boundaries and the Northern strategy Area.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.030		Site: 326/327 House o The Trees							PEX Session:							
Policy: CS 1		Map:			Issue: Strategy Areas											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The basis on which these areas were derived is however, objected to. It is contended that the site subject to these representations would be more appropriately located in the Northern Strategy Area. Penrhiwfer lies in the Southern Strategy Area.	
2 3	Representation text It is accepted that Ward boundaries were used to delineate these boundaries, However, the Penrhiwfer area is physically and socially linked to the Rhondda Valley and has characteristics which are associated with the northern valley settlements where small sites will continue to make an important contribution to the housing landbank.	
4 5	Changes sought Include Penrhiwfer Area in Northern Strategy area.	
6 6	Candidate Site Ref No 327	
21 11	Why attend Examination? To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will achieve consistency in terms of the physical characteristics of the settlement relating to the northern valleys areas.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.031		Site: 326/327 House o The Trees							PEX Session:							
Policy: CS 2		Map:			Issue: Strategy Areas											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The basis on which these areas were derived is however, objected to. It is contended that the site subject to these representations would be more appropriately located in the Northern Strategy Area. Penrhiwfer lies in the Southern Strategy Area.	
2 3	Representation text	
	It is accepted that Ward boundaries were used to delineate these boundaries, However, the Penrhiwfer area is physically and socially linked to the Rhondda Valley and has characteristics which are associated with the northern valley settlements where small sites will continue to make an important contribution to the housing landbank.	
4 5	Changes sought	
	Include Penrhiwfer Area in Northern Strategy area.	
6 6	Candidate Site Ref No	
	327	
21 11	Why attend Examination?	
	To present the full case before the Inspector	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It will achieve consistency in terms of the physical characteristics of the settlement relating to the northern valleys areas.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D10			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.033										Site: 326/327 House o The Trees			PEX Session:			
Policy: CS 4				Map:			Issue: Housing Requirement									
Summary:																

Item Question

Representation Text

1 2 Issue Summary

Policy CS4 – Housing Requirements and Policy AW1 – New Housing

Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.

Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.

2 3 Representation text

Policy CS4 – Housing Requirements and Policy AW1 – New Housing

Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.

Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.

1370.D11			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Document: Deposit Draft, p.043

Site:

PEX Session:

Policy: AW 1

Map:

Issue: Housing Requirement

Summary:

Item Question

Representation Text

1 2 Issue Summary

Policy CS4 – Housing Requirements and Policy AW1 – New Housing

Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.

Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.

2 3 Representation text

Policy CS4 – Housing Requirements and Policy AW1 – New Housing

Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.

Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D12			<input type="checkbox"/>	S		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.045						Site: 326/327		House o The Trees				PEX Session:			
Policy: AW 2				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary	
Policy CS4 – Housing Requirements and Policy AW1 – New Housing		
Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.		
Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.		
2	3 Representation text	
Policy CS4 – Housing Requirements and Policy AW1 – New Housing		
Support is given to the Total Housing Requirement proposed of 14,850 new dwellings in the period 2006-2021.		
Support for Policy AW2 – Sustainable locations is also given. However representations within this document will seek to demonstrate that the submission site is more appropriately considered as being within a settlement boundary and within the Northern Strategy Area, in order that it fully complies with the criteria.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D13			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.096							Site:			PEX Session:						
Policy: SSA 4				Map:			Issue: Principal Towns & Key Settlements									
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	
<p>Southern Strategy Area Policy SSA4 and Northern Strategy Area Policy NSA2 – Development in the Key Settlements of Tonyrefail and Tonypandy.</p> <p>Support is given to the identification of Tonyrefail and Tonypandy as key settlements and the above policies, which encourages development which supports and reinforces the role of the centres as Key Settlements.</p> <p>It is noted, however, that whilst Tonyrefail is proposed to accommodate large scale housing growth of some 1400 units, comparatively small levels of growth are envisaged in Tonypandy and mainly associated with the development of the Llwynypia Hospital Site to the north.</p> <p>Due to factors such as ground condition constraints and topography, few large scale developable sites are available in the Rhondda Valley. Hence traditionally the area has relied on small sites for its housing requirements. Furthermore Tonyrefail has accommodated growth in recent years which is linked to the lack of opportunities in the Rhondda. The release of sites such as the submission site would therefore be compatible with the strategy objectives of supporting the roles of both Tonypandy (with which Penrhiwfer is physically linked), and Tonyrefail.</p>		
2	3 Representation text	
<p>Southern Strategy Area Policy SSA4 and Northern Strategy Area Policy NSA2 – Development in the Key Settlements of Tonyrefail and Tonypandy.</p> <p>Support is given to the identification of Tonyrefail and Tonypandy as key settlements and the above policies, which encourages development which supports and reinforces the role of the centres as Key Settlements.</p> <p>It is noted, however, that whilst Tonyrefail is proposed to accommodate large scale housing growth of some 1400 units, comparatively small levels of growth are envisaged in Tonypandy and mainly associated with the development of the Llwynypia Hospital Site to the north.</p> <p>Due to factors such as ground condition constraints and topography, few large scale developable sites are available in the Rhondda Valley. Hence traditionally the area has relied on small sites for its housing requirements. Furthermore Tonyrefail has accommodated growth in recent years which is linked to the lack of opportunities in the Rhondda. The release of sites such as the submission site would therefore be compatible with the strategy objectives of supporting the roles of both Tonypandy (with which Penrhiwfer is physically linked), and Tonyrefail.</p>		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1370.D14			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.065							Site:			PEX Session:						
Policy: NSA 2				Map:			Issue: Principal Towns & Key Settlements									
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	
<p>Southern Strategy Area Policy SSA4 and Northern Strategy Area Policy NSA2 – Development in the Key Settlements of Tonyrefail and Tonypandy.</p> <p>Support is given to the identification of Tonyrefail and Tonypandy as key settlements and the above policies, which encourages development which supports and reinforces the role of the centres as Key Settlements.</p> <p>It is noted, however, that whilst Tonyrefail is proposed to accommodate large scale housing growth of some 1400 units, comparatively small levels of growth are envisaged in Tonypandy and mainly associated with the development of the Llwynypia Hospital Site to the north.</p> <p>Due to factors such as ground condition constraints and topography, few large scale developable sites are available in the Rhondda Valley. Hence traditionally the area has relied on small sites for its housing requirements. Furthermore Tonyrefail has accommodated growth in recent years which is linked to the lack of opportunities in the Rhondda. The release of sites such as the submission site would therefore be compatible with the strategy objectives of supporting the roles of both Tonypandy (with which Penrhiwfer is physically linked), and Tonyrefail.</p>		
2	3 Representation text	
<p>Southern Strategy Area Policy SSA4 and Northern Strategy Area Policy NSA2 – Development in the Key Settlements of Tonyrefail and Tonypandy.</p> <p>Support is given to the identification of Tonyrefail and Tonypandy as key settlements and the above policies, which encourages development which supports and reinforces the role of the centres as Key Settlements.</p> <p>It is noted, however, that whilst Tonyrefail is proposed to accommodate large scale housing growth of some 1400 units, comparatively small levels of growth are envisaged in Tonypandy and mainly associated with the development of the Llwynypia Hospital Site to the north.</p> <p>Due to factors such as ground condition constraints and topography, few large scale developable sites are available in the Rhondda Valley. Hence traditionally the area has relied on small sites for its housing requirements. Furthermore Tonyrefail has accommodated growth in recent years which is linked to the lack of opportunities in the Rhondda. The release of sites such as the submission site would therefore be compatible with the strategy objectives of supporting the roles of both Tonypandy (with which Penrhiwfer is physically linked), and Tonyrefail.</p>		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1383.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090, para.6.97		Site: 776//NSA 25.8		Hirwaun Common, Cwm Dare & Cwm Aman		Delete Site		PEX Session:							
Policy: NSA 25		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Incorrect identification/designation of part of this area.	
2 3	Representation text Please see attached plan and photo. The area shown edged red on the attached plan should not be considered to be included within the SLA designation because it is hard standing area with garages. In terms of the SLA criteria: A - It is not a prominent feature that requires protection. B - It certainly does not have dramatic topography. C - It is not unspoilt or pre-industrial. Actually it is the site of a former colliery. D - It is not vulnerable or sensitive to change. E - Five garages and a hard standing are not a locally rare landscape. F - It is nor rare or special in any way that merits designation within the SLA.	
4 5	Changes sought My conclusion therefore is that the SLA designation should be removed from this area as shown on Proposals Map Sheet 1 North.	
9 7	Why no previous Representation I only noted that the site could be suitable for development.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The alteration would ensure that the Plan is accurate and realistic. Local evidence would prevent a 'broad-brush' approach.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1383.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090, para.6.97		Site: 776//NSA 25.8		Hirwaun Common, Cwm Dare & Cwm Aman		Delete Site		PEX Session:							
Policy: NSA 25		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Incorrect designation of part of this area/Boundary of SNA inaccurate.	
2 3	Representation text Please see attached plan NSA 25-8 Paragraph 6.97, Page 90. The area shown on the attached plan should not be considered to be included within the SLA designation. There has been an extremely broad-brush approach to this designation, and the boundary of the designated area NAS 25 (8), in this location is inaccurate. In terms of the SLA criteria: A - The field is not a prominent feature that requires protection, nor does it form part of the wider area that requires protection. The field has houses on one side, allotments on another, and a private road on a third side. B - It certainly does not have dramatic topography. C - It is not unspoilt or pre-industrial. Actually it is the site of many minor workings and is referred to locally as 'the patches'. There are numerous spoil heaps and it does not form a part of any pre-industrial field pattern. D - It is not vulnerable or sensitive to change. E - It is not a locally rare landscape. It is a mixture of agriculturally improved grassland, spoil heaps, workings and dirt tracks. F - It is not rare or special in any way that merits designation within the SLA.	
4 5	Changes sought My conclusion therefore is that the SLA designation should be removed from the area edged in red within Proposals Map Sheet 1 North.	
9 7	Why no previous Representation I only noted rgar the site could be suitable for development.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Local evidence and more appropriate boundary drawing would prevent a 'broad-brush' approach.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1383.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054						Site:				Delete Site		PEX Session:			
Policy: AW 8				Map:				Issue: Appendix 1							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Incorrect identification/designation of part of this area.	
2 3	Representation text Appendix 1E Sites of Important Nature Conservation Number 22 - Cwmdare North Constraints Map Please see attached plan and photograph The area shown edges red on the attached plan should not be considered to be included within the SINC designation because it is a hard standing area with garages. There has clearly been a very broad-brush approach to this designation and as this area consists of garages and a hard standing I fail to see how it can be included as a Site of Important Nature Conservation. There needs to be a localised and detailed approach rather than a broad-brush approach.	
4 5	Changes sought My conclusion is that the SINC designation (constraints map) should be removed from the area edged in red on my plan attached.	
9 7	Why no previous Representation I only noted that the site could be suitable for development.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The alteration would ensure that the Plan is accurate and realistic. Local evidence would prevent a 'broad-brush' approach.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1383.D4			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054				Site:						Delete Site		PEX Session:			
Policy: AW 8				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Incorrect designation on Constraints Map of Regionally Important Geological and Geomorphological Sites.	
2 3	Representation text Constraints Map Regionally Important Geological and Geomorphological Sites Please see attached plan The area shown on your constraints plan and highlighted on the plan attached should not be considered an Regionally Important Geological or Geomorphological Site. The rock face was actually created in the mid nineteen sixties as part of the Penybryn opencast site, worked by British Coal. Inopen cast engineering terms the rock face is a 'high-wall' - i.e. part of on-giong operations. Restoration was never started let alone completed. There are slippages on a regular basis as there has been no engineering work to make safe the site. Rather than designating it for an element of protection, the Mineral Planning Authority should be examining themselves as to how this site was allowed to be left unrestored. Consideration should be given to undertaking restoration works and designating the site as suitable for a land reclamation scheme. No doubt the operations of current open-cast sites and quarries within RCT will be interested to know of this designation. It could create a precedence. They will have no obligation to restore their workings as they would be 'Regionally Important Geological and Geomorphological Sites'.	
4 5	Changes sought My conclusion is that the designation as above (shown on the Constraints Map) should be removed from the area highlighted on my plan attached.	
9 7	Why no previous Representation Unaware of designation at that point.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The alteration would ensure that plan designations are accurate and realistic.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1397.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 309/308		Heol Creigiau				New Site		PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Land at Heol Creigiau, Llantwit Fardre should be included as a housing allocation in Appendix 1a.	
2 3	Representation text The representation proposes that the site at Ystrad Barwig - Heol Creigiau, Llantwit Fardre is allocated in the LDP for housing. Evidence in support of the representation is contained in the supporting document provided.	
4 5	Changes sought Inclusion of land at Heol Creigiau, Llantwit Fardre in the list of allocated housing sites in Appendix 1a.	
6 6	Candidate Site Ref No 308.	
8 7	Previous Representation No KW 12.2 Ongoing discussion since 2005.	
21 11	Why attend Examination? In order to fully explain and examine the complicated issues of the impact of the Church Village bypass and hydrological assessment.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The inclusion of this site in the list of allocated sites will make use of underused land and will properly reflect the evidence base. It will also assist in ensuring a stable growth in population.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1400.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148		Site: 684//SSA 10.6			Mill Street, Tonyrefail			Amend site boun			PEX Session:					
Policy: SSA 10		Map:			Issue: Housing Allocation											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary That the site is considered suitable for residential development.	
2 3	Representation text The identification of an allocation under policy SSA 10 (6) is supported and should be maintained. However, it is considered that the boundary should be extended to take in additional enclosure at the southern part of the site which logically forms part of the larger are to the north of the access to Tycha Fawr Farm.	
4 5	Changes sought Extend boundary of an allocation SSA10 (6) to include intervening enclosure to the south, which lies to north of the access to Tylcha Farw Farm, and revise dwelling provision by an extra 20 - 30 units.	
9 7	Why no previous Representation The exact settlement boundary / housing allocations were not identified until the Deposit Plan Stage.	
21 11	Why attend Examination? The allocation of this enlarged site would bring forward an available housing site in the early part of the LDP when there is potentially a shortfall in respect of the overall provision. Such provision should be debated at the examination and not via written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed revision to the site boundaries would enable a more logical and comprehensive development to take place, recognising existing features, and would permit additional housing land to be brought forward in the early part of the plan period.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1400.D2			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180		Site: 828//SSA 23.6		Mynydd y Glyn & Nant Muchudd Basin		Delete Site		PEX Session:							
Policy: SSA 23		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The site edged red on the attached plan should be removed from the Special Landscape area under the provisions of SSA 23.6.	
2 3	Representation text It is considered that the SLA, and particular the provision of SSA 23, have been drawn too widely. The land in question is similar in character to that allocated under SSA 10.6, an area of which forms an integral part, being the land to the north of the access road to and the farm and building of Tylcha Fawr Farm.	
4 5	Changes sought The site should be removed from the special Landscape Area 23.6 in accordance with the attached plan.	
6 6	Candidate Site Ref No 186/496	
9 7	Why no previous Representation The definition of the Special Landscape Area boundaries were not identified until the Deposit Plan stage.	
21 11	Why attend Examination? The exclusion of the site from the SLA and the provision of a settlement boundary and housing allocation in addition to that proposed for this part of Tonyyrefail is a fundamental issue which should be considered by examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It is considered that in conjunction with representations submitted under SSA 10.6 that the site should be allocated for residential purposes. As such the quality of the landscape is not critical to policy SLA23.6 and should be excluded from the allocation. The exclusion of the land from the SLA, and its allocation for housing would permit the site to be delivered early in the plan period to meet short term housing need. Such provision would make the LDP policies more robust in the light of concerns regarding the deliverability of the housing land supply in the earlier part of the LDP period, and is compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1400.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109, para.6.161		Site: 704//SSA 15.3		Land east of Mill Street, Tonyrefail		PEX Session:										
Policy: SSA 15		Map:		Issue: Retail												
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary Support is offered for the allocation.		
2 3	Representation text The allocation will enable additional retail space to be made available, whilst at the same time assisting with the provision of improved circulation and parking within the town centre.		
4 5	Changes sought A settlement boundary should be included around Gilfach Goch as shown on the attached plan under the provisions of Policy SSA 13 and the site edged red should be included in it.		
21 11	Why attend Examination? If attendance is necessary in respect of the housing allocation SSA 10.6 then it may be appropriate to deal with the allocations for the overall site comprehensively.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

1400.D4			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.110, para.6.165		Site:		PEX Session:												
Policy: SSA 16		Map:		Issue: Retail												
Summary:																
Item	Question	Representation Text														
1 2	Issue Summary Support is offered for the identification of Tonyrefail as a key settlement area.															
2 3	Representation text The allocation will enable additional retail space to be made available thereby reinforcing Tonyrefails role as a key settlement in the retail hierarchy.															
21 11	Why attend Examination? If attendance is necessary in respect of the housing allocation SSA 10.6 then it may be appropriate to deal with the allocations for the overall site comprehensively,															
Item	Question	Reply	Tick box Replies													
3 4	Seek changes? Any changes to be made to the Plan?	No														

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1400.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108, para.6.157		Site:		Settlement Boun		PEX Session:										
Policy: SSA 13		Map:		Issue: Settlement Boundary												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Definition of Settlement Boundary.	
2 3	Representation text It is considered that the enclosure 1474 which is contained by the access lane to Tylcah Farm itself should be included within the settlement boundary and developed as part of the related housing allocation.	
4 5	Changes sought It is considered that the settlement boundary should be amended as shown on the attached plan under the provision of policy SSA 13 and site edged red should be included within it.	
9 7	Why no previous Representation Submissions were not made in respect of the settlement boundary as these were not identified until the Deposit Plan Stage.	
21 11	Why attend Examination? The need to ensure that there is an adequate extent, range and choice of housing sites deliverable particularly in the earlier part of the LDP period, to meet housing needs is fundamental to the soundness of the LDP and is an issue which should be considered at examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed change would enable additional housing land to be brought forward in the early part of the plan period, utilising more logical boundaries than those currently proposed.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1403.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 294/293		Ty Coch, Heathlands N.		Settlement Boun		PEX Session:							
Policy: SSA 13		Map:		Issue: Settlement Boundary											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	It has been left out of the plan due to access, however there is a further access off main road via Ty Coch with good visual display	
2 3	Representation text	
	We object to it being left out of the Plan due to access only as there is a further access as in Q2.	
4 5	Changes sought	
	293 Land north of Ty Coch, Heathlands Gilfach Goch . I would like the land to be within the authorities settlement boundaries.	
6 6	Candidate Site Ref No	
	293	
9 7	Why no previous Representation	
	We were not made aware of the consultation period. Application made 19th March 2005. Reply received 3rd Feb 09 from RCT. No contact between these dates.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The new plan is not flexible or realistic as my application to divert the existing plan line by approx 20 metres would have satisfied my requirements.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1403.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 294/293 Ty Coch, Heathlands N.						Settlement Boun				PEX Session:			
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	I have been left out of the plan due to access however there is a further access off main road via Ty Coch with good visual displays.	
2 3	Representation text	
	We request consideration of a possible alternative continuation line of the the boundary - alternative plan.	
4 5	Changes sought	
	293 land north of Ty Coch, Heathland, Gilfach Goch. I would like the land to be within the authorities settlement boundaries.	
9 7	Why no previous Representation	
	We were not made aware of the consultation period. Application made 19th March 05 reply 3rd feb 09 from RCT. No contact between these dates.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Continuation of the existing settlement boundary line and general rounding off would allow alternative arrangements for building and access.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1412.D1			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113		Site: 813//SSA 21.7						Pontypridd to Tonyrefail via Llantrisant				PEX Session:			
Policy: SSA 21		Map:						Issue: Transportation							
Summary:															

Item	Question	Representation Text
1	Issue Summary	Representation to SSA 21.7.
2	Representation text	Regeneration of the site is being considered for a mix of uses including student accommodation, university uses, residential and employment. A masterplan of the whole site is to be completed. The Draft Deposit Plan shows the site as white land within the settlement boundary and therefore lends itself to the proposed regeneration and future beneficial use of the site. We request that the specific route of cycle route SSA 21.7 through the site is flexible. It would be advantageous to ensure that the cycle route works as an integral part of the regeneration scheme. This will ensure connections across the valley is achieved, taking into account the topography of the site, mix of future uses and optimum site layout.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1420.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 88/83		Hospital Site				New Site		PEX Session:			
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Abstraction [sic] of development site on land adjacent to Tyntyla Park, Llwynypia.	
2 3	Representation text Submission to RCT to reinstate area of land for future delvelopment of 55 houses, as previously included within LP for 1991-2006.	
4 5	Changes sought Inclusion of site designated H1.27 for development in conjunction with approved development of Llwynypia Hospital site.	
9 7	Why no previous Representation Site previously included in RCT development plan for 1991-2006 as suitable for 55 houses. Refer to submission letter 18/03/09. Due to the site area having been previously included in the Council's delvelopment plan, it is considered relevant [?] to have been acceptable for inclusion in the forthcoming UDP - and all tests and criteria are proven by historic principles.	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Site was previously included in UDP.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1425.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 194/191 Plot 10-12, Incline Row						Settlement Boun				PEX Session:			
Policy: SSA 13				Map:				Issue:							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Policy SSA10 as the site has not been allocated for housing	
2 3	Representation text I object to the housing allocation in the policy	
4 5	Changes sought Policy SSA 13 to amend the settlement boundary to include the site	
6 6	Candidate Site Ref No 191	
9 7	Why no previous Representation Verbal only. This was due to a close family member becoming very ill. I call for extenuating circumstances here and will provide evidence if necessary.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site has not been analysed (sic) in details and certain aspects have been overlooked.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1425.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 194/191		Plot 10-12, Incline Row		New Site		PEX Session:								
Policy: SSA 10		Map:		Issue: Housing Allocation												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary I object to the site being excluded from housing allocation and outside settlement boundaries (SSA 10 Policy).	
2 3	Representation text I object to the site being excluded (Policy SSA 10) because it has not been flooded in 999 years (TAN 5). And it has full access facilities.	
4 5	Changes sought I would like to include site 191 plots 10, 11, 12 within the plan. (There were houses built on this site previously. (SSA 13).	
6 6	Candidate Site Ref No 191	
9 7	Why no previous Representation No formal documentation. However many phone calls and written correspondance regarding the possibility of change of development boundaries over period 2000/2008	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site has not been examined as an individual site and a proper full assessment can only be carried out by viewing and visiting the site. The site has been assessed by computer generated information so the topography of the site has been overlooked.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1425.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 194/191		Plot 10-12, Incline Row				New Site		PEX Session:			
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Policy SSA 10 with reference to site 191	
2 3	Representation text I object to the policy SSA 10 because the site has never flooded and access to site 191 has already been provided. (1993).	
4 5	Changes sought I would like the site to be included in the LDP	
6 6	Candidate Site Ref No 191	
9 7	Why no previous Representation Verbal only over a 10 year period. No formal representation was asked for until recently. I did not to this because my wife became very ill and I could not make time	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site has not been fully analysed (sic)		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1431.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 685//SSA 10.7		Gwern Heulog, Coed Ely		Delete Site		PEX Session:					
Policy: SSA 10				Map:		Issue: Housing Allocation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	This residential allocation (Land at Gwern Heulog, Coed Ely) was included in the plan following the removal of the residential allocation on the Phurnacite Plant Abercwmboi. This and other sites added at this stage appear to have development constraints which will make them difficult and costly to implement.
2 3	Representation text	This site extends development into open countryside on the top of a hill away from facilities and services. Initial inspection suggests this is not an obvious location for future growth of sustainable settlements. The site has been examined through the Candidate Site Assessment Process and has been scored very leniently. At Stage 1 when assessing the 18 Objectives of the site, its remote location on agricultural land with no defensible boundaries are not problematic. The Stage 2 LDP Assessment of the land is very favourable, the site is considered able to deliver a mix of dwelling types, an integrated community and protect landscape heritage etc. All achieve a blue coding. Three further objectives also achieve the top, blue colour coding for sustainable transport, climate change and renewable energy. The application of these assessment criteria are not applied equally across all sites. A reassessment of this site should be undertaken which may require its deletion from the plan.
4 5	Changes sought	This site at Gwern Heulog, Coed Ely should be omitted from the plan.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1431.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 686//SSA 10.8		Tylcha Wen Terrace, Tonyrefail		Delete Site		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	This residential allocation (Land to the rear of Tylcha Wen Terrace) was included in the plan following the removal of the residential allocation on the Phurnacite Plant Abercwmboi. This and other sites added at this stage appear to have development constraints which will make them difficult and costly to implement.	
2 3	Representation text	
	This site is extremely steep and would be very costly and challenging to develop. In addition to these topographic constraints access into the site also appears very difficult.	
	Despite these apparent constraints, the site has been examined through the Candidate Site Assessment Process and has been scored very positively. The site's topography and access are classed as neutral. The other stage 1 objectives including impact on views and agricultural land are classed as fair.	
	The Stage 2 LDP Assessment of the land is very favourable, the site is considered able to deliver a mix of dwelling types, an integrated community and protect landscape heritage, sustainable transport and provide an environment that promotes well being. These all achieve a blue colour coding. The ability to achieve al of these objectives on a sloping site of this severity must be questioned?	
	The application of these assessment criteria are not applied equally across all sites. A reassessment of this site should be undertaken which may require its deletion from the plan.	
4 5	Changes sought	
	The residential allocation SSA 10.8 Land to the rear of Tylcha Wen Terrace, Tonyrefail should be omitted from the plan.	
9 7	Why no previous Representation	
	These particular proposals did not appear in the Preferred Strategy consultation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
	We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1431.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 687//SSA 10.9		Tylcha Ganol Farm \ Mill Street, Tonyrefail		Delete Site		PEX Session:					
Policy: SSA 10				Map:		Issue: Housing Allocation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	This residential allocation (land part of Tylcha Ganol Farm, south of Mill Street Tonyrefail) was included in the plan following the removal of the residential allocation on the Phurnacite Plant Abercwmboi. This and other sites added at this stage appear to have development constraints which will make them difficult and costly to deliver.
2 3	Representation text	This site appears to have constrained access, it is currently heavily wooded and would extend the urban area out into open countryside where there appear to be no defensible boundaries. Despite these apparent constraints, the site has been examined through the Candidate Site Assessment Process and has been scored very positively. The Stage 2 LDP Assessment of the land is very favourable, the site is considered able to deliver a mix of dwelling types, an integrated community and protect landscape heritage, sustainable transport and provide an environment that promotes well being. These all achieve a blue colour coding. The protection and enhancement of the landscape and countryside are coded yellow but with landscaping can be revised to green? The application of these assessment criteria are not applied equally across all sites. A reassessment of this site should be undertaken which may require its deletion from the plan.
4 5	Changes sought	The residential allocation SSA 10.9 Land part of Tylcha Ganol Farm, south of Mill Street, Tonyrefail should be omitted from the plan.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
	We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1431.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 688//SSA 10.10		Hafod Wen \ Concorde Drive, Tonyrefail		Delete Site		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	The residential allocation (Land east of Hafod Wen and North of Concorde Drive Tonyrefail) has been extended to include the additional land to the west (Candidate site No. 134). This addition follows the removal of the residential allocation on the Phurnacite Plant Abercwmboi This and other sites added at this later stage appear to have development constraints which will make them difficult and costly to deliver
2 3	Representation text	This site comprises two candidate site nominations 134 and 602. The site is dissected by a triangular wedge of land which is designated as an SSSI. This is likely to place a serious constraint on the way the adjacent land can be developed and may limit the ability to deliver 100 units as prescribed in the plan.
4 5	Changes sought	The residential allocation SSA 10.10 (Land east of Hafod Wen and north of Concorde Drive Tonyrefail) should be thoroughly reassessed and part or all of the site should be omitted from the plan.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2	We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA10 are not based on robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1431.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.069		Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda						Delete Site		PEX Session:					
Policy: NSA 5		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	This strategic allocation on the former Fernhill Colliery, Blaenrhondda lies at the head of the Rhondda Fawr in a remote and challenging location. The site has many constraints which raise a serious question about the deliverability of this site.
2 3	Representation text	The supporting text to this strategic allocation refers to a number of constraints and lists just the most notable of these. The list includes access; nature conservation; land reclamation and low land values. This is a low value area which is distant from the main centres of population and employment. The aspiration of developing up to 400 residential units at the head of the Rhondda Fawr Valley is not sustainable. This housing will exceed the existing community's capacity for growth and will therefore need to rely on drawing people in from elsewhere with increased commuting to places of employment. The technical difficulties in delivering this site include access and ground conditions both of which will impose high costs to the development of the site and seriously affect its viability. The need to assist the regeneration of the northern valleys is understood but this must be achieved by sound and credible proposals. The inclusion of the former Fernhill Colliery site as an allocation is unrealistic and unlikely to be delivered.
4 5	Changes sought	The former Fernhill Colliery Site should not be included as a Strategic Site.
9 7	Why no previous Representation	These particular proposals did not appear in the Preferred Strategy consultation

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Soundness Test CE2		
We believe the policy contravenes Soundness Test CE2 as the allocations in policy SSA 10 are not based on a robust and credible evidence base. Implementing the changes within this representation will help to satisfy this Soundness Test.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1437.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 183		Site: 826//SSA 23.4		Coed-yr-Hendy & Mwyndy		Amend site boun		PEX Session:								
Policy: SSA 23		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged red on the attached plan should be removed from the Special Landscape Area under the provisions of SSA 23.4.	
2 3	Representation text	
	It is considered that the Special Landscape Area, and in particular that under the provisions of SSA 23.4 have been drawn too widely, and that the land in question could be developed for housing without any significant impact on the overall character of the SLA.	
4 5	Changes sought	
	The site should be removed from the Special Landscape Area 23.4 in accordance with the attached plan.	
6 6	Candidate Site Ref No	
	126	
9 7	Why no previous Representation	
	Submissions were made in respect of this site but not in relation to the Special Landscape Area as the boundaires thereof were not identified until the Deposit Plan Stage.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It is considered that in conjunction with representations submitted under SSA10 that the site should be allocated for residential development. As such, the quality of the landscape of the site is not critical to policy SSA 23 and should be excluded from the allocation. The exclusion of the land from the SLA, and its allocoation for housing would permit the site to be delivered early in the period to meet short term housing need. Such provision would make the plans policies more robust in the light of concerns regarding the deliverability of the housing land supply in the earlier part of the LDP period, and is compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1437.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149		Site: 131/126		Talygarn W (2)		New Site		PEX Session:		Policy: SSA 10		Map:		Issue: Housing Allocation	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The site edged in red on the attached plan should be allocated for residential development under the provisions of SSA 10.		
2 3	Representation text	
It is submitted that this site is suitable to accommodate residential development. The site relates well to existing built up limits adjoining residential development to the north-east and south-east. The allocation of this site would comprise logical consolidation of this part of Talygarn. The site has reasonable access to local services, facilities, employment opportunities as well as public transport. The site would help meet the housing needs of the Borough, including local needs and could also provide an element of affordable housing. The site is potentially available for development in the early part of the plan period and comprises an economically viable proposal.		
4 5	Changes sought	
The site, or at least part of it, should be allocated for residential development under the provisions of Policy SSA10.		
6 6	Candidate Site Ref No	
126		
9 7	Why no previous Representation	
S		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Talygarn is available to meet short term housing need. Further, The site comprises a logical consolidation of this part of the settlement. The allocation of the site for housing would make the plan's policies more robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1437.D3			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108, para.6.157 - 158		Site: 131/126 Talygarn W (2)			Settlement Boun			PEX Session:								
Policy: SSA 13				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	A settlement boundary should be drawn around Talygarn as shown on the attached plan under the provisions of Policy SSA 13. The site edged red on the plan should be included within the settlement boundary.	
2 3	Representation text	
	It is submitted that a settlement boundary should be drawn around Talygarn, which together with Brynsadler comprises a sizeable settlement, and the site edged red should be included within it. A settlement boundary was identified around Talygarn in the adopted Rhondda Cynon Taff (Taff Ely) Local Plan and it is considered that the settlement should have a defined settlement boundary carried forward in the LDP. Related submissions have been made that this site should be attached for housing. The site adjoins residential development to the north- east and south east and comprises a logical consolidation of this part of Talygarn.	
4 5	Changes sought	
	A settlement boundary should be included around Talygarn as shown on the attached plan under the provision of Policy SSA 13 and the site edged red should be included within it.	
6 6	Candidate Site Ref No	
	126	
9 7	Why no previous Representation	
	S	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It is submitted that a settlement boundary should be identified around Brynsadler/ Talygarn, which comprises a sizeable settlement. A settlement boundary was identified around it in the adopted Local Plan and there is no sound reason to change this approach. The exclusion of a settlement boundary for Talygarn is considered inappropriate. The allocation of the site shown on the attached plan for housing and the related inclusion of a settlement boundary would help meet housing needs in this part of the Borough. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Talygarn is avalaible to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement. The allocation of the site for housing and the inclusion of a settlement boundary, would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1438.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:			PEX Session:						
Policy: NSA 12				Map:		Issue: Settlement Boundary									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Residential development adjacent to settlement boundaries	
2 3	Representation text Many opportunities occur to local landowners and householders to develop small areas of land adjacent to settlement boundaries which relate very well to the adjacent settlement.	
4 5	Changes sought Provision to be made on an area wide basis (both North and South areas) to allow single houses adjacent to settlement boundaries subject to normal planning considerations.	
8 7	Previous Representation No Unambiguous policy detail was only set out in the Deposit Draft of the plan	
21 11	Why attend Examination? N/A	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To allow greater flexibility when determining applications immediately adjacent to/or stradling the settlement boundary		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1438.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108						Site:						PEX Session:			
Policy: SSA 13						Map:			Issue: Settlement Boundary						
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Residential development adjacent to settlement boundaries	
2 3	Representation text Many opportunites occur to local landowners and householders to develop small areas of land adjacent to settlement boundaries which relate very well to the adjacent settlement.	
4 5	Changes sought Provision to be made on an area wide basis (both North and South areas) to allow single houses adjacent to settlement boundaries subject to normal planning considerations.	
9 7	Why no previous Representation Unambiguous policy detail was only set out in the Deposit Draft of the plan	
21 11	Why attend Examination? n/a	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To allow greater flexibility when determining applications immediately adjacent to/ or stradling the settlement boundary.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1444.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.077		Site: 528/537		Parc Newydd Farm opp., Site B		New Site		PEX Session:						
Policy: NSA 9		Map:		Issue: Housing Allocation										
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the non-inclusion of CS 537 as a site for residential development in policy NSA 9.	
2 3	Representation text	
	CS 537 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal would greatly improve the flow of water during times of flood, to the extent that CS 536 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would release CS 537 for inclusion within policy NSA 9 for residential development in close proximity to Abercynon.	
4 5	Changes sought	
	Inclusion of CS 537 for residential development in policy NSA 9.	
6 6	Candidate Site Ref No	
	CS 537.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 537. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 537 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Inclusion of CS 537 within NSA 9 would be consistent with policy AW 2 in the Deposit LDP. It would be in a sustainable location within a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 536 [sic] would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 537 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	Inclusion of CS 537 in policy NSA 9 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.5 ha of disused sewage beds and is therefore a "brownfield" site. The replacement sewage treatment works to the south of CS 537 and extensive woodland act as a buffer zone between the settlements of Glyncoch and Abercynon.		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 537. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079		Site: 528/537 Parc Newydd Farm opp., Site B						Settlement Boun				PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the non-inclusion of CS 537 within the settlement boundary of Abercynon under policy NSA 12.	
2 3	Representation text	
	CS 537 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal would greatly improve the flow of water during times of flood, to the extent that CS 537 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would release CS 537 for inclusion within the settlement boundary for Abercynon under policy NSA 12.	
4 5	Changes sought	
	Inclusion of CS 537 for residential development in policy NSA 12.	
6 6	Candidate Site Ref No	
	CS 537.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 537. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 537 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Inclusion of CS 537 within NSA 12 would be consistent with policy AW 2 in the Deposit LDP. It would be in a sustainable location within a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 537 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 537 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	Inclusion of CS 537 in policy NSA 12 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.5 ha of disused sewage beds and is therefore a "brownfield" site. The replacement sewage treatment works to the south of CS 537 and extensive woodland act as a buffer zone between the settlements of Glyncoch and Abercynon.		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 537. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D3			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 527/536 Parc Newydd Farm opp, Site A							PEX Session:							
Policy: NSA 26				Map:				Issue: Environment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the inclusion of CS 536 within policy NSA 26 Cynon Valley River Park.	
2 3	Representation text	
	CS 536 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal as part of a residential development proposal for CS 536 would greatly improve the flow of water during times of flood, to the extent that CS 536 would no longer be within the 1 in 100 year flood plain. Removal of the "flood plain" designation would add weight to the removal of CS 536 from policy NSA 26 since the Cynon River Park relates to flood plain areas only.	
4 5	Changes sought	
	Removal of CS 536 from policy NSA 26 Cynon Valley River Park.	
6 6	Candidate Site Ref No	
	CS 536.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 536. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 536 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Removal of CS 536 from policy NSA 26 would be consistent with policy AW 2 in the Deposit LDP. It would allow CS 536 to enjoy a sustainable location within, it is proposed, a defined settlement boundary that would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 536 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 536 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	The exclusion of CS 536 from policy NSA 26 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.59 ha and adjoins former disused sewage beds to the south.		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 536. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 527/536		Parc Newydd Farm opp, Site A				New Site		PEX Session:			
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the non-inclusion of CS 536 as a site fro residential development in policy NSA 9.	
2 3	Representation text	
	CS 536 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal would greatly improve the flow of water during times of flood, to the extent that CS 536 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would release CS 536 for inclusion within policy NSA 9 as a site for residential development in close proximity to Abercynon.	
4 5	Changes sought	
	Inclusion of CS 536 for residential development in policy NSA 9.	
6 6	Candidate Site Ref No	
	CS 536.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 536. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 536 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Inclusion of CS 536 within NSA 9 would be consistent with policy AW 2 in the Deposit LDP. It would allow CS 536 to enjoy a sustainable location within a defined settlement boundary that would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 536 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 536 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	Inclusion of CS 536 from policy NSA 26 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion".		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 536. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079		Site: 527/536 Parc Newydd Farm opp, Site A						Settlement Boun				PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the non-inclusion of CS 536 within the settlement boundary for Abercynon under policy NSA 12.	
2 3	Representation text	
	CS 536 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal would greatly improve the flow of water during times of flood, to the extent that CS 536 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would release CS 536 for inclusion within the settlement boundary for Abercynon under policy NSA 12.	
4 5	Changes sought	
	Inclusion of CS 536 for residential development in policy NSA 12.	
6 6	Candidate Site Ref No	
	CS 536.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 536. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 536 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Inclusion of CS 536 within NSA 12 would be consistent with policy AW 2 in the Deposit LDP. It would be in a sustainable location within a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 536 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 536 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	Inclusion of CS 536 in policy NSA 12 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.59 ha and adjoins former disused sewage beds on CS 357 to the south. The replacement sewage treatment works to the south of CS 537 and extensive woodland act as a buffer zone between the settlements of Glyncoch and Abercynon.		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 536. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089		Site: 527/536 Parc Newydd Farm opp, Site A						PEX Session:							
Policy: NSA 24				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the non-inclusion of CS 536 within the settlement boundary for Abercynon under policy NSA 24.6 [sic]. Should read (see Q5 & Q9): Objection is raised to the inclusion of CS 536 within a green wedge under policy NSA 24.6.	
2 3	Representation text	
	CS 536 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal as part of a residential development scheme for CS 536 would greatly improve the flow of water during times of flood, to the extent that CS 536 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would add weight to the removal of CS 536 from policy NSA 24.6. The replacement sewage works south of CS 537 together with extensive woodlands provide a sufficient buffer zone to prevent Abercynon and Glyncoch coalescing.	
4 5	Changes sought	
	Removal of CS 536 from policy NSA 24.6	
6 6	Candidate Site Ref No	
	CS 536.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 536. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 536 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
<p>Removal of CS 536 from policy NSA 24.6 would be consistent with policy AW 2 in the Deposit LDP. It would allow CS 536 to enjoy a sustainable location within a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 536 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 536 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.</p> <p>The exclusion of CS 536 from policy NSA 24.6 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.59 ha and adjoins former disused sewage beds on CS 357 to the south. The replacement sewage treatment works to the south of CS 537 and extensive woodland act as a buffer zone between the settlements of Glyncoch and Abercynon.</p> <p>People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhivceiber for example, just 4 km to the north of CS 536. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.</p>																

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 528/537 Parc Newydd Farm opp., Site B						PEX Session:							
Policy: NSA 26				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to the inclusion of CS 537 within policy NSA 26 Cynon Valley River Park.	
2 3	Representation text	
	CS 537 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal as part of a residential development proposal for CS 537 would greatly improve the flow of water during times of flood, to the extent that CS 537 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain designation would add weight for the removal of CS 537 from policy NSA 26, since the Cynon River Park relates to flood plain areas only.	
4 5	Changes sought	
	Removal of CS 537 from policy NSA 26 Cynon Valley River Park.	
6 6	Candidate Site Ref No	
	CS 537.	
9 7	Why no previous Representation	
	The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 537. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 537 would support the regeneration of Abercynon and Pontypridd.	

Item	Question	Reply	Soundness Tests
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Removal of CS 537 from policy NSA 12 would be consistent with policy AW 2 in the Deposit LDP. It would allow CS 537 to enjoy a sustainable location within, it is proposed, a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 537 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 537 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.		
	The exclusion of CS 537 from policy NSA 26 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.5 ha of former disused sewage beds, the condition of which makes it inappropriate for promotion as a "river park".		
	People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhiwceiber for example, just 4 km to the north of CS 537. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1444.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089		Site: 528/537 Parc Newydd Farm opp., Site B						PEX Session:							
Policy: NSA 24		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Objection is raised to the inclusion of CS 537 within policy NSA 24.6.		
2 3	Representation text CS 537 lies within a flood plain bordering the River Taff to the south of Abercynon, where there is an automatic policy objection to development. The "Floodplain" designation by the EA is attributable to a narrow bridge over the River Taff located within the site. This bridge is an impediment to river flow in times of flood, severely impairing the river's regime. The bridge is unused and surplus to requirements, its removal as part of a residential development scheme for CS 537 would greatly improve the flow of water during times of flood, to the extent that CS 537 would no longer be within the 1 in 100 year flood plain. Removal of the flood plain categorisation would add weight to the removal of CS 537 from policy NSA 24.6. The replacement sewage works south of CS 537 together with extensive woodlands provide a sufficient buffer zone to prevent Abercynon and Glyncoch coalescing.		
4 5	Changes sought Removal of CS 537 from policy NSA 24.6.		
6 6	Candidate Site Ref No CS 537.		
9 7	Why no previous Representation The PS Option is based on social, economic and environmental objectives that accord with the proposed development of CS 537. Future development is to accommodate local needs in selective locations that would contribute to the vitality of centres. In this case, CS 537 would support the regeneration of Abercynon and Pontypridd.		
Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
<p>Removal of CS 537 from policy NSA 24.6 would be consistent with policy AW 2 in the Deposit LDP. It would allow CS 537 to enjoy a sustainable location within a defined settlement boundary and would not unacceptably conflict with surrounding uses. Development of the site would be consistent with PPW objectives, para 9.1, which aims to ensure "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. CS 537 would be within walking distance of Abercynon town centre where there is a recently upgraded railway station and bus stops giving access to jobs and services in the Taff and Cynon valleys. Development of CS 537 would assist the regeneration of both Abercynon and Pontypridd. A local primary school is within walking distance of the site and Pontypridd Comprehensive School is situated 1.25 km to the SE of the site.</p> <p>The exclusion of CS 537 from policy NSA 24.6 would also be consistent with para. 9.2.14 in PPW, where it states that LDPs make provision for affordable housing as an "essential element in contributing to community regeneration and strengthening social inclusion". The site covers an area of 3.5 ha of former disused sewage beds. The replacement sewage treatment works to the south of site 537 and extensive woodland act as a buffer zone between the settlements of Glyncoch and Abercynon.</p> <p>People, Places, Futures - The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas. Cynon Valley has pockets of deprivation amongst the worst in the County Borough, at Penrhivceiber for example, just 4 km to the north of CS 537. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit... set in attractive environments. Abercynon as a key location at the confluence of the Cynon and Taff valleys is largely ignored in the draft LDP as a location where a mix of housing types, accommodated on quality sites, would prove to be a major regeneration stimulus in a deprived area.</p>																

Item	Question	Reply	Tick box	Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes	
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1447.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106			Site:			New Site			PEX Session:					
Policy: SSA 10			Map:			Issue: Housing Allocation								
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
That land near Tylchawen Terrace, Tonyrefail has not been included within the settlement boundary or allocated for residential development. Refer to plan and letter dated 25 October 2006.		
2 3	Representation text	
It is suggested that the land identified on the plan forms a logical extension of the settlement, and should be allocated for residential development. The land cannot be designated as countryside as development has taken place on the site, consequently it should be designated brownfield land.		
4 5	Changes sought	
Allocate site for residential development.		
8 7	Previous Representation No	
See letter 25/10/06.		

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
11 8	P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Additional land should be allocated in the Tonyrefail area to assist regeneration.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1447.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.108			Site:			Settlement Boun			PEX Session:					
Policy: SSA 13			Map:			Issue: Settlement Boundary								
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
That land near Tylchawen Terrace, Tonyrefail has not been included within the settlement boundary or allocated for residential development. Refer to plan and letter dated 25 October 2006.		
2 3	Representation text	
It is suggested that the land identified on the plan forms a logical extension of the settlement, and should be allocated for residential development. The land cannot be designated as countryside as development has taken place on the site, consequently it should be designated brownfield land.		
4 5	Changes sought	
Include site within settlement boundary.		
6 6	Candidate Site Ref No	
See letter dated 25/10/06.		

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
11 8	P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Additional land should be allocated in the Tonyrefail area to assist regeneration.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1465.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site: 485/493		Mount Pleasant Inn W.						New Site		PEX Session:		
Policy:				Map:						Issue: Policy Omission						
Summary:																

Item Question

Representation Text

1 2 Issue Summary

Allocation of the Land West of Mount Pleasant Inn and the Land between A465 and Treherbert Road (Candidate Sites 493 and 494) as future sites for open space, recreation, ecological enhancement and community uses.

The proposed allocation is shown on Plan Ref PLA/NSA/2 which accompanies this Representation.

The two parcels of land are adjacent to Blaen Cynon SAC (a Natura 2000 site) and Cors Bryn-gaer SSSI to the north and east. It is our understanding that the SAC is recognised for its potential as habitat for the Marsh Fritillary butterfly.

In accordance with Policy AW8 which seeks to protect and enhance the natural environment we propose the allocation of the Land West of Mount Pleasant Inn and the Land between A465 and Treherbert Road (Candidate Sites 493 and 494) as areas to be brought forward for open space with opportunities for recreation and ecological enhancement.

We are seeking the inclusion of a new site specific policy in the Written Statement, draft text has been provided in response to Q5 and allocation of the sites on the Proposal Map.

REPRESENTATION DETAIL by: Representation No**Rhondda Cynon Taf County Borough Council Local Development Plan**

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2	3	Representation text													
<p>A related proposal for further mining on the main Tower Colliery site could present an opportunity to remove spoil from these existing coal tips and create a land form that can be brought forward for habitat enhancement and present opportunities for open space, public access and recreational uses alongside appropriate supporting facilities such as car parking, local access improvements and community facilities that would be consistent with the sensitivities of the neighbouring SAC site.</p> <p>Given its strategic location it is in our opinion that the site presents a unique opportunity to bring forward a much needed open pace within the LDP and deliver ecological enhancement in accordance with Policy AW8.</p> <p>Subject to an agreed programme of mitigation, we are confident that the proposed land reclamation should not have adverse effects on sites of international, national or local nature conservation interest and would not be contrary to policy NSA3. Any proposals would be subject to assessment under Regulation 48 of the Habitats Regulations.</p> <p>More importantly it would help to deliver overriding policy objectives to protect and enhance biodiversity and abundance of wildlife habitats and maintain and enhance the ecological networks in the area.</p> <p>The two Candidate Sites were brought forward earlier in the Development Plan process as a potential 'eco park' and were identified within the 2008 Hirwaun Village Study as development sites. However, after further consideration of the development potential and sensitivities of the site we do not consider that substantial levels of built development on the site is appropriate. The sites present significant opportunities for open space provision for both informal and formal recreational and community activities alongside ecological enhancement within Hirwaun whilst fulfilling many of the objectives of the Heads of the Valleys Programme.</p> <p>The allocation of the sites for open space, recreation and ecological uses, supports Strategic Planning Obligation 5 which seeks to provide an environment that encourages healthy and safe lifestyles and promotes well being through improvement in access to green space in the north of the Borough.</p> <p>We have consulted CCW and their view is that they do not foresee any problem with the identification of the land for open space or community use per se provided it can be demonstrated that the proposed development in the area will not have a significant effect on the adjacent SAC or the features of the SAC.</p>															

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4	5														
<p>Changes sought</p> <p>Allocation of the Land West of Mount Pleasant Inn and the Land between A465 and Treherbert Road (Candidate Sites 493 and 494) on the Proposals Map as open space and inclusion of a new site specific policy in the Written Statement promoting the reclamation of the sites and their restoration for open space, providing opportunities for recreation, ecological enhancement with appropriate ancillary and community facilities.</p> <p>The proposed allocation is shown on Plan Ref PLA/NSA/2 which accompanies this Representation.</p> <p>We are seeking the inclusion of a new site specific policy in the Written Statement, draft text has been provided in response to Q5 below and allocation of the sites on the Proposal Map. The suggested policy wording to be included as a new policy in the NSA series is provided below:</p> <p>Policy NSAx – Land West of Mount Pleasant Inn and the Land between A465 and Treherbert Road</p> <p>Development proposals that propose the reclamation of the Land West of Mount Pleasant Inn and the Land between A465 and Treherbert Road, without having any adverse affects on sites of international, national and/or local nature conservation interest, and bring it forward as an area of open space for recreational purposes and ecological enhancement alongside ancillary and community uses will be supported.</p> <p>Reasoned justification for proposed changes</p> <p>The reclamation of the coal tip presents a unique opportunity to bring forward much needed open space for Hirwaun and presents significant opportunities for ecological enhancement, recreation and access to open space within Hirwaun and the surrounding area whilst fulfilling many of the objectives of the Heads of the Valleys Programme.</p> <p>Any ancillary facilities on the site, such as car parking, changing facilities, community facilities or visitor and interpretation facilities will need to be carefully designed to reflect the sensitivities of the site.</p> <p>Changes to LDP proposals map (sheet 1 north)</p> <p>The proposed allocation for the Proposals Map is shown on Plan Ref PLA/NSA/2 which accompanies this Representation.</p>															
6	6														
<p>Candidate Site Ref No</p> <p>493 and 494</p>															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
9	7			Why no previous Representation											
<p>No formal representation was made to the Preferred Strategy due to the fact that the area was identified as one of the Strategic Development Sites in RCT in line with the wishes and requirements of Tower Colliery. It was also recommended as a strategic site within the Hirwaun village study.</p> <p>However extensive and detailed meetings were held with the First Minister, WAG, Chief Executive of RCT and senior members, and Head of Planning during the period when broad aspirations for the area were being identified. Concerns were only raised when the proposed plan for the area was tabled initially and on examination of the Deposit Draft LDP which excluded these sites for any development.</p>															

21	11			Why attend Examination?											
<p>This is to ensure that all issues are properly addressed and to respond to any questions raised.</p>															

Item	Question	Reply	Soundness Tests
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17	8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes
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20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	
<p>The allocation of the sites for reclamation and future use for recreational and ecological uses will support a number of strategic planning objectives as set out in the Local Development Plan, and wider objectives within the Heads of the Valleys Initiative. It provides a unique opportunity to promote biodiversity and habitat enhancement supported through Draft Policy AW8.</p>			

Item	Question	Reply	Tick box Replies
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3	4	Seek changes? Any changes to be made to the Plan?	Yes
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5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No
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REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1465.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075, para.6.38				Site: 5//NSA 8		OSTR Hirwaun/Penywaun				Amend site boun		PEX Session:				
Policy: NSA 8				Map:						Issue: Strategic Sites						
Summary:																

Item Question

Representation Text

1 2 Issue Summary

Revision to policy NSA 8 Land to the South of Hirwaun, deletion of the accompanying Indicative Concept Plan in the Written Statement on Page 76 and alterations to the Proposals Map.

Alterations to the Proposals Map include revisions to the Strategic Site Boundary and Residential Settlement Boundary to include and allow for the comprehensive redevelopment of the Land to the South of Hirwaun. Alterations are shown on Plan Ref PLA/NSA8/1 which accompanies this Representation.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3			Representation text											
<p>Policy NSA 8 supports the redevelopment of Land to the South of Hirwaun and defines within a Concept Statement a mix and quantum of development that is deemed appropriate on the site and which delivers the strategic planning objectives of the Local Development Plan and the enhancement of Hirwaun as a key settlement.</p> <p>Whilst we support the underlying development assumptions that support Policy NSA8 in its current form we feel the current proposed wording of the policy and the inclusion of an Indicative Concept Plan with the current land use allocations is too prescriptive at this stage in the development design process.</p> <p>We believe that given the large-scale nature of the site a more flexible, co-ordinated and comprehensive approach to its future development form is required. To ensure that, we believe that a sensible approach would be to give the site a more generic allocation as a Strategic Site which, prior to the development phase progressing, will require the preparation of a Development Framework. This will allow for a more comprehensive approach to the redevelopment of the site given the long timeframe. This approach underlines our clients' desire for a co-ordinated approach to the comprehensive restoration of the whole site.</p> <p>The Residential Settlement Boundary needs to be realigned to reflect the potential opportunities for the redevelopment of the whole site. At this stage, its current alignment constitutes an unnecessary constraint on the comprehensive and sensitive development of the site. The revisions to the Residential Settlement Boundary on the Proposals Map includes all the Tower Land excepting the southern higher and steeper slopes.</p> <p>The proposed changes to the Reasoned Justification supporting revised Policy NSA 8 (set out in our response to Q5) will require consideration of landscape setting and potentially structural landscaping. This should serve to protect the landscape setting of the site, whilst not precluding development form within the Residential Settlement Boundary at this early stage in the development process.</p> <p>While seeking to achieve a more flexible approach to the form of development that comes forward on the site, we are neither challenging the policy position nor the evidence base in terms of quantum and type of development proposed. Our only objective is to ensure that sufficient flexibility is maintained that ensures the best development over a long timeframe (that may well extend beyond the plan period) which delivers the strategic planning objectives and enhancement of Hirwaun as a key settlement. The policy should not preclude other appropriate land uses coming forward on site, such as leisure and tourism.</p> <p>The proposed changes in the wording of the policy allows for greater flexibility for delivering 'appropriate' development on the site and taking a more comprehensive approach to the spatial form of the development. It allows for greater flexibility in approaching design ensuring best and the most appropriate built environment for future.</p> <p>The proposed changes in wording delivers the mix of land uses identified in the Concept Statement and the Development Framework approach is in accordance with Policy AW6 which requires master planning for this and other Strategic Sites.</p> <p>More importantly the development framework will build on the design principles and Concept</p>															

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
4	5			Changes sought											
<p>We have set out below a suggested revision to Policy NSA 8- Land South of Hirwaun (pg 75) and the accompanying Reasoned Justifications. We propose that this text replaces the current policy NSA 8 and paragraphs 6.38 to 6.42 in the Deposit Draft of the Local Development Plan.</p> <p>The revisions to Policy NSA8 should be accompanied by the deletion of the Indicative Concept Plan from Page 76 of the Written Statement and the incorporation of the suggested revision to the Proposals Map as shown in Plan Ref PLA/NSA8/1 accompanying our Representation. The suggested policy revision is provided below:</p> <p>Policy NSA 8 – Land South of Hirwaun</p> <p>In accordance with policy CS 3 land is allocated South of Hirwaun as a Strategic Site. Proposals for development within the Strategic Site include the construction of 1,000 dwellings (400 within the plan period), 36 hectares of employment land, retail, and leisure floor space, tourism development, health, education and community facilities.</p> <p>Proposals for development within the Strategic Site should be developed through a Development Framework. Proposals which are in conformity with the Development Framework and other relevant policies of the Local Development Plan will be permitted. Development on the Strategic Site will be subject to a large scale reclamation scheme.</p> <p>Reasoned justification for Policy NSA8</p> <p>The development proposed at the Land South of Hirwaun comprises a large scale multi-use proposal. Although a development concept for the site has been prepared, further assessment and consultation is required before the detailed disposition of land uses can be determined. In recognition of the fact that the site has been allocated in the plan as a Strategic Site, it is intended that a development framework will be prepared for the site that will identify detailed land uses. The development framework will provide guidance to developers on the key elements of spatial form, the required mix of uses and design principles. The Development Framework will form the starting point for developers in the preparation of the required Masterplan for the site.</p> <p>The Development Framework will need to address:</p> <ul style="list-style-type: none"> • the known constraints on the site; • the integration of new housing with the existing town centre; • development of a local centre to serve both the existing and new communities to include retail, commercial, health, education and community facilities; • provision of the local centre to be phased to coincide with appropriate stages of residential development (400 to be constructed during the plan period); • development of at some 36 ha of employment; 															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
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- opportunities to capitalise on tourism and leisure opportunities;
- protection of existing open space; and
- creation of a landscape setting, habitat restoration and ecological enhancement.

Development proposals for the site will be considered in conjunction with emerging Heads of the Valleys Initiatives and discussions with Tower Colliery on future use of the land after coal related operations have ceased. Potential exists for large-scale employment and some residential uses.

Development of the site is linked to the proposed dualling of the A465 trunk road from Hirwaun to Abergavenny, involving a 1.4km length of new road through part of the Strategic Site. The A465 dualling proposals need to be fully integrated with the development proposals for the site to ensure that severance associated with the highway proposals is minimised and to ensure that local access to and within the Strategic Site is achieved in the most appropriate and sustainable manner.

The Council's vision for the Strategic Site is the enhancement of Hirwaun as a key settlement in Rhondda Cynon Taf, through residential, employment and community development, and restoration and enhancement of landscape and habitats.

The site is subject to a number of constraints most notably:

- high-pressure gas main and safety zone;
- Sites of Importance for Nature Conservation and Site of Special Scientific Interest;
- recent mining activity; and
- safeguarding and future working of coal reserves.

9 7 Why no previous Representation

No formal representation was made to the Preferred Strategy due to the fact that the area was identified as one of the Strategic Development Sites in RCT in line with the wishes and requirements of Tower Colliery.

However extensive and detailed meetings were held with the First Minister, WAG, Chief Executive of RCT and senior members, and Head of Planning during the period when broad aspirations for the area were being identified.

Concerns were only raised when the proposed plan for the area was tabled initially and on examination of the Deposit Draft LDP.

21 11 Why attend Examination?

This is to ensure that all issues are properly addressed and to respond to any questions raised.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Soundness Tests</i>
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				The Development Framework will provide a flexible policy and design tool and would help in providing strategic advice to developers on the key elements of spatial form, the required mix of uses and appropriate design principles.												
				Future Masterplans for the area would be based on the Development Framework and therefore there would be a high degree of flexibility in arriving at an appropriate spatial form and development mix through the master planning exercise.												
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													No	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1465.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

Revision to policy NSA 8 Land to the South of Hirwaun, deletion of the accompanying Indicative Concept Plan in the Written Statement on Page 76 and alterations to the Proposals Map.

Alterations to the Proposals Map include revisions to the Strategic Site Boundary and Residential Settlement Boundary to include and allow for the comprehensive redevelopment of the Land to the South of Hirwaun. Alterations are shown on Plan Ref PLA/NSA8/1 which accompanies this Representation.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2	3	Representation text													
<p>Policy NSA 8 supports the redevelopment of Land to the South of Hirwaun and defines within a Concept Statement a mix and quantum of development that is deemed appropriate on the site and which delivers the strategic planning objectives of the Local Development Plan and the enhancement of Hirwaun as a key settlement.</p> <p>Whilst we support the underlying development assumptions that support Policy NSA8 in its current form we feel the current proposed wording of the policy and the inclusion of an Indicative Concept Plan with the current land use allocations is too prescriptive at this stage in the development design process.</p> <p>We believe that given the large-scale nature of the site a more flexible, co-ordinated and comprehensive approach to its future development form is required. To ensure that, we believe that a sensible approach would be to give the site a more generic allocation as a Strategic Site which, prior to the development phase progressing, will require the preparation of a Development Framework. This will allow for a more comprehensive approach to the redevelopment of the site given the long timeframe. This approach underlines our clients' desire for a co-ordinated approach to the comprehensive restoration of the whole site.</p> <p>The Residential Settlement Boundary needs to be realigned to reflect the potential opportunities for the redevelopment of the whole site. At this stage, its current alignment constitutes an unnecessary constraint on the comprehensive and sensitive development of the site. The revisions to the Residential Settlement Boundary on the Proposals Map includes all the Tower Land excepting the southern higher and steeper slopes.</p> <p>The proposed changes to the Reasoned Justification supporting revised Policy NSA 8 (set out in our response to Q5) will require consideration of landscape setting and potentially structural landscaping. This should serve to protect the landscape setting of the site, whilst not precluding development form within the Residential Settlement Boundary at this early stage in the development process.</p> <p>While seeking to achieve a more flexible approach to the form of development that comes forward on the site, we are neither challenging the policy position nor the evidence base in terms of quantum and type of development proposed. Our only objective is to ensure that sufficient flexibility is maintained that ensures the best development over a long timeframe (that may well extend beyond the plan period) which delivers the strategic planning objectives and enhancement of Hirwaun as a key settlement. The policy should not preclude other appropriate land uses coming forward on site, such as leisure and tourism.</p> <p>The proposed changes in the wording of the policy allows for greater flexibility for delivering 'appropriate' development on the site and taking a more comprehensive approach to the spatial form of the development. It allows for greater flexibility in approaching design ensuring best and the most appropriate built environment for future.</p> <p>The proposed changes in wording delivers the mix of land uses identified in the Concept Statement and the Development Framework approach is in accordance with Policy AW6 which requires master planning for this and other Strategic Sites.</p>															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i>	<i>EVIDENCE</i>	<i>NO FRTHR EVID.</i>	<i>Recommendation</i>	<i>Response</i>	
									<i>in parts</i>	<i>Add'l</i>	<i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	

More importantly the development framework will build on the design principles and Concept Statement for the site which sets out the proposed mix of uses. The Development Framework approach will maximise the opportunity for the integration of the site with the town centre and could form part of a wider Strategic Regeneration Framework covering both the site and the town centre.

Changes to LDP Proposals Map (sheet 1 north)
Changes to Policy NSA 8, alterations to the LDP Proposals Map and the deletion of the Indicative Concept Plan for Land South of Hirwaun from the Written Statement will allow for the comprehensive redevelopment of the Strategic Site and will support the planning objectives as outlined above.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
4	5														
<p>Changes sought</p> <p>We have set out below a suggested revision to Policy NSA 8- Land South of Hirwaun (pg 75) and the accompanying Reasoned Justifications. We propose that this text replaces the current policy NSA 8 and paragraphs 6.38 to 6.42 in the Deposit Draft of the Local Development Plan.</p> <p>The revisions to Policy NSA8 should be accompanied by the deletion of the Indicative Concept Plan from Page 76 of the Written Statement and the incorporation of the suggested revision to the Proposals Map as shown in Plan Ref PLA/NSA8/1 accompanying our Representation. The suggested policy revision is provided below:</p> <p>Policy NSA 8 – Land South of Hirwaun</p> <p>In accordance with policy CS 3 land is allocated South of Hirwaun as a Strategic Site. Proposals for development within the Strategic Site include the construction of 1,000 dwellings (400 within the plan period), 36 hectares of employment land, retail, and leisure floor space, tourism development, health, education and community facilities.</p> <p>Proposals for development within the Strategic Site should be developed through a Development Framework. Proposals which are in conformity with the Development Framework and other relevant policies of the Local Development Plan will be permitted. Development on the Strategic Site will be subject to a large scale reclamation scheme.</p> <p>Reasoned justification for Policy NSA8</p> <p>The development proposed at the Land South of Hirwaun comprises a large scale multi-use proposal. Although a development concept for the site has been prepared, further assessment and consultation is required before the detailed disposition of land uses can be determined. In recognition of the fact that the site has been allocated in the plan as a Strategic Site, it is intended that a development framework will be prepared for the site that will identify detailed land uses. The development framework will provide guidance to developers on the key elements of spatial form, the required mix of uses and design principles. The Development Framework will form the starting point for developers in the preparation of the required Masterplan for the site.</p> <p>The Development Framework will need to address:</p> <ul style="list-style-type: none"> • the known constraints on the site; • the integration of new housing with the existing town centre; • development of a local centre to serve both the existing and new communities to include retail, commercial, health, education and community facilities; • provision of the local centre to be phased to coincide with appropriate stages of residential development (400 to be constructed during the plan period); • development of at some 36 ha of employment; 															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
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- opportunities to capitalise on tourism and leisure opportunities;
- protection of existing open space; and
- creation of a landscape setting, habitat restoration and ecological enhancement.

Development proposals for the site will be considered in conjunction with emerging Heads of the Valleys Initiatives and discussions with Tower Colliery on future use of the land after coal related operations have ceased. Potential exists for large-scale employment and some residential uses.

Development of the site is linked to the proposed dualling of the A465 trunk road from Hirwaun to Abergavenny, involving a 1.4km length of new road through part of the Strategic Site. The A465 dualling proposals need to be fully integrated with the development proposals for the site to ensure that severance associated with the highway proposals is minimised and to ensure that local access to and within the Strategic Site is achieved in the most appropriate and sustainable manner.

The Council's vision for the Strategic Site is the enhancement of Hirwaun as a key settlement in Rhondda Cynon Taf, through residential, employment and community development, and restoration and enhancement of landscape and habitats.

The site is subject to a number of constraints most notably:

- high-pressure gas main and safety zone;
- Sites of Importance for Nature Conservation and Site of Special Scientific Interest;
- recent mining activity; and
- safeguarding and future working of coal reserves.

9 7 Why no previous Representation

No formal representation was made to the Preferred Strategy due to the fact that the area was identified as one of the Strategic Development Sites in RCT in line with the wishes and requirements of Tower Colliery.

However extensive and detailed meetings were held with the First Minister, WAG, Chief Executive of RCT and senior members, and Head of Planning during the period when broad aspirations for the area were being identified.

Concerns were only raised when the proposed plan for the area was tabled initially and on examination of the Deposit Draft LDP.

21 11 Why attend Examination?

This is to ensure that all issues are properly addressed and to respond to any questions raised.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Soundness Tests</i>
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				The Development Framework will provide a flexible policy and design tool and would help in providing strategic advice to developers on the key elements of spatial form, the required mix of uses and appropriate design principles.												
				Future Masterplans for the area would be based on the Development Framework and therefore there would be a high degree of flexibility in arriving at an appropriate spatial form and development mix through the master planning exercise.												
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													No	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1465.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site: 483/489		Tower Colliery Pit Head Site				New Site		PEX Session:				
Policy:				Map:						Issue: Policy Omission						
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	Allocation of the Tower Colliery Pit Head Site (Candidate Site 489) for future heritage, tourism and leisure uses.
		We are seeking the inclusion of a site specific policy in the Written Statement in relation to the Tower Colliery Pit Head Site. We have drafted a suggested policy for inclusion in our reponse to Q5.
		The proposed allocation is shown on Plan Ref PLA/NSA/3 which accompanies this Representation.
2	3 Representation text	The site is a closed deep pit mine located to the southwest of Hirwaun village alongside the A4061. The site is currently used as the offices for the Tower Colliery operations but is likely to come forward for redevelopment within the plan period.
		Redevelopment presents a unique opportunity to bring forward this brownfield site for tourism and leisure uses which respects and buiklds on the area's heritage and strong links to the mining industry.
		The site contains a number of listed structures associated with its mining operations, namely The Tower Colliery Head frame/pithead and the engine/fan house. Any development proposals will need to propect and where possible enhance these listed structures, where possible bringing them back into active use.
		Subject to an agreed programme of mitigation, we are confident that the site can be developed for tourism and leisure uses without any adverse effects on local built heritage or nature conservation interest and would not be contrary to policy NSA 3.
		Turning Heads - A Strategy for the Heads of the Valleys seeks to deliver an appealing and coherent tourism and leisure experience in the area. Policy CS1 in the LDP seeks to promote new forms of employment in tourism and leisure whilst protecting the cultural identity of the area. Policy NSA 3 promotes opportunities for new retail and tourism development for Hirwaun. Paragraph 6.16 of the Deposit Draft of the LDP states that Hirwaun Village Study identified the need to promote the tourist and visitor offer tf Hirwaun.
		The development of the Tower Colliery Pit Head Site for tourism and leisure would help to expand the tourism product offer in the area and help to create a more diverse tourism experience, which in terms meet the stated strategic policy objectives.
		The Candidate Site was brought forward earlier in the Development Plan process for 'mixed use development' and was identified within the 2008 Hirwaun Village Study as a Strategiuc Site for development. We feel redevelopment of the site presents a significant opportunity for meeting an already identified need for increased tourism and leisure development that respects the existing cultural and heritage links with and within the community.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4	5														Changes sought Allocation of the Tower Colliery Pit Head Site (Candidate Site 489) for future heritage, tourism and leisure uses. We are seeking the inclusion of a site specific policy in the Written Statement in relation to the Tower Colliery Pit Head Site. We have drafted a suggested policy for inclusion in our responses to Q5. The proposed allocation is shown on Plan Ref PLA/NSA/3 which accompanies this Representation. The suggested policy wording to be included as a new policy in the NSA series is provided below: Policy NSA xx - Tower Colliery Pit Head Site Proposals for the development of the Tower Colliery Pit Head Site for leisure and tourism uses that protect the built heritage and nature conservation interests on the site will be supported. Reasoned justification for proposed changes The reclamation and redevelopment of the Tower Colliery Pit Head Site presents a unique opportunity to promote development that will support the industrial heritage on the site, whilst helping to promote employment within the leisure and tourism sectors in the local economy in support of the Heads of the Valley Initiative and strategic planning objectives in the LDP. Any ancillary facilities on the site, such as car parking or visitors and interpretation facilities will need to be carefully designed to reflect the sensitives of the site.
6	6														Candidate Site Ref No 489
9	7														Why no previous Representation No formal representation was made to the Preferred Strategy due to the fact that the area was identified as one of the Strategic Development Sites in RCT in line with the wishes and requirements of Tower Colliery. It was also recommended as a strategic site within the Hirwaun Village Study. However extensive and detailed meetings were held with the First Minister, WAG, Chief Executive of RCT and senior members, and Head of Planning during the period when broad aspirations for the area were being identified. Concerns were only raised when the proposed plan for the area was tabled initially and on examination of the Deposit Draft LDP which excluded these sites for any development.
21	11														Why attend Examination? This is to ensure that all issues are properly addressed and to respond to any questions raised.
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
17	8														CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
20	9														Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of the Tower Colliery Pit Head Site for heritage tourism and leisure will support a number of strategic planning objectives as set out in the Local Development Plan, and wider objectives within the Heads of the Valleys Initiative. It provides a unique opportunity to promote tourism and leisure whilst conserving the Grade II listed buildings on site and its SINC status.
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4														Seek changes? Any changes to be made to the Plan? Yes
5	6														Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes
7	7														Previous Representations? Did you make any previous representations on this issue during the Cons? No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1470.D1			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 693//SSA 10.15 Brynteg Court, Beddau						PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary The allocation of land south of Brynteg Court, Beddau for residential development is supported.		
2 3	Representation text Tinn Developments Ltd restates the continued viability of this allocation and their intention to deliver the number of housing units identified within the plan period.		
21 11	Why attend Examination? The issue of the adequacy of the housing provision is fundamental to the soundness of the plan and requires full consideration at the Examination.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1475.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.26, para.4.11						Site:			PEX Session:						
Policy:				Map:		Issue: Core Strategy									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The Rhondda has no designated Principal Town	
2 3	Representation text	
	The fact that Rhondda has no Principal Town will have a dramatic and detrimental effect on the area. As funding and resources are focused on the Principal Towns in the Cwm Cynon and Taff Ely areas, Rhondda will decline further. The negativity of the decision will be felt in terms of employment, investment, community cohesion, and in the confidence of the Rhondda population. All this goes against the stated aims of the plan.	
4 5	Changes sought	
	That at least one 'key settlement' (p.27, 4.14) within the Rhondda be upgraded to Principal Town status.	
9 7	Why no previous Representation	
	I was not aware of the consultation	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The absence of a Principal Town in Rhondda will relegate a significant section of the authority to secondary status. Designating a Principal Town in Rhondda would ensure an even spread of investment and development throughout the county borough.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1475.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.069		Site: 2//NSA 5							OSTR Fernhill Colliery, Blaenrhondda		New Site		PEX Session:				
Policy: NSA 5				Map:				Issue: Strategic Sites									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	I support the current designation of Leisure and Tourism.	
2 3	Representation text	
	I believe that the proposal contradicts the following policy of the LDP	
	Policy CS 13 - Protection Of The Natural Environment	
	Rhondda Cynon Taf's distinctive rural character will be preserved and enhanced by the protection and improvement of the natural environment, countryside and landscape from inappropriate development.	
	Development proposals will not be permitted if it would	
	- cause unacceptable harm to the following:-	
	i) The character and quality of local landscapes and the wider countryside;	
	ii) Ecology and wildlife of acknowledged importance;	
	iii) The quality of natural resources including water, air and soil;	
	iv) Natural drainage of surface water;	
	The intensive development proposed for this site would spoil an area of unique beauty and have an adverse effect on the whole of area.	
4 5	Changes sought	
	That the site remains designated for Leisure and Tourism.	
9 7	Why no previous Representation	
	I was not aware of the consultation.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1484.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054		Site: 410/414 Bute Terrace rear (LP allocation)						PEX Session:							
Policy: AW 8		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The Hirwaun Ironworks SINC includes land to the rear of Bute Terrace which has an extant consent for residential development (in Part) and is allocated in the extant development plan for resid etila use it should, therefore, be excluded from the designation.	
2 3	Representation text The site has an extant planning consent(in Part) and is included within the settlement boundary for Hirwaun in the adopted Cynon Valley Local Plan being allocated for residential development. There have been no material changes in circumstances to warrant its exclusion from the defined settlement in the LDP. Please see accompanying supporting statement and information.	
4 5	Changes sought Amendment of the Hirwaun Ironworks SINC boundary to exclude the site as indicated in the accompanying ecological assessment and supporting statement.	
6 6	Candidate Site Ref No 397/414	
9 7	Why no previous Representation The preferred strategy is considered acceptable in general terms.	
21 11	Why attend Examination? Whilst the principle of residential development is clearly acceptable, there are other more complex issues to consider which would benefit from discussion at the examination.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The amendment will reflect the current planning status of the site and its ecological importance.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1484.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077		Site: 410/414		Bute Terrace rear (LP allocation)		New Site		PEX Session:								
Policy: NSA 9		Map:		Issue: Housing Allocation												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Policy NSA 9 allocates land for residential development on non - strategic sites in the Northern strategy area. Land to the rear of Bute Terrace has an extant consent for residential development (in Part) and is currently allocated for residential use in the extant local plan it should be included in Policy NSA 9 as a residential allocation.	
2 3	Representation text	
	Land to the rear of Bute Terrace, Hiwaun should be included as a residential allocation. See supporting statement and information. There have been no material changes in circumstances to warrant its omission from the LDP.	
4 5	Changes sought	
	Policy NSA 9 should be amended to include land to the rear of Bute Terrace, Hirwaun as a residential allocation.	
6 6	Candidate Site Ref No	
	397/414	
9 7	Why no previous Representation	
	The preferred strategy is considered acceptable and is support of the allocation of the site for residential development.	
21 11	Why attend Examination?	
	Whilst the principle of residential development is clearly acceptable, there are other more complex issues to consider which would benefit from discussion at the examination.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	It is an acceptable alternative site which should be included as an allocation as it is an existing allocation with planning permission (in part) and can be readily developed thereby providing a better range and choice of sites to reinforce Hirwauns role as a key settlement.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1484.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079		Site: 410/414						Bute Terrace rear (LP allocation)			Settlement Boun		PEX Session:		
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary at Hirwaun should be amended to incorporate land the rear of Bute Terrace, Hiwaun.		
2 3	Representation text	
The site has an extant planning consent(in Part) and is included within the settlement boundary for Hirwaun in the adopted Cynon Valley Local Plan being allocated for residential development. There have been no material changes in circumstances to warrant its exclusion from the defined settlement in the LDP. Please see accompanying supporting statement and information.		
4 5	Changes sought	
The settlement boundary should be amended as indicated in the supporting statement.		
6 6	Candidate Site Ref No	
397/414		
9 7	Why no previous Representation	
The overall strategy is considered acceptable and is considered to to be supportive of the inclusion of the site within the settlement boundary of Hirwaun.		
21 11	Why attend Examination?	
Whilst the principle of residential development is clearly acceptable, there are other more complex issues to consider which would benefit from discussion at the examination.		

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
The LDP would then be consistent with the adopted local development plan and would reflect the existence of an extant planning permission (in Part) and allow more flexible growth in the key settlement of Hirwaun.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1484.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 410/414 Bute Terrace rear (LP allocation)							PEX Session:							
Policy: NSA 26		Map:			Issue: Environment											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Policy NSA 26 designates land as Cynon Valley River Park but the land to the rear of Bute Terrace, Hirwaun has an extant consent for residential development (in part) and is currently allocated for residential development in the extant local plan.	
2 3	Representation text	
	Land to the rear of Bute Terrace, Hirwaun should be excluded from the Cynon Valley River Park designation (NSA 26). See supporting statement and information.	
4 5	Changes sought	
	The boundary of the policy NSA 26 designation should be amended to exclude land to the rear of Bute Terrace, Hirwaun.	
6 6	Candidate Site Ref No	
	397/414	
9 7	Why no previous Representation	
	The preferred strategy is considered acceptable and is supportive of residential allocation of the site.	
21 11	Why attend Examination?	
	Whilst the principle of residential development is clearly acceptable, there are other more complex issues to consider which would benefit from discussion at the examination.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The plan will (SIC) then reflect the correct position with regard to the planning status of the site and will contribute towards the aims of the River Park strategy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1504.D1			<input type="checkbox"/>	S		M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077		Site: 660//NSA 9.10 Godreaman Street, Godreaman						PEX Session:							
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	1. To support Policy NSA 9 - Allocation 10- Land to the end of Godreaman Street, Godreaman and	
	2. To challenge the accuracy of the response to Question 9 'is there potential risk of contaminated land?' in Appendix 5.3 Candidate Sites- Stage 1 Assessments document	
2 3	Representation text	
	1. The owner of the site is aware of a letter dated 23 March 2009 from local residents expressing concern to the site's (ID 512) allocation. The objections have been addressed via the Agent's response in a letter dated 25 March 2009. (Copy attached).	
	2. Following telephone discussions and email correspondence between Agent and Mr Alex Brown (RCT Contaminated Land Officer) between March 23 - March 25 2009, it is considered the site is not contaminated (see attached letter dated 25 March 2009).	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

1504.D2			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.077		Site: 660//NSA 9.10 Godreaman Street, Godreaman						PEX Session:							
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	To support Policy NSA 9 - Allocation 10 - Land to the end of Godreaman Street, Godreaman.	
2 3	Representation text	
	The owner of the site is aware of a letter dated 23 March 2009 from local residents expressing concern to the site's (ID 512) allocation. The objections have been addressed via the Agent's response in a letter dated 25 March 2009 (copy attached)	
21 11	Why attend Examination?	
	Clarification would be best achieved with regard to commenting upon objector's concerns	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1504.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077		Site: 660//NSA 9.10						Godreaman Street, Godreaman			PEX Session:				
Policy: NSA 9		Map:				Issue: Housing Allocation									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary		
To challenge the accuracy of the response to Question 9 - 'Is there potential risk of contaminated land?' in Appendix 5.3 Candidate Sites - Stage 1 Assessments document.			
2 3	Representation text		
Following telephone discussions / e mail correspondence March 22-25 2009 between Agent and Mr Alex Brown (RCT Contaminated Land Officer) it is submitted the site (ID 512) is NOT contaminated as explained in attached Agents letter dated 25 March 2009.			
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1509.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054		Site: 521/530 Hendrefedog S.						PEX Session:							
Policy: AW 8		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary We request that our site is omitted from the adjacent SINC.	
2 3	Representation text The site is part of the former housing development along Caradog Road. Although not yet developed it forms an important part of the future development.	
4 5	Changes sought Our site to be omitted from the SINC.	
9 7	Why no previous Representation We were not aware of the sites inclusion within the SINC until late in the publication. We attended a Road Show on 26th February to discuss and were advised to formally apply.	

Item	Question	Reply	Soundness Tests
11 8	P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Please see enclosed correspondence.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1521.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 569/578			Llantrisant Road E.			Settlement Boun			PEX Session:					
Policy: SSA 13				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Objection is raised to policy SSA 13 for the non-inclusion of CS 578 and adjoining allotment land within the settlement boundary for Tonyrefail.	
2 3	Representation text	
	Tonyrefail is designated a Key Settlement in Policy SSA 4 of the Draft Deposit LDP. Supporting para 6.124 states, "Opportunities exist within the settlement of Tonyrefail for new residential and commercial development that can support the process of regeneration." Draft policy AW1 - new housing, states that provision will be made for 14,850 new dwellings during the plan period 2006-2021 to be met by allocations in the LDP. Draft policy SSA 10 proposes 2,695 new dwellings on 19 non-strategic sites in the southern part of RCT, of which 10 sites capable of delivering 1,445 dwellings are proposed in the Tonyrefail / Coed Ely area. It is doubtful, under current economic conditions, whether the house building rates for the 5-year period 201-2006 (referred to in policy SSA 10) can be maintained. It is important that identified sites are capable of being developed within a five-year period. CS 578 is a windfall site that is immediately available for development. Both the CS and adjoining allotment land should be included in the settlement boundary for this part of Tonyrefail. The allotment garden relates to the urban / domestic environment and CS 578 has for many years supported various land uses, including a leather workshop, chicken coops and stables. Currently there are two concrete and two old wooded stables on the site, and an unimplemented planning permission for a domestic garage. It would seem appropriate to accept the possibility of this land qualifying for windfall status at some time during the plan period. The settlement boundary should therefore be amended to follow a straight line extending from the rear of the Red Cow Inn to the housing site north of the allotments. The redrawn boundary would represent a logical rounding off of this part of Tonyrefail.	
4 5	Changes sought	
	Policy SSA 13 to amend the settlement boundary to include CS 578 and adjoining allotment land.	
6 6	Candidate Site Ref No	
	578.	
9 7	Why no previous Representation	
	Agent only recently engaged to represent the landowner. Landowner syays he was not consulted on the PS.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
<p>Inclusion of CS 578 within the settlement boundary for Tonyrefail will ensure flexibility for the identification of a possible windfall site, which in the SSA, must occur within the settlement boundary. As a possible windfall site, its development would be consistent with PPW March 2002 objective, para 9.1, which aims to ensure, "people in Wales have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. The site would support, in a small way, the provision of services and retail facilities in Tonyrefail town centre. PPW states, chapter 9 para 9.1.2, "Local Planning Authorities should promote more sustainable residential environments, avoid large housing areas of monotonous character and make appropriate provision for affordable housing." The candidate site is limited in size, but its development would add value to the general housing stock of the area.</p> <p>People Places, Futures- The Wales Spatial Plan highlights the need to tackle poverty and deprivation in the worst affected areas by creating sustainable communities with access to affordable housing. Tonyrefail and Gilfach Goch have pockets of deprivation amongst the worst in the County Borough. The Spatial Plan advocates the strengthening of Valley communities as desirable places to live, work and visit ... set in attractive environments. Tonyrefail is a key mid valley settlement where a mix of housing types, accommodated on quality sites, will prove to be a major stimulus in the regeneration of a deprived area. CS 578 accords with the Spatial Plan in delivering an important, albeit small, upgrading of the housing stock. This will only be possible if policy SSA 13 is amended as suggested.</p> <p>Inclusion of CS 578 in draft policy SSA 13 would also satisfy the aspirations of the local community with regard to their expressed vision of a better life as expressed through the auspices of the County Borough's Community Plan 2004-2014. Easy access to local town centres for shopping and other services was perceived as highly desirable. The CS would be within walking distance of Tonyrefail town centre and local schools.</p>																

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1523.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114		Site: 832//SSA 23.10 Taff Vale Eastern Slopes						Settlement Boun				PEX Session:			
Policy: SSA 23				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary should be moved to include an area currently on the extremity of the special landscape area (NSA 25, SSA23), adjacent to Glyntaff Road, Glyntaff, Pontypridd.		
2 3	Representation text	
Residential development has been carried out within the S.L.A., adjacent to Thornhill House, Glyntaff. Additionally, the area edged pink on the enclosed 'Plan 1' is within the SLA but has previously been the subject of an approved planning application. The boundary of the S.L.A is therefore inappropriate (sic) within this localised area.		
4 5	Changes sought	
The area edged pink on 'Plan 1' and the recently developed area adjacent to Thornhill House, Glyntaff should fall within the settlement limit, not within the S.L.A.		

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
It would ensure that areas previously approved as suitable for residential development and areas which have already been developed fall within the settlement limits, not within a Special Landscape Area.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1523.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108				Site:				Settlement Boun		PEX Session:					
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary should be moved to include an area currently on the extremity of the Special Landscape Area (NSA 25, SSA 23), adjacent to Glyntaff Road, Glyntaff, Pontypridd.		
2 3	Representation text	
Residential development has been carried out within the S.L.A., adjacent to Thornhill House, Glyntaff. Additionally, the area edged pink on the enclosed 'Plan 1' is within the SLA but has previously been the subject of an approved planning application. The boundary of the S.L.A is therefore inappropriate (sic) within this localised area.		
4 5	Changes sought	
The area edged pink on 'Plan 1' and the recently developed area adjacent to Thornhill House, Glyntaff should fall within the settlement limit, not within the S.L.A.		

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
It would ensure that areas previously approved as suitable for residential development and areas which have already been developed fall within the settlement limits, not within a Special Landscape Area.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1523.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.090				Site:						Settlement Boun		PEX Session:			
Policy: NSA 25				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The settlement boundary should be moved to include an area currently on the extremity of the Special Landscape Area (NSA 25, SSA 23), adjacent to Glyntaff Road, Glyntaff, Pontypridd.		
2 3	Representation text	
Residential development has been carried out within the S.L.A., adjacent to Thornhill House, Glyntaff. Additionally, the area edged pink on the enclosed 'Plan 1' is within the SLA but has previously been the subject of an approved planning application. The boundary of the S.L.A is therefore inappropriate (sic) within this localised area.		
4 5	Changes sought	
The area edged pink on 'Plan 1' and the recently developed area adjacent to Thornhill House, Glyntaff should fall within the settlement limit, not within the S.L.A.		

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
It would ensure that areas previously approved as suitable for residential development and areas which have already been developed fall within the settlement limits, not within a Special Landscape Area.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1529.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108				Site: 591/600 High Street S.				Settlement Boun		PEX Session:					
Policy: SSA 13		Map:		Issue: Settlement Boundary											
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	Exclusion of factory site rear of 164-168 High Street, Gilfach from policy SSA10.	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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2 3 Representation text

Please see attached sheets RE: Candidate Site 600 representation;

Description

Candidate site 600 - Factory site rear of 164-168 High Street, Gilfach Goch

This site was formerly the location of two factory units (now demolished) up to 1995 run by two companies known as Rhondda Glass and Alan Rogers & Sons Haulage. Access to the site is gained via an unadopted private access rear of High Street, Gilfach Goch, and up until 1995 was used by various vehicles including heavy haulage trucks.

The site extends to approximately 1 acre and is included in the Title Number WA496586 (as shown on the attached Land Registry Plan).

It can be seen from the Photograph 1, below, that the site now lies as a vacant flat plateau to the rear of the High Street and would be described as a brownfield site.

It is felt that a number of considerations should be looked at in terms of amending the settlement boundary and allocating this site for residential development, namely:

1. Access - whilst constrained at present opportunities to improve and develop;
2. Redevelopment of a brownfield site;
3. Position of the settlement boundary - and the establishment of a principle of development nearby.

Each of these points will be expanded upon below.

Access

Access to the site, whilst presently via a single track access does have potential to be improved and be widened, as vacant underused land runs along its length. Whilst no detailed investigations have been undertaken at this time, it is felt that the plan should be flexible to allow sites to be allocated where there is potential to develop and improve access. The present access is shown in Photograph 2 below.

Regeneration

As the site is vacant and redundant, flytipping and unauthorised use can be a problem here. It is felt that bringing back the site into beneficial use will benefit the area. This being a key aim of Policy AW 11 - point 3 of the Deposit Draft "The redevelopment of derelict, unsightly and underused vacant land for alternative uses will have significant regeneration benefits".

Why allocate green field sites for housing developments, when sites like this one are unsightly in small communities. Policy AW11 aims to provide flexibility for appropriate reuse of sites that are no longer required for employment purposes. It is considered that to deem this site unsuitable on the grounds of access constraints is not appropriate where a site has an existing access and was formerly used by industry.

Position of Settlement Boundary

As highlighted on the attached plan, the boundary of this site just falls outside the settlement boundary SSA13. The principle of modern larger self build residential development is evident nearby as shown also highlighted on the plan and by Photograph 3 below. These properties being located at the entrance to the site access just of High Street.

Demand for modern larger family housing is evident in Gilfach with self build plots pepper-potted throughout the community. Whilst there has been large scale development by the major house builders in Tonyrefail, there is little opportunity for the residents of Gilfach and Evanstown to move into larger family homes in the traditional valley community. The LDP does not allow flexibility of choice in terms of expansion of the settlement at Gilfach, there seems to be a concentration to migration to the larger town of Tonyrefail with numerous large residential developments being identified on Greenfield sites.

It is considered that this former factory site provides a key opportunity to allow for expansion of the community. Allowing the ability for mixed size housing to be brought forward will allow for greater

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
															choice for residents. The site forms a natural expansion to the community boundary, will provide regeneration to the area. The LDP plan is for a period of up to 1021, flexibility should be allowed in terms of smaller key sites which could have wider impact on valley communities like this one, not just wide scale development in the larger town.
4 5				Changes sought											Inclusion of factory site rear of 164-168 High Street Gilfach into settlement boundary and allocation for housing in policy SSA10.
6 6				Candidate Site Ref No											600
9 7				Why no previous Representation											Was not given the opportunity . Despite several phone calls , planning officers were only happy to discuss proceedure and not specifics about the site.
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
19 8				CE4 Test? Not flexible to deal with changing circumstances?											Yes
20 9				Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan											Extension of settlement boundary at Gilfach Goch to include candidate site 600 and allocation of site for housing. Allowing for flexibility of choice in terms of new housing in Gilfach Goch.
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3 4				Seek changes? Any changes to be made to the Plan?											Yes
5 6				Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit											Yes
7 7				Previous Representations? Did you make any previous representations on this issue during the Cons											No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1529.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 591/600 High Street S.						New Site		PEX Session:			
Policy: SSA 10		Map:						Issue: Housing Allocation							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	Exclusion of factory site rear of 164-168 High Street, Gilfach from policy SSA10.	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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2 3 Representation text

Please see attached sheets RE: Candidate Site 600 representation;

Description

Candidate site 600 - Factory site rear of 164-168 High Street, Gilfach Goch

This site was formerly the location of two factory units (now demolished) up to 1995 run by two companies known as Rhondda Glass and Alan Rogers & Sons Haulage. Access to the site is gained via an unadopted private access rear of High Street, Gilfach Goch, and up until 1995 was used by various vehicles including heavy haulage trucks.

The site extends to approximately 1 acre and is included in the Title Number WA496586 (as shown on the attached Land Registry Plan).

It can be seen from the Photograph 1, below, that the site now lies as a vacant flat plateau to the rear of the High Street and would be described as a brownfield site.

It is felt that a number of considerations should be looked at in terms of amending the settlement boundary and allocating this site for residential development, namely:

1. Access - whilst constrained at present opportunities to improve and develop;
2. Redevelopment of a brownfield site;
3. Position of the settlement boundary - and the establishment of a principle of development nearby.

Each of these points will be expanded upon below.

Access

Access to the site, whilst presently via a single track access does have potential to be improved and be widened, as vacant underused land runs along its length. Whilst no detailed investigations have been undertaken at this time, it is felt that the plan should be flexible to allow sites to be allocated where there is potential to develop and improve access. The present access is shown in Photograph 2 below.

Regeneration

As the site is vacant and redundant, flytipping and unauthorised use can be a problem here. It is felt that bringing back the site into beneficial use will benefit the area. This being a key aim of Policy AW 11 - point 3 of the Deposit Draft "The redevelopment of derelict, unsightly and underused vacant land for alternative uses will have significant regeneration benefits".

Why allocate green field sites for housing developments, when sites like this one are unsightly in small communities. Policy AW11 aims to provide flexibility for appropriate reuse of sites that are no longer required for employment purposes. It is considered that to deem this site unsuitable on the grounds of access constraints is not appropriate where a site has an existing access and was formerly used by industry.

Position of Settlement Boundary

As highlighted on the attached plan, the boundary of this site just falls outside the settlement boundary SSA13. The principle of modern larger self build residential development is evident nearby as shown also highlighted on the plan and by Photograph 3 below. These properties being located at the entrance to the site access just of High Street.

Demand for modern larger family housing is evident in Gilfach with self build plots pepper-potted throughout the community. Whilst there has been large scale development by the major house builders in Tonyrefail, there is little opportunity for the residents of Gilfach and Evanstown to move into larger family homes in the traditional valley community. The LDP does not allow flexibility of choice in terms of expansion of the settlement at Gilfach, there seems to be a concentration to migration to the larger town of Tonyrefail with numerous large residential developments being identified on Greenfield sites.

It is considered that this former factory site provides a key opportunity to allow for expansion of the community. Allowing the ability for mixed size housing to be brought forward will allow for greater

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
															choice for residents. The site forms a natural expansion to the community boundary, will provide regeneration to the area. The LDP plan is for a period of up to 1021, flexibility should be allowed in terms of smaller key sites which could have wider impact on valley communities like this one, not just wide scale development in the larger town.
4 5				Changes sought											Inclusion of factory site rear of 164-168 High Street Gilfach into settlement boundary and allocation for housing in policy SSA10.
6 6				Candidate Site Ref No											600
9 7				Why no previous Representation											Was not given the opportunity . Despite several phone calls , planning officers were only happy to discuss proceedure and not specifics about the site.
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
19 8				CE4 Test? Not flexible to deal with changing circumstances?											Yes
20 9				Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan											Extension of settlement boundary at Gilfach Goch to include candidate site 600 and allocation of site for housing. Allowing for flexibility of choice in terms of new housing in Gilfach Goch.
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3 4				Seek changes? Any changes to be made to the Plan?											Yes
5 6				Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit											Yes
7 7				Previous Representations? Did you make any previous representations on this issue during the Cons											No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1556.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149		Site:		New Site		PEX Session:									
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged in red on the attached plan should be allocated for residential development under the provisions of Policy SSA 10. The site would accommodate approximately 500-750 dwellings and would help to provide flexibility in the land supply.	
2 3	Representation text	
	It is considered that the site is suitable to accommodate residential development. Whilst the site does not relate to the existing settlement boundary there is a shortage of suitable residential sites in the Pontypridd area and the release of the land for housing will provide a better range of housing sites and help to stimulate the local economy and aid the regeneration of Pontypridd Town Centre.	
4 5	Changes sought	
	The site should be allocated for residential development under the provisions of Policy SSA10.	
9 7	Why no previous Representation	
	Harmers has only recently been instructed but it is understood that submissions were not made at the Preferred Strategy Stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	There is concern about the deliverability of the allocated housing land supply, and the lack of range and choice of housing sites in the Pontypridd Area. The site is fully deliverable and would make an important contribution to the range and choice of housing sites in the Pontypridd Area thereby providing an important stimulus to the local economy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1556.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183		Site: 828//SSA 23.6		Mynydd y Glyn & Nant Muchudd Basin		PEX Session:									
Policy: SSA 23		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The site shown edge red on the attached plan should be deleted from the Special Landscape Area designation.	
2 3	Representation text The SLA in this area covers an extensive area and when the site was allocated in the Deposit Taff Ely Local Plan it was considered that it would not have an unacceptable impact on the SLA. The development of the site would be of the highest environmental standards with the exclusion of the land over the 259m contour and include a comprehensive landscape scheme.	
4 5	Changes sought The site shown edged in red on the attached plan should be excuded from the SLA designation.	
9 7	Why no previous Representation The extent of the SLA designation was not known at this stage.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of the site for housing and its deletion from the SLA land contribution to the provision of a wide range and choice of housing which would make the plan more sound and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1561.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site: 273/272		Trebanog road				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:						Issue: Settlement Boundary					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Land to the rear of 154-161 Trebanog Road Cymmer Porth (CS 272) should be included in the settlement boundary.	
2 3	Representation text Evidence submitted in support sets out the reasons for representation.	
4 5	Changes sought Land to the rear of 154-161 Trebanog Road Cymmer Porth (CS 272) should be included in the settlement boundary.	
6 6	Candidate Site Ref No 272	
9 7	Why no previous Representation Did not feel it necessary to do so. Better to submit objection at this stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan See attached statement		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1561.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 687//SSA 10.9		Tylcha Ganol Farm \ Mill Street, Tonyrefail		Delete Site		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Objection to SSA 10.9.	
2 3	Representation text Evidence submitted in support sets out reason for objection - section 6, page 6.	
4 5	Changes sought 7.3 ... the site at Tylcha Ganol Farm, south of Mill Street ... removed from the housing allocation and returned to open countryside to be used for agricultural purposes.	
6 6	Candidate Site Ref No 338.	
9 7	Why no previous Representation Did not feel it necessary to do so. Better to submit objection at this stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan See attached statement.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1561.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108		Site: 509/518		Station Road N.		Settlement Boun		PEX Session:							
Policy: SSA 13		Map:		Issue: Settlement Boundary											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Include land North of Station Road, Tonyrefail (CS 518) in settlement boundary.	
2 3	Representation text Evidence submitted in support sets out reasons for representation.	
4 5	Changes sought 7.3 ... the land north of Station Road ... included within the settlement boundary of Tonyefail, in accordance with Policy CS 2 and SSA 2 ...	
6 6	Candidate Site Ref No 518.	
9 7	Why no previous Representation Did not feel it necessary to do so. Better to submit objection at this stage.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan See attached statement.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1564.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.077			Site:			New Site			PEX Session:						
Policy: NSA 9			Map:			Issue: Housing Allocation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	To add a site to the list of northern area housing allocations - Land at Dare Rd, Cwmdare	
2 3	Representation text	
	1. <input type="checkbox"/> In its preferred strategy, the land comprising the former Phurnacite plant at Abercwmbai was designated as a strategic site. The intention was that it be designated for a variety of uses, including residential.	
	2. <input type="checkbox"/> The site is still promoted in the Plan as a strategic site (policy NSA 6), but the housing element of the designation has been dropped because of potential flooding difficulties.	
	3. <input type="checkbox"/> The loss of the proposed housing allocation resulted in a shortfall of 500 units in the northern policy area of the Plan, notably in the Aberdare/Cynon Valley area. Aberdare is designated as a Principal Town in the core strategy.	
	4. <input type="checkbox"/> The Council's response to the loss of the 500 units was to designate alternative land, not in the Aberdare/Cynon Valley area, but in or around Tonyrefail. This town is not only remote from Aberdare, but is located in a different policy area. In all, 4 sites were designated in or around Tonyrefail to make up for the deficiency in the north. The Council's response to the loss of the Phurnacite land as a housing designation is regarded as unsound. Its actions are considered illogical and incoherent.	
	5. <input type="checkbox"/> The loss of a major housing designation in the northern policy area should be compensated for in the north, particularly in the Aberdare area. One such site is proposed by the representor – land at Dare Road, Cwmdare, shown on the attached plan.	
	6. <input type="checkbox"/> A detailed site assessment has been prepared in accordance with the Council's preferred methodology and is attached. It is considered that the site scores well in terms of all sustainability issues for the reasons set out in the assessment. It also compares well in these terms with many other sites allocated by the council, in particular the 4 sites in the Tonyrefail area, mentioned above.	
	7. <input type="checkbox"/> In locational terms the site is close to all main social and community facilities and is accessible by public transport. It is a site which has been recently assessed for its landscape value and, in this regard, was not considered noteworthy – the boundary of the SLA lies some distance away. The site is considered to have a greater visual affinity with the adjoining modern housing development than with the countryside beyond. The development of the site would provide the opportunity to introduce a less harsh boundary to modern development than currently exists when viewed from the upper reaches of the SLA and Country Park.	
4 5	Changes sought	
	That the site shown on the attached plan 'Land at Dare Road, Cwmdare' be added to the list of allocated sites comprised in policy NSA 9 and that the appropriate amendment be made to appendix 1a. That consideration be given to the removal of some, if not all of the sites designated in or around Tonyrefail as a result of the loss of housing potential at the Phurnacite site.	
9 7	Why no previous Representation	
	No specific allocations had been made at that stage.	
21 11	Why attend Examination?	
	Since the procedures are yet to be clarified, the representor wishes to reserve its position as to whether an appearance at the hearing e.g. for a round table discussion or other form of debate, would be appropriate.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?													
										Yes					
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan													
The council has not properly considered the implications or alternatives to the loss of a major housing designation in the northern policy area. The additional allocations in Tonyrefail are not a realistic and appropriate response. The northern area would lose a significant number of private sector and potential affordable homes. The allocation of the site in Cwmdare would assist in making up for the perceived deficiency. In addition, it is a preferable allocation to others designated in the north in that it is more sustainable.															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													
										Yes					
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													
										No					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1564.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.085						Site:				New Site		PEX Session:			
Policy: NSA 18				Map:				Issue: Retail							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary That the Council's retail policies for the Northern area are unsound.	
2 3	Representation text For the reasons given in the supporting evidence, Riverside Retail Park should be included as a District Centre in policy NSA 18.	
4 5	Changes sought Please refer to accompanying document.	
8 7	Previous Representation No [blank]	
21 11	Why attend Examination? So that the various and complicated issues involves may be properly covered.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Please refer to accompanying document.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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1564.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.084						Site:				New Site		PEX Session:			
Policy: NSA 17				Map:				Issue: Retail							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary That the Council's retail policies for the Northern area are unsound.	
2 3	Representation text For the reasons given in the supporting evidence, Riverside Retail Park should be allocated under NSA 17 as a site where comparison goods may be sold.	
4 5	Changes sought Please refer to accompanying document.	
8 7	Previous Representation No [blank]	
21 11	Why attend Examination? So that the various and complicated issues involves may be properly covered.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Please refer to accompanying document.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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1564.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 778//NSA 26						Cynon Valley River Park			PEX Session:				
Policy: NSA 26				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	To exclude the designation of Cynon Valley River Park from the Tirfounder Fields/ Riverside Retail Park site, Cwmbach, Aberdare	
2 3	Representation text	
	Planning permission has been granted for the development of the whole of the Tirfounder Fields land for a mixture of retail, housing, pub/hotel and other commercial uses. The site is partly developed and the remainder of the site will be completed within the plan period. There is therefore very little purpose in proposing the designation of the land as part of the Cynon Valley River Park. Additionally, the evidence base contains documentation in respect of the Park described by the Council as a strategy. In fact, it appears not to be a strategy, but a series of incoherent notes and aspirations.	
4 5	Changes sought	
	To remove the Cynon Valley River Park designation from the proposals map as it affects Tirfounder Fields.	
9 7	Why no previous Representation	
	It was not proposed at the time.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The changes, in view of the site's planning history, would reverse an illogical action on the part of the Council and make the plan sounder.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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1564.D5			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.073		Site: 4//NSA 7 0STR Robertstown/Abernant								PEX Session:						
Policy: NSA 7				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary To remove the reference to medical centre from the description of the designation for the Robertstown site.	
2 3	Representation text 1. The proposed medical centre represents a major investment by the local health authority in the Cynon Valley area and is part of a strategy to improve and rationalise local health facilities. 2. The proposed medical centre is currently the subject of a formal tendering procedure. The tendering process includes the provision of an appropriate site by the tenders. The representor has been shortlisted as a candidate to provide this facility. If successful with its bid, the representor does not intend to build the facility at Robertstown. 3. The allocation of this site for a medical centre is considered premature since no comparative evaluations of other sites has been conducted. Neither have the Health Authority indicated a preference for Robertstown. The health authority is a Plan stakeholder; it has not expressed, to my clients knowledge a preference for this site.	
4 5	Changes sought To remove the reference to a proposed medical centre from policy NSA 7.	
9 7	Why no previous Representation Whilst the Robertstown site was being promoted at the time as a strategic site, it was not envisaged or proposed then that the medical centre would be sited there.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan There is no evidence to suggest that other sites have been properly evaluated by the Council. for the medical centre facility. This allocation is therefore unsound since other more appropriate sites could be available to serve the requirement.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1630.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038, para.4.72			Site:			PEX Session:									
Policy: CS 8			Map:			Issue: Transportation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Paragraph 4.72 needs to refer to park and ride in addition to park and share and also make reference to walking, cycling and the need for Travel Plans. It has not been possible to access the Supplementary Planning Guidance Document for Planning Obligations referred to in para 4.75.	
2 3	Representation text Statistics on Commuting in Wales, 2007 (Dec 2008) figures show commuting levels from Rhondda Cynon Taf (RCT) with 16000 people working in Cardiff. According to statistics published from Annual Population Survey 2007, Cardiff has a total workforce of 196,200. Of these, 37.7% (74,000) live outside Cardiff and commute into Cardiff every day, mostly by car. The number of Cardiff residents who travel out of Cardiff to work is 25,400. The net gain to Cardiff is 48,600. The RCT Deposit LDP indicates that significant growth is focused in the South – in the Principal Town/ Growth Areas of Pontypridd and Llantrisant (including Talbot Green), the Key Settlement/ Growth Areas of Llanharan and Tonyrefail, and Strategic sites in Beddau (site 6), Mwynday/Talbot Green (site 7) and Llanharan (site 8). The LDP states that Llantrisant (including Talbot Green) is an area in which significant new housing, employment and retail development will be accommodated. It also indicates that land for residential development to accommodate the needs of the growing population of Pontypridd will be provided in the nearby settlements of Church Village, Llantwit Fardre, Treforest and Beddau. These sites also represent attractive commuting distances to Cardiff. This is likely to put additional pressure on M4 and key routes into Cardiff which are already heavily congested at peak commuter periods– notably the A470 and A4232, particularly if the trend for commuting from RCT to Cardiff continues to grow. It is essential that new development includes appropriate public transport provision (in addition to walking and cycling) to minimise the demand for travel within the Sewta region and, particularly, to minimise commuting by car into Cardiff. This further extends to the requirements for Travel Plans, particularly for residential developments to be strengthened as a part of the development process, and to ensure the facilities to monitor and enforce these plans are in place.	
4 5	Changes sought Amend third sentence of paragraph 4.72 to include reference to park and ride in addition to park and share and also make reference to walking, cycling and need for Travel Plans Ensure that Developer Contributions Supplementary Planning Guidance is published as part of the LDP and can be accessed.	
9 7	Why no previous Representation This issue was too detailed for the preferred Strategy stage – however a general concern was raised about the potential impact of increased car commuting from RCT on the M4 and key routes into the City.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The change proposed to the Deposit Plan would enable it to better mitigate the impacts of the Plan on its neighbouring authority Cardiff and help reduce the potential impact of increased car commuting levels on the M4 and key routes into the City.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1630.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047, para.5.26				Site:										PEX Session:	
Policy: AW 5				Map:										Issue: Design	
Summary:															

Item Question	Representation Text
1 2 Issue Summary Need to strengthen requirement for Travel Plans, particularly for residential developments in the development process.	
2 3 Representation text Statistics on Commuting in Wales, 2007 (Dec 2008) figures show commuting levels from Rhondda Cynon Taf (RCT) with 16000 people working in Cardiff. According to statistics published from Annual Population Survey 2007, Cardiff has a total workforce of 196,200. Of these, 37.7% (74,000) live outside Cardiff and commute into Cardiff every day, mostly by car. The number of Cardiff residents who travel out of Cardiff to work is 25,400. The net gain to Cardiff is 48,600. The RCT Deposit LDP indicates that significant growth is focused in the South – in the Principal Town/ Growth Areas of Pontypridd and Llantrisant (including Talbot Green), the Key Settlement/ Growth Areas of Llanharan and Tonyrefail, and Strategic sites in Beddau (site 6), Mwynday/Talbot Green (site 7) and Llanharan (site 8). The LDP states that Llantrisant (including Talbot Green) is an area in which significant new housing, employment and retail development will be accommodated. It also indicates that land for residential development to accommodate the needs of the growing population of Pontypridd will be provided in the nearby settlements of Church Village, Llantwit Fardre, Treforest and Beddau. These sites also represent attractive commuting distances to Cardiff. This is likely to put additional pressure on M4 and key routes into Cardiff which are already heavily congested at peak commuter periods– notably the A470 and A4232, particularly if the trend for commuting from RCT to Cardiff continues to grow. It is essential that new development includes appropriate public transport provision (in addition to walking and cycling) to minimise the demand for travel within the Sewta region and, particularly, to minimise commuting by car into Cardiff. This further extends to the requirements for Travel Plans, particularly for residential developments to be strengthened as a part of the development process, and to ensure the facilities to monitor and enforce these plans are in place.	
4 5 Changes sought New second sentence to paragraph 5.26 to strengthen requirement for Travel Plans: In order that the transport impacts of development proposals can be objectively assessed and properly addressed, all planning applications for developments which are likely to have a significant impact on trip generation and travel demand must be accompanied by a Travel Plan.	
9 7 Why no previous Representation This issue was too detailed for the preferred Strategy stage – however a general concern was raised about the potential impact of increased car commuting from RCT on the M4 and key routes into the City.	

Item Question	Reply	Soundness Tests
12 8 C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The change proposed to the Deposit Plan would enable it to better mitigate the impacts of the Plan on its neighbouring authority Cardiff and help reduce the potential impact of increased car commuting levels on the M4 and key routes into the City.		

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1630.D3			<input type="checkbox"/>	O	W	M				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site:										PEX Session:		
Policy:				Map:										Issue: Policy Omission		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Need to include policy protecting disused railway formations from development that would compromise its future transport use.	
2 3	Representation text Planning Policy Wales seeks to safeguard from development disused railway land where there is a realistic prospect of its reuse for transport purposes in the future. The progression of the LDPs for Cardiff and Rhondda Cynon Taf (RCT) has identified the need to consider options for a new segregated public transport link along a westward corridor from Fairwater in Cardiff to Llantrisant, with a possible extension of this route to Tonyrefail in RCT. The scheme would provide an opportunity to deliver high quality and efficient public transport, walking and cycling links to enable sustainable growth in RCT, to the north west of Cardiff and to connect with the site of the proposed IBP at M4 Junction 33. In view of this the Cardiff Deposit LDP includes a policy protecting disused railway formations from development that potentially compromises its future as a segregated transport corridor. In view of this it is considered a complementary policy is needed in the RCT Deposit Plan to ensure the route of the possible segregated transport link is protected in its entirety should the scheme prove feasible at a later date.	
4 5	Changes sought Insert new policy relating to protection of disused railway formations from development that would compromise its future transport use, similar to policy included in deposit Cardiff LDP set out below POLICY TRANS5: PROTECTION OF TRANSPORT INFRASTRUCTURE Existing and disused transport infrastructure, including railway land and formations and docks land, will be protected from development that would compromise its future transport use, where re-use is a realistic prospect.	
9 7	Why no previous Representation This issue was too detailed for the preferred Strategy stage – however a general concern was raised about the potential impact of increased car commuting from RCT on the M4 and key routes into the City.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The change proposed to the Deposit Plan would ensure a joined up approach with the Cardiff Deposit LDP and ensure a possible route for a segregated public transport link is protected in its entirety.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1630.D4			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035, para.4.57				Site:				PEX Session:							
Policy: CS 6				Map:				Issue: Employment							
Summary:															

<i>Item Question</i>	<i>Representation Text</i>
2 3	Representation text Support and endorse the recognition in the paragraph of the regional economic benefits of an International Business Park at Junction 33.

<i>Item Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1630.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112			Site:			PEX Session:									
Policy: SSA 20			Map:			Issue: Transportation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Park and ride/park and share provision in the new developments listed need to be provided as a high priority.	
2 3	Representation text Statistics on Commuting in Wales, 2007 (Dec 2008) figures show commuting levels from Rhondda Cynon Taf (RCT) with 16000 people working in Cardiff. According to statistics published from Annual Population Survey 2007, Cardiff has a total workforce of 196,200. Of these, 37.7% (74,000) live outside Cardiff and commute into Cardiff every day, mostly by car. The number of Cardiff residents who travel out of Cardiff to work is 25,400. The net gain to Cardiff is 48,600. The RCT Deposit LDP indicates that significant growth is focused in the South – in the Principal Town/ Growth Areas of Pontypridd and Llantrisant (including Talbot Green), the Key Settlement/ Growth Areas of Llanharan and Tonyrefail, and Strategic sites in Beddau (site 6), Mwynday/Talbot Green (site 7) and Llanharan (site 8). The LDP states that Llantrisant (including Talbot Green) is an area in which significant new housing, employment and retail development will be accommodated. It also indicates that land for residential development to accommodate the needs of the growing population of Pontypridd will be provided in the nearby settlements of Church Village, Llantwit Fardre, Treforest and Beddau. These sites also represent attractive commuting distances to Cardiff. This is likely to put additional pressure on M4 and key routes into Cardiff which are already heavily congested at peak commuter periods– notably the A470 and A4232, particularly if the trend for commuting from RCT to Cardiff continues to grow. It is essential that infrastructure solutions are developed to mitigate the impacts on Cardiff, particularly in terms of commuter traffic from the authority area which is already substantial and is the second largest external contributor to congestion in peak hours. Hence the transport proposals contained in SSA 20 Park and Ride/Park and Share should be provided as a high priority, in collaboration with Cardiff and Sewta, in relation to the LDP and the RTP to allow for sustainable strategic growth whilst reducing the impacts of growth in terms of vehicle numbers, on the current infrastructure.	
4 5	Changes sought Reword first line of Policy SSA20 to: Provision for park and ride/park and share facilities will be provided as a high priority within the following developments:	
9 7	Why no previous Representation This issue was too detailed for the preferred Strategy stage – however a general concern was raised about the potential impact of increased car commuting from RCT on the M4 and key routes into the City.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The change proposed to the Deposit Plan would enable it to better mitigate the impacts of the Plan on its neighbouring authority Cardiff and help reduce the potential impact of increased car commuting levels on the M4 and key routes into the City.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1630.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112, para.6.172			Site:			PEX Session:									
Policy: SSA 20			Map:			Issue: Transportation									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary	Need to consider additional issues in support of park and ride/park and share facilities, particularly the need for sites to be supported by the introduction of public transport facilities, including bus priority measures on key road corridors and for developer contributions to be sought towards these measures.	
2 3	Representation text	<p>Statistics on Commuting in Wales, 2007 (Dec 2008) figures show commuting levels from Rhondda Cynon Taff (RCT) with 16000 people working in Cardiff. According to statistics published from Annual Population Survey 2007, Cardiff has a total workforce of 196,200. Of these, 37.7% (74,000) live outside Cardiff and commute into Cardiff every day, mostly by car. The number of Cardiff residents who travel out of Cardiff to work is 25,400. The net gain to Cardiff is 48,600.</p> <p>The RCT Deposit LDP indicates that significant growth is focused in the South – in the Principal Town/ Growth Areas of Pontypridd and Llantrisant (including Talbot Green), the Key Settlement/ Growth Areas of Llanharan and Tonyrefail, and Strategic sites in Beddau (site 6), Mwynday/Talbot Green (site 7) and Llanharan (site 8).</p> <p>The LDP states that Llantrisant (including Talbot Green) is an area in which significant new housing, employment and retail development will be accommodated. It also indicates that land for residential development to accommodate the needs of the growing population of Pontypridd will be provided in the nearby settlements of Church Village, Llantwit Fardre, Treforest and Beddau. These sites also represent attractive commuting distances to Cardiff.</p> <p>This is likely to put additional pressure on M4 and key routes into Cardiff which are already heavily congested at peak commuter periods– notably the A470 and A4232, particularly if the trend for commuting from RCT to Cardiff continues to grow.</p> <p>In order to help combat this the park and ride/park and share facilities, need to be supported by the introduction of public transport facilities, including bus priority measures on key road corridors and for developer contributions to be sought towards these measures.</p>	
4 5	Changes sought	Add additional sentence to paragraph 6.172 highlighting the need for each site to be supported by bus priority measures and the need to seek contributions from developers towards the cost of such measures.	
9 7	Why no previous Representation	This issue was too detailed for the preferred Strategy stage – however a general concern was raised about the potential impact of increased car commuting from RCT on the M4 and key routes into the City.	
Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	The change proposed to the Deposit Plan would enable it to better mitigate the impacts of the Plan on its neighbouring authority Cardiff and help reduce the potential impact of increased car commuting levels on the M4 and key routes into the City.	

Item	Question	Reply	Tick box Replies
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REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

1632.D1 C W M

Document: Deposit Draft Site: PEX Session:

Policy: Map: Issue: Habitat Regulations Assessment

Summary:

Item	Question	Representation Text
1	2	Issue Summary Draws attention to the requirements of Regulation 85 of the Habitats Regulations.
2	3	Representation text Executive summary Paragraph 0.2 We particularly draw your attention to the requirements of regulation 85 of the Regulations and the necessity to demonstrate, after consultation, how the assessment has been amended to take on board the comments made by CCW and, how they are to be incorporated into the plan itself. This amended record of the assessment will then form part of the suite of documents submitted to the inspector. It should also note that where the assessment for particular policies has been deferred to lower tier plans or project implementation, this needs to be clearly justified. In addition, the Assessment should also acknowledge the authority's general duties to have regard to the manner in which the plan would be carried out, and to any conditions or restrictions which could avoid adverse impacts on the European site(s) (Regulation 48(6) of the Conservation (Natural Habitats &c) Regulations 1994). Given both of these points, it is clear that the RCT Local Development Plan will need to continue to make reference to the Habitats Regulations regardless of the completion of this element of the HRA process.

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D2			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft				Site:								PEX Session:			
Policy:				Map:								Issue: Habitat Regulations Assessment			
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Assessment of impacts of the LDP on SAC lying outside the plan area.		
2 3	Representation text 2.0 Method Paragraph 2.3 In general, CCW commends RCT on the positive iterative way it has approached the HRA process. We agree with Blaencynon SAC being identified as requiring further appropriate assessment but we are still unclear why some European and international sites outside the County boundary were excluded on the basis of an arbitrary 5km "buffer zone". This is inappropriate and, as illustrated in the evaluation of significant effects on the Cardiff Beech Woods SAC, artificially excludes potential impacts from the Plan on sites considerably further afield. For example, the plan will require additional water resources, some of which may come from designated SAC Rivers such as the Usk and Wye. While we are not suggesting that the screening exercise is repeated, it would be a suitably precautionary approach for the local authority to satisfy itself that there are no impacts on these sites inherent to the plan.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

1632.D3		<input type="checkbox"/>	C	W	M			<input type="checkbox"/>							
Document:Deposit Draft				Site:								PEX Session:			
Policy:				Map:								Issue: Habitat Regulations Assessment			
Summary:															
Item	Question	Representation Text													
1 2	Issue Summary Impact of LDP on Cardiff Beech Woods SAC.														
2 3	Representation text 3.0 Re-screening of Cardiff Beech Woods SAC. Paragraph 3.3 While we agree that, when considered alone, the proposals contained within the RCT LDP are unlikely to have a significant effect through increased recreation pressure on the Cardiff Beech Woods SAC, we feel this is primarily due to the provision of adequate alternatives supported and encouraged by the plans various health, access and biodiversity polices. We do not feel that the distance limitation is a valid justification, as while it states that 49% of recreational visits involve journeys less than 4.7 km, the corollary is that 51% of journeys are over this distance which might include considerable new developments identified in the plan.														
Item	Question	Reply	Tick box Replies												
3 4	Seek changes? Any changes to be made to the Plan?	No													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D4			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft						Site:								PEX Session:	
Policy:				Map:										Issue: Habitat Regulations Assessment	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary In-combination effects of adjoining plans on Cardiff Beech Woods SAC.	
2 3	Representation text 3.0 Re-screening of Cardiff Beech Woods SAC. Paragraph 3.4 There may be in-combination effects relating to recreational impacts on the site from, for example, visitors from Cardiff City Council and Caerphilly CBC areas. It is unclear how the plan could be effectively amended to avoid such in-combination effects, as the main points of concern are outwith the plan area (Castell Coch and Cwm Nofydd), thus making obvious mitigation measures, such as implementing effective visitor management, beyond the scope of the plan. We, therefore, concur with the assessment within the report in relation to this aspect.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D5			<input type="checkbox"/>	O	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft						Site:								PEX Session:	
Policy:				Map:										Issue: Habitat Regulations Assessment	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary CCW look forward to incorporation of a positive commitment towards implementing suitable air quality monitoring in the plan itself.	
2 3	Representation text 3.0 Re-screening of Cardiff Beech Woods SAC. Paragraph 3.5 We concur with the assessment made in relation to air quality and providing there is effective implementation of the positive sustainable transport measures. We also note the positive commitment towards implementing suitable air quality monitoring (potentially in conjunction with other competent authorities). We look forward to seeing this being incorporated in the plan itself and would welcome the opportunity to work with the Authority to re-appraise it should any negative effects be identified as a consequence of the monitoring. Providing these recommendations are complied with then we concur that the plan is unlikely to have a significant effect on the Cardiff Beech Woods SAC through the vector of increased localised air pollution.	

4 5	Changes sought Incorporation of a positive commitment towards implementing suitable air quality monitoring in the plan	
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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D6			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:	
Policy:				Map:										Issue: Habitat Regulations Assessment	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Precautionary approach to Blaen Cynon SAC		
2 3	Representation text 4.0 Appropriate Assessment – Blaen Cynon SAC CCW notes the changes made to the preferred strategy to ensure that the allocations within the deposit plan no longer include an area of the Blaencynon SAC and also incorporate certain mitigation and avoidance measures. However, as discussed below, we feel that additional measures would be appropriate to ensure the Plan takes a suitably precautionary approach to this site.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:								PEX Session:	
Policy:				Map:										Issue: Habitat Regulations Assessment	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Monitoring of impacts of plan on Blaen Cynon SAC.	
2 3	Representation text 4.0 Appropriate Assessment – Blaen Cynon SAC Paragraph 4.6 Air Quality. While it is correct that the Blaencynon Management Plan and Conservation Objectives do not currently identify air quality as a significant factor affecting the favourable condition of the marsh fritillary feature, it does have the potential to have some impact on the site, particularly as the key pollutants such as nitrogen oxides are already at or close to their critical load for the marshy grassland supporting habitat. We concur with the assessment that, providing the general policy implications are complied with in relation to air quality and sustainable transport support, there are unlikely to be significant impacts alone from the proposals within the plan. However, given the significant proposed upgrading to the trunk road network (A465 duelling) and the unknown nature of the proposed developments surrounding the site, there may be potential in-combination effects, which are likely to become more clear as our understanding of the site improves and the proposed management actions implemented. Therefore, we think it would be a suitable precautionary approach for the plan to incorporate appropriate air quality monitoring for the site to ensure that impacts over the timescale of the plan, in combination with other plans and projects, do not lead to an exceedence of the critical loads for the site and consequently lead to significant adverse effects. We look forward to seeing this being incorporated in the plan itself and would welcome the opportunity to work with the Authority to re-appraise it should any negative effects be identified as a consequence of the monitoring.	
4 5	Changes sought Incorporate into the plan air quality monitoring for Blaen Cynon SAC.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D8			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site:										PEX Session:		
Policy:				Map:										Issue: Habitat Regulations Assessment		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Hydrological impact of the plan on Blaen Cynon SAC.	
2 3	Representation text 4.0 Appropriate Assessment – Blaen Cynon SAC Paragraph 4.8 Hydrological Regime. The maintenance of the hydrological regime is critical to the favourable conservation status of the site. While it is correct to state that the site is near the headwaters of the River Cynon we are unsure of how the surface and groundwater systems within the site interact and, therefore, it is incautious to assume that abstractions from near the site will not have any impact on the water levels on the site, even if it is focused further downstream. Any abstraction associated with proposed developments within the plan should be clearly identified as needing further detailed appropriate assessment at the detailed proposal stage (ie at the lower tier planning stage). In addition, if any of the proposals are likely to require on-site abstractions as a requirement of their implementation, then this should be assessed further prior to plan adoption. This is particularly important for the developments associated with strategic site 5 and potentially employment allocation 9 and some of the housing allocation within strategic site 4. These potential impacts have been effectively identified in the assessment, however, we are unconvinced that the proposed avoidance and mitigation measures are sufficiently precautionary to ensure the framework for development that is being set by the plan will not be compromised at the project implementation stage. The addition of suitable caveats relating to water resources, site design and, potentially, monitoring should provide sufficient confidence for an assessment of no likely significant effect to be reached. We look forward to seeing these measures incorporated into the final report and plan.	
4 5	Changes sought The addition into the final [HRA] report and [LDP] plan of suitable caveats relating to water resources, site design and, potentially, monitoring for the developments associated with strategic site 5 and potentially employment allocation 9 and some of the housing allocation within strategic site 4.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D9			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site:										PEX Session:		
Policy:				Map:										Issue: Habitat Regulations Assessment		
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary Integrity of the Blaen Cynon SAC.		
2 3	Representation text 4.0 Appropriate Assessment – Blaen Cynon SAC Paragraph 4.10 Habitat loss and Fragmentation. The assessment correctly identifies the importance of suitable habitat outside the site boundary to achieving favourable conservation status for the marsh fritillary feature. We also note that, following the earlier screening and consultation exercise, development allocations proposed within the boundary of the SAC itself have been amended. The role of the assessment, therefore, is to ensure that the plan policies and allocations do not set the framework for development that may compromise the integrity of the SAC, and consequently, lead to complications, or even refusal of permission, at the detailed implementation stage. To ensure this is the case, any proposed development affecting suitable habitat to support the marsh fritillary feature (ie policy allocations NSA 14, strategic site 5; Land South of Hirwaun and Employment allocation 9 (north of Fifth Avenue, Hirwaun industrial estate)) should clearly identify the potential for adverse effects and must include clear mitigation or avoidance measures. We note that some justification is given as to why the impact from some of these developments will be lessened, however, the loss of only small areas of land may still be significant in the context of maintaining favourable conservation status. Similarly, separation of the proposed development site from the SAC needs to be considered carefully as marsh fritillaries are a mobile feature and while dispersal is limited, they can (as the assessment notes) travel up to 2km. The potential in-combination effects that may result from the proposed dualling of the A465 which will further complicate any proposed mitigation and avoidance measures.		
4 5	Changes sought Any proposed development affecting suitable habitat to support the marsh fritillary feature (ie policy allocations NSA 14, strategic site 5; Land South of Hirwaun and Employment allocation 9 (north of Fifth Avenue, Hirwaun industrial estate)) should clearly identify the potential for adverse effects and must include clear mitigation or avoidance measures.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D10			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft				Site:										PEX Session:		
Policy:				Map:										Issue: Habitat Regulations Assessment		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Avoidance and mitigation measures to protect Blaen Cynon SAC.	
2 3	Representation text 4.0 Appropriate Assessment – Blaen Cynon SAC Developing avoidance and Mitigation measures. Paragraph 4.17. We welcome and support the proposed mitigation outlined in this and the following paragraphs. However, we feel it falls somewhat short in ensuring that significant adverse effect will be avoided. Our understanding of the ecological requirements of marsh fritillaries is continuously improving, but current evidence suggests that a minimum of 50ha of suitable habitat is required and potentially as much as 100ha is desirable to ensure the maintenance of favourable conservation status. We would draw your attention to the draft report "Strategic Assessment of the Marsh Fritillary Butterfly and its Habitat in Rhondda Cynon Taff – Document Ref 2132c/1027, 2005" prepared for RCT CBC by Richard Smith on behalf of the Earth Science Partnership. This report identifies the key marsh fritillary habitat around Blaencynon and this should be used to inform and guide the mitigation and avoidance measures contained within the key policies listed above. In particular, the strategic polices should clearly state that proposed development will either avoid these key habitat areas or acknowledge the necessity for full mitigation (including like for like replacement or securing suitable habitat management of alternative areas of habitat), subject to detailed site evaluation, prior to development progressing. This will not fully address the issue of habitat fragmentation or loss of connectivity between areas of suitable habitat. However, a suitably worded change to the policies (particularly those relating to strategic site 5), along the lines indicated, should ensure that such connections are fully considered and accommodated for at the detailed project implementation stage. Providing these steps, and the ones outlined with respect to air quality and hydrology, are taken, then we feel that the overall assessment is a reasonable conclusion.	
4 5	Changes sought The draft report "Strategic Assessment of the Marsh Fritillary Butterfly and its Habitat in Rhondda Cynon Taff – Document Ref 2132c/1027, 2005" by Richard Smith on behalf of the Earth Science Partnership should be used to inform and guide the mitigation and avoidance measures contained within the key policies (ie policy allocations NSA 14, strategic site 5; Land South of Hirwaun and Employment allocation 9 (north of Fifth Avenue, Hirwaun industrial estate)). In particular, the strategic polices should clearly state that proposed development will either avoid these key habitat areas or acknowledge the necessity for full mitigation (including like for like replacement or securing suitable habitat management of alternative areas of habitat), subject to detailed site evaluation, prior to development progressing.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D12			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft 1: Introduction							Site:			PEX Session:						
Policy:				Map:			Issue: Introduction & Context									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary General comment.	
2 3	Representation text There are many instances throughout the plan where we consider proposals should be considered in the context of a number of plan policies, and not simply against the policy that might support an allocation.	
4 5	Changes sought We therefore advise that to aid use of the plan, particularly for the general public, a clear statement is set out at the beginning of the plan advising that proposals will need to be assessed in the context of the plan as a whole, and not simply against an individual policy.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D13			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft 1: Introduction							Site:			PEX Session:						
Policy:				Map:			Issue: Introduction & Context									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Para 1.13 - typo.	
2 3	Representation text ... covers an area of 424 square metres.	
4 5	Changes sought [Not specified]	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D14			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft 1: Introduction							Site:			PEX Session:						
Policy:				Map:			Issue: Introduction & Context									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Local Strategies.	
2 3	Representation text To demonstrate that the plan has considered fully its relationship with other relevant plans and strategies, CCW consider that this section should explain the plan's relationship with the development plans and strategies of adjacent authorities as well as a wider range of local strategic policies and programmes of the authority e.g. any LBAP, Local Transport Plan, Local Housing Plan (LDP Wales 2005, para. 2.9).	
4 5	Changes sought ... this section should explain the plan's relationship with the development plans and strategies of adjacent authorities as well as a wider range of local strategic policies and programmes of the authority e.g. any LBAP, Local Transport Plan, Local Housing Plan (LDP Wales 2005, para. 2.9).	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D15			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft 2: Key Issues							Site:			PEX Session:						
Policy:				Map:			Issue: Key Issues									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Key Environmental Trends.	
2 3	Representation text Information in the Deposit Plan regarding the number of SACs and SSSIs is incorrect.	
4 5	Changes sought There are 14 SSSIs and 3 SACs (Coedydd Nedd a Mellte (part) Blaen Cynon (part) Cardiff Beechwoods (part). As part of the development of the environmental evidence base (LDP Manual 2006, para. 5.4.1), CCW considers that the condition of designated sites should be provided where appropriate.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D16			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:		Deposit Draft 3: Vision and Objectives				Site:						PEX Session:			
Policy:		Map:				Issue: Vision & Objectives									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Delivering the Community Strategy Vision	
2 3	Representation text Whilst generally supporting the LDP framework proposed to deliver the Community Strategy vision, CCW consider that the framework fails to have regard to the Community Strategy's goal (Community Strategy page 15) which stems from that vision 'To protect and improve our local environment, which we value because of the growing quality of its bio-diversity, natural beauty, heritage, parks and open spaces, streetscape and architecture.'	
4 5	Changes sought To ensure the LDP is consistent with the land use element of the community strategy we therefore advise that the 3rd bullet point is amended to include natural heritage.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D17			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document:		Deposit Draft 3: Vision and Objectives				Site:						PEX Session:			
Policy:		Map:				Issue: Vision & Objectives									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary LDP Objectives: Sustainable Communities	
2 3	Representation text CCW support the principle of objectives [1 and 2].	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D18			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft 3: Vision and Objectives				Site:				PEX Session:							
Policy:				Map:				Issue: Vision & Objectives							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary LDP Objectives - Achieving Potential	
2 3	Representation text CCW support the objective [3] in principle.	

1632.D19			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document:Deposit Draft 3: Vision and Objectives				Site:				PEX Session:							
Policy:				Map:				Issue: Vision & Objectives							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary LDP Objectives - Better Quality Of Life	
2 3	Representation text CCW support the principle of the objectives [4, 5 & 6], but suggests that there should be an objective to minimise the need to travel for facilities per se and not just a requirement to reduce the need to travel by car.	
4 5	Changes sought We therefore advise that objective 6 be amended in line with Planning Policy Wales (PPW March 2002 para 2.3.2) to reduce/minimise the need to travel, especially by car.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D20			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:		Deposit Draft 3: Vision and Objectives				Site:						PEX Session:			
Policy:		Map:				Issue: Vision & Objectives									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary LDP objectives - Develop & Protect The County Borough For Future Generations	
2 3	Representation text Objective 7 - CCW supports the objective. Objective 8 – CCW supports the objective principles to protect biodiversity, focus development away from areas vulnerable to flooding, reducing energy consumption through improved design, and promoting development in Principal Towns and Key Settlements. Objective 9 - CCW support the objective in principle. Objective 10 - CCW support the principle of the objective,	
4 5	Changes sought Objective 8 - However in line with PPW (para 2.3.2), CCW consider that the objective [8] should also seek to minimise the effects of climate change, and not simply manage its effects. Furthermore, whilst supporting the principle to increase the supply of energy from renewable sources, CCW considers that the objective [8] should be amended to consider locational appropriateness. Objective 10 - but suggests that it [10] should incorporate an intention to reuse materials where appropriate.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D21			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft 4: Core Strategy				Site:										PEX Session:	
Policy:				Map:										Issue: Core Strategy	
Summary:															

Item Question	Representation Text
1 2 Issue Summary Core Strategy.	
2 3 Representation text Para 4.1 CCW has concerns about the ambitious strategy for growth proposed by the LDP and is concerned that its delivery is likely to be unrealistic during the plan period, particularly given the current economic climate, and that it will lead to the sterilisation/ blight of large areas within the county borough. As such the strategy would be contrary to LDP Wales 2005, para 1.21.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

1632.D22	<input type="checkbox"/>	O	W	M		<input type="checkbox"/>									
Document:Deposit Draft 4: Core Strategy				Site:										PEX Session:	
Policy:				Map:										Issue: Core Strategy	
Summary:															

Item Question	Representation Text
1 2 Issue Summary Core Strategy - para 4.4.	
2 3 Representation text CCW welcome the emphasis of the northern strategy on sustainable communities and halting the process of depopulation and decline. However we are concerned that delivering sustainability relates to pursuing four objectives at the same time, social progress, protection of the environment, prudent use of natural resources and the maintenance of economic development and employment, and that this fails to be reflected in the hybrid approach of the core strategy.	

We recognise that there are substantial differences between the northern and southern parts of the county. However we consider that the ultimate aim/objective for all parts of the county should be to deliver sustainable development and communities across the county as a whole. While it will require different approaches in different parts of the county to achieve this, the aim of the outcome across the county should be the same.

4 5 Changes sought
[extracted from Q3:] we consider that the ultimate aim/objective for all parts of the county should be to deliver sustainable development and communities across the county as a whole.

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1632.D23			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft 4: Core Strategy						Site:								PEX Session:	
Policy:				Map:				Issue: Core Strategy							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Core Strategy - para. 4.7.	
2 3	Representation text CCW welcome the emphasis of the northern strategy on sustainable communities and halting the process of depopulation and decline. However we are concerned that delivering sustainability relates to pursuing four objectives at the same time, social progress, protection of the environment, prudent use of natural resources and the maintenance of economic development and employment, and that this fails to be reflected in the hybrid approach of the core strategy. We recognise that there are substantial differences between the northern and southern parts of the county. However we consider that the ultimate aim/objective for all parts of the county should be to deliver sustainable development and communities across the county as a whole. While it will require different approaches in different parts of the county to achieve this, the aim of the outcome across the county should be the same.	
4 5	Changes sought [extracted from Q3:] we consider that the ultimate aim/objective for all parts of the county should be to deliver sustainable development and communities across the county as a whole.	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D24			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:		Deposit Draft 4: Core Strategy				Site:						PEX Session:			
Policy:		Map:				Issue: Core Strategy									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Core Strategy - para 4.10.		
2 3	Representation text Focusing development to achieve maximum social and economic benefits needs to be balanced with the requirement to minimise environmental impacts and reduce the emissions of greenhouse gases to produce quality, sustainable developments/settlements. As set out in the preceding paragraph, sustainable development requires an integrated approach of the four objectives, social progress, protection of the environment, prudent use of natural resources and the maintenance of economic development and employment.		
4 5	Changes sought [Extracted from Q3:] Focusing development to achieve maximum social and economic benefits needs to be balanced with the requirement to minimise environmental impacts and reduce the emissions of greenhouse gases to produce quality, sustainable developments/settlements.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D25			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>						
Document:		Deposit Draft 4: Core Strategy				Site:						PEX Session:			
Policy:		Map:				Issue: Core Strategy									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Core Strategy - para 4.17.		
2 3	Representation text We note that the Strategic sites were assessed as part of the SEA process and a number of recommendations were made with the aim of avoiding and mitigating environmental impacts. It is not clear how those recommendations have been incorporated into the LDP.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1632.D26			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft 4: Core Strategy				Site:										PEX Session:	
Policy:				Map:										Issue: Core Strategy	
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Core Strategy - para 4.19.	
2 3	Representation text CCW welcomes the recognition of the importance of balancing the need for development with the need to protect the global and local environment, but advises that such recognition and the need to deliver sustainable development should be a fundamental aim of the plan and be set out clearly at the start of the core strategy, and not relegated to the end.	
4 5	Changes sought [Extracted from Q3:] the recognition of the importance of balancing the need for development with the need to protect the global and local environment, and the need to deliver sustainable development, should be a fundamental aim of the plan and be set out clearly at the start of the core strategy, and not relegated to the end.	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D27			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030						Site:			PEX Session:						
Policy: CS 1				Map:		Issue: Strategy Areas									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comments on criteria of policy CS 1.	
2 3	Representation text Policy CS 1 - Development in the North CCW supports the broad thrust of the policy , particularly criteria 2, 3, and 6. With regard the other criteria, CCW has the following comments: Criterion 1: It is not clear how the term commercial is to be defined in this context. As well as promoting residential and commercial development Principal Towns and Key settlements should also promote other forms of development such as social and recreational facilities and uses that encourage people to use them and support the roles of Principal Towns and Key Settlements. Criterion 4: should promote sustainable regeneration schemes for the identified areas. Criterion 7: Whilst supporting the provision in Criterion 7 to protect the natural environment, CCW consider that this provision should be a 'stand-alone' criterion that is distinguished from "cultural identity". Furthermore, we advise that the policy makes provision for, where appropriate, the enhancement of natural heritage interests. CCW considers that in order to be consistent with PPW and TAN 18 Criterion 8 should promote integrated and sustainable travel provision that minimises the need to travel.	
4 5	Changes sought [Extracted from Q3:] Criterion 1: the term commercial is to be defined in this context. Principal Towns and Key settlements should also promote other forms of development such as social and recreational facilities and uses that encourage people to use them. Criterion 4: should promote sustainable regeneration schemes for the identified areas. Criterion 7: the provision in Criterion 7 to protect the natural environment should be a 'stand-alone' criterion that is distinguished from "cultural identity". The policy should make provision for, where appropriate, the enhancement of natural heritage interests. Criterion 8 should promote integrated and sustainable travel provision that minimises the need to travel.	
3 4	Seek changes? Any changes to be made to the Plan?	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D28			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.031						Site:			PEX Session:						
Policy: CS 2				Map:			Issue: Strategy Areas								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comments on the criteria of policy CS 2.	
2 3	Representation text Policy CS 2 - Development in The South See comments for paras 4.4 and 4.7 above on 'sustainable growth'. CCW supports the principle of Criteria 1, 2, 5, 6. However we consider that the scale of development proposed within the southern strategy area actively undermines the first 2 criteria of the policy. Criterion 3: CCW support the principle of the promotion of a large scale regeneration scheme at Pontypridd. Whilst we support some regeneration at Tonyrefail, we have serious concerns about some of the allocations proposed as part of the regeneration proposals, and their implications for Rhos Tonyrefail site of special scientific interest (SSSI). As such we therefore consider parts of the proposals for the area to be contrary to national legislation and guidance, and inconsistent with the test of soundness C2. Criterion 4: CCW have serious concerns about the level of growth promoted for Llantrisant/Talbot Green with the resultant coalescence that will occur between the 2 settlements, and also the impact the proposals for Mwyndy will have on the area also, resulting in further coalescence of Llantrisant/Talbot Green with Pontyclun, Henty and Miskin. Whilst supporting the provision in Criterion 7 to protect the natural environment, CCW consider that this provision should be a 'stand-alone' criterion that is distinguished from "cultural identity". Furthermore, we recommend that the policy makes provision for, where appropriate, the enhancement of natural heritage interests. CCW considers that in order to be consistent with PPW and TAN 18, Criterion 8 should promote integrated and sustainable travel provision that minimises the need to travel.	
4 5	Changes sought [Extracted from Q3:] Criterion 3: Tonyrefail, serious concerns about some of the allocations proposed. Criterion 4: serious concerns about the level of growth promoted for Llantrisant/Talbot Green and Mwyndy. The provision in Criterion 7 to protect the natural environment should be a 'stand-alone' criterion that is distinguished from "cultural identity". The policy should make provision for, where appropriate, the enhancement of natural heritage interests. Criterion 8 should promote integrated and sustainable travel provision that minimises the need to travel.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D29			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032				Site:				PEX Session:							
Policy: CS 3				Map:				Issue: Strategic Sites							
Summary:															

Item Question	Representation Text
1 2 Issue Summary Strategic sites - CCW position unchanged.	
2 3 Representation text Policy CS 3 - Strategic Sites CCW maintain our earlier comments regarding the proposed strategic sites (responses dated 11.10.06 and 21.02.2007). These are large sites and many contain significant biodiversity interest. Given the large nature of the sites there will be significant opportunities to incorporate and enhance areas of biodiversity interest within proposals that may be brought forward within these sites. This would be in line with your Authority's duties under S.40 of the NERC act. In addition we would wish to see specific guidance within the LDP relating to the need for assessment of any proposals for the Hirwaun site to take account of the proximity of the Blaen Cynon SAC and the features for which the site is of European Importance. Your Authority has a duty under Regulation 3(4) of the Conservation (Natural Habitats, &c) Regulations 1994 (as amended), which requires all local planning authorities in exercise of their functions, to have regard to the provisions of the above Directive in so far that they might be affected by those functions. This would include consideration of the presence of protected species (Regulation 38-45), and an assessment of the implications for European sites are required by regulation 48. Where proposals are unable to demonstrate that there will not be a likely significant effect upon the nearby Blaen Cynon SAC and the population of Marsh Fritillary butterflies which use the site, an appropriate assessment of the implications of the proposals for the site will need to be undertaken by your authority before you issue any consent or permission for the proposals. It is incumbent on an applicant to provide such information as your authority may reasonably require to undertake the appropriate assessment. Marsh fritillaries are dependent upon a network of available habitat and any losses of habitat in the area outside the SAC could be considered to have an adverse effect on the viability of the population centred on the SAC. Many of these points are dealt with in the HRA document, but do not seem to have been taken into account when drafting policies for the LDP.	
4 5 Changes sought [Extracted from Q3:] Given the large nature of the [strategic] sites, there will be significant opportunities to incorporate and enhance areas of biodiversity interest within proposals that may be brought forward within these sites. We would wish to see specific guidance relating to the need for assessment of any proposals for the Hirwaun [strategic] site to take account of the proximity of the Blaen Cynon SAC and the features for which the site is of European Importance.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D30			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033						Site:			PEX Session:						
Policy: CS 4				Map:		Issue: Housing Requirement									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Housing apportionment exercise.	
2 3	Representation text Policy CS 4 - Housing Requirements We note the housing apportionment exercise that has been undertaken in South East Wales in line with the requirements of Ministerial Interim Planning Policy Statement 01/2006 Housing. Whilst welcoming and supporting the drive to accommodate more housing in the valley areas in an attempt to stem the outward migration that has been evident in recent decades and regenerate those areas, CCW has serious concern about the reality of delivering the 14,850 dwellings proposed in the LDP, particularly in the light of past completion rates and the current economic climate. We are aware of other authorities in the South East Wales area that are proposing housing numbers through their LDPs higher than those agreed through the apportionment exercise. Although they realistically have more likelihood of being delivered, authorities that increase their apportionment, tend to undermine the apportionment exercise to some extent, and particularly the high figures proposed in areas that have historically seen lower completion rates than those proposed through apportionment. We therefore query how realistic such a high housing figure is, and whether it accords with test of coherence and effectiveness CE2, one of the tests of soundness of a plan.	
4 5	Changes sought Serious concern about the reality of delivering 14,850 dwellings.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D31			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:								PEX Session:	
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Concern about the less defined approach for the Northern Strategy Area.	
2 3	Representation text CCW supports the use of clear development boundaries that provide clarity for both developers and local residents where development will be permitted. We reiterate our earlier comments on the LDP Preferred Strategy about our concern at the less defined approach that is proposed for the Northern Strategy Area, where it is proposed to allow residential development adjoining settlement boundaries where appropriate. We note and welcome the comments in paragraph 6.61 in relation to Aberdare, and accept that windfall sites will come forward during the plan period. However we consider that the points raised in paragraph 6.61 are applicable to other settlements in the northern strategy area, and that ad hoc development on the edge of settlements could lead to the erosion of the character and amenity of those settlements and the countryside surrounding them. This concern is reinforced by paragraph 5.37 in the plan which identifies that because of the topography within the county, many developments, even small scale ones, are visible over considerable distances. To avoid the loss of amenity and character, extensions to settlements should therefore be assessed and planned for in a consistent manner and identified through the LDP process. We would also question how such an ad hoc approach enables adequate environmental/sustainability examination to be undertaken of possible sites, particularly their cumulative impacts on settlements and the surrounding area, as they fail to be picked up through SEA process and as they are proposed to be for 10 dwellings or less, are unlikely to require Environmental Impact Assessment.	
4 5	Changes sought See Q3 - infers a change required to bring NSA 12 into line with SSA 13.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D32			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033				Site:				PEX Session:							
Policy: CS 4				Map:				Issue: Housing Requirement							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Para. 4.45.	
2 3	Representation text CCW supports the use of clear settlement boundaries that provide certainty to both residents and developers as to where development will be permitted. CCW have serious concerns therefore with regard to the apparent less defined approach proposed for the Northern Strategy Area.	
4 5	Changes sought See Q3 - infers a change required to apply the SSA 13 approach to the Northern Strategy Area.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D33			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035		Site: 5//NSA 8 OSTR Hirwaun/Penywaun							PEX Session:							
Policy: CS 6				Map:				Issue: Employment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Employment requirement for Strategic Site 5, Hirwaun	
2 3	Representation text Policy NSA 8 - Land South of Hirwaun	
	<p>Given the proximity of the proposals to the Blaen Cynon SAC, CCW advise that specific guidance should be included within the LDP relating to the need for assessment of Likely Significant Effect on the Blaen Cynon SAC and the features for which the site is of European Importance. Your Authority has a duty under Regulation 3(4) of the Conservation (Natural Habitats, &c) Regulations 1994 (as amended), which requires all local planning authorities in exercise of their functions, to have regard to the provisions of the above Directive in so far that they might be affected by those functions. This would include consideration of the presence of protected species (Regulation 38-45), and an assessment of the implications for European sites are required by regulation 48. Where proposals are unable to demonstrate that there will not be a likely significant effect upon the nearby Blaen Cynon SAC and the population of Marsh Fritillary butterflies which use the site, an appropriate assessment of the implications of the proposals for the site will need to be undertaken by your authority before you issue any consent or permission for the site. It is incumbent on an applicant to provide such information as your authority may reasonably require to undertake the appropriate assessment. Marsh fritillaries are dependent upon a network of available habitat and any losses of habitat in the area outside the SAC could be considered to have an adverse effect on the viability of the population centred on the SAC. Whilst we recognise that advice relating to this requirement is covered by other National policy we consider that it is important to at least make reference to the constraints of the site in the LDP to ensure that potential developers are aware of the importance of the site and the requirements of the regulations that have to be satisfied when dealing with this site. CCW is also aware that this area contains a number of habitats listed in the UK Biodiversity Action Plan including, wet and dry heath, rhos pasture and marshy grassland habitats that may support marsh fritillary butterfly.</p> <p>Recently the village has experienced some residential development, acting primarily as a dormitory for Cardiff, Pontypridd, Merthyr Tydfil and Aberdare. It is important therefore that any future residential development, if it is to be sustainable, should also have associated community/daily retail services/ infrastructure developed in tandem with it, so that people are not forced to travel to Aberdare/ Merthyr for their daily living requirements. This applies similarly to the need for good integrated transport infrastructure for the area.</p> <p>Given the prominence of the site, and within its context as a gateway to the Brecon Beacons National Park and Heads of the Valley strategic project area, we advise that any future development should incorporate landscape and habitat improvements and enhancements and build on the strong public right of way network within the site.</p>	
4 5	Changes sought [Extracted from Q3:] Specific guidance should be included within the LDP relating to the need for assessment of Likely Significant Effect on the Blaen Cynon SAC and the features for which the site is of European Importance. it is important to at least make reference to the constraints of the site in the LDP. Any future residential development should also have associated community/daily retail services/ infrastructure developed in tandem with it. This applies similarly to the need for good integrated transport infrastructure for the area. Any future development should incorporate landscape and habitat improvements and enhancements and build on the strong public right of way network within the site.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?						Yes							
1632.D34				<input type="checkbox"/>	O	W	M		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.037				Site: 7//SSA 8 0STR Mwyndy				PEX Session:							
Policy: CS 7				Map:				Issue: Retail							
Summary:															

<i>Item Question</i>															Representation Text	
1	2	Issue Summary														
Retail development in Mwyndy / Talbot Green strategic site.																
2	3	Representation text														
Policy SSA 8 - Mwyndy / Talbot Green Area																
As expressed previously, we have serious concerns relating to this proposal, its major extension into open countryside and the coalescence of a number of small settlements. The allocation into open countryside and a very quiet and undisturbed valley would result in the loss of traditional field patterns and important boundary features, all of which make an important contribution to the landscape and character of the area. The area has potential for breeding Otter and other major biodiversity interests. Developers should be made aware through the policy and its reasoned justification, that biodiversity surveys will be required to be submitted in support of any application for development at the site. Clarification is sought as to where uses are proposed within the scheme, as the shading on the indicative concept plan identified in the deposit plan fails to match up with the attached key, which has proved difficult in identifying the indicative location of uses and how they reinforce and integrate with the existing principal settlement of Llantrisant/Talbot Green, and follow the sequential approach to town centre development.																
Para. 4.61.																
CCW supports and welcomes the intention to strengthen the role of retail centres in the Principal Towns and Key Settlements, and to provide retail development intended to meet local need in sustainable locations. We query however, how the retail allocation proposed for Mwyndy meets these criteria, and how it meets the sequential approach to retail allocation required by Ministerial Interim Planning Policy Statement – Planning for Retail and Town Centres (MIPPS 02/2005)?																
4	5	Changes sought														
[Extracted from Q3:]																
Developers should be made aware through the policy and its reasoned justification, that biodiversity surveys will be required to be submitted in support of any application for development at the site. Clarification is sought as to where uses are proposed within the scheme, as the shading on the indicative concept plan identified in the deposit plan fails to match up with the attached key.																
The inference is that the change sought is the deletion of proposals affecting existing countryside.																

<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?						Yes							

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D35			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038						Site:								PEX Session:	
Policy: CS 8				Map:				Issue: Transportation							
Summary:															

Item Question	Representation Text
1 2 Issue Summary Strategic transport network.	
2 3 Representation text CCW welcome the provision of public transport improvements, walking and cycling provision within the plan.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

1632.D36		<input type="checkbox"/>	O	W	M			<input type="checkbox"/>							
Document: Deposit Draft, p.039						Site: 733//CS 9.2 Hirwaun Industrial Estate								PEX Session:	
Policy: CS 9				Map:				Issue: Waste Management							
Summary:															

Item Question	Representation Text
1 2 Issue Summary Allocation of Hirwaun I E for waste management.	
2 3 Representation text CS 9.2 Hirwaun Industrial Estate. A significant area of this allocated site is of high biodiversity significance being lowland bog on deep peat deposits which act as significant CO2 sinks. As such, CCW consider that it should be safeguarded from development. This would be in line with your Authority's duty under S40 of the NERC act. In addition, this site is also situated in close proximity to the Blaen Cynon SAC and any proposals will require assessment under Regulation 48 of the Habitats regulations. The critical loads for Nitrogen and acid deposition within the vicinity of the SAC are already being exceeded. Processes that add further concentrations to these loadings are unlikely to be acceptable at this location, and we therefore query how realistic the proposal for waste disposal is at this site?	

Item Question	Reply	Tick box Replies
4 5 Changes sought Hirwaun I E should be safeguarded from development.		
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D37			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040						Site:								PEX Session:	
Policy: CS 10				Map:				Issue: Minerals							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comments on Mineral policy criteria.	
2 3	Representation text Policy CS 10 - Minerals CCW supports the policy in principle, but recommends amending criteria 3 and 4 as follows. Criterion 3. This assumes that the working of the mineral will be encouraged at any cost. Recommend that an additional statement is added to the criterion to the effect that working of the resource will be encouraged subject to limiting environmental and residential impacts to acceptable levels. Criterion 4. Delete "adequate", and replace with "appropriate". Para. 4.81- CCW supports the clarification of the need to balance the need for extraction against other material considerations.	
4 5	Changes sought [Extracted from Q3:] Criterion 3. Additional statement added to the criterion to the effect that working of the resource will be encouraged subject to limiting environmental and residential impacts to acceptable levels. Criterion 4. Delete "adequate", and replace with "appropriate".	
3 4	Seek changes? Any changes to be made to the Plan?	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D38			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041							Site:			PEX Session:					
Policy: CS 11				Map:			Issue: Climate Change								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comments on Climate Change criteria.	
2 3	Representation text CCW broadly supports the policy, however we suggest amending criterion A)1 to clarify the baseline for C02 reduction, and promoting development proposals that minimise the need to travel. CCW recommends that criterion 3 promotes the re-use of existing materials where appropriate. CCW suggests incorporating biodiversity considerations and opportunities into design requirements aimed at mitigating and adapting to climate change effects e.g. the 'urban forestry' concept, green roofs and incorporation of ecological connectivity within developments.	
4 5	Changes sought [Extracted from Q3:] Criterion A)1 should clarify the baseline for C02 reduction, and promoting development proposals that minimise the need to travel. Criterion A)3 should promote the re-use of existing materials where appropriate. Policy should incorporate biodiversity considerations and opportunities into design requirements aimed at mitigating and adapting to climate change effects e.g. the 'urban forestry' concept, green roofs and incorporation of ecological connectivity within developments.	
3 4	Seek changes? Any changes to be made to the Plan?	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1632.D39			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.043				Site:				PEX Session:							
Policy: AW 1				Map:				Issue: Housing Requirement							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Comment on AW 1.	
2 3	Representation text Notwithstanding our serious concerns about the number of houses proposed to be allocated during the plan period (see comments for Policy CS4), CCW support the broad principles of the policy.	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1632.D40			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.045							Site:			PEX Session:							
Policy: AW 2				Map:			Issue: Design										
Summary:																	

Item	Question	Representation Text	
1 2	Issue Summary Comments on AW 2.		
2 3	Representation text CCW support the principle of policy criteria 2, 6, 9. With regard to Criterion 1; CCW supports the use of clear settlement boundaries that provide certainty to both residents and developers as to where development will be permitted. CCW have serious concerns therefore with regard to the apparent less defined approach proposed for the Northern Strategy Area. Criterion 3: Whilst we welcome and support the criterion for accessibility by a range of travel options, CCW suggest that this could be strengthened by inserting at the beginning of the criterion, 'Minimises the need to travel and has.....' Criterion 4: CCW support the principle of the policy but recommend that it is strengthened to have good access to key services and facilities by means other than the car. Whilst welcoming the broad objective of Criterion 8, CCW considers that it should be amended to protect the integrity of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites.		
4 5	Changes sought [Extracted from Q3:] Criterion 1: settlement boundaries: serious concerns with regard to the less defined approach for the Northern Strategy Area. Criterion 3: could be strengthened by inserting at the beginning of the criterion, 'Minimises the need to travel and has.....' Criterion 4: recommend that it is strengthened to have good access to key services and facilities by means other than the car. Criterion 8: amend to protect the INTEGRITY of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D41			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.045				Site:										PEX Session:	
Policy: AW 3				Map:										Issue: Affordable Housing	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 3.	
2 3	Representation text Whilst supporting policy criteria 1, 3, CCW advise that the policy should be amended so that proposals will be considered favourably, subject to them meeting all other criteria against which a housing development would be judged (Ministerial Interim Planning Policy Statement (MIPPS) 01/2006 – Housing, para. 9.2.22). We advise that policy criterion 4 should be amended to enable the protection of the integrity of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites. [NB apparent duplication:] CCW considers that the policy should be amended so that proposals will be considered favourably, subject to them meeting all other criteria against which a housing development would be judged (Ministerial Interim Planning Policy Statement (MIPPS) 01/2006 – Housing, para. 9.2.22).	
4 5	Changes sought [Extracted from Q3:] The policy should be amended so that proposals will be considered favourably, subject to them meeting all other criteria against which a housing development would be judged. Criterion 4 should be amended to enable the protection of the INTEGRITY of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D42			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046				Site:										PEX Session:	
Policy: AW 4				Map:										Issue: Planning Obligations	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on AW 4.		
2 3	Representation text CCW welcomes and supports the principle of the policy, particularly the intention that contributions may be sought in respect of access to natural green space, environmental and landscape improvements and nature conservation.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1632.D43			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.047							Site:			PEX Session:							
Policy: AW 5				Map:			Issue: Design										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 5.	
2 3	Representation text CCW welcomes and supports the principle of the policy, but considers that criterion 2 should be amended to make provision for, where appropriate, natural heritage enhancements. CCW supports provision in Criterion B)4 for on-site zero or low carbon equipment, for particular forms of development. However, existing material planning considerations, such as designations, may limit the appropriateness of applying uniform requirements for all areas. In such cases, CCW considers that any new on-site carbon reduction requirement should be applied in a manner that does not compromise the reason for designation. Consideration should be given to, where technical constraints prohibits achieving on-site carbon reduction targets, equivalent carbon savings to be made elsewhere. Therefore, CCW recommends amending criterion B)4: - after "more units provide" insert ", where appropriate,".	
4 5	Changes sought [Extracted from Q3:] Criterion 2 should be amended to make provision for, where appropriate, natural heritage enhancements. Criterion B)4 - after "more units provide" insert ", where appropriate,".	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D44			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047						Site:			PEX Session:						
Policy: AW 5				Map:		Issue: Design									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on para. 5.23.	
2 3	Representation text CCW welcomes the content of this paragraph, and supports the aim to ensure that new developments give careful consideration to walking and cycling links, both within and off site. Such links should where possible also provide access to natural green space, which as well as being important for biodiversity is also important for people's health and well being.	
4 5	Changes sought We therefore advise that the text is amended to incorporate the requirement for links to natural green space, or that reference is made paragraph 5.33 of the plan.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D45			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.049						Site:			PEX Session:						
Policy: AW 6				Map:		Issue: Design									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 6.	
2 3	Representation text CCW welcomes and supports the principle of the policy and the commitment to raise the standard of design within the County Borough.	
4 5	Changes sought However, we consider that a caveat should be added to the policy to state that proposals will be considered favourably, subject to them complying with other LDP policies, or a general statement added to the introduction of the plan to state that development proposals will be considered against the plan as a whole.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D46			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052						Site:								PEX Session:	
Policy: AW 7				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 7.	
2 3	Representation text CCW broadly supports the principle of the policy to protect and enhance the built environment. However we are concerned that public open space, allotments, public rights of way, bridleways and cycle tracks also exist widely in the countryside, and therefore do not sit comfortably within a policy on the built environment. We therefore suggest that they are covered by a separate policy. With regards to criterion 2 of the policy the usability of routes and their accessibility should also be taken into consideration when considering development proposals.	
4 5	Changes sought Public open space, allotments, public rights of way, bridleways and cycle tracks: suggest that they are covered by a separate policy. Criterion 2: the usability of routes and their accessibility should also be taken into consideration when considering development proposals.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D47			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052						Site:								PEX Session:	
Policy: AW 7				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on para 5.45.	
2 3	Representation text CCW welcome the recognition of registered historic landscapes within the plan.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D48			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.054							Site:		PEX Session:						
Policy: AW 8				Map:			Issue: Environment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 8.	
2 3	Representation text CCW welcome and support the inclusion of a policy aimed at providing protection for locally designated sites, and ecological networks. However, CCW recommends amending the penultimate paragraph to make provision for development proposals to also demonstrate the AVOIDANCE of likely adverse impacts on protected and priority species. CCW welcomes the clarification in paragraph 5.50 that "planning proposals that affect internationally and nationally designated sites will be assessed in accordance with National Planning Policy", however to comply with LDP Wales the LDP should contain DETAILED POLICIES for all areas where protection is essential (LDP Wales 2005, para. 2.18). CCW advise that the policy is amended to make provision for the appropriate protection and enhancement of ALL TYPES of sites designated for nature conservation, and to make provision for coherence of the Natura 2000 network. Given the relationship of the county borough to the Brecon Beacons National Park (BBNP) and your authority's duty to have regard to the purposes of conserving the natural beauty, wildlife and cultural heritage of the Park (Section 62 Environment Act 1995: PPW 5.3.4, 5.3.7) CCW advise that the policy makes reference to your duty and how this will be applied when considering proposals that could have impacts on the National Park.	
4 5	Changes sought Amend the penultimate paragraph to make provision for development proposals to also demonstrate the AVOIDANCE of likely adverse impacts on protected and priority species. Paragraph 5.50: internationally and nationally designated sites: the LDP should contain DETAILED POLICIES for all areas where protection is essential. Amend policy to make provision for the appropriate protection and enhancement of ALL TYPES of sites designated for nature conservation, and to make provision for coherence of the Natura 2000 network. Your authority's duty to have regard to the purposes of conserving the natural beauty, wildlife and cultural heritage of BBNP: the policy to make reference to your duty and how this will be applied when considering proposals that could have impacts on the National Park.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D49			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft						Site:			PEX Session:						
Policy:				Map:			Issue:								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on Proposals Map.	
2 3	Representation text While we note that a constraints map has been prepared for the plan area, we consider that the 'Proposals Map' should identify the boundaries of protected sites, including all types of designated sites as required in LDP Wales (LDP Wales 2005, para. 2.24).	
4 5	Changes sought The 'Proposals Map' should identify the boundaries of protected sites, including all types of designated sites.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D50			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.055						Site:			PEX Session:						
Policy: AW 9				Map:			Issue: Design								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 9.	
2 3	Representation text CCW considers that the policy should be amended so that proposals will be considered favourably, subject to them complying with other LDP policies, and in particular should make provision for: - the form, bulk and general design of development (including residential curtilage) to be in keeping with the local surroundings; - any proposed conversion should not lead to dispersal of activity on such a scale as to prejudice town and village vitality to be included within the policy itself, rather than placing it in the supporting text.	
4 5	Changes sought Amend policy so that proposals will be considered favourably, subject to them complying with other LDP policies, and in particular should make provision for: - the form, bulk and general design of development (including residential curtilage) to be in keeping with the local surroundings; - any proposed conversion should not lead to dispersal of activity on such a scale as to prejudice town and village vitality.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D51			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.055							Site:			PEX Session:						
Policy: AW 9				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on para 5.56.	
2 3	Representation text Whilst many buildings are important to the landscape character of the county, there are also many buildings that have a negative impact on its character. Advise that the word 'Many' is inserted at the start of the paragraph.	
4 5	Changes sought The word 'Many' inserted at the start of the paragraph.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D52			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.055							Site:			PEX Session:						
Policy: AW 9				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on para 5.58.	
2 3	Representation text Advise that 'and surrounding area' is added to the end of the first sentence after 'compatible with the existing character of the building.'	
4 5	Changes sought 'and surrounding area' added to the end of the first sentence after 'compatible with the existing character of the building.'	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D53			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.056						Site:			PEX Session:						
Policy: AW 10				Map:		Issue: Environment									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on AW 10.

2 3 Representation text
CCW supports the principle of the policy.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

1632.D54			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.057						Site:			PEX Session:						
Policy: AW 11				Map:		Issue: Employment									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on AW 11.

2 3 Representation text
CCW questions whether in the current economic climate 12 months is a sufficient length of time to market a site, before considering a change of use?

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1632.D55			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.058				Site:										PEX Session:	
Policy: AW 12				Map:										Issue: Renewable Energy/Wind farms	
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary Comment on AW 12.		
2 3	Representation text CCW supports the principle of the policy.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D56			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059						Site:								PEX Session:	
Policy: AW 13				Map:										Issue: Renewable Energy/Wind farms	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on AW 13.	
2 3	Representation text Whilst noting the provision with TAN 8 for local authorities to undertake "local refinement" within SSAs (TAN 8, para. 2.4), CCW notes that the Planning Inspector when dismissing the Hirwaun wind farm proposal described the approach adopted in the Annex D Refinement Study for SSA F as "unnecessarily restrictive" (Appeal Decision APP/L6940/A/07/2058755). Clarification is therefore required whether the refinement study has been modified since that decision? If not, we question the appropriateness of restricting the location of wind farm development to land within the refinement study. We recommend that the policy is amended accordingly. CCW further recommends that the policy should be amended to: - make provision for the protection and, where appropriate, enhancement of natural habitats and protected species; and - specifically protect the natural beauty and special qualities of the Brecon Beacons National Park	
4 5	Changes sought If the refinement study has not been modified, the policy to be amended re restricting the location of wind farm development to land within the refinement study. The policy should be amended to: - make provision for the protection and, where appropriate, enhancement of natural habitats and protected species; and - specifically protect the natural beauty and special qualities of the Brecon Beacons National Park	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D57			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060				Site:										PEX Session:	
Policy: AW 14				Map:										Issue: Minerals	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on para.s 5.79 & 5.80.	
2 3	Representation text CCW welcome and support the clarification that: - mineral safeguarding does not indicate a presumption that planning permission for their extraction; and - there may exist "significant constraints" to extraction within safeguarding areas, including environmental constraints.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

1632.D58			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.064				Site:										PEX Session:	
Policy: NSA 1				Map:										Issue: Principal Towns & Key Settlements	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 1.	
2 3	Representation text CCW supports the policy in principle, but recommends that permission for proposals should be subject to complying with other LDP policies.	
4 5	Changes sought Permission for proposals should be subject to complying with other LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D59			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.065				Site:										PEX Session:		
Policy: NSA 2				Map:										Issue: Principal Towns & Key Settlements		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 2.	
2 3	Representation text CCW supports the policy in principle, but recommends that permission for proposals should be subject to complying with other LDP policies.	
4 5	Changes sought Permission for proposals should be subject to complying with other LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D60			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.066				Site:										PEX Session:		
Policy: NSA 3				Map:										Issue: Principal Towns & Key Settlements		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 3.	
2 3	Representation text CCW supports the policy in principle, but recommends that permission for proposals should be subject to complying with other LDP policies. Given its location on the edge of the BBNP, we advise that reference to the National Park and your authority's section 62 duties under the Environment Act 1995 are included within the policy or its amplification.	
4 5	Changes sought Permission for proposals should be subject to complying with other LDP policies. Reference to the National Park and your authority's section 62 duties under the Environment Act 1995 included within the policy or its amplification.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D61			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.067		Site: 1//NSA 4 OSTR Maerdy Colliery						PEX Session:							
Policy: NSA 4		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 4.	
2 3	Representation text This is a site which we understand has been subject to ecological assessment as part of a previous land reclamation scheme and it does contain pockets of biodiversity interest. Opportunities should be taken to integrate these into any proposed development. Similarly to the Fernhill Colliery Site, this site is particularly prominent when viewed from above and the A4233 from Aberdare. Careful design and consideration of the roofscape will therefore be important with any development. Opportunity should be taken to seek footpath and cycleway improvements from the site to link into the surrounding network.	
4 5	Changes sought Pockets of biodiversity interest: opportunities should be taken to integrate these into any proposed development. Careful design and consideration of the roofscape will be important with any development. Opportunity should be taken to seek footpath and cycleway improvements from the site to link into the surrounding network.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D62			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.069		Site: 2//NSA 5						OSTR Fernhill Colliery, Blaenrhondda				PEX Session:			
Policy: NSA 5		Map:				Issue: Strategic Sites									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on NSA 5.		
2 3	Representation text This is an area of significant landscape value. Both visually and also through its inclusion in the Rhondda Landscape of Historic Interest. The site also plays a prominent role in distant views over the valley when approaching Treherbert along the A4061 from Hirwaun. Design and roofscapes will therefore be particularly important when developing this site. There is a need to build on the potential and usage of existing footpaths within the site and its proximity, and consider improving footpath and cycle links to the railway station at Treherbert.		
4 5	Changes sought Design and roofscapes will therefore be particularly important when developing this site. There is a need to build on the potential and usage of existing footpaths within the site and its proximity, and consider improving footpath and cycle links to the railway station at Treherbert.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D63			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.071		Site: 3//NSA 6 0STR Phurnacite Plant						PEX Session:							
Policy: NSA 6		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 6.	
2 3	Representation text There would appear to be many opportunities for the integration of open space, important ecological features and good cycle and walking links within any proposals on this site. Given the location of the site between Mountain Ash and Aberdare, consideration should also be given to improving cycle and walking links from the site to those two town centres and incorporating good public transport links. Given that the site occupies a position between three communities, Aberaman, Abercwmboi and Cwmbach, it is important that any development avoids their coalescence, and ensures that their individual community identities are maintained.	
4 5	Changes sought Integration of open space, important ecological features and good cycle and walking links within any proposals on this site. Improving cycle and walking links from the site to those two town centres and incorporating good public transport links. Any development to avoid coalescence, and ensure that their individual community identities are maintained.	
3 4	Seek changes? Any changes to be made to the Plan?	Reply Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D64			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.073		Site: 4//NSA 7 0STR Robertstown/Abernant							PEX Session:							
Policy: NSA 7		Map:			Issue: Strategic Sites											
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary Comment on NSA 7.		
2 3	Representation text This site contains large areas of semi natural woodland and mature trees. The river Cynon also runs through the site and this may well support otters, a European Protected Species. The site rises from the valley floor up towards Abernant, and is therefore quite important in the landscape context of the area. Development should therefore respect the site's topography, and seek to enhance the landscape and built form of the villa development on the lower part of Abernant Road. Additionally any development should seek to maintain the strong identities of Abernant and Robertstown, and prevent their coalescence. Given the proximity of the site to the town centre it is important that good cycle and pedestrian links are incorporated into any development and seek to build on the strong network of footpaths that currently cross the site and go around its perimeter, and that good public transport links are incorporated into the development.		
4 5	Changes sought Development should respect the site's topography, and seek to enhance the landscape and built form of the villa development on the lower part of Abernant Road. Any development should seek to maintain the strong identities of Abernant and Robertstown, and prevent their coalescence. Good cycle and pedestrian links to be incorporated into any development and build on the strong network of footpaths that currently cross the site and go around its perimeter. Good public transport links to be incorporated into the development.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D65			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075		Site: 5//NSA 8							OSTR Hirwaun/Penywaun			PEX Session:				
Policy: NSA 8		Map:				Issue: Strategic Sites										
Summary:																

Item	Question	Representation Text
1	2 Issue Summary Comment on NSA 8.	
2	3 Representation text Given the proximity of the proposals to the Blaen Cynon SAC, CCW advise that specific guidance should be included within the LDP relating to the need for assessment of Likely Significant Effect on the Blaen Cynon SAC and the features for which the site is of European Importance. Your Authority has a duty under Regulation 3(4) of the Conservation (Natural Habitats, &c) Regulations 1994 (as amended), which requires all local planning authorities in exercise of their functions, to have regard to the provisions of the above Directive in so far that they might be affected by those functions. This would include consideration of the presence of protected species (Regulation 38-45), and an assessment of the implications for European sites are required by regulation 48. Where proposals are unable to demonstrate that there will not be a likely significant effect upon the nearby Blaen Cynon SAC and the population of Marsh Fritillary butterflies which use the site, an appropriate assessment of the implications of the proposals for the site will need to be undertaken by your authority before you issue any consent or permission for the site. It is incumbent on an applicant to provide such information as your authority may reasonably require to undertake the appropriate assessment. Marsh fritillaries are dependent upon a network of available habitat and any losses of habitat in the area outside the SAC could be considered to have an adverse effect on the viability of the population centred on the SAC. Whilst we recognise that advice relating to this requirement is covered by other National policy we consider that it is important to at least make reference to the constraints of the site in the LDP to ensure that potential developers are aware of the importance of the site and the requirements of the regulations that have to be satisfied when dealing with this site. CCW is also aware that this area contains a number of habitats listed in the UK Biodiversity Action Plan including, wet and dry heath, rhos pasture and marshy grassland habitats that may support marsh fritillary butterfly. Recently the village has experienced some residential development, acting primarily as a dormitory for Cardiff, Pontypridd, Merthyr Tydfil and Aberdare. It is important therefore that any future residential development, if it is to be sustainable, should also have associated community/daily retail services/ infrastructure developed in tandem with it, so that people are not forced to travel to Aberdare/ Merthyr for their daily living requirements. This applies similarly to the need for good integrated transport infrastructure for the area. Given the prominence of the site, and within its context as a gateway to the Brecon Beacons National Park and Heads of the Valley strategic project area, we advise that any future development should incorporate landscape and habitat improvements and enhancements and build on the strong public right of way network within the site.	
4	5 Changes sought [Extracted from Q3:] Specific guidance should be included within the LDP relating to the need for assessment of Likely Significant Effect on the Blaen Cynon SAC and the features for which the site is of European Importance. it is important to at least make reference to the constraints of the site in the LDP. Any future residential development should also have associated community/daily retail services/ infrastructure developed in tandem with it. This applies similarly to the need for good integrated transport infrastructure for the area. Any future development should incorporate landscape and habitat improvements and enhancements and build on the strong public right of way network within the site.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
Item Question										Reply			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			

1632.D66 O W M

Document: Deposit Draft, p.077 Site: PEX Session:

Policy: NSA 9 Map: Issue: Housing Allocation

Summary:

Item	Question	Representation Text
1	2	Issue Summary Comment on NSA 9.
2	3	Representation text Policy CS 4 - Housing Requirements We note the housing apportionment exercise that has been undertaken in South East Wales in line with the requirements of Ministerial Interim Planning Policy Statement 01/2006 Housing. Whilst welcoming and supporting the drive to accommodate more housing in the valley areas in an attempt to stem the outward migration that has been evident in recent decades and regenerate those areas, CCW has serious concern about the reality of delivering the 14,850 dwellings proposed in the LDP, particularly in the light of past completion rates and the current economic climate. We are aware of other authorities in the South East Wales area that are proposing housing numbers through their LDPs higher than those agreed through the apportionment exercise. Although they realistically have more likelihood of being delivered, authorities that increase their apportionment, tend to undermine the apportionment exercise to some extent, and particularly the high figures proposed in areas that have historically seen lower completion rates than those proposed through apportionment. We therefore query how realistic such a high housing figure is, and whether it accords with test of coherence and effectiveness CE2, one of the tests of soundness of a plan.
4	5	Changes sought Serious concern about the reality of delivering 14,850 dwellings.

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D67			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.078						Site:								PEX Session:	
Policy: NSA 10				Map:				Issue: Design							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on NSA 10.		
2 3	Representation text CCW recommends that permission for proposals should be subject to those proposals complying with other LDP policies. Furthermore, in considering density levels, proposals should have regard to existing and future infrastructure, including public transport nodes and corridors, and open space/green corridors.		
4 5	Changes sought Permission for proposals should be subject to those proposals complying with other LDP policies. Density levels should have regard to existing and future infrastructure, including public transport nodes and corridors, and open space/green corridors.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D68			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.078						Site:								PEX Session:	
Policy: NSA 11				Map:				Issue: Affordable Housing							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on NSA 11.		
2 3	Representation text CCW supports the policy in principle, particularly the intention to bring a number of empty properties back into use.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1632.D69			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:								PEX Session:	
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary Comment on NSA 12.	
2 3	Representation text CCW supports the use of clear settlement boundaries that provide certainty to both residents and developers as to where development will be permitted. As is stated in our response to Policies CS4 and AW 2, CCW have concerns therefore with the approach proposed for the Northern Strategy Area. CCW considers that permission for proposals for residential development outside, but adjoining the defined settlement boundary, should be subject to those proposals complying with other LDP policies. CCW considers that criterion 8 should be amended to protect the INTEGRITY of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites.	
4 5	Changes sought Northern Strategy Area: permission for proposals for residential development outside, but adjoining the defined settlement boundary, should be subject to those proposals complying with other LDP policies. Criterion 8 should be amended to protect the INTEGRITY of designated sites, and therefore should refer to proposed development located within, near or adjacent to designated sites.	

<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D70			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.081						Site:			PEX Session:						
Policy: NSA 13				Map:		Issue: Settlement Boundary									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 13.	
2 3	Representation text CCW supports the policy in principle, and notes that the policy could contribute towards relieving pressure for development on greenfield sites. However, CCW considers that the policy should note that permission will be subject to compliance with other LDP policies.	
4 5	Changes sought Policy should note that permission will be subject to compliance with other LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D71			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.081				Site:										PEX Session:	
Policy: NSA 13				Map:										Issue: Settlement Boundary	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on para. 6.63.		
2 3	Representation text CCW notes the reference that during conversion "the presence of bats and owls may be an issue and must be thoroughly investigated". The presence of a species protected under European or UK legislation is a material consideration in the planning process. Therefore, the potential impacts that a proposed development may have on protected species should be considered at the pre-application stage and sufficient information to enable a proper assessment of this issue should be submitted with the planning application. CCW seeks further detail regarding: "the relaxation of car parking and amenity space standards".		
4 5	Changes sought The potential impacts that a proposed development may have on protected species should be considered at the pre-application stage and sufficient information submitted with the planning application. Further detail regarding: "the relaxation of car parking and amenity space standards".		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D72			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.082										Site: 674//nsa 14.2 Hirwaun Industrial Estate, Hirwaun.			PEX Session:			
Policy: NSA 14				Map:			Issue: Employment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 14.	
2 3	Representation text NSA 14.2 Land North of Fifth Avenue Hirwaun. This site is in close proximity to the Blaen Cynon SAC and any proposals will be subject to assessment under Regulation 48 of the Habitats Regulations.	
4 5	Changes sought NSA 14.2 Land North of Fifth Avenue Hirwaun. Proposals will be subject to assessment under Regulation 48 of the Habitats Regulations.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D73			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.083										Site:			PEX Session:			
Policy: NSA 16				Map:			Issue: Employment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 16.	
2 3	Representation text CCW supports the policy in principle, but recommends that support for proposals should be subject to compliance with other relevant LDP policies.	
4 5	Changes sought Support for proposals should be subject to compliance with other relevant LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D74			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.084						Site:			PEX Session:						
Policy: NSA 17				Map:		Issue: Retail									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on NSA 19.

2 3 Representation text
No comments, notwithstanding comments relating to the Hirwaun Strategic site NSA 8 above.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan? No

1632.D75			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.085						Site:			PEX Session:						
Policy: NSA 18				Map:		Issue: Retail									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on NSA 18.

2 3 Representation text
CCW supports the policy.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan? No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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1632.D76			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.086						Site:		PEX Session:							
Policy: NSA 19				Map:		Issue: Retail									
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on NSA 19.	
2 3 Representation text CCW supports the policy.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

1632.D77			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.087						Site:		PEX Session:							
Policy: NSA 20				Map:		Issue: Transportation									
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on NSA 20.	
2 3 Representation text CCW query whether all of the road schemes identified, particularly the Rhondda Fach Relief Road Extension (beyond Maerdy), are likely to be brought forward during the plan period? If there is no probability of them being implemented, we do not consider they should be included in the plan.	
4 5 Changes sought Delete road schemes not likely in plan period.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D78			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.087							Site:			PEX Session:						
Policy: NSA 21				Map:			Issue: Transportation									
Summary:																

Item Question															Representation Text		
1	2	Issue Summary															
Comment on NSA 21.																	
2	3	Representation text															
CCW support the principle of the policy.																	
Item Question															Reply	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?														No	

1632.D79			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>							
Document: Deposit Draft, p.088							Site:			PEX Session:							
Policy: NSA 22				Map:			Issue: Transportation										
Summary:																	
Item Question															Representation Text		
1	2	Issue Summary															
Comment on NSA 22.																	
2	3	Representation text															
CCW supports the principle of the policy.																	
Item Question															Reply	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?														No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D80			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088						Site:			PEX Session:						
Policy: NSA 23				Map:		Issue: Transportation									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on NSA 23.

2 3 Representation text
CCW supports in principle the provision to improve and extend the cycle network.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

1632.D81			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.089						Site:			PEX Session:						
Policy: NSA 24				Map:		Issue: Environment									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Part of comment on NSA 24.

2 3 Representation text
CCW welcomes and supports the policy. We welcome the intention to prevent the coalescence of Abernant and Cwmbach, ...

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D82			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089							Site: 4//NSA 7 0STR Robertstown/Abernant			New Site		PEX Session:				
Policy: NSA 24				Map:			Issue: Environment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Part of comment on NSA 24.	
2 3	Representation text CCW ... have serious concerns that ... measures are not proposed to prevent the coalescence of Robertstown and Abernant, particularly as the plan promotes a strategic site for the area that will result in the coalescence of both villages.	
4 5	Changes sought Green wedge between Robertstown and Abernant.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D83			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.090							Site:					PEX Session:				
Policy: NSA 25				Map:			Issue: Environment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on NSA 25.	
2 3	Representation text CCW supports the policy.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D84			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 778//NSA 26						Cynon Valley River Park			PEX Session:				
Policy: NSA 26		Map:				Issue: Environment									
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on NSA 26.	
2 3 Representation text CCW supports this policy.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	

1632.D85			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.091		Site:						PEX Session:							
Policy: NSA 27		Map:				Issue: Environment									
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on NSA 27.	
2 3 Representation text We note that a large number of land reclamation schemes have been identified. CCW are aware that a number of these sites may contain significant biodiversity interest and any proposals for reclamation should be fully assessed for their impact on biodiversity, protected species and landscape.	
4 5 Changes sought Any proposals for reclamation should be fully assessed for their impact on biodiversity, protected species and landscape.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D86			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.093						Site:								PEX Session:	
Policy: SSA 1				Map:										Issue: Principal Towns & Key Settlements	
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on SSA 1.	
2 3 Representation text CCW supports the policy in principle, however we recommend that permission should be subject to compliance with other relevant LDP policies.	
4 5 Changes sought Permission should be subject to compliance with other relevant LDP policies.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

1632.D87			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.095						Site:								PEX Session:	
Policy: SSA 3				Map:										Issue: Principal Towns & Key Settlements	
Summary:															

Item Question	Representation Text
1 2 Issue Summary Comment on SSA 3.	
2 3 Representation text As outlined for policy CS2, CCW have serious concerns about the level of growth proposed in the Llantrisant/Talbot Green area, particularly when considered in combination with the strategic proposals for Mwyndy, and the resulting coalescence and loss of character and identity that will occur between Llantrisant/Talbot Green/ Pontyclun/Hendy and Miskin.	
4 5 Changes sought Serious concerns about the level of growth proposed in the Llantrisant/Talbot Green area.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D88			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.096				Site:								PEX Session:			
Policy: SSA 4				Map:								Issue: Principal Towns & Key Settlements			
Summary:															

<i>Item Question</i>														Representation Text		
1	2	Issue Summary Comment on SSA 4.														
2	3	Representation text CCW supports the policy in principle, however we recommend that permission should be subject to compliance with other relevant LDP policies.														
4	5	Changes sought Permission should be subject to compliance with other relevant LDP policies.														
<i>Item Question</i>														<i>Reply</i>	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1632.D89			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.096							Site:			PEX Session:							
Policy: SSA 5				Map:			Issue: Principal Towns & Key Settlements										
Summary:																	

Item	Question	Representation Text	
1 2	Issue Summary Comment on SSA 5.		
2 3	Representation text Please see comments relating to housing land allocation SSA 10.2 (Trane Farm), as follows: CCW have serious concerns relating to the allocation of land within the Rhos Tonyrefail Site of Special Scientific Interest (allocations SSA 10.2, Trane Farm and SSA 10.10, land East of Hafod Wen and north of Concorde Drive, Tonyrefail) Parts of these sites are situated on land notified as part of the Rhos Tonyrefail Site of Special Scientific Interest (SSSI). We do not consider that the allocation of these sites for residential development is compatible with their natural heritage interests and their status as SSSI and consider that should the sites be developed it would result in considerable damage to the features for which the SSSI is of special interest. We therefore question the rationale and justification to promote them as allocations within the emerging Local Development Plan (LDP) given their nationally important status as an SSSI, and the serious threat that residential development would pose to the survival of their scientific interest. The Countryside and Rights of Way Act 2000 places clear responsibilities for the conservation and enhancement of SSSI on local authorities. Section 28G requires Authorities "to take reasonable steps, consistent with the proper exercise of the Authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest." The proposal to allocate these sites for residential development would result in considerable harm to the SSSI and would be a clear dereliction of your duty as laid down in law. This would result in this part of the plan being inconsistent with national policy (Planning Policy Wales, para 5.5.8) and result in part of the LDP failing one of the 'tests of soundness' which it is required to fulfil prior to adoption. CCW are extremely concerned that despite acknowledgement within the supporting text of these allocations, an allocation for development confers a certainty to landowners and developers that the principle of development is acceptable. CCW therefore object to the inclusion of these sites within the deposit Local Development Plan, as we consider that such allocations would be contrary to national legislation and planning guidance relating to the conservation and enhancement of SSSIs. As such, we consider the proposals fail the soundness test C2.		
4 5	Changes sought Deletion of SSA 10.2 Trane Farm - including education facilities under SSA 5.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D90			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.097						Site:								PEX Session:		
Policy: SSA 6				Map:										Issue: Principal Towns & Key Settlements		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 6.	
2 3	Representation text CCW supports the policy in principle, however we recommend that permission should be subject compliance with other relevant LDP policies.	
4 5	Changes sought Permission should be subject compliance with other relevant LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D91			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.098						Site: 6//SSA 7 0STR Cwm Colliery								PEX Session:		
Policy: SSA 7				Map:										Issue: Strategic Sites		
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 7.	
2 3	Representation text We are aware that much of this site has developed habitat interests on the spoil tips and that detailed ecological work has been carried out in the past. It is important that any development (as with all the sites referred to) integrates into the existing community, and establishes a good, safe network of footpath and cycle links.	
4 5	Changes sought Any development (as with all the sites referred to) to integrate into the existing community, and establishes a good, safe network of footpath and cycle links.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D92			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.100		Site: 7//SSA 8 0STR Mwyndy						PEX Session:							
Policy: SSA 8		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment on SSA 8.		
2 3	Representation text As expressed previously, we have serious concerns relating to this proposal, its major extension into open countryside and the coalescence of a number of small settlements. The allocation into open countryside and a very quiet and undisturbed valley would result in the loss of traditional field patterns and important boundary features, all of which make an important contribution to the landscape and character of the area. The area has potential for breeding Otter and other major biodiversity interests. Developers should be made aware through the policy and its reasoned justification, that biodiversity surveys will be required to be submitted in support of any application for development at the site. Clarification is sought as to where uses are proposed within the scheme, as the shading on the indicative concept plan identified in the deposit plan fails to match up with the attached key, which has proved difficult in identifying the indicative location of uses and how they reinforce and integrate with the existing principal settlement of Llantrisant/Talbot Green, and follow the sequential approach to town centre development.		
4 5	Changes sought [Extracted from Q3:] Developers should be made aware through the policy and its reasoned justification, that biodiversity surveys will be required to be submitted in support of any application for development at the site. Clarification is sought as to where uses are proposed within the scheme.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D93			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.103		Site: 8//SSA 9 0STR OCC Llanilid						PEX Session:							
Policy: SSA 9		Map:				Issue: Strategic Sites									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 9.	
2 3	Representation text CCW have similar concerns over the development of this area and the likely coalescence of Llanharry, Llanilid and Llanharan, and the Pencoed area. Cumulatively the proposals could have a major impact on landscape and biodiversity interests in the area. There are also likely to be considerable highway and traffic implications, and one would question the sustainability implications of such proposals.	
4 5	Changes sought Concerns over the development.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D94			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 680//SSA 10.2		Trane Farm, Tonyrefail		Amend site boun		PEX Session:					
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 10.	
2 3	Representation text <p>CCW have serious concerns relating to the allocation of land within the Rhos Tonyrefail Site of Special Scientific Interest (allocations SSA 10.2, Trane Farm and SSA 10.10, land East of Hafod Wen and north of Concorde Drive, Tonyrefail) Parts of these sites are situated on land notified as part of the Rhos Tonyrefail Site of Special Scientific Interest (SSSI). We do not consider that the allocation of these sites for residential development is compatible with their natural heritage interests and their status as SSSI and consider that should the sites be developed it would result in considerable damage to the features for which the SSSI is of special interest. We therefore question the rationale and justification to promote them as allocations within the emerging Local Development Plan (LDP) given their nationally important status as an SSSI, and the serious threat that residential development would pose to the survival of their scientific interest.</p> <p>The Countryside and Rights of Way Act 2000 places clear responsibilities for the conservation and enhancement of SSSI on local authorities. Section 28G requires Authorities "to take reasonable steps, consistent with the proper exercise of the Authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest."</p> <p>The proposal to allocate these sites for residential development would result in considerable harm to the SSSI and would be a clear dereliction of your duty as laid down in law. This would result in this part of the plan being inconsistent with national policy (Planning Policy Wales, para 5.5.8) and result in part of the LDP failing one of the 'tests of soundness' which it is required to fulfil prior to adoption. CCW are extremely concerned that despite acknowledgement within the supporting text of these allocations, an allocation for development confers a certainty to landowners and developers that the principle of development is acceptable. CCW therefore object to the inclusion of these sites within the deposit Local Development Plan, as we consider that such allocations would be contrary to national legislation and planning guidance relating to the conservation and enhancement of SSSIs. As such, we consider the proposals fail the soundness test C2.</p>	
4 5	Changes sought Exclusion of SSSI from SSA 10.2.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D95			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 688//SSA 10.10						Hafod Wen \ Concorde Drive, Tonyrefail				PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 10.	
2 3	Representation text CCW have serious concerns relating to the allocation of land within the Rhos Tonyrefail Site of Special Scientific Interest (allocations SSA 10.2, Trane Farm and SSA 10.10, land East of Hafod Wen and north of Concorde Drive, Tonyrefail) Parts of these sites are situated on land notified as part of the Rhos Tonyrefail Site of Special Scientific Interest (SSSI). We do not consider that the allocation of these sites for residential development is compatible with their natural heritage interests and their status as SSSI and consider that should the sites be developed it would result in considerable damage to the features for which the SSSI is of special interest. We therefore question the rationale and justification to promote them as allocations within the emerging Local Development Plan (LDP) given their nationally important status as an SSSI, and the serious threat that residential development would pose to the survival of their scientific interest. The Countryside and Rights of Way Act 2000 places clear responsibilities for the conservation and enhancement of SSSI on local authorities. Section 28G requires Authorities "to take reasonable steps, consistent with the proper exercise of the Authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest." The proposal to allocate these sites for residential development would result in considerable harm to the SSSI and would be a clear dereliction of your duty as laid down in law. This would result in this part of the plan being inconsistent with national policy (Planning Policy Wales, para 5.5.8) and result in part of the LDP failing one of the 'tests of soundness' which it is required to fulfil prior to adoption. CCW are extremely concerned that despite acknowledgement within the supporting text of these allocations, an allocation for development confers a certainty to landowners and developers that the principle of development is acceptable. CCW therefore object to the inclusion of these sites within the deposit Local Development Plan, as we consider that such allocations would be contrary to national legislation and planning guidance relating to the conservation and enhancement of SSSIs. As such, we consider the proposals fail the soundness test C2.	
4 5	Changes sought Exclusion of SSSI from SSA 10.10.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D96			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107							Site:			PEX Session:						
Policy: SSA 11				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 11.	
2 3	Representation text CCW recommends that permission for proposals should be subject to those proposals complying with other relevant LDP policies. Furthermore, in considering density levels, proposals should have regard to existing and future infrastructure, including public transport nodes and corridors, and the provision of public open space.	
4 5	Changes sought Permission for proposals should be subject to those proposals complying with other relevant LDP policies. Density levels: proposals should have regard to existing and future infrastructure, including public transport nodes and corridors, and the provision of public open space.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D97			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.107							Site:			PEX Session:						
Policy: SSA 12				Map:			Issue: Affordable Housing									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 12.	
2 3	Representation text CCW supports the policy in principle.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D98			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108						Site:						PEX Session:			
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 13.	
2 3	Representation text CCW supports the policy, but recommends that permission for proposals should be subject to those proposals complying with other relevant LDP policies.	
4 5	Changes sought Permission for proposals should be subject to those proposals complying with other relevant LDP policies.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D99			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.109						Site: 699//SSA 14.1 South of Llantrisant Business Park, Llantrisant						PEX Session:			
Policy: SSA 14				Map:				Issue: Employment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 14.1.	
2 3	Representation text Notwithstanding our concerns about the coalescence of the Llantrisant area, we support and welcome the comments in Appendix 1 that the area south of Llantrisant Business Park proposed for allocation is sited next to the Llantrisant Common and Pastures SSSI and that applications will need to demonstrate no detriment to the site.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D100			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.110						Site:			PEX Session:						
Policy: SSA 16				Map:		Issue: Retail									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
Comment on SSA 16.

2 3 Representation text
CCW supports the policy.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

1632.D101			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.110						Site:			PEX Session:						
Policy: SSA 17				Map:		Issue: Retail									
Summary:															

Item Question

Representation Text

1 2 Issue Summary
CCW supports the principle of the policy.

2 3 Representation text
CCW supports the principle of the policy.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
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1632.D102			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.111							Site:	PEX Session:								
Policy: SSA 18				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 18.	
2 3	Representation text As with Policy NSA 20, CCW query whether the road schemes are likely to come forward in the plan period? If not, we do not consider they should be included in the plan.	
4 5	Changes sought Road schemes not likely to come forward in the plan period should not be included in the plan.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D103			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.112							Site:	PEX Session:								
Policy: SSA 19				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 19.	
2 3	Representation text CCW support the principle of this policy.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D104			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112							Site:			PEX Session:						
Policy: SSA 20				Map:			Issue: Transportation									
Summary:																

Item Question

Representation Text

1 2 Issue Summary
Comment on SSA 20.

2 3 Representation text
CCW support the policy.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

1632.D105			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>						
Document: Deposit Draft, p.113							Site:			PEX Session:						
Policy: SSA 21				Map:			Issue: Transportation									
Summary:																

Item Question

Representation Text

1 2 Issue Summary
Comment on SSA 21.

2 3 Representation text
CCW supports in principle the provision to improve and extend the cycle network.

Item Question

Reply

Tick box Replies

3 4 Seek changes? Any changes to be made to the Plan?

No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D106			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113						Site:			PEX Session:						
Policy: SSA 22				Map:		Issue: Environment									
Summary:															

Item Question														Representation Text		
1	2	Issue Summary Comment on SSA 22.														
2	3	Representation text CCW supports the policy.														
Item Question														Reply	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?													No	

1632.D107			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.114						Site:			PEX Session:						
Policy: SSA 23				Map:		Issue: Environment									
Summary:															

Item Question														Representation Text		
1	2	Issue Summary Comment on SSA 23.														
2	3	Representation text CCW supports the policy.														
Item Question														Reply	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D108			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.115						Site:								PEX Session:	
Policy: SSA 24				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Comment on SSA 24.	
2 3	Representation text We note that a large number of land reclamation schemes have been identified. CCW are aware that a number of these sites may contain significant biodiversity interest and any proposals for reclamation should be fully assessed for their impact on biodiversity, protected species and landscape.	
4 5	Changes sought Any proposals for reclamation should be fully assessed for their impact on biodiversity, protected species and landscape.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

1632.D109			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>						
Document: Deposit Draft, p.108						Site: 646/655 Parc Eirin adj roundabout						Settlement Boun		PEX Session:	
Policy: SSA 13				Map:				Issue:							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Settlement boundary amendment required to exclude land notified as SSSI.	
2 3	Representation text We have noted that the settlement boundary at Parc Eirin (specifically to the south of the A4093) shown below, encompasses a small part of the Rhos Tonyrefail SSSI and we would advise that the boundary be amended to exclude the land notified as SSSI. [Map provided in original rep.]	
4 5	Changes sought Parc Eirin (specifically to the south of the A4093): boundary to be amended to exclude the land notified as SSSI. [Map provided in original rep.]	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1632.D110			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft 7: Monitoring and Review		Site:		PEX Session:											
Policy:		Map:		Issue: Monitoring Framework											
Summary:															

Item	Question	Representation Text
1	2 Issue Summary Comments on Objectives 6, 7, & 8.	
2	3 Representation text Chapter 7: Monitoring And Review Framework CCW is concerned that despite aims contained in Objective 7, the proposed monitoring and review framework does not include specific indicators or targets with regard to natural heritage. Objective 6 CCW suggests that the following indicators be used as part of the monitoring and review framework: <input type="checkbox"/> Number of urban parks and green spaces with Green Flag Awards. Objective 7 CCW suggests that the following indicators be used as part of the monitoring and review framework: <input type="checkbox"/> % of sites (of various types) in favourable condition; <input type="checkbox"/> status of NERC 2006, Section 42 species/habitats; <input type="checkbox"/> Number and area of sites (of various types e.g. SINC's and LNR) within the plan; <input type="checkbox"/> Status of BAP/ LBAP habitats and species; <input type="checkbox"/> Proportion of land under agri-environment agreement or which is in conversion to organic farming; <input type="checkbox"/> Area of greenfield land lost; <input type="checkbox"/> Area secured for natural heritage improvements through S106 agreements. Objective 8 CCW suggests that the following indicators be used as part of the monitoring and review framework: <input type="checkbox"/> % developments with Sustainable Urban Drainage Systems (SUDS); <input type="checkbox"/> No. or % homes in floodplain <input type="checkbox"/> % of new homes conforming to recognised codes for sustainable buildings <input type="checkbox"/> No. or % roads/railway lines in floodplain	

REPRESENTATION DETAIL by: Representation No

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1643.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114		Site: 830//SSA 23.8						Efail Isaf, Garth & Nantgarw Western Slopes				PEX Session:			
Policy: SSA 23		Map:						Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The land is wrongly designated a Special Landscape Area.	
2 3	Representation text Paragraph 6.180 sets out the Council's criteria derived from LANDMAP for the designation of SLAs. The land at Ffrwd Philip does not meet any of the requirements as it is low lying urban fringe land proliferated with services infrastructure that will require intrusive maintenance on occasion. For this reason the inclusion of the land conflicts with requirements of paragraph 5.3.11 of Planning Policy Wales (WAG, 2002).	
4 5	Changes sought Exclusion of the land edges in blue on the attached plan from the SLA.	
9 7	Why no previous Representation The landowners have slipped through the net of public consultation as they do not read the local press, nor were they represented by an agent at the time. The LDP process only became apparent after a casual enquiry to the planning department.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Planning Policy Wales sets out that non-statutory designations should only be applied to areas of substantive conservation value where there is a good reason to believe that normal planning policies cannot provide the necessary protection. As there is little conservation value on this land the designation is not needed (C2), nor justified (CE2).		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1643.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106							Site:	New Site			PEX Session:					
Policy: SSA 10				Map:			Issue: Housing Allocation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	There is an inadequate supply of deliverable housing sites at locations where people wish to live to achieve the identified housing aims of the plan.	
2 3	Representation text	
	Viable new housing sites must be allocated at areas of demand to prevent a scarcity of land causing local affordability problems and the displacement of economically active population to other parts of South Wales.	
4 5	Changes sought	
	Allocation of unconstrained land at Ffrwd Philip Farm, Efail Isaf under policy SSA10 for residential development. This 1.75 ha site has the capacity to yield around 50 new houses towards the overall housing target.	
9 7	Why no previous Representation	
	The landowners have slipped through the net of public consultation as they do not read the local press, nor were represented by an agent at the time. The LDP process only became apparent after a casual enquiry to the planning department.	
21 11	Why attend Examination?	
	The issue of the adequacy of housing provision is fundamental to the soundness of the plan and requires full consideration at the examination.	

Item	Question	Reply	Soundness Tests
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The inclusion of the site will help increase the supply of development land in the Llantrisant/ NW Cardiff Strategic Opportunity Area of the Wales Spatial Plan (C3), and give proper regard for the implications arising out of the proposals for an International Business Park and Junction 33 as contained with the Cardiff LDP Preferred Strategy (CE1). It is a viable site that will help to compensate for the Council's allocation of uneconomic sites (CE2).		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1643.D3			<input type="checkbox"/>		I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108				Site:				Settlement Boun		PEX Session:					
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The land should be included within the settlement boundary.	
2 3	Representation text The land is promoted as an alternative site for housng development under policy SSA10 and requires a consequential amendment to the settlement boundary for Efail Isaf.	
4 5	Changes sought Inclusion of the land edged red on the attached plan within the settlement boundary for Efail Isaf as shown.	
9 7	Why no previous Representation The landowners have slipped through the net of the public consultation as they do not read the local press, nor were they represented by an agent at the time. The LDP process only became apparent after a casual enquiry to the planning department.	
21 11	Why attend Examination? The issue of the adequacy of the housing provision in the south of the county is fundamental to the soundness of the plan and requires full consideration at the Examination.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The inclusion of the site will help increase the supply of development land in the Llantrisant/NW Cardiff Strategic Opportunity Area of the Wales Spatial Plan (C3), and give proper regard for the implications arising out of the proposals for an International Business Park at Junction 33 as contained with the Cardiff LDP preferred strategy (CE1). It is a viable site that will help to compensate for the Council's allocation of uneconomic sites (CE2).		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1663.D1			<input type="checkbox"/>	O	W	M			Yes	200	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft						Site:						New Site		PEX Session:			
Policy:				Map:						Issue: Policy Omission							
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	We wish to propose the Stelco Hardy Factory site, Blaencwm Road, Blaenrhondda as a new non strategic candidate site under the heading "Community Use"	
2 3	Representation text	
	We were not aware that we could put forward this site for inclusion in the LDP. It has not been proposed as a candidate site in the LDP. Our proposals fit extremely well into the Community Plan, satisfying Coherence and Effectiveness tests.	
4 5	Changes sought	
	Inclusion of this site in the "Community Use" category in the LDP	
9 7	Why no previous Representation	
	We were not aware we could submit the site at the earlier stages as we are not the owners. We have since been advised that we can submit it at this stage.	

Item	Question	Reply	Soundness Tests
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The land will be allocated for Community use.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1827.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077				Site: 659//NSA 9.9		Ynyscynon Farm, Cwmbach		Delete Site		PEX Session:					
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Housing development Ynyscynon Farm Cwmbach.	
2 3	Representation text Part of this site sticks out like a "sore thumb" into the green wedge between Cwmbach and Aernant. The majority of this site was designated a SINC but was cleared and the SINC status was lost. This does not bode well for SINC areas and the part of this site which juts out into the green wedge may pose a threat to the greenwedge.	
4 5	Changes sought The part of the area designated for housing which juts out into the green wedge should be removed from the list of areas designated for housing and should form part of the green wedge.	
9 7	Why no previous Representation Did not have the details then as we have in the present document.	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The changes I propose are detailed ones and do not fall into any category specified in question 8.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1827.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.060										Site: 744//AW 14.4 Coal Safeguarding and Buffer		Delete Site		PEX Session:		
Policy: AW 14				Map:				Issue: Minerals								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Safeguarding of Minerals area near Gwrhyd Farm, Abernant, Aberdare.	
2 3	Representation text There has been enough damage caused by opencase coal mining in the area from Bryn Pica to the above area since the late 1940's. Any future opencast mining for coal in this area would be highly detrimental.	
4 5	Changes sought Delete this are from the list of areas designated in the Plan for safeguarding of Minerals.	
9 7	Why no previous Representation Did not have the details then as we have in the present documents.	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The changes I propose are detailed ones and do not fall into any category specified in question 8.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1827.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.073				Site: 4//NSA 7		0STR Robertstown/Abernant		Delete Site		PEX Session:					
Policy: NSA 7		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Housing development site of present Aberdare General Hospital.	
2 3	Representation text Objective 14 states "High density housing where appropriate on parts of the hospital site." High density housing does not in my opinion tie in with statement SA2 "Sensative development of the hospital site will ensure protection of the attractive parkland setting" High density provision is at odds with this. On the plan on pafe 74 the area shaded for high density development includes the main area of trees protected by tree preservation orders including a magnificent grove of giant redwood trees. This cannot be accurate.	
4 5	Changes sought 1. Prevent any high density housing at the hospital site. 2. Alter the plan on page 74 to ensure that the areas shaded to indicate housing development do not include T.P.O areas which you agree should be retained as part of the plan.	
8 7	Previous Representation No 1827	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The changes I propose are detailed ones and do not fall into any category specified in Question 8.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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1827.D4			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039, para.4.76 - 4.78										Site: 732//CS 9.1			Bryn Pica		PEX Session:	
Policy: CS 9				Map:				Issue: Waste Management								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Waste disposal sites - Bryn Pica and Hirwaun Industrial Estate.	
2 3	Representation text	
	I object strongly (sic) to the only sites in the plan being in the Aberdare area. The other two parts of RCT namely Rhondda and Taff Ely should share the burden of refuse disposal. In addition the two sites specified are both in the extreme north of the County Borough far away from most of the populated areas. This will incur very expensive transport costs which is unacceptable from an audit point of view.	
4 5	Changes sought	
	Develop (sic) refuse disposal sites in the Rhondda and Taff Ely as well as those in the Cynon Valley.	
9 7	Why no previous Representation	
	Did not have the details then as we have in the present document.	

Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The changes I propose are detailed ones and do not fall into any category specified in Question 8.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

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1893.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site: 467/473		Hirwaun Ironworks, North		Delete Site		PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Reply	Soundness Tests
1 2	Issue Summary GLOUCESTERS SITE, HIRWAUN (NORTH IRONWORKS) DID NOT PERFORM WELL WITH CANDIDATE SITE ASSESSMENT METHODOLOGY AND WAS REJECTED BECAUSE OF ACCESS CONSTRAINTS, FLOOD RISKS AND DUE TO BEING A SINC SITE		Representation Text
2 3	Representation text SHOULD DEVELOPMENT OF GLOUCESTERS SITE NOT COME FORWARD THROUGH EXISTING CONDITION FOR ANY REASON, E.G. LAPSE, APPEAL/CONTEST THEN THE AREA SHOULD NOT BENEFIT FROM THE STATUS AFFORDED TO IT BY POLICY NSA12 FOR THE SAME REASONS GIVEN FOR REJECTION AND BECAUSE IT WOULD RESULT IN THE LOSS OF A VALUED COMMUNITY AMENITY/OPEN SPACE		
4 5	Changes sought GLOUCESTERS SITE, HIRWAUN (NORTH IRONWORKS) SHOULD BE TAKEN OUT OF RESIDENTIAL SETTLEMENT BOUNDARY AND OFF CANDIDATE SITE REGISTER		
	Item Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan THIS CHANGE WOULD POSITIVELY RESPOND TO OVER 500 REPRESENTATIONS WHICH WERE MADE BY RESIDENTS OF HIRWAUN TO THE PREFERRED STRATEGY AND BE AN ACCURATE REFLECTION OF COMMUNITY INVOLVEMENT THIS CHANGE WOULD ENSURE THAT A SITE REJECTED DURING THE CANDIDATE SITE ASSESSMENT METHODOLOGY IS NOT AFFORDED SETTLEMENT BOUNDARY STATUS UNTIL 2021		
	Item Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

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1893.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.075				Site: 5//NSA 8		OSTR Hirwaun/Penywaun				New Site		PEX Session:		
Policy: NSA 8				Map:				Issue: Strategic Sites						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	NSA8 Object to allowance of 75% phasing development before infrastructure is in place. This should be no more than 10 to 25%. There is existing lack of infrastructure. The development should not take place at all until road networks are improved to Aberdare. Development of Tower site should be for green space and / or tourism. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent. P76 Tower Map This development should not go ahead until Aberdare road links are improved. The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
																The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
																There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN
Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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1893.D3			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.079		Site: 467/473 Hirwaun Ironworks, North							Delete Site		PEX Session:						
Policy: NSA 12				Map:				Issue: Settlement Boundary									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA12 Remove Gloucesters site in Hirwaun from Settlement Boundary (as identified on Sheet 1). It failed Candidate Site Assessment so should be removed. There is possibility of planning lapsing and should therefore not exist in the settlement boundary until (if) site is developed as it is not suitable for development.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community</p>
2 3	Representation text	<p>P79 NSA12 The Gloucesters site in Hirwaun should not benefit from settlement boundary status, it should be outwith this boundary. Should the outline planning permission currently related to the site lapse, or not come to fruition due to appeal / protest / village green status, it should not be considered as an area of settlement / suitable for housing in relation to other new policies within this LDP. The Gloucesters site failed the Candidate Site Assessment, but yet still managed to gain outline planning, in complete contradiction to a number of policies within this LDP. Should the Gloucesters be built upon it will be the loss of an important community space</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

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1893.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088		Site: 754//NSA 22.2						Former railway site Hirwaun			PEX Session:				
Policy: NSA 22				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	NSA22 Rail Network, relating to Hirwaun specifically, the potential station has been given detailed planning for housing development & the other alternative is in Brecon Beacons National Park LDP as a potential site for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P 88 NSA22 Rail Network In relation to the former Train Station at Hirwaun, the land inside the settlement boundary which could have been used to develop / reopen a railway station has already been committed to housing development, with planning permission gained recently. Land opposite and outside the settlement boundary is at threat from Candidate site proposals in the Brecon Beacons LDP.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN			

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Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1893.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088				Site:								PEX Session:			
Policy: NSA 23				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary NSA23 Bridleways / access for horse riders should be considered in conjunction with cycle routes. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2	3 Representation text NSA23 Cycle Network WHAT ABOUT BRIDLEWAYS? There is little mention of bridleways in this plan, yet there are over 3,300 passported horses in RCT. There is a Bridleways group working in partnership with organisations such as the Groundwork Trust, the Local Access Forum etc, trying to build strategic routes from Caerphilly, through RCT, to Neath Port Talbot. Yet, the Council gives little attention to this. Why not create more bridleways as ANY USER (walkers, cyclists etc), are entitled to use a Bridleway, yet horse riders cannot / are not permitted (by law) to use cycle ways / footpaths. Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for. Partnership working would make far more sense than attempting to create two routes for different users across the same locations. Horse riding complies with RCT's Healthy Living and Outdoors policies etc, but horse riders are frequently being forgotten / having their existing access which they have used for over 20 years removed. NB: Horses cannot ride safely on tarmac paths, so again liaison with the British Horse Society and Briar's Bridleways will ensure safe recommended surfaces. There are certain barriers used to prevent motor cyclists which prevent horses access, so again liaison with relevant bodies to find suitable / recommended barriers, steps etc. Recommend use joined up thinking and liaison between groups to ensure access for ALL, which includes horse riders. Horse riding is prolific in RCT, yet has historically gone unnoticed due to there being sufficient access off road to go riding. However, as more and more paths (used for over 20 years), get blocked / tarmaced there will be more riders on the road causing significant hazard. I understand a lot of work has been conducted in the South of RCT, but until these paths are joined up with the North and become strategic routes, there will always be an issue as only 7% of horse owners own horse transport (we cannot ride down the A470 to access the paths South of RCT!).	
4	5 Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10	8 P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12	8 C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19	8 CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
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<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1893.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089			Site:			PEX Session:									
Policy: NSA 24			Map:			Issue: Environment									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA24 Green wedge to prevent Rhigos and Hirwaun merging should be identified Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA 24 Green Wedges Suggest identification of a Green Wedge between Hirwaun and Rhigos to prevent the two villages spreading and merging in the future.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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Rhondda Cynon Taf County Borough Council Local Development Plan

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1893.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.091		Site: 778//NSA 26 Cynon Valley River Park						PEX Session:						
Policy: NSA 26				Map:				Issue: Environment						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary NSA26 Hirwaun should benefit from the Cynon Valley River Park Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community	
2 3	Representation text NSA 26 River Park Hirwaun should benefit from the Cynon Valley River Park.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													

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1893.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030		Site: 467/473 Hirwaun Ironworks, North						Delete Site		PEX Session:				
Policy: CS 1				Map:				Issue: Strategy Areas						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	
	CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1).	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	CS1 Gloucesters site, Hirwaun: request to remove from settlement boundary. This is a designated SINC and should outline planning not come to fruition, the site should not be within the settlement boundary for future.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12	
	#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.	
	#Tower employment site to become tourism destination / green space.	
	#Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.		
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	The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													

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1893.D9			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032		Site: 711//CS 3.5 South of Hirwaun							PEX Session:							
Policy: CS 3				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary CS3 Housing settlements should not be next to busy roads (I.e. housing site in Hirwaun on both sides of newA465) Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text CS3 p32 4.37 Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aassessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1893.D10			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033		Site: 717//CS 4.3						Hirwaun (South)			PEX Session:				
Policy: CS 4				Map:				Issue: Housing Requirement							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS4 Housing Site 3 (Land South of Hirwaun) should be carefully and properly planned and integrated as has the potential to become an isolated 'suburb'.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS4</p> <p>Concern that the proposed development site south of Hirwaun will not integrate well with remainder of village due to dualling of A465. It should not act as a 'suburb'. The area should be properly integrated with the existing village and a green wedge should be designated between this settlement and Rhigos to prevent the two from merging (e.g as has happened with Trecynon and Cwmdare for example).</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

Item	Question	Reply	Tick box Replies
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Rhondda Cynon Taf County Borough Council Local Development Plan

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3	4	Seek changes? Any changes to be made to the Plan?														Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1893.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 727//CS 8.a4						Aberdare Bypass			PEX Session:				
Policy: CS 8				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059. The A4059 should be carefully planned and the 'ecit' route should not be at Croes Bytchan as there will be no direct access to new A465, thus moving rather than solving the problem, and increasing safety issues.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P38 CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059 (proposed within this LDP). The development should not take place in isolation – the surrounding infrastructure must be in place first.</p> <p>The A4059 must be carefully planned in conjunction with the A465 dualling. Currently, the A4059 is illustrated as linking from the current Aberdare bypass to the Croes Bychan junction. With the current A465 plans, this should be changed, as there will be an overbridge at Croes Bychan so no direct access to A465. This will either push traffic directly through the centre of Hirwaun village, OR via Croes Bychan which will prove extremely dangerous and could affect safety of current businesses as there is a Riding School, Livery Yard and Farms, thus many horses and slow moving vehicles which use the Croes Bychan Road. This should be reconsidered in line with the direct access to the A465 or you will just be directing the existing traffic problem elsewhere, but not solving it.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
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Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1893.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039			Site:			PEX Session:									
Policy: CS 9			Map:			Issue: Waste Management									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS9 ensure road infrastructure is sufficient. Ensure waste received is not travelling so far to reach the site that it impacts detrimentally upon RCTs carbon footprint.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS9 Waste Management</p> <p>Site at Hirwaun may be a suitable site in isolation, but will it be suitable when considered with other proposed developments in terms of additional vehicles etc. Road network and infrastructure must be improved and made sufficient to support additional heavy vehicles. There should be restrictions around the catchment area of the waste (i.e. in the locality and / or neighbouring authorities), in line with climate change policy.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

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10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1893.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040			Site:			PEX Session:									
Policy: CS 10			Map:			Issue: Minerals									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS10 We object to an opencast coalmine which will impact negatively upon the surrounding area and people. We propose the site to be used as a green space / country park or tourism employment site which will have a LONG TERM sustainable future, creating local jobs and a community benefit.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P40 CS10 Minerals We object to open cast coal mining.</p> <p>The objection is based upon social, economic and environmental grounds. There is no confidence that jobs will be provided to local people. The number of jobs created through opencast mining (as opposed to deep mining) is minimal. We are not confident of a safeguard balance in extraction of minerals. It has not been made explicit what planning gain / community benefits are being offered (if at all). What are the agreements and closure plans in terms of replacing the landscape, habitats etc to their former / current status. An open cast mine is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p> <p>The proposition if such a site opening here is already causing anxiety and stress amongst residents who are concerned about their health and wellbeing, their quality of life, the visual and airborne impacts. This coupled with the additional proposals for wind farms, housing development, road development, waste facility development is too much to bear for many people. If we are forced to have 'clean' energy from wind farms, why must we then have an open cast coalmine AND an energy from waste facility? It is acknowledged in various health impact assessment that the proposal of an individual facility / planning proposal can detriment to human health in relation to mental well being due to the stress caused by the perception of what will be built, but to impose such significant infrastructure changes all within the same area should surely be revised. Hirwaun should not bear the burden of all of RCT's energy issues. It is the largest authority in Wales, yet al;l major development in line with National strategy and strateginc / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. It is also in the Council's interest to do so, as the more heightened people's awareness of this situation, the more opposition each planning application will face. Hirwaun is not trying to diminish its responsibility but believes in fair distribution, which is not apparent in this LDP.</p> <p>If the case for the site is employment, it would be far more beneficial and sustainable, with longer term gain in terms of jobs, human health, recreation, leisure and so on, to use the proposed site as a tourism area. This would be sustainable and local people could be employed to manage, maintain, garden / landscape / provide and teach recreational activities such as fishing, canoeing, horse riding, cycling, walking, camping / accommodation, and other associated outdoor activities, provide catering facilities etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	

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19	8	CE4 Test?		Not flexible to deal with changing circumstances?											Yes
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>															
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box	Replies	
3	4	Seek changes? Any changes to be made to the Plan?											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											Yes		

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1893.D14			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:			PEX Session:						
Policy: CS 11				Map:			Issue: Climate Change								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS11 Wales has a plan to achieve One Planet Living by 2050. Some of the policies, in particular CS10 will counteract this.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	p41 CS11 Minerals extraction will lead to increased carbon dioxide (CO2), plus additional green house gas emissions. There is therefore potential for CS10 to have a detrimental effect upon CS11. Minerals extraction (as proposed for Hirwaun mountain) is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK is regulated by the Intergovernmental Panel for Climate Change (IPCC) and has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
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20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

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1893.D15			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046			Site:			PEX Session:									
Policy: AW 4			Map:			Issue: Planning Obligations									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary AW4 Bridleways / horse access must be considered. There is only talk of walkers / cyclists. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text P46 AW4 Bridleways Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

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12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														Yes

1893.D16 S W M

Document: Deposit Draft, p.054 Site: PEX Session:

Policy: AW 8 Map: Issue: Environment

Summary:

Item Question	Representation Text
1 2 Issue Summary AW8 agree that natural environment should be protected.	
2 3 Representation text AW8 States that the natural environment is to be protected and enhanced, and no permission for development on designated SINC sites – agree with this. Only permitted where not unacceptably disruptive / damaging – agree with this. However, the Gloucesters site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1893.D17			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059			Site:			PEX Session:									
Policy: AW 13			Map:			Issue: Renewable Energy/Wind farms									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	AW13 opposed to large windfarm which would be blight on landscape. This should be considered with all other applications taking place as it is too much for one community to bear having numerous large infrastructure in its locality.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	AW13 Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													
1893.D18			<input type="checkbox"/>			M			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		
Document:						Site:									PEX Session:
Policy:					Map:										
Summary:															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1899.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.075		Site: 5//NSA 8							OSTR Hirwaun/Penywaun		New Site		PEX Session:				
Policy: NSA 8				Map:				Issue: Strategic Sites									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA8 Object to allowance of 75% phasing development before infrastructure is in place. This should be no more than 10 to 25%. There is existing lack of infrastructure. The development should not take place at all until road networks are improved to Aberdare. Development of Tower site should be for green space and / or tourism.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent.</p> <p>P76 Tower Map This development should not go ahead until Aberdare road links are improved. The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.</p>
4 5	Changes sought	<p>Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

Filtered to show: (All representations)

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
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Item	Question	Reply	Tick box	Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1899.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.079				Site: 467/473		Hirwaun Ironworks, North		Delete Site		PEX Session:				
Policy: NSA 12				Map:				Issue: Settlement Boundary						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA12 Remove Gloucesters site in Hirwaun from Settlement Boundary (as identified on Sheet 1). It failed Candidate Site Assessment so should be removed. There is possibility of planning lapsing and should therefore not exist in the settlement boundary until (if) site is developed as it is not suitable for development.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community</p>
2 3	Representation text	<p>P79 NSA12</p> <p>The Gloucesters site in Hirwaun should not benefit from settlement boundary status, it should be outwith this boundary. Should the outline planning permission currently related to the site lapse, or not come to fruition due to appeal / protest / village green status, it should not be considered as an area of settlement / suitable for housing in relation to other new policies within this LDP. The Gloucesters site failed the Candidate Site Assessment, but yet still managed to gain outline planning, in complete contradiction to a number of policies within this LDP. Should the Gloucesters be built upon it will be the loss of an important community space for which the Council should provide an alternative space in the village. We propose the site at Tower Colliery, currently proposed as an employment site. This could be a green open space for all, or could provide employment via green tourism.</p>
4 5	Changes sought	<p>Remove Gloucesters Site, Hirwaun, from the Settlement Boundary.</p> <p>Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>Tower employment site to become tourism destination / green space.</p> <p>Add green wedge between Hirwaun and Rhigos.</p> <p>Add specific reference to Bridleways/horse access alongside cycle routes/walkways</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
<p>I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.</p> <p>C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf</p>																

Item	Question	Reply	Tick box	Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1899.D3			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.088		Site: 754//NSA 22.2							Former railway site Hirwaun			PEX Session:					
Policy: NSA 22				Map:				Issue: Transportation									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	NSA22 Rail Network, relating to Hirwaun specifically, the potential station has been given detailed planning for housing development & the other alternative is in Brecon Beacons National Park LDP as a potential site for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P 88 NSA22 Rail Network In relation to the former Train Station at Hirwaun, the land inside the settlement boundary which could have been used to develop / reopen a railway station has already been committed to housing development, with planning permission gained recently. Land opposite and outside the settlement boundary is at threat from Candidate site proposals in the Brecon Beacons LDP.
4 5	Changes sought	Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways

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10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
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3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1899.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088			Site:			PEX Session:									
Policy: NSA 23			Map:			Issue: Transportation									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA23 Bridleways / access for horse riders should be considered in conjunction with cycle routes. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA23 Cycle Network WHAT ABOUT BRIDLEWAYS? There is little mention of bridleways in this plan, yet there are over 3,300 passported horses in RCT. There is a Bridleways group working in partnership with organisations such as the Groundwork Trust, the Local Access Forum etc, trying to build strategic routes from Caerphilly, through RCT, to Neath Port Talbot. Yet, the Council gives little attention to this. Why not create more bridleways as ANY USER (walkers, cyclists etc), are entitled to use a Bridleway, yet horse riders cannot / are not permitted (by law) to use cycle ways / footpaths. Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for. Partnership working would make far more sense than attempting to create two routes for different users across the same locations. Horse riding complies with RCT's Healthy Living and Outdoors policies etc, but horse riders are frequently being forgotten / having their existing access which they have used for over 20 years removed. NB: Horses cannot ride safely on tarmac paths, so again liaison with the British Horse Society and Briar's Bridleways will ensure safe recommended surfaces. There are certain barriers used to prevent motor cyclists which prevent horses access, so again liaise with relevant bodies to find suitable / recommended barriers, steps etc. Recommend use joined up thinking and liaison between groups to ensure access for ALL, which includes horse riders. Horse riding is prolific in RCT, yet has historically gone unnoticed due to there being sufficient access off road to go riding. However, as more and more paths (used for over 20 years), get blocked / tarmaced there will be more riders on the road causing significant hazard. I understand a lot of work has been conducted in the South of RCT, but until these paths are joined up with the North and become strategic routes, there will always be an issue as only 7% of horse owners own horse transport (we cannot ride down the A470 to access the paths South of RCT!).	
4 5	Changes sought Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1899.D5			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089							Site:			PEX Session:						
Policy: NSA 24				Map:			Issue: Environment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary NSA24 Green wedge to prevent Rhigos and Hirwaun merging should be identified Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA 24 Green Wedges Suggest identification of a Green Wedge between Hirwaun and Rhigos to prevent the two villages spreading and merging in the future.	
4 5	Changes sought Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan	
<p>I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.</p> <p>C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf</p>																
Item Question															Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 778//NSA 26 Cynon Valley River Park						PEX Session:							
Policy: NSA 26		Map:				Issue: Environment									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA26 Hirwaun should benefit from the Cynon Valley River Park Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community	
2 3	Representation text NSA 26 River Park Hirwaun should benefit from the Cynon Valley River Park.	
4 5	Changes sought Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
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Item Question															Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030				Site: 467/473		Hirwaun Ironworks, North		Delete Site		PEX Session:					
Policy: CS 1		Map:		Issue: Strategy Areas											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1).	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	CS1 Gloucesters site, Hirwaun: request to remove from settlement boundary. This is a designated SINC and should outline planning not come to fruition, the site should not be within the settlement boundary for future.	
4 5	Changes sought	
	Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan
<p>I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.</p> <p>C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032		Site: 711//CS 3.5 South of Hirwaun						PEX Session:							
Policy: CS 3		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary CS3 Housing settlements should not be next to busy roads (I.e. housing site in Hirwaun on both sides of newA465) Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.		
2 3	Representation text CS3 p32 4.37 Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.		
4 5	Changes sought Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways		
Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
																I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.
																P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
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Item	Question											Reply	Tick box	Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1899.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033		Site: 717//CS 4.3						Hirwaun (South)		PEX Session:					
Policy: CS 4		Map:				Issue: Housing Requirement									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	CS4 Housing Site 3 (Land South of Hirwaun) should be carefully and properly planned and integrated as has the potential to become an isolated 'suburb'. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	CS4 Concern that the proposed development site south of Hirwaun will not integrate well with remainder of village due to dualling of A465. It should not act as a 'suburb'. The area should be properly integrated with the existing village and a green wedge should be designated between this settlement and Rhigos to prevent the two from merging (e.g as has happened with Trecynon and Cwmdare for example).
4 5	Changes sought	Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
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Item Question															Reply	Tick box Replies
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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

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1899.D10			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 727//CS 8.a4							Aberdare Bypass			PEX Session:				
Policy: CS 8		Map:			Issue: Transportation											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059. The A4059 should be carefully planned and the 'ecit' route should not be at Croes Bytchan as there will be no direct access to new A465, thus moving rather than solving the problem, and increasing safety issues.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P38 CS8</p> <p>The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059 (proposed within this LDP). The development should not take place in isolation – the surrounding infrastructure must be in place first.</p> <p>The A4059 must be carefully planned in conjunction with the A465 dualling. Currently, the A4059 is illustrated as linking from the current Aberdare bypass to the Croes Bychan junction. With the current A465 plans, this should be changed, as there will be an overbridge at Croes Bychan so no direct access to A465. This will either push traffic directly through the centre of Hirwaun village, OR via Croes Bychan which will prove extremely dangerous and could affect safety of current businesses as there is a Riding School, Livery Yard and Farms, thus many horses and slow moving vehicles which use the Croes Bychan Road. This should be reconsidered in line with the direct access to the A465 or you will just be directing the existing traffic problem elsewhere, but not solving it.</p>
4 5	Changes sought	<p>Remove Gloucesters Site, Hirwaun, from the Settlement Boundary.</p> <p>Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>Tower employment site to become tourism destination / green space.</p> <p>Add green wedge between Hirwaun and Rhigos.</p> <p>Add specific reference to Bridleways/horse access alongside cycle routes/walkways</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Item</i>	<i>Question</i>											<i>Reply</i>	<i>Tick box</i>	<i>Replies</i>	
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1899.D11			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039		Site: 733//CS 9.2							Hirwaun Industrial Estate			PEX Session:				
Policy: CS 9				Map:				Issue: Waste Management								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>CS9 ensure road infrastructure is sufficient. Ensure waste received is not travelling so far to reach the site that it impacts detrimentally upon RCTs carbon footprint.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS9 Waste Management</p> <p>Site at Hirwaun may be a suitable site in isolation, but will it be suitable when considered with other proposed developments in terms of additional vehicles etc. Road network and infrastructure must be improved and made sufficient to support additional heavy vehicles. There should be restrictions around the catchment area of the waste (i.e. in the locality and / or neighbouring authorities), in line with climate change policy.</p>
4 5	Changes sought	<p>Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
																I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.
																P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
																There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.
																C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf
Item	Question											Reply	Tick box	Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040				Site:								PEX Session:			
Policy: CS 10				Map:				Issue: Minerals							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary	<p>CS10 We object to an opencast coalmine which will impact negatively upon the surrounding area and people. We propose the site to be used as a green space / country park or tourism employment site which will have a LONG TERM sustainable future, creating local jobs and a community benefit.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2	3 Representation text	<p>P40 CS10 Minerals We object to open cast coal mining.</p> <p>The objection is based upon social, economic and environmental grounds. There is no confidence that jobs will be provided to local people. The number of jobs created through opencast mining (as opposed to deep mining) is minimal. We are not confident of a safeguard balance in extraction of minerals. It has not been made explicit what planning gain / community benefits are being offered (if at all). What are the agreements and closure plans in terms of replacing the landscape, habitats etc to their former / current status. An open cast mine is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p> <p>The proposition if such a site opening here is already causing anxiety and stress amongst residents who are concerned about their health and wellbeing, their quality of life, the visual and airborne impacts. This coupled with the additional proposals for wind farms, housing development, road development, waste facility development is too much to bear for many people. If we are forced to have 'clean' energy from wind farms, why must we then have an open cast coalmine AND an energy from waste facility? It is acknowledged in various health impact assessment that the proposal of an individual facility / planning proposal can detriment to human health in relation to mental well being due to the stress caused by the perception of what will be built, but to impose such significant infrastructure changes all within the same area should surely be revised. Hirwaun should not bear the burden of all of RCT's energy issues. It is the largest authority in Wales, yet al;l major development in line with National strategy and strateginc / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. It is also in the Council's interest to do so, as the more heightened people's awareness of this situation, the more opposition each planning application will face. Hirwaun is not trying to diminish its responsibility but believes in fair distribution, which is not apparent in this LDP.</p> <p>If the case for the site is employment, it would be far more beneficial and sustainable, with longer term gain in terms of jobs, human health, recreation, leisure and so on, to use the proposed site as a tourism area. This would be sustainable and local people could be employed to manage, maintain, garden / landscape / provide and teach recreational activities such as fishing, canoeing, horse riding, cycling, walking, camping / accommodation, and other associated outdoor activities, provide catering facilities etc.</p>
4	5 Changes sought	<p>Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways</p>

Item	Question	Reply	Soundness Tests
10	8 P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
12	8	C1 Test?		Does not have regard to other relevant plans, policies and strategies realting to the area or a						Yes					
15	8	C4 Test?		Toes not have regard to RCT Community Plan?						Yes					
16	8	CE1 Test?		Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth						Yes					
17	8	CE2 Test?		Not realistic and appopriates and/or not founded on robust and credible evidence?						Yes					
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
<p>I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aseessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.</p> <p>C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf</p>															

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:			PEX Session:						
Policy: CS 11				Map:			Issue: Climate Change								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS11 Wales has a plan to achieve One Planet Living by 2050. Some of the policies, in particular CS10 will counteract this.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	p41 CS11 Minerals extraction will lead to increased carbon dioxide (CO2), plus additional green house gas emissions. There is therefore potential for CS10 to have a detrimental effect upon CS11. Minerals extraction (as proposed for Hirwaun mountain) is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK is regulated by the Intergovernmental Panel for Climate Change (IPCC) and has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.	
4 5	Changes sought	
	Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
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15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1899.D14			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.046							Site:			PEX Session:							
Policy: AW 4				Map:			Issue: Planning Obligations										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary AW4 Bridleways / horse access must be considered. There is only talk of walkers / cyclists. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text P46 AW4 Bridleways Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.	
4 5	Changes sought Remove Gloucesters Site, Hirwaun, from the Settlement Boundary. Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. Tower employment site to become tourism destination / green space. Add green wedge between Hirwaun and Rhigos. Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

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10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response		
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan	
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Item	Question														Reply	Tick box	Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1899.D15			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052						Site:								PEX Session:	
Policy: AW 7				Map:				Issue: Design							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

AW7 Horse access must be considered as well as cyclists and walkers.

Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3			Representation text											
				AW7											
<p>Horses are not allowed to access walkways and cycle-routes (unless by agreement) but all users can access a bridleways. According to the National Equine Database there are 3500 horses registered in RCT but the number of dedicated bridleways is extremely low so horse riders are forced to rely on other routes. The issue in RCT is that many routes that have been traditionally used by horse riders to stay safe and off the road are now being allocated as cycle routes and barriers are being erected to stop motorbikes, which also stop horse riders from using the routes. Briars Bridleways (www.briarsbridleways.co.uk) has been working with the RCT Council parks and countryside department to ensure that suitable barriers are put up that are usable by both horses and cyclists. There is an argument for horse riders to upgrade these routes to bridleways if access is taken away as the majority of routes have been used for over 20 years. This will increase the workload of the rights of way department and is completely unnecessary if there is a joined up approach between department, consultation and consideration with horse riders, and links between other strategies i.e. RCT Rights of Way Improvement plan. Simple inexpensive options/alterations will make a big difference to horse riders such as including a horse step by the side of K-Frame barrier which will allow horse riders to continue to access the small routes that provide links between longer routes. Horse riding is a healthy pastime that is known to control weight, build healthy bones and muscles, reduce the risk of heart disease, diabetes, cancer and premature death through promoting an active lifestyle. Riding and caring for horses is known to improve self esteem, stress, anxiety & depression. According to Weight Watchers one hour horse riding actually burns more calories than an hour of aerobics. With the obesity problems in the country surely all outdoor activities should be promoted not just cycling. There is also a safety issue for horse riders when riding on the road. Motorists find horse riders a nuisance. Briars Bridleways are in the process of conducting a road safety survey for horse riders. Please find link to a report from the first batch of responses http://app.sgizmo.com/reports/37098/104893/UE4SW2J3H3F5JO2Z1LV4UXP47G569G/?ts=1237979348 I will make a final report available when the survey has been completed. You will notice that from the first 44 responses · 54.55% of people ride on the road weekly, & 29.55% daily. In the main they have to ride on the road to access off road riding, but 31.82% have no access to off road riding. · Nine of the 44 respondents (a staggering 20%) have been involved in a road traffic accident whilst horse riding. plus 68% of total respondents have had near misses and 75% of total respondents have been verbally or physically (hand gestures, objects thrown etc) abused whilst riding. · The majority of people have asked for better off road riding facilities These are just a few of the comments from the questionnaire: · My horse was hit from behind by an impatient van driver; I ended up in hospital with a fractured spine and was unable to ride for two years. The driver was taken to court and charged with driving without due care and attention. · A car was coming up behind and didn't have enough room to pass me as another car was oncoming so it caught my horses hock (back leg) · Hit by car when horse 'shied' (i.e. panicked / jumped away from whatever it was frightened of) 1 metre into road. · Waved down woman driver who was driving towards me very fast; she shouted abuse and drove past, hardly slowing at all. · Local driver came down hill from her home. Tried to pass myself & horse instead of waiting for wider area 100 yards down lane. My horse panicked at being pushed into hedge and swung towards the car. The car ended up in a ditch · Turning left at a junction with a car behind waiting to go straight on. Car came down hill towards us going too fast, slammed brakes on when they saw us causing gravel to fly up. My horse reversed at speed narrowly missing the car behind us by which point was moving forwards. Plus more and more as boy racers and large lorries use lanes as a short cut though. · On a weekly basis I am sworn at (usually two finger salute) by the boy racers who use the lanes and refuse to slow down. The workers who use it as a cut through at rush hour are just as bad and I've had engines revved behind my horse. I've had things thrown out of the window & verbal abuse and this is supposed to be fun!!! · A group of about twelve motorcyclists came up behind me and stopped because my horse was upset. One of them decided to race past causing my horse to take fright. Fortunately the others stayed back. · Every time I go riding there is a new barrier or fence put up where I have ridden for years, there is a total lack of consideration for horse riders when these barriers are put up Surely the council has a moral obligation to keep people safe whilst pursuing their pastime? Why should walkers and cyclists have access to safe off road routes but not horse riders? I am forced to ride on a 60mph road for approx 2 miles to access my nearest off road riding, on the same road there is a livery yard and a riding school, which were given planning permission by RCT Council! Adjoining counties have been developing rights of ways to include horse riders and are working to develop joined up routes between counties. There are tourism and business development opportunities associated with horse riding such as horse trekking businesses, the opportunity to develop long distance horse routes with the utilisation of local pubs/hotels to provide bed and breakfast for horse riders. These routes if developed could also be utilised by walkers and cyclists creating a holiday that can be enjoyed by all the family. The Brecon Beacons National Park has done this with some success http://www.horseridingbreconbeacons.com/about-the-national-park Caerphilly County Borough Council was awarded in London for it's efforts to provide bridleways and safe off road riding. RCT Council is the only council preventing horse riders from using the Taff Trail. Studies recently conducted by the British Horse Society and the Association of British Riding Schools show that the credit crunch has had little or no effect on people attending riding schools and trekking centres and in some cases business has increased. With a little bit of foresight this could be beneficial to the economy in RCT, especially important in the current economic climate. A handful of useful statistics in relation to Horse riding in UK is provided below. USEFUL STATISTICS TO PUT HORSE RIDING IN CONTEXT WITH CYCLING: HORSE RIDING CYCLING</p> <p>British Horse Society (BHS) Membership UK: 67,757 British Cycling (BC) Membership UK: 18,400</p> <p>BHS:- Riding Club Membership: 38,500 - Affiliated Bridleways Associations: 140 - BHS Approved Establishments: 964 of which 293 are BHS Approved Livery Yards. - Registered instructors: 2,412 BC:- 1,200 clubs affiliated - 10,000 full racing licence holders - approx 850 members are coaches - approx 1,200 licence holders are MTB riders - approx 1,900 members participate in Cyclo-Cross events - approx 600 of our licence holders are BMX riders - approx 600 our members are Cycle Speedway riders</p> <p>Percentage of the UK population who regularly horse ride (2005/06): 7% (or 4.3 Million) Percentage of the UK population who regularly cycle (2007): 10% (or 6 million)</p> <p>Economic revenue from horse riding: · £4 billion on horses and riding · £417 million on buying horses · £732 million on lessons with 35 million paid-for riding lessons taking place every year (source: BETA National Equestrian Survey 2005/6) Economic revenue from cycling: ?</p> <p>Therefore, this identifies that horse riding is also prolific and should therefore be given the same weighting as cycling when considering access / new routes etc. We are not opposed to cycling, we just want the same treatment given to horse riders.</p>															

REPRESENTATION DETAIL by: Representation No

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17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes

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 The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.

There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.

C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers.CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism.CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1899.D16			<input type="checkbox"/>	S	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.054							Site:		PEX Session:					
Policy: AW 8				Map:		Issue: Environment								
Summary:														

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
1 2	Issue Summary AW8 agree that natural environment should be protected.		
2 3	Representation text AW8 States that the natural environment is to be protected and enhanced, and no permission for development on designated SINC sites – agree with this. Only permitted where not unacceptably disruptive / damaging – agree with this. However, the Gloucesters site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.		
<i>Item</i>	<i>Question</i>	<i>Reply</i>	<i>Tick box Replies</i>
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1899.D17			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059						Site:								PEX Session:	
Policy: AW 13				Map:										Issue: Renewable Energy/Wind farms	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	AW13 opposed to large windfarm which would be blight on landscape. This should be considered with all other applications taking place as it is too much for one community to bear having numerous large infrastructure in its locality.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	AW13	
	Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.	
4 5	Changes sought	
	Remove Gloucesters Site, Hirwaun, from the Settlement Boundary.	
	Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.	
	Tower employment site to become tourism destination / green space.	
	Add green wedge between Hirwaun and Rhigos.	
	Add specific reference to Bridleways/horse access alongside cycle routes/walkways	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
<p>I have not read all the documents referred to in C or CE, so cannot make an informed decision / am only basing this on certain elements / reports I have read.</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. This plan is dated 2006 - 2021, yet major planning decisions were made based on the old LDP post 2006.</p> <p>C1 Needs to consider all stakeholders in the ROWIP (which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf), and not just cyclists and walkers. CE 1 Neighbouring authorities are planning cross-border equestrian routes to benefit local riders and enhance tourism. CE 2 So that it will come into line with the ROWIP for the County which recognises the needs of the large number of horse riders in Rhondda-Cynon-Taf</p>																
Item Question															Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D1			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.118, para.7.4		Site:										PEX Session:			
Policy:		Map:										Issue: Monitoring Framework			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Policy CS5 leads into policies NSA 11 and SSA 12 and as such should capture data which allows NSA11 and SSA12 to be monitored. Affordable homes are provided by a provision of 25% against NSA11 and 40% against SSA12 Therefore data needs to be split North and South. Affordable houses are also provided by new build Social Landlords and also older properties reused. The indicator should clarify this.	
2 3	Representation text Affordable homes are provided by a provision of 25% against NSA 11 and 40% against SSA12 Therefore data needs to be split North and South. Affordable houses are also provided by new build Social Landlords and also older properties reused. The indicator should clarify this.	
4 5	Changes sought The indicator needs to be changed.	
9 7	Why no previous Representation It was not covered by the Preferred Strategy (to which I did respond), but was included as part of the Sustainability Appraisal Targets and Indicator Consultation. See page 82 of the Sustainability Appraisals/ Strategic Environmental Assesment 2007 where my representation form covers this point and the comment noted- Indicator Amended.	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Necessary to give meaning to the relationship between the policies and the indicator.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D2			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.118, para.7.4				Site:								PEX Session:			
Policy:				Map:								Issue: Monitoring Framework			
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Rate of Development is not an Indicator of Policy CS3 aims. INDICATOR SHOULD READ: Number of house completions in Strategic Site Number of jobs created in Strategic Site During plan period.	
2 3	Representation text Rate of Development is not an Indicator of Policy CS3 aims. INDICATOR SHOULD READ: Number of house completions in Strategic Site Number of jobs created in Strategic Site During plan period.	
4 5	Changes sought The indicator needs to be changed.	
9 7	Why no previous Representation Not applicable	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The indicator will reflect the effectiveness of choosing the strategic sites under policy CS3		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D3			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.118, para.7.4				Site:										PEX Session:	
Policy:				Map:										Issue: Monitoring Framework	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Core Policy CS8 indicator 3 is not relevant to this policy. With the decline in traditional industries and the reliance on electronic data transfer, more people will be encouraged to set up businesses at home, therefore they will live and work in RCT but not travel.	
2 3	Representation text Core Policy CS8 indicator 3 is not relevant to this policy. With the decline in traditional industries and the reliance on electronic data transfer, more people will be encouraged to set up businesses at home, therefore they will live and work in RCT but not travel.	
4 5	Changes sought This indicator needs to be deleted.	
9 7	Why no previous Representation Not applicable	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The remaining 3 indicators are measures of the success of policy CS8.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D4			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.063, para.4.16		Site:		PEX Session:											
Policy:		Map:		Issue: Core Strategy											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Chapter 6- Northern Strategy Area. Building Sustainable Communities. Para 6.2 Treherbert is referred to in this paragraph as a key settlement and small settlement. Para 4.16 identifies Treherbert as a small settlement, providing a limited range of services to meet local needs.	
2 3	Representation text Chapter 6- Northern Strategy Area. Building Sustainable Communities. Para 6.2 Treherbert is referred to in this paragraph as a key settlement and small settlement. Para 4.16 identifies Treherbert as a small settlement, providing a limited range of services to meet local needs.	
4 5	Changes sought Clarification as to which category Treherbert actually fits into.	
9 7	Why no previous Representation Not applicable	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To make the information more coherent.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D5			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.145			Site:			PEX Session:									
Policy:			Map:			Issue: Appendix 4									
Summary:															

Item Question	Representation Text
1 2 Issue Summary Appendix 4- Glossary of terms OMMISION (SIC) of descritpion of the term "indicative Concept Plan" Evidence provided and attached. Copy sourced from the Internet explaining the role an indicative plan plays in the formation of the LDP.	
2 3 Representation text Appendix 4- Glossary of terms OMMISION of descritpion of the term "indicative Concept Plan" Evidence provided and attached. Copy sourced from the Internet explaining the role an indicative plan plays in the formation of the LDP.	
4 5 Changes sought "Indicative Concpet Plan" should be added to the Glossary of terms.	
9 7 Why no previous Representation An indicative concept plan was not included in the Preferred Strategy.	

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will make understanding of the plan clearer to the public.		

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1930.D6			<input type="checkbox"/>	O	W	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Document: Deposit Draft, p.2, para.2.7			Site:			PEX Session:									
Policy:			Map:			Issue: Key Issues									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Social, Economic and Environmental conflicting data. Evidence.	
2 3	Representation text Social, Economic and Environmental conflicting data. Evidence. CE2 Key social trends Bullet point 1 Populaion projected to year 2030 well outside life of plan. Bullet point 2 Population projection to year 2031 well outside life of plan. If this information was used to assist in planning for the development and use of the land within the County Borough, why has the base year been chnaged to the 2008 Index of multiple deprivation? If the reason is to provide a picture that is as up to date as possible, surely a new table should be provided as an appendix to the draft plan to advise consultees of the changes, as the table provided page 70 Delivery Agreement is WIMD 2005. The term "Welsh index of Multiple Deprivation 2008" is not included in appendiz 4- Glossary of Terms. Key Environmental trends Bullet point 3. 4.5 if the opportunity to provide more up to date information has been exercised surley the facts and figures stated in these bullet points should be changed to the latest avabile year, ie 2007/2008 especially as RCT has achieved significant progress in recycling.	
4 5	Changes sought Change points 1& 2 so they reflect the life of the plan. Clarify the use of the base year 2008 for the index. Change the waste information provided to reflect current position.	
9 7	Why no previous Representation Not applicable	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan it will show they are founded on robust and criedible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D7			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.091			Site:			PEX Session:									
Policy: NSA 27			Map:			Issue: Environment									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The strategic site former Fernhill colliery NSA 5 is not included in the list covered by the policy, But has need for major reclamation.	
2 3	Representation text	
	The strategic site former Fernhill colliery NSA 5 is not included in the list covered by the policy, But has need for major reclamation.	
	NSA 27 NSA 5 Para 6.102 "some eyesores such as mineral workings or waste sites are created with Planning Permission, subject to conditions devised to ensure restoration of the site". Policy NSA 5 clearly states; "this site is subject to a large scale reclamation scheme".	
	Even if this scheme is being undertaken by a private developer and not the Council (it is certainly not currently being done through RCT) through its Land Reclamation and Engineering Department, the site should still be listed to ensure, especially in the current economic climate, to the Community, that history will not repeat itself at this site. This site has already been subjected to at least 3 previous private attempts at reclamation over the past 20 years all resulting in unacceptable devastation, and only partial remedial works.	
	One such scheme granted by application no 54/93/0323 to Fernhill Mining (copy attached) included conditions for restoration and planting of the site including formation of lakes, to Country Park status - this never happened.	
	Therefore the site needs the added protection of being listed under the Policy to ensure that this time all Planning Conditions and Obligations are inherent and will be met in full, and the Community will not, yet again, have to resort to involving the local Council and Environment Agency (copy of Email attached) when problems occur.	
4 5	Changes sought	
	Inclusion of the Strategic Site NSA 5 Former Fernhill Colliery Site in this policy.	
9 7	Why no previous Representation	
	Not applicable	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Inclusion of the site NSA 5 will ensure all land reclamation schemes are subject to the same constraints, standards and conditions.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D8			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.043, para.5.2				Site:				PEX Session:							
Policy: AW 1				Map:				Issue: Housing Requirement							
Summary:															

Item	Question	Representation Text
1	2	Issue Summary The statement 5.2 Each policy is shown in bold followed by justification and expansion of the preferred policy Approach. Please see attached sheet outlining suggestion.
2	3	Representation text The statement 5.2 Each policy is shown in bold followed by justification and expansion of the preferred policy Approach. Please see attached sheet outlining suggestion. Q3 Justification attached to policy AW1 The Justification following the policy in bold lettering has no paragraph number so cannot be referred to in that manner. Surely the logical sequence of the justification should be: The contents of paragraph 5.3 omitting the last sentence The first sentence of the unnumbered paragraph The last sentence of paragraph 5.3 It would then read, "in accordance with the guidance contained in paragraph 9.2.2 of the Ministerial Interim Planning Policy Statement, the Council in partnership with the other 10 authorities in South East Wales has been involved in the process of apportioning housing land requirement for the region. Population projections indicate the number of households in South East Wales will increase by 108,900 between 2003 and 2023. The housing requirement figure in Policy CS4 accords with the agreed housing apportionment for South East Wales". The next paragraph should start with the sentence which commences with the words "in order to accommodate this growth..."

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4	5			Changes sought											
<p>Q3 Justification attached to policy AW1</p> <p>The Justification following the policy in bold lettering has no paragraph number so cannot be referred to in that manner.</p> <p>Surely the logical sequence of the justification should be:</p> <p>The contents of paragraph 5.3 omitting the last sentence The first sentence of the unnumbered paragraph The last sentence of paragraph 5.3</p> <p>It would then read, "in accordance with the guidance contained in paragraph 9.2.2 of the Ministerial Interim Planning Policy Statement, the Council in partnership with the other 10 authorities in South East Wales has been involved in the process of apportioning housing land requirement for the region. Population projections indicate the number of households in South East Wales will increase by 108,900 between 2003 and 2023. The housing requirement figure in Policy CS4 accords with the agreed housing apportionment for South East Wales".</p> <p>The next paragraph should start with the sentence which commences with the words "in order to accommodate this growth..."</p>															

9 7 Why no previous Representation
 Not covered in the Preferred Strategy.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Soundness Tests
16	8 CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20	9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan As is stands the justification does not set out a coherent strategy.		

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4 Seek changes? Any changes to be made to the Plan?	Yes	
5	6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7	7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D9			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.092, para.item 2		Site:		PEX Session:											
Policy: NSA 28		Map:		Issue: Waste Management											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Policy NSA28 item 2 Treorchy. THE SITE HAS CLOSED The Civic Amenity Site at Treorchy was closed December 2008	
2 3	Representation text Policy NSA28 item 2 Treorchy. THE SITE HAS CLOSED The Civic Amenity Site at Treorchy was closed December 2008	
4 5	Changes sought This site needs to be deleted	
9 7	Why no previous Representation Recent change	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To comply with the Evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D10			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.044, para.5.6										Site:		PEX Session:				
Policy: AW 1				Map:			Issue: Housing Requirement									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Justification for allocation of land, for 8889 houses in plan period	
2 3	Representation text Justification for allocation of land, for 8889 houses in plan period	
	Para 4.1 The LDP strategy will provide A LAND USE FRAMEWORK.	
	Para 5.6 gives justification for the reduction of the allocation from 14,500 new houses to the LDP requirement of 8,890.	
	Para 2.7 Key Social Trends, bullet point 7, the County Borough has around 4000 empty properties, the majority of which are in the northern area of RCT.	
	Policy CS5 Affordable housing 4.47 states, "through the LDP the Council will expand opportunities to maximise the provision of affordable homes in respect of both social rented and low cost housing for sale. This will be achieved by establishing appropriate arrangements for sites including in and OFF site provision, promoting the RE-USE rehabilitation of existing older housing stock as defined by policy AW1."	
	The policy therefore is not Coherent, as no attempt has been made to justify the take up pf the empty properties IN LAND USE TERMS.	
4 5	Changes sought An explanation of what % or number of affordable hoems the Council will accept in the form of refurbished properties.	
9 7	Why no previous Representation Not applicable	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will clarify the position regarding re use of refurbished vacant properties.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA Repr Council	Officer	Recommendation	Response
1930.D11			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Document: Deposit Draft, p.032, para.4.48			Site:			PEX Session:								
Policy: CS 5			Map:			Issue: Affordable Housing								
Summary:														

Item	Question	Representation Text
1 2	Issue Summary Para 4.48 Affordable housing. The planning system will seek to deliver 3000 affordable units over a 15 year plan period, northern area 604 units, southern area 2396 units. Evidence provided - Spreadsheet attached, compiled from information in Housing and Land Requirement Topic paper 2007	
2 3	Representation text Para 4.48 Affordable housing. The planning system will seek to deliver 3000 affordable units over a 15 year plan period, northern area 604 units, southern area 2396 units. Evidence provided - Spreadsheet attached, compiled from information in Housing and Land Requirement Topic paper 2007 Policy CS5 Affordable Housing States approx 3000 affordables need to be provided over the next 15 years. 604 in the northern area, 2396 in the southern area. Policy NSA11, affordables states "to achieve the 604 units in the northern area a 25% contribution will be sought", therefore 604 =25%. Total build therefore approx 2416 units. Policy SSA 12 affordables states "to achieve the 2396 units in the southern area, a 40% contribution will be sought", therefore 2396 = 40% total build approx 5990 units. Policy AW1 allocates land for the provision of 14, 500 new houses. As per Housing Land Requirement Topic Paper 2007 (see spreadsheet attached) 2901 houses to the north, 11931 houses to the south. Actual allocations 2995 houses to the north, 5895 houses to the south. Calculated 2416 houses to the north, 5990 houses to the south. 1. The reduction shown in policy AW1 14, 850 houses to the allocated 8,890 houses is assumed to only affect the southern area. 2. The percentage needed in the south to achieve 2396 units SHOULD READ 2396/ 11931=20% Therefore the policy is UNSOUND and does not reflect the information supplied in the Evidence Base.	
4 5	Changes sought Clarification of how the numbers of affordable units (3000) has been calculated.	
9 7	Why no previous Representation Not applicable	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Soundness Tests				
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes				
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It would make the LDP sound														
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D12			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.033, para.4.43		Site:		PEX Session:											
Policy: CS 4		Map:		Issue: Housing Requirement											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Allocations identified in policy CS4 do not accord with the agreed housing apportionment figures for South East Wales. 4.42 Population and Household Projection Study 2006 4.43 Housing Land Requirement Topic Paper 2007 Evidence provided - A spread sheet complied using the above reports. The Rhondda Fawr- Treorchy and Tonypandy- has 165 houses allocated. The provision in this policy of 400 houses for the Strategic Site of Fernhill ALONE is excessive. The reasoning is unsound.	
2 3	Representation text Allocations identified in policy CS4 do not accord with the agreed housing apportionment figures for South East Wales. 4.42 Population and Household Projection Study 2006 4.43 Housing Land Requirement Topic Paper 2007 Evidence provided - A spread sheet complied using the above reports. The Rhondda Fawr- Treorchy and Tonypandy- has 165 houses allocated. The provision in this policy of 400 houses for the Strategic Site of Fernhill ALONE is excessive. The reasoning is unsound.	
4 5	Changes sought Removal of this Strategic Site from CS4.1	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocations under this policy would then accord with National Policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D13			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.032						Site: 2//NSA 5		0STR Fernhill Colliery, Blaenrhondda				Delete Site		PEX Session:	
Policy: CS 3				Map:				Issue: Strategic Sites							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Site 2 has no employment allocation.	
2 3	Representation text Site 2 has no employment allocation. CE2 Policy CS3 Strategic Sites says: "In order to promote Sustainable growth within RCT, the following sites are allocated for the development of a mixture of large scale residential, employment, retail and recreational purposes." 4.36 Of the 5 sites in the northern area 3 are in the Cynon Valley and have their own employment allocation. 2 are in the Rhondda Valley, Maerdy has employment allocation but Fernhill only has Housing (and a shop). There will be no strategic transport link between the two sites during the life of the plan and their physical location at the heads of the Rhondda valleys necessitates journeys over mountain roads which are often closed to access the Strategic Employment sites in the Cynon valley. Therefore the plan is unsound in its allocations of the Former Fernhill Colliery Strategic Site in the Rhondda Valley. Policy CS8 4.72 "Development throughout the County Borough will be directed to locations that offer A CHOICE of modes of transport. Fernhill does not.	
4 5	Changes sought Site 2 The Former Fernhill Colliery site, Blaenrhondda should be deleted as a candidate site.	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Its allocation would then comply with the aim of the policy.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

1930.D14		<input type="checkbox"/>		O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.031						Site:						PEX Session:			
Policy: CS 2				Map:				Issue: Strategy Areas							
Summary:															

Item	Question	Representation Text
1	Issue Summary	
	The fact that policy CS1 Achievement no 3 "Ensuring the removal of dereliction by promoting the re use of under used and derelict land and buildings" is not included in this policy, assumes that no such places exist in the south.	
	Evidence- Comparison of policy CS1 and CS2 included Policy SSA7 The land qualifies as a brownfield site Policy SSA12 Affordable housing makes reference to "contributions will be sought for the re use/ rehabilitation of existing older housing stock".	
2	Representation text	
	The fact that policy CS1 Achievement no 3 "Ensuring the removal of dereliction by promoting the re use of under used and derelict land and buildings" is not included in this policy, assumes that no such places exist in the south.	
	Evidence- Comparison of policy CS1 and CS2 included Policy SSA7 The land qualifies as a brownfield site Policy SSA12 Affordable housing makes reference to "contributions will be sought for the re use/ rehabilitation of existing older housing stock".	
4	Changes sought	
	Either delete the achievement from item 3 policy CS1 or include it as an achievement in policy CS2.	
9	Why no previous Representation	
	not relevant to the Preferred Strategy Consultation	
21	Why attend Examination?	
	This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
16	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan As it stands it fails test CE1- are the policies within the LDP themselves consistent.		

Item	Question	Reply	Tick box Replies
3	Seek changes? Any changes to be made to the Plan?	Yes	
5	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D15			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.031						Site:								PEX Session:	
Policy: CS 2				Map:										Issue: Strategy Areas	
Summary:															

Item	Question	Representation Text
1 2	Issue Summary No reference made under this policy to the achievement aim for housing as indicated in policy CS1 bullet point 2. Evidence provided attached- comparison of policies CS1 Developments in the north and CS2 Developments in the south. CS1 bullet point 2 has been omitted from policy CS2 but the statement applies in BOTH cases. Policy CS5 Affordable Housing 4.48 states "604 new dwellings in the northern... 2396 new dwellings in the southern ..." Therefore it is needed in both areas.	
2 3	Representation text No reference made under this policy to the achievement aim for housing as indicated in policy CS1 bullet point 2. Evidence provided attached- comparison of policies CS1 Developments in the north and CS2 Developments in the south. CS1 bullet point 2 has been omitted from policy CS2 byt the statement applies in BOTH cases. Policy CS5 Affordable Housing 4.48 states "604 new dwellings in the northern... 2396 new dwellings in the southern ..." Therefore it is needed in both areas.	
4 5	Changes sought The inclusion of the wording of the achievement aim needed to be met under policy CS1 bullet point 2 "...providing high quality, affordable accommodation that promotes diversity in the residential market ..." to be included in the achievements of policy CS2.	
9 7	Why no previous Representation No reference was made to this specific issue but my Preferred Strategy consultation response included a reference to Strategic Policies. Appendix 1. If the basic understanding of the difference between the north and the south are not appreciated- SP1 north, SP2 south - (look carefully) how can the rest of the policy possibly be relied upon, let alone implemented?	
21 11	Why attend Examination? This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan As it stands it fails test CE1- "are the policies wihtin the LDP consistent."
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D16			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.031			Site:			PEX Session:									
Policy: CS 2			Map:			Issue: Strategy Areas									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Policy CS2 Achievements, bullet point 6. Reducing daily out commuting by private car. Evidence provided comparison of policies CS1 development in the north and CS2 development in the south. Page 8 of employment land requirement topic paper, figure 1- Outward commuting in RCT does not specify origin of commuters, therefore it cannot be assumed all originate in the south. See attached	
2 3	Representation text Policy CS2 Achievements, bullet point 6. Reducing daily out commuting by private car. Evidence provided comparison of policies CS1 development in the north and CS2 development in the south. Page 8 of employment land requirement topic paper, figure 1- Outwards commuting in RCT does not specify origin of commuters, therefore it cannot be assumed all originate in the south. See attached	
4 5	Changes sought Either delete this statement from CS2 bullet point 6 or include it in policy CS1	
9 7	Why no previous Representation Not relevant.	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan As it stands, it fails test CE1.- are the policies within the LDP themselves consistent.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D17			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.030			Site:			PEX Session:										
Policy: CS 1			Map:			Issue: Strategy Areas										
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Policy CS1 Item 2 "providing high quality, affordable accommodation that promotes diversity in the residential market". Does not accuratley represent the 'Assembly Governments' Vision for housing. Evidence provided- a copy of page 1 Housing Land Requirements topic paper para 2.1 the phrase "to be able to choose where they live" is not covered by this statement. Therefore the policy fails the test of soundndess C3.	
2 3	Representation text Policy CS1 Item 2 "providing high quality, affordable accommodation that promotes diversity in the residential market". Does not accuratley represent the 'Assembly Governments' Vision for housing. Evidence provided- a copy of page 1 Housing Land Requirements topic paper para 2.1 the phrase "to be able to choose where they live" is not covered by this statement. Therefore the policy fails the test of soundndess C3.	
4 5	Changes sought Reference to phrase "to be able to choose where they live" to be incorporated into item 2.	
9 7	Why no previous Representation Policy SP1 Development in the north- made no reference to this statement.	
21 11	Why attend Examination? This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will have regard to the Wales Spatial Plan.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1930.D18			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069		Site: 2//NSA 5						OSTR Fernhill Colliery, Blaenrhondda			Delete Site		PEX Session:			
Policy: NSA 5		Map:				Issue: Strategic Sites										
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary Evidence Base Item 3 Findings of the candidate site assesment process (2009)		
2 3	Representation text Evidence Base Item 3 Findings of the candidate site assesment process (2009) See attached documents Evidence base The consultation period for the deposit draft, local development plan 2006-2021 commenced on 5th February 2009 and was intended to close on 19th March 2009 giving a six week period for responses. In fact the date was extended by 1 week due to inclement weather to 26th March 2009. Information appeared on the Council's website on the 23rd February 2009, to say that a CD of the Evidence Base was available to the public and we made an immediate request for a copy. After many emails and phone calls, a copy was hand delivered to a member of the group. But the findings of the Candidate site Process were omitted from this CD. This necessitated further emails and eventually the information was added to the Council's website on Friday 13th March 2009, 5 weeks after the Consultation started! My copy of the CD arrived on Monday 16th March 2009 and this version has been updated with the findings of the Candidate Site Assessment process 2009. A detailed assessment of the candidate site assessment process in relation to Fernhill is contained in the supporting information.		
4 5	Changes sought Policy NSA5 - Strategic Site, former Fernhill Colliery, Blaenrhondda Site to be removed as a strategic site.		
9 7	Why no previous Representation All comments are based upon Candidate Site 187 and not NSA5 Some comments would relate to both.		
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of this site is not realistic or appropriate and the Evidence used to access its suitability is flawed. It should be removed from the Strategic Sites category.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1930.D19			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069																	
Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda																	
Delete Site PEX Session:																	
Policy: NSA 5																	
Map:																	
Issue: Strategic Sites																	
Summary:																	

Item	Question	Representation Text
1	2 Issue Summary	
	Evidence base documents	
	Findings of the candidate site assessment process (2009) comment made by Development Team . Comparison of sites clearly illustrates a more suitable site that complies with most of the sustainability issues.	
2	3 Representation text	
	Evidence base documents	
	Findings of the candidate site assessment process (2009) comment made by Development Team . Comparison of sites clearly illustrates a more suitable site that complies with most of the sustainability issues.	
	See attached sheets.	
	Policy NSA 5 Page 69	
	Evidence base	
	findings of the candidate site assessment process (2009)	
	Ref made to RCT Cabinet meeting held 15 Dec 2008	
	Agenda item 7 LDP (appendix B)	
	Elected members statements Item 1	
	Comment posted against this item "however, the site represents the ONLY opportunity for significant development to take place in the Rhondda Fawr".	
	Presented as evidence, the comparison of	
	Candidate site 187 Former Fernhill Colliery Site, Blaenrhondda.	
	Against	
	Candidate Sites 64 Site at the rear of Dinam Park, Pentre.	
	65 Large site at the rear of Kennard St, Pentre	
	66 Large site at the rear of Kennard St Pentre	
	67 Site at rear of Bwllfa Cottages, Pentre. Together forming one large development.	
	Documents	
	The stages one, two & three assessments for the sites.	
	Comparison of facilities in each area	
	Copies of the proposal and constraints map.	
	Copy of the map from the Rhondda Local Plan 1991- 2006	
	Copy of page 38- Candidate site refusals giving reasons why 64 to 67 were refused.	
4	5 Changes sought	
	Removal of Policy NSA 5	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
21	11	Why attend Examination?															
This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.																	
<i>Item Question</i>										<i>Reply</i>		Soundness Tests					
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes					
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will comply with the tests for soundness.															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1930.D20			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.25		Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda						Delete Site		PEX Session:						
Policy: NSA 5		Map:		Issue: Strategic Sites												
Summary:																

Item Question	Representation Text
1 2 Issue Summary Para 6.25 The site is subject to a number of constraints most notably Bullet point 1 Access. Para 6.26 item d. defines one of the problems to be addressed regarding access- namely secondary access for public transport. Thr sustainability appraisal for NSA 5 (page 467 of the report item 7 Transposrtation) shows the problem has been recognized, as any road public transport could be used for private cars, and a barrier system would not be feasible and would be costly. Page 323 policy CS3 Strategic Sites item 7 Transport- suggested mitigation- sites that cannot achieve good public services should be reconsidered.	
2 3 Representation text Para 6.25 The site is subject to a number of constraints most notably Bullet point 1 Access. Para 6.26 item d. defines one of the problems to be addressed regarding access- namely secondary access for public transport. Thr sustainability appraisal for NSA 5 (page 467 of the report item 7 Transposrtation)shows the problem has been recognized, as any road public transport could be used for private cars, and a barrier system would not be feasible and would be costly. Page 323 policy CS3 Strategic Sites item 7 Transport- suggested mitigation- sites that cannot achieve good public services should be reconsidered.	
4 5 Changes sought This site is NOT suitable as a strategic site predominantly for housing and as such should be deleted.	
21 11 Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation is NOT realisitc.		

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	732	EVIDENCE Add'l	SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1930.D21			<input type="checkbox"/>	O	I	M		Yes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.069, para.6.23		Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda					PEX Session:									
Policy: NSA 5		Map:					Issue: Strategic Sites									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The statement "former housing land that was cleared sererval decades ago" is very misleading. Evidence- a copy of an extract of the map of the site obtained from the LAND REGISTRY. The houses shown to the right (east) of the map are Fernhill houses, demolished in 1965/1966 and this area is now SINC- coloured green on the concept statement map. The houses shown on the left (West) of the map were Caroline Street, are outside the boundary of the land covered by candidate site no.187.	
2 3	Representation text The statement "former housing land that was cleared sererval decades ago" is very misleading. Evidence- a copy of an extract of the map of the site obtained from the LAND REGISTRY. The houses shown to the right (east) of the map are Fernhill houses, demolished in 1965/1966 and this area is now SINC- coloured green on the concept statemenap map. The houses shown on the left (West) of the map were Caroline Street, are outside the boundary of the land covered by candidate site no.187.	
4 5	Changes sought The statement should be removed from the paragraph.	
21 11	Why attend Examination? This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Thes (SIC) policy has not been formulated using all available evidence		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D22			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.26																
Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda																
Policy: NSA 5																
Map:																
Issue: Strategic Sites																
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Para 6.26 bullet point (e) Restoration of the land north of the site for amenity open space.	
2 3	Representation text Para 6.26 bullet point (e) Restoration of the land north of the site for amenity open space. This site is surrounded on 3 sides by a SPECIAL LANDSCAPE AREA NSA 25.7 and Blaenrhondda Park with numerous facilities is an easy walk to the south. If the description "north of the site", refers to the large spoil tip blocking the top of the valley, its removal is necessary to satisfy issues relating to the Flooding Risk, as the tip is showing signs of slope instability and slippage would result in the river culvert being blocked with consequent serious flooding risk Please see attached sheet copy of 5.2.1 Strategic Flood Consequence Assessment for the site. See copy of the developer's publicity blurb sourced from the Internet, this clearly states all the land reclamation requirements to make the site suitable for housing. Http://www.fernhilldevelopment.c.uk/Fernhill-Exhibition-Boards.pdf The above document also indicates that this immediate area is not developable, so worthless to a developer.	
4 5	Changes sought Delete the phrase from point (e).	
9 7	Why no previous Representation Not applicable	
21 11	Why attend Examination? This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan This area is part of NSA 25.7 and removal of this tip is required primarily for safety reasons not as inferred, its removal is to provide amenity open space.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

1930.D23			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.26				Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda								PEX Session:			
Policy: NSA 5				Map:				Issue: Strategic Sites							
Summary:															

Item Question	Representation Text
1 2 Issue Summary Para 6.26 item d Access The proposal to provide spine paths and cycle ways linking the plateau to the village. Evidence provided- The map from the evidence pack when applying to have a route registered on the Definitive Rights of Way Map. Spine paths and Cycle ways already exist linking the site with the village and surrounding areas including the Loops and Links routes, and are well used. (see paths marked on map)	
2 3 Representation text Para 6.26 item d Access The proposal to provide spine paths and cycle ways linking the plateau to the village. Evidence provided- The map from the evidence pack when applying to have a route registered on the Definitive Rights of Way Map. Spine paths and Cycle ways already exist linking the site with the vilage and surrounding areas including the Loops and Links routes, and are well used. (see paths marked on map)	
4 5 Changes sought The paragraph 6.26 item d Access- needs to be reworded.	
9 7 Why no previous Representation Not relevant to the preferred strategy.	
21 11 Why attend Examination? This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan How can you provide something that already exists?		

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	
5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D24			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069		Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda						Delete Site		PEX Session:					
Policy: NSA 5		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The justification for this policy makes reference to policy CS3 Strategic Sites, but is not satisfactory. Policy CS- Justification - states: "in order to promote sustainable growth within RCT the following sites are allocated for the development of a mixture of large scale residential, employment, retail and recreational purposes". A local shop (as proposed in the plan for Fernhill) does not satisfy either the Employment or the Retail requirement.	
2 3	Representation text The justification for this policy makes reference to policy CS3 Strategic Sites, but is not satisfactory. Policy CS- Justification - states: "in order to promote sustainable growth within RCT the following sites are allocated for the development of a mixture of large scale residential, employment, retail and recreational purposes". A local shop (as proposed in the plan for Fernhill) does not satisfy either the Employment or the Retail requirement.	
4 5	Changes sought This site does not qualify for its "mixed use development" category and should be omitted.	
21 11	Why attend Examination? This representation is one of several, which are complex issues made in respect of this policy and it would be necessary to address all these issues at the same time.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan This allocation as a strategic site is not appropriate in this category.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D25			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.25		Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda								PEX Session:						
Policy: NSA 5				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Para 6.25 Constriants bulltet point 4- Low land values. 'Low land values' are not covered in the sustainability Appraisal Report and therefore cannot be Considered a constraint.	
2 3	Representation text Para 6.25 Constriants bulltet point 4- Low land values. 'Low land values' are not covered in the sustainability Appraisal Report and therefore cannot be Considered a constraint.	
4 5	Changes sought Removal of Constraint bullet point 4.	
9 7	Why no previous Representation Not applicable	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It wil be in line with the constraints specified in the Sustainability Appraisal for policy NSA5		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
1930.D26			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.25						Site: 2//NSA 5		0STR Fernhill Colliery, Blaenrhondda				Delete Site		PEX Session:	
Policy: NSA 5				Map:				Issue: Strategic Sites							
Summary:															

Item Question

Representation Text

1 2 Issue Summary

Ref Para 6.25 'The site is subject to a number of constraints, most notably...'

THIS DOES NOT ACCORD WITH POLICY AW5
C) ACCESSIBILITY bullet point 3

SEE ATTACHED SHEET

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2	3			Representation text											
<p>Ref Para 6.25 'The site is subject to a number of constraints, most notably...'</p> <p>THIS DOES NOT ACCORD WITH POLICY AW5 C) ACCESSIBILITY bullet point 3</p> <p>SEE ATTACHED SHEET</p> <p>Paragraph 6.26 Items to be addressed</p> <p>1 Item (d) Access Primary access to this site is from the A4061 Rhigos Mountain Road. The only other access through Brook Street, Blaenrhondda being impossibly restricted</p> <p>Evidence provided: Google Earth Views of the area.</p> <p>Map A- The approximate access point from the site onto the A4061 has been plotted from the LDP map and is marked Y.</p> <p>The A4061 from the south, Treherbert, sweeps around a hairpin bend and the view of the proposed junction is then obscured by the steep mountainside at point X on the inside of the right hand bend beyond. Particularly for anyone overtaking along this seemingly straight and level stretch this point is very misleading as vehicles coming from the north are totally invisible and because they are descending the mountain they tend to be going very fast on the approach to the bend. This is a NOTORIOUS danger Black Spot, but there is no warning sign, there have been many very serious and fatal accidents at this spot due to this misleading bend. The situation is made worse by slow/ heavy vehicles which to this point have crawled slowly possibly for many miles and this is the first seemingly clear piece of road where it appears possible to overtake. If a junction were formed here it would be Fatal. In foggy weather of low cloud the situation is made much worse. There is no safe spot for a junction on this part of the A4061 road.</p> <p>Map B- The route of the A4061 from Treherbert has been coloured for clarification. The point where the colour ends in Treherbert marks the position of the ROAD CLOSED permanant sign. It was pointed out to the Development Control Team at a public meeting, by a Paramedic who lives in Tynewydd, that when the road is closed, due to adverse weather conditions, as has happened several times this year, the site would be WITHOUT EMERGENCY SERVICE COVER.</p> <p>2 Preferred Strategy Regulation 15, Statement of Consultation March 2008, page 7, Department of Enterprise and Transport, concerned the following main issues; It SUPPORTED the identification of 3 strategic sites. Site 3 Phurnacite Site 4 Robertstown Site 5 Hirwaun</p> <p>Specific issues for Site 1 Maerdy Site 7 Mwyndy Site 8 OCG Llanilid</p> <p>BUT</p> <p>Site 2 Fernhill and Site 6 Cwm Colliery Are not even mentioned therefore were UNSUPPORTED.</p>															
4	5			Changes sought											
<p>THIS SITE IS NOT SUITABLE AS A STRATEGIC SITE PREDOMINENTLY FOR HOUSING AND AS SUCH SHOULD BE DELETED.</p>															

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
21	11	Why attend Examination?															
This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.																	
<i>Item Question</i>										<i>Reply</i>		Soundness Tests					
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes					
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Policy NSA 5 IS NOT REALISTIC															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D27			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069, para.6.24 / 6.27		Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda				PEX Session:									
Policy: NSA 5		Map:				Issue: Strategic Sites									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Terminology used. Para 6.24 "The Councils vision for the Strategic Site is one of high quality residential development on a restored valley floor set in a dramatic landscape" Surely the term "valley floor" contradicts the statement in 6.27 where the term "residential plateaus" is used. There is no provision in the land reclamation scheme to completely remove the spoil tips.	
2 3	Representation text Terminology used. Para 6.24 "The Councils vision for the Strategic Site is one of high quality residential development on a restored valley floor set in a dramatic lanscape" Surely the term "valley floor" contradicts the statement in 6.27 where the term "residential plateaus" is used. There is no provision in the land reclamation scheme to completely remove the spoil tips.	
4 5	Changes sought Para 6.24 should be reworded.	
9 7	Why no previous Representation Not applicable	
21 11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It would clarify the Council's vision for the site and indeed anyone who reads the plan.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D28			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.068		Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda										PEX Session:			
Policy: NSA 5		Map:				Issue: Strategic Sites									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
<p>The indicative Concept Plan shows the area of the Strategic Site as much larger than that of the proposed Candidate site no 187 which was assessed under the Candidate site methodology.</p> <p>Page 31 of the delivery agreement alternative sites (submitted by interested persons/ organizations) says "site allocation representations, are those which seek to change a deposit LDP by adding a new site, or by altering or deleting a proposed site" Please see attached copies of documents.</p>		
2 3	Representation text	
<p>The indicative Concept Plan shows the area of the Strategic Site as much larger than that of the proposed Candidate site no 187 which was assessed under the Candidate site methodology.</p> <p>Page 31 of the delivery agreement alternative sites (submitted by interested persons/ organizations) says "site allocation representations, are those which seek to change a deposit LDP by adding a new site, or by altering or deleting a proposed site" Please see attached copies of documents.</p>		
4 5	Changes sought	
<p>The revised site boundary must be covered by a representation requesting the change of boundary so that it follows the procedure for all the other changes and is subjected to additional consultation</p>		
9 7	Why no previous Representation	
<p>The comments made on the preferred strategy were made against the Candidate Site no 187 (copy attached) not the revised boundary that appears on the Indicative Concept Statement.</p>		
21 11	Why attend Examination?	
<p>This is one of a number of representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.</p>		

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>It will ensure that the site NSA 5 is treated as all the other sites which require alteration.</p>			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D29			<input type="checkbox"/>	O	I	M			Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069										Site: 2//NSA 5 OSTR Fernhill Colliery, Blaenrhondda			Delete Site		PEX Session:	
Policy: NSA 5				Map:				Issue: Strategic Sites								
Summary:																

Item Question **Representation Text**

1 2 Issue Summary
Comparison of Relevant Alternatives

2 3 Representation text
Comparison of Relevant Alternatives

see attached sheet.

Ref Appendix 3 Development Plan Evidence Base.

Item 17 Tourism Opportunites Study for the Heads of the Valley area of RCT 2007.

Due to the shortage of time caused by the UN-availability of the Evidence base CD. An IN DEPTH STUDY of the above report has not been undertaken, however some very relevant point have emerged.

Page 2 Study Area 1.4

"during the latter stage of the study, the Heads of the Valley's boundary was extended to include the wards of Treherbert and Treorchy."
This was to allow the Rhondda Fawr to share in the Tourism Grants and benefits that all the other South Wales Valleys enjoy.

Page 22 Visitor's Surveys bullet point 4

Surely Blaenrhondda conservation Area, the History of the Valley, Bronze Age, Roman History, Druids and the Industrial recent past together with the spectacular and unique scehery including Blaencwm, Cwm Saerbren and Cwm Parc, Pen Pych mountain, the only flat topped 3 sided mountain in the Northern Hemisphere together with the Magnificent waterfalls, make this an area that people would wish to visit and enjoy, if only the incentive, encouragement and facilites were there to help them.
Our valley is also unique in that we have a Sheperd, who is a tenant on the Fernhill site, who carries out the traditional hill shephedring practices, used in the valley before coal was developed.

Page 64 LS4 Equestrian Centre.

It appears that the only category Treherbert has been assessed on for some unknown reason is equestrian. The refurbishment of TyDraw Farm, Blaencwm (www.tydrawfarm.com/index.html) provides all thse necessary facilities in the locality and considering that due to its high cost, it is a pastime that appeals to a very small percentage of the population, it represents a lost opportunity for the regeneration potential of the whole area.
Our alternative proposal for Candidate site 187 makes provision for a Bridel path through thr aite that will link with the active Equestrian facilities in the Cynon Valley.

The location of Strategic Search area F, Wind farms around the head of the valley will not necessarily detract from its beauty. In fact the next round of consultations being undertaken by the provider Nuon will commence in April 2009. The literature they have provided for these consultations indicates they have moved several possible locations already and decreased the intended size of some of the windmills all as a result of the previous consultation round.

This would be the chance to show the Country that renewable technologies can exist without spoiling the countryside. The valley that once provided fossil fuels is now home to a major contributor of renewable energy.

Our proposals for generating electricity within the site, and the restrictions on car usage in the valley, solar panels on the roof of the building and rain water collection will all contribute to the climate change sustainability requirements.

Therefore this is another case where relevant alternativs to NSA 5 have not been considered.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
4	5	Changes sought Removal of Policy NSA 5 pending further consideration.															
9	7	Why no previous Representation Not applicable															
21	11	Why attend Examination? This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.															
<i>Item Question</i>										<i>Reply</i>		Soundness Tests					
17	8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?										Yes					
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site NSA 5 must be fairly considered for the most suitable and rewarding use for the Community. NSA 5 must be fairly compared with alternative proposals for "Tourism and Leisure and Employment".															
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1930.D30			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069		Site: 2//NSA 5						OSTR Fernhill Colliery, Blaenrhondda			Settlement Boun PEX Session:				
Policy: NSA 5		Map:				Issue: Strategic Sites									
Summary:															

Item Question

Representation Text

1 2 Issue Summary

The extension of the settlement boundary around the small settlement of Treherbert to include the site NSA 5.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
2	3			Representation text										
<p>The extension of the settlement boundary around the small settlement of Treherbert to include the site NSA 5</p> <p>See attached sheet</p> <p>Candidate sites assessment process (2009), the results of this process were reported in the format:</p> <ol style="list-style-type: none"> 1) Candidate sites approved 2) Settlement Boundaries approved 3) Candidate site refusals <p>Item 1 As some candidate sites already sat within the settlement Boundary, these required no changes. But others were on the edge of settlements and so the boudnaires were changed to allow incorporation of these sites.</p> <p>Item 2 This report does not clarfiy if the sites were for inclusion or removal from the settlement boundary.</p> <p>Item 3 Similarly with the refusals sites on the edge of settlements, there is no distinction of inclusion or exclusion from the boundaires.</p> <p>With reference to the preferred strategy document</p> <p>para 6:16:1 "an important element of the strategy will be the use of residential settlement boundaires to establish a settlement hierarchy. RESIDENTIAL SETTLEMENT BOUNDARIES PROVIDE CERTAINTY FOR MEMBERS OF THE PUBLIC and developers about the development limits of urban areas, they maintain the integrity and character of towns and vilages and protect the countryside from incremental urbanisation". "In the Northern Strategy Area, except the principal town of Aberdare, development will be permitted within and where appropriate, adjoining defined residential settlement boundaires."</p> <p>RCT Evidence Base no 39 RCT Local Development Pain Preferred Strategy Regulation 15 Statement of consultation 2008</p> <p>Welsh Assembly Government Representations Page 11 Settlement Boundaires, says: "The flexible use of Settlement Boundaries in the Northern Strategy Area is UNQUALIFIED and would be inconsistent with National Policy if there were not a criteria - based policy to provent unfettered development in the countryside."</p> <p>The existing Rhondda Local Plan settlement boundary around the small settlement of Treherbert included Balencwm and extended only to the top of the Conservation area of Blaenrhondda. The proposed settlement boundary for Treherbert now excludes the whole of Blaencwm and has been extended around the Strategic Site of Fernhill NSA 5. The boundary around Treherbert has also been affected by many smaller changes. The proposals map Sheet 1, is of such a small scale it is impossible to read properly and the settlement boundary line appears to run through peoples back gardens.</p> <p>Where does the certainty for members of the Public fit in? Developers can suggest any area, subject to certain criteria being met, which will result in the settlement boundary being changed. How can anyone follow the logic of the Candidate Site Process when only the allocated housing sites are shown on the propsals maps.</p> <p>Settlement Boundaries also form an essential tool for statistical data collection. In fact the Index of Multiple Deprivation, which was used to identify the picture of the social, economic and environmental issues for this plan gathers its data from specific areas within the existing settlement boundaires.</p>														
4	5			Changes sought										
<p>The reinstatement of the existing settlement boundary to exclude this site.</p>														

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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21	11	Why attend Examination?													
This is one of a number of Representations being made on connected issues and it is essential they be explained and the connection discussed with more detailed evidence available.															
<i>Item Question</i>										<i>Reply</i>			Soundness Tests		
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes			
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan													
The plan does NOT set out a Coherent Strategy.															
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1930.D31			<input type="checkbox"/>	O	I	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.069		Site: 2//NSA 5						OSTR Fernhill Colliery, Blaenrhondda			New Site		PEX Session:			
Policy: NSA 5				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
We wish to submit an alternative proposal for the former Fernhill Colliery Site, Blaenrhondda Strategic Site covered by Policy NSA5.		
2 3	Representation text	
There was no relevant alternative proposal submitted for the site, therefore the sustainability Appraisal was only assessed as a mixed use category. Please see separate sheet listing documents included with this proposal.		
4 5	Changes sought	
To retani its clasification under the old Rhondda Plan as Tourism and Leisure Activities .		
21 11	Why attend Examination?	
We are not able to make a case for our proposal before, as we were only made aware that we could make a case by Mrs Sheila Davis and Planning Aid Wales just recently. It is necessary to explain why and how our proposal is more suitable for the area.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
CE2 Effectiveness Test- as there was no submitted alternative use the category of Mixed Use Development was not assessed against a relevant alternative category through the sustainability appraisal system, nor indeed against the previous category.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1930.D32			<input type="checkbox"/>	O	W	M		Yes	732	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.063, para.6.2		Site:		PEX Session:											
Policy:		Map:		Issue: Northern Strategy Area											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Chapter 6- Northern Strategy Area. Building Sustainable Communities. Para 6.2 Treherbert is referred to in this paragraph as a Key Settlement and Small Settlement. Para 4.16 identifies Treherbert as a small settlement, providing a limited range of services to meet local needs.		
2 3	Representation text Chapter 6- Northern Strategy Area. Building Sustainable Communities. Para 6.2 Treherbert is referred to in this paragraph as a Key Settlement and Small Settlement. Para 4.16 identifies Treherbert as a small settlement, providing a limited range of services to meet local needs.		
4 5	Changes sought Clarification as to which category Treherbert actually fits into.		
9 7	Why no previous Representation Not applicable		
Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To make the information more coherent		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1975.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075				Site: 5//NSA 8		OSTR Hirwaun/Penywaun				New Site		PEX Session:		
Policy: NSA 8				Map:				Issue: Strategic Sites						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA8 Object to allowance of 75% phasing development before infrastructure is in place. This should be no more than 10 to 25%. There is existing lack of infrastructure. The development should not take place at all until road networks are improved to Aberdare. Development of Tower site should be for green space and / or tourism.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent.</p> <p>P76 Tower Map This development should not go ahead until Aberdare road links are improved. The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
																Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
																Point 2:
																P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
																The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
																There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN
<i>Item</i>	<i>Question</i>											<i>Reply</i>	<i>Tick box Replies</i>			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1975.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.079		Site: 467/473 Hirwaun Ironworks, North							Delete Site		PEX Session:						
Policy: NSA 12				Map:				Issue: Settlement Boundary									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	NSA12 Remove Gloucesters site in Hirwaun from Settlement Boundary (as identified on Sheet 1). It failed Candidate Site Assessment so should be removed. There is possibility of planning lapsing and should therefore not exist in the settlement boundary until (if) site is developed as it is not suitable for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community
2 3	Representation text	P79 NSA12 The Gloucesters site in Hirwaun should not benefit from settlement boundary status, it should be outwith this boundary. Should the outline planning permission currently related to the site lapse, or not come to fruition due to appeal / protest / village green status, it should not be considered as an area of settlement / suitable for housing in relation to other new policies within this LDP. The Gloucesters site failed the Candidate Site Assessment, but yet still managed to gain outline planning, in complete contradiction to a number of policies within this LDP. Should the Gloucesters be built upon it will be the loss of an important community space
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN	

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Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1975.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088		Site: 754//NSA 22.2						Former railway site Hirwaun			PEX Session:				
Policy: NSA 22				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	NSA22 Rail Network, relating to Hirwaun specifically, the potential station has been given detailed planning for housing development & the other alternative is in Brecon Beacons National Park LDP as a potential site for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P 88 NSA22 Rail Network In relation to the former Train Station at Hirwaun, the land inside the settlement boundary which could have been used to develop / reopen a railway station has already been committed to housing development, with planning permission gained recently. Land opposite and outside the settlement boundary is at threat from Candidate site proposals in the Brecon Beacons LDP.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?															
												Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons															
												Yes					

REPRESENTATION DETAIL by: Representation No

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1975.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088				Site:								PEX Session:			
Policy: NSA 23				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1	2 Issue Summary NSA23 Bridleways / access for horse riders should be considered in conjunction with cycle routes. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2	3 Representation text NSA23 Cycle Network WHAT ABOUT BRIDLEWAYS? There is little mention of bridleways in this plan, yet there are over 3,300 passported horses in RCT. There is a Bridleways group working in partnership with organisations such as the Groundwork Trust, the Local Access Forum etc, trying to build strategic routes from Caerphilly, through RCT, to Neath Port Talbot. Yet, the Council gives little attention to this. Why not create more bridleways as ANY USER (walkers, cyclists etc), are entitled to use a Bridleway, yet horse riders cannot / are not permitted (by law) to use cycle ways / footpaths. Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for. Partnership working would make far more sense than attempting to create two routes for different users across the same locations. Horse riding complies with RCT's Healthy Living and Outdoors policies etc, but horse riders are frequently being forgotten / having their existing access which they have used for over 20 years removed. NB: Horses cannot ride safely on tarmac paths, so again liaison with the British Horse Society and Briar's Bridleways will ensure safe recommended surfaces. There are certain barriers used to prevent motor cyclists which prevent horses access, so again liaise with relevant bodies to find suitable / recommended barriers, steps etc. Recommend use joined up thinking and liaison between groups to ensure access for ALL, which includes horse riders. Horse riding is prolific in RCT, yet has historically gone unnoticed due to there being sufficient access off road to go riding. However, as more and more paths (used for over 20 years), get blocked / tarmaced there will be more riders on the road causing significant hazard. I understand a lot of work has been conducted in the South of RCT, but until these paths are joined up with the North and become strategic routes, there will always be an issue as only 7% of horse owners own horse transport (we cannot ride down the A470 to access the paths South of RCT!).	
4	5 Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10	8 P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12	8 C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19	8 CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
																Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN
Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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1975.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089			Site:			PEX Session:									
Policy: NSA 24			Map:			Issue: Environment									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA24 Green wedge to prevent Rhigos and Hirwaun merging should be identified Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA 24 Green Wedges Suggest identification of a Green Wedge between Hirwaun and Rhigos to prevent the two villages spreading and merging in the future.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
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1975.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 778//NSA 26 Cynon Valley River Park						PEX Session:							
Policy: NSA 26				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA26 Hirwaun should benefit from the Cynon Valley River Park Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community	
2 3	Representation text NSA 26 River Park Hirwaun should benefit from the Cynon Valley River Park.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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1975.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030		Site: 467/473		Hirwaun Ironworks, North		Delete Site		PEX Session:						
Policy: CS 1		Map:		Issue: Strategy Areas										
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1). Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	CS1 Gloucesters site, Hirwaun: request to remove from settlement boundary. This is a designated SINC and should outline planning not come to fruition, the site should not be within the settlement boundary for future.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.			
Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.			
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3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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1975.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.032		Site: 711//CS 3.5 South of Hirwaun						PEX Session:						
Policy: CS 3				Map:				Issue: Strategic Sites						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary CS3 Housing settlements should not be next to busy roads (I.e. housing site in Hirwaun on both sides of newA465) Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text CS3 p32 4.37 Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
															Yes

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1975.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.033		Site: 717//CS 4.3						Hirwaun (South)		PEX Session:						
Policy: CS 4				Map:				Issue: Housing Requirement								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>CS4 Housing Site 3 (Land South of Hirwaun) should be carefully and properly planned and integrated as has the potential to become an isolated 'suburb'.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS4 Concern that the proposed development site south of Hirwaun will not integrate well with remainder of village due to dualling of A465. It should not act as a 'suburb'. The area should be properly integrated with the existing village and a green wedge should be designated between this settlement and Rhigos to prevent the two from merging (e.g as has happened with Trecynon and Cwmdare for example).</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

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3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

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1975.D10			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 727//CS 8.a4						Aberdare Bypass			PEX Session:				
Policy: CS 8				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059. The A4059 should be carefully planned and the 'ecit' route should not be at Croes Bytchan as there will be no direct access to new A465, thus moving rather than solving the problem, and increasing safety issues.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P38 CS8</p> <p>The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059 (proposed within this LDP). The development should not take place in isolation – the surrounding infrastructure must be in place first.</p> <p>The A4059 must be carefully planned in conjunction with the A465 dualling. Currently, the A4059 is illustrated as linking from the current Aberdare bypass to the Croes Bychan junction. With the current A465 plans, this should be changed, as there will be an overbridge at Croes Bychan so no direct access to A465. This will either push traffic directly through the centre of Hirwaun village, OR via Croes Bychan which will prove extremely dangerous and could affect safety of current businesses as there is a Riding School, Livery Yard and Farms, thus many horses and slow moving vehicles which use the Croes Bychan Road. This should be reconsidered in line with the direct access to the A465 or you will just be directing the existing traffic problem elsewhere, but not solving it.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
																The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
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Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1975.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039			Site:			PEX Session:									
Policy: CS 9			Map:			Issue: Waste Management									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS9 ensure road infrastructure is sufficient. Ensure waste received is not travelling so far to reach the site that it impacts detrimentally upon RCTs carbon footprint.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS9 Waste Management</p> <p>Site at Hirwaun may be a suitable site in isolation, but will it be suitable when considered with other proposed developments in terms of additional vehicles etc. Road network and infrastructure must be improved and made sufficient to support additional heavy vehicles. There should be restrictions around the catchment area of the waste (i.e. in the locality and / or neighbouring authorities), in line with climate change policy.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

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10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?															
												Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons															
												Yes					

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1975.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040				Site:								PEX Session:			
Policy: CS 10				Map:				Issue: Minerals							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS10 We object to an opencast coalmine which will impact negatively upon the surrounding area and people. We propose the site to be used as a green space / country park or tourism employment site which will have a LONG TERM sustainable future, creating local jobs and a community benefit.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P40 CS10 Minerals We object to open cast coal mining.</p> <p>The objection is based upon social, economic and environmental grounds. There is no confidence that jobs will be provided to local people. The number of jobs created through opencast mining (as opposed to deep mining) is minimal. We are not confident of a safeguard balance in extraction of minerals. It has not been made explicit what planning gain / community benefits are being offered (if at all). What are the agreements and closure plans in terms of replacing the landscape, habitats etc to their former / current status. An open cast mine is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p> <p>The propositio oif such a site opening here is already causing anxiety and stress amongst residents who are concerned about their health and wellbeing, their quality of life, the visual and airborne impacts. This coupled with the additional proposals for wind farms, housing development, road development, waste facility development is too much to bear for many people. If we are forced to have 'clean' energy from wind farms, why must we then have an open cast coalmine AND an energy from waste facility? It is acknowledged in various health impact assessment that the proposal of an individual facility / planning proposal can detriment to human health in relation to mental well being due to the stress caused by the perception of what will be built, but to impose such significant infrastructure changes all within the same area should surely be revised. Hirwaun should not bear the burden of all of RCT's energy issues. It is the largest authority in Wales, yet al;l major development in line with National strategy and strateginc / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. It is also in the Council's interest to do so, as the more heightened people's awareness of this situation, the more opposition each planning application will face. Hirwaun is not trying to diminish its responsibility but believes in fair distribution, which is not apparent in this LDP.</p> <p>If the case for the site is employment, it would be far more beneficial and sustainable, with longer term gain in terms of jobs, human health, recreation, leisure and so on, to use the proposed site as a tourism area. This would be sustainable and local people could be employed to manage, maintain, garden / landscape / provide and teach recreational activities such as fishing, canoeing, horse riding, cycling, walking, camping / accommodation, and other associated outdoor activities, provide catering facilities etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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19	8	CE4 Test?		Not flexible to deal with changing circumstances?											Yes
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>															
<i>Item</i>	<i>Question</i>											<i>Reply</i>	<i>Tick box</i>	<i>Replies</i>	
3	4	Seek changes? Any changes to be made to the Plan?											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											Yes		

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1975.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:			PEX Session:						
Policy: CS 11				Map:			Issue: Climate Change								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS11 Wales has a plan to achieve One Planet Living by 2050. Some of the policies, in particular CS10 will counteract this.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	p41 CS11 Minerals extraction will lead to increased carbon dioxide (CO2), plus additional green house gas emissions. There is therefore potential for CS10 to have a detrimental effect upon CS11. Minerals extraction (as proposed for Hirwaun mountain) is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK is regulated by the Intergovernmental Panel for Climate Change (IPCC) and has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
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<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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1975.D14			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046			Site:			PEX Session:									
Policy: AW 4			Map:			Issue: Planning Obligations									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary AW4 Bridleways / horse access must be considered. There is only talk of walkers / cyclists. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text P46 AW4 Bridleways Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														Yes

1975.D15 S W M

Document: Deposit Draft, p.054 Site: PEX Session:

Policy: AW 8 Map: Issue: Environment

Summary:

Item Question	Representation Text
1 2 Issue Summary AW8 agree that natural environment should be protected.	
2 3 Representation text AW8 States that the natural environment is to be protected and enhanced, and no permission for development on designated SINC sites – agree with this. Only permitted where not unacceptably disruptive / damaging – agree with this. However, the Gloucesters site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

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1975.D16			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059			Site:			PEX Session:									
Policy: AW 13			Map:			Issue: Renewable Energy/Wind farms									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	AW13 opposed to large windfarm which would be blight on landscape. This should be considered with all other applications taking place as it is too much for one community to bear having numerous large infrastructure in its locality. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	AW13 Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
															Yes

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1981.D1			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075				Site: 5//NSA 8		0STR Hirwaun/Penywaun				New Site		PEX Session:				
Policy: NSA 8				Map:						Issue: Strategic Sites						
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	NSA8 Object to allowance of 75% phasing development before infrastructure is in place. This should be no more than 10 to 25%. There is existing lack of infrastructure. The development should not take place at all until road networks are improved to Aberdare. Development of Tower site should be for green space and / or tourism. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent. P76 Tower Map This development should not go ahead until Aberdare road links are improved. The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
																The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
																There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN
Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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1981.D2			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079		Site: 467/473			Hirwaun Ironworks, North			Delete Site		PEX Session:						
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA12 Remove Gloucesters site in Hirwaun from Settlement Boundary (as identified on Sheet 1). It failed Candidate Site Assessment so should be removed. There is possibility of planning lapsing and should therefore not exist in the settlement boundary until (if) site is developed as it is not suitable for development.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community</p>
2 3	Representation text	<p>P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent.</p> <p>P76 Tower Map This development should not go ahead until Aberdare road links are improved.</p> <p>The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
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3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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1981.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088		Site: 754//NSA 22.2						Former railway site Hirwaun			PEX Session:				
Policy: NSA 22				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	NSA22 Rail Network, relating to Hirwaun specifically, the potential station has been given detailed planning for housing development & the other alternative is in Brecon Beacons National Park LDP as a potential site for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P 88 NSA22 Rail Network In relation to the former Train Station at Hirwaun, the land inside the settlement boundary which could have been used to develop / reopen a railway station has already been committed to housing development, with planning permission gained recently. Land opposite and outside the settlement boundary is at threat from Candidate site proposals in the Brecon Beacons LDP.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN			

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

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1981.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088				Site:								PEX Session:			
Policy: NSA 23				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA23 Bridleways / access for horse riders should be considered in conjunction with cycle routes. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA23 Cycle Network WHAT ABOUT BRIDLEWAYS? There is little mention of bridleways in this plan, yet there are over 3,300 passported horses in RCT. There is a Bridleways group working in partnership with organisations such as the Groundwork Trust, the Local Access Forum etc, trying to build strategic routes from Caerphilly, through RCT, to Neath Port Talbot. Yet, the Council gives little attention to this. Why not create more bridleways as ANY USER (walkers, cyclists etc), are entitled to use a Bridleway, yet horse riders cannot / are not permitted (by law) to use cycle ways / footpaths. Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for. Partnership working would make far more sense than attempting to create two routes for different users across the same locations. Horse riding complies with RCTs Healthy Living and Outdoors policies etc, but horse riders are frequently being forgotten / having their existing access which they have used for over 20 years removed. NB: Horses cannot ride safely on tarmac paths, so again liaison with the British Horse Society and Briar's Bridleways will ensure safe recommended surfaces. There are certain barriers used to prevent motor cyclists which prevent horses access, so again liaise with relevant bodies to find suitable / recommended barriers, steps etc. Recommend use joined up thinking and liaison between groups to ensure access for ALL, which includes horse riders. Horse riding is prolific in RCT, yet has historically gone unnoticed due to there being sufficient access off road to go riding. However, as more and more paths (used for over 20 years), get blocked / tarmaced there will be more riders on the road causing significant hazard. I understand a lot of work has been conducted in the South of RCT, but until these paths are joined up with the North and become strategic routes, there will always be an issue as only 7% of horse owners own horse transport (we cannot ride down the A470 to access the paths South of RCT!).	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies			
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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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1981.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089			Site:			PEX Session:									
Policy: NSA 24			Map:			Issue: Environment									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA24 Green wedge to prevent Rhigos and Hirwaun merging should be identified Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA 24 Green Wedges Suggest identification of a Green Wedge between Hirwaun and Rhigos to prevent the two villages spreading and merging in the future.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

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10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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1981.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091		Site: 778//NSA 26 Cynon Valley River Park						PEX Session:							
Policy: NSA 26				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA26 Hirwaun should benefit from the Cynon Valley River Park Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community	
2 3	Representation text NSA 26 River Park Hirwaun should benefit from the Cynon Valley River Park.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
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1981.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030		Site: 467/473 Hirwaun Ironworks, North						Delete Site		PEX Session:					
Policy: CS 1				Map:				Issue: Strategy Areas							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1).	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	CS1 Gloucesters site, Hirwaun: request to remove from settlement boundary. This is a designated SINC and should outline planning not come to fruition, the site should not be within the settlement boundary for future.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12	
	#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.	
	#Tower employment site to become tourism destination / green space.	
	#Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.		
	Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.		
	The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
	There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
1981.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.032		Site: 711//CS 3.5 South of Hirwaun						PEX Session:						
Policy: CS 3				Map:				Issue: Strategic Sites						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary CS3 Housing settlements should not be next to busy roads (I.e. housing site in Hirwaun on both sides of newA465) Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text CS3 p32 4.37 Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aassessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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Rhondda Cynon Taf County Borough Council Local Development Plan

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
															Yes

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1981.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033		Site: 717//CS 4.3						Hirwaun (South)			PEX Session:				
Policy: CS 4				Map:				Issue: Housing Requirement							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS4 Housing Site 3 (Land South of Hirwaun) should be carefully and properly planned and integrated as has the potential to become an isolated 'suburb'.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS4</p> <p>Concern that the proposed development site south of Hirwaun will not integrate well with remainder of village due to dualling of A465. It should not act as a 'suburb'. The area should be properly integrated with the existing village and a green wedge should be designated between this settlement and Rhigos to prevent the two from merging (e.g as has happened with Trecynon and Cwmdare for example).</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

Item	Question	Reply	Tick box Replies
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3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

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Rhondda Cynon Taf County Borough Council Local Development Plan

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1981.D10			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 727//CS 8.a4						Aberdare Bypass		PEX Session:					
Policy: CS 8		Map:		Issue: Transportation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059. The A4059 should be carefully planned and the 'ecit' route should not be at Croes Bytchan as there will be no direct access to new A465, thus moving rather than solving the problem, and increasing safety issues.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P38 CS8</p> <p>The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059 (proposed within this LDP). The development should not take place in isolation – the surrounding infrastructure must be in place first.</p> <p>The A4059 must be carefully planned in conjunction with the A465 dualling. Currently, the A4059 is illustrated as linking from the current Aberdare bypass to the Croes Bychan junction. With the current A465 plans, this should be changed, as there will be an overbridge at Croes Bychan so no direct access to A465. This will either push traffic directly through the centre of Hirwaun village, OR via Croes Bychan which will prove extremely dangerous and could affect safety of current businesses as there is a Riding School, Livery Yard and Farms, thus many horses and slow moving vehicles which use the Croes Bychan Road. This should be reconsidered in line with the direct access to the A465 or you will just be directing the existing traffic problem elsewhere, but not solving it.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
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Item	Question											Reply	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

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Rhondda Cynon Taf County Borough Council Local Development Plan

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1981.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.039						Site:						PEX Session:		
Policy: CS 9				Map:				Issue: Waste Management						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary	<p>CS9 ensure road infrastructure is sufficient. Ensure waste received is not travelling so far to reach the site that it impacts detrimentally upon RCTs carbon footprint.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS9 Waste Management</p> <p>Site at Hirwaun may be a suitable site in isolation, but will it be suitable when considered with other proposed developments in terms of additional vehicles etc. Road network and infrastructure must be improved and made sufficient to support additional heavy vehicles. There should be restrictions around the catchment area of the waste (i.e. in the locality and / or neighbouring authorities), in line with climate change policy.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?														
												Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														
												Yes				

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1981.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040			Site:			PEX Session:									
Policy: CS 10			Map:			Issue: Minerals									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS10 We object to an opencast coalmine which will impact negatively upon the surrounding area and people. We propose the site to be used as a green space / country park or tourism employment site which will have a LONG TERM sustainable future, creating local jobs and a community benefit.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P40 CS10 Minerals We object to open cast coal mining.</p> <p>The objection is based upon social, economic and environmental grounds. There is no confidence that jobs will be provided to local people. The number of jobs created through opencast mining (as opposed to deep mining) is minimal. We are not confident of a safeguard balance in extraction of minerals. It has not been made explicit what planning gain / community benefits are being offered (if at all). What are the agreements and closure plans in terms of replacing the landscape, habitats etc to their former / current status. An open cast mine is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p> <p>The proposition of such a site opening here is already causing anxiety and stress amongst residents who are concerned about their health and wellbeing, their quality of life, the visual and airborne impacts. This coupled with the additional proposals for wind farms, housing development, road development, waste facility development is too much to bear for many people. If we are forced to have 'clean' energy from wind farms, why must we then have an open cast coalmine AND an energy from waste facility? It is acknowledged in various health impact assessment that the proposal of an individual facility / planning proposal can detriment to human health in relation to mental well being due to the stress caused by the perception of what will be built, but to impose such significant infrastructure changes all within the same area should surely be revised. Hirwaun should not bear the burden of all of RCT's energy issues. It is the largest authority in Wales, yet al;l major development in line with National strategy and strateginc / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. It is also in the Council's interest to do so, as the more heightened people's awareness of this situation, the more opposition each planning application will face. Hirwaun is not trying to diminish its responsibility but believes in fair distribution, which is not apparent in this LDP.</p> <p>If the case for the site is employment, it would be far more beneficial and sustainable, with longer term gain in terms of jobs, human health, recreation, leisure and so on, to use the proposed site as a tourism area. This would be sustainable and local people could be employed to manage, maintain, garden / landscape / provide and teach recreational activities such as fishing, canoeing, horse riding, cycling, walking, camping / accommodation, and other associated outdoor activities, provide catering facilities etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

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12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	

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19	8	CE4 Test?		Not flexible to deal with changing circumstances?											Yes
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>															
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											Yes		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
1981.D13			<input type="checkbox"/>	O	W	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.041							Site:			PEX Session:							
Policy: CS 11				Map:			Issue: Climate Change										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>CS11 Wales has a plan to achieve One Planet Living by 2050. Some of the policies, in particular CS10 will counteract this.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>p41 CS11 Minerals extraction will lead to increased carbon dioxide (CO2), plus additional green house gas emissions. There is therefore potential for CS10 to have a detrimental effect upon CS11. Minerals extraction (as proposed for Hirwaun mountain) is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK is regulated by the Intergovernmental Panel for Climate Change (IPCC) and has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aassessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1981.D14			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046			Site:			PEX Session:									
Policy: AW 4			Map:			Issue: Planning Obligations									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary AW4 Bridleways / horse access must be considered. There is only talk of walkers / cyclists. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text P46 AW4 Bridleways Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons															Yes

1981.D15 S W M

Document: Deposit Draft, p.054 Site: PEX Session:

Policy: AW 8 Map: Issue: Environment

Summary:

Item Question	Representation Text
1 2 Issue Summary AW8 agree that natural environment should be protected.	
2 3 Representation text AW8 States that the natural environment is to be protected and enhanced, and no permission for development on designated SINC sites – agree with this. Only permitted where not unacceptably disruptive / damaging – agree with this. However, the Gloucesters site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
1981.D16			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059			Site:			PEX Session:									
Policy: AW 13			Map:			Issue: Renewable Energy/Wind farms									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	AW13 opposed to large windfarm which would be blight on landscape. This should be considered with all other applications taking place as it is too much for one community to bear having numerous large infrastructure in its locality.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	AW13 Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
	There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

2022.D1 S I M

Document: Deposit Draft, p.031 Site: PEX Session:

Policy: CS 2 Map: Issue: Strategy Areas

Summary:

Item	Question	Representation Text
1	2	Issue Summary
<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>		
2	3	Representation text
<p>Policy CS2</p> <p>The emphasis for sustainable growth in the SSA to benefit the whole of the Borough as set out in the policy is supported. In seeking to achieve this we support the inclusion of bullet point 5 in the policy as being one of the ways in which it can be achieved. Providing opportunities for significant inward investment, in sustainable locations is a key policy objective set out in Section 2.3 of Planning Policy Wales and will contribute to sustainable development. Redevelopment at Treforest Industrial Estate presents an opportunity for sustainable economic growth through the re-use of previously developed land in a sustainable location.</p> <p>Similarly we support the inclusion of bullet point 6 in the policy and contend that redevelopment of existing sustainable employment sites within the Borough, such as Treforest Industrial Estate can help reduce out commuting by providing employment opportunities close to one of the main centres of population in the SSA.</p>		
8	7	Previous Representation No
2022		
21	11	Why attend Examination?
The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.		

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.031, para.4.31-4.34						Site:			PEX Session:							
Policy: CS 2				Map:				Issue: Strategy Areas								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Paragraph 4.31 – 4.34</p> <p>Paragraph 4.31 states that the ability of the SSA to absorb further growth at existing rates, without social and environmental degradation, is being tested. In seeking to accommodate further growth re-use of underused or vacant sites could help contribute to the development needs of the Borough. The preference for re-use of previously developed land is set out in paragraph 2.7 of Planning Policy Wales which states that:</p> <p>“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value.”</p> <p>Previously developed or existing employment sites could be more readily absorbed in the SSA delivering sustainable economic opportunities without creating the same adverse social or environmental impacts that could occur through the development of new or greenfield sites.</p> <p>Treforest Industrial Estate has a variety of vacant sites and buildings that are suitable for redevelopment to meet changing requirements for employment land provision within the Borough and to help continue the transformation of the economy. SEGRO are currently preparing a Masterplan which identifies a range of appropriate uses for the Estate to include all B1 uses (offices, research and development and light industry), general industry (Class B2) and warehousing and distribution (Class B8) and appropriate sui generis uses as well as other ancillary uses such as retail (Class A1), cafes and restaurants (Class A3), crèche (Class D1) and leisure uses (Class D2). Treforest Industrial Estate is located adjacent to the strategic road network and in close proximity to the national motorway network and as such can take advantage of those strategic linkages set out in paragraph 4.8. As such we are seeking acknowledgement within the plan that existing employment 17283/A3/JP/ac -3- 25th March 2009 and previously developed sites have the potential to assist with meeting the demands for future development within the SSA.</p> <p>We support the acknowledgement in paragraph 4.34 that not all the requirements of Policy CS2 will always be met and that the priority of economic regeneration objectives should be given significant weight.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.035, para.4.51							Site:			PEX Session:							
Policy: CS 6				Map:				Issue: Employment									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Paragraph 4.51</p> <p>The supporting text to policy CS6 set out in paragraph 4.51 states that a progressive approach must be taken within the Borough in the development of land for economic purposes. We support the Council's intention to maximise the opportunity for large scale inward investment whilst ensuring growth in the local employment sector through the allocation of sites. We feel that making more efficient use of existing employment areas can also play an important role in meeting the development needs of the Borough and suggest that reference is made within the policy to the potential that they can contribute in meeting these requirements. By widening out the permitted uses that will be acceptable on existing employment areas this can help in meeting the demands of existing firms within the Borough looking to expand and diversify, whilst also attracting new employers into the Borough. Treforest Industrial Estate is an existing employment area that could contribute to growth in the local employment sector through re-use and redevelopment of underused or vacant plots. The identification of a broader range of uses that would be permitted at the Estate could attract new employers to the area thus contributing to economic investment and job creation and the potential for this should be acknowledged in the plan.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D4			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035, para.4.52 - 4.53						Site:			PEX Session:						
Policy: CS 6				Map:			Issue: Employment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Paragraph 4.52 – 4.53</p> <p>We support the identification of key sectors for employment growth within the Borough and the acknowledgement that there have been recent changes in the economy which are likely to impact on employment land sites. The changing structure of the economy away from manufacturing and the continued increase in service sector employment indicates that the Borough's planning policies in respect of new employment provision should be responsive and flexible to these ever changing market needs.</p> <p>The key sectors of employment growth set out in paragraph 4.52 do not reflect the changes in employment that are listed in paragraph 4.53. Employment levels in distribution for instance have increased but this is not identified as a key sector of employment growth. We feel that those sectors of the economy that are experiencing an increase in employment levels should be recognised and that the need to provide for the specific requirements of these sectors in terms of land and premises should be identified within the plan in order to maintain this recent success.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.035, para.4.55							Site:			PEX Session:							
Policy: CS 6				Map:				Issue: Employment									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.	
2 3	Representation text	
	Paragraph 4.55 We support the statement within the paragraph that indicates the Council's support for the redevelopment and modernisation of redundant sites, including the sub-division of large premises to create smaller units. We feel that in addition to sub-division of redundant or vacant properties, re-use or redevelopment of existing vacant and underused employment sites for alternative uses should also be supported by the policy and supporting text in order to maximise all opportunities to bring back land into beneficial use and to reduce the need to develop on greenfield sites. The full range of employment generating uses (i.e. Class B1, B2 and B8) should be included along with those that are identified in paragraphs 4.52 and 4.53.	
8 7	Previous Representation No	
	2022	
21 11	Why attend Examination?	
	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D6			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.036, para.4.59						Site:			PEX Session:						
Policy: CS 6				Map:				Issue: Employment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Paragraph 4.59</p> <p>Representations were submitted on behalf of SEGRO at the Preferred Strategy consultation stage seeking the identification of a Simplified Planning Zone (SPZ) at Treforest Industrial Estate. SEGRO's original objections to the omission of the identification of a proposed SPZ at Treforest Industrial Estate still stand.</p> <p>Guidance contained in paragraph 7.2.4 of Planning Policy Wales notes that SPZs offer a means to encourage development and to generate private sector interest. It goes on to state that local planning authorities have a statutory duty to keep under review the desirability of an SPZ scheme for part or parts of their area.</p> <p>More detailed guidance on SPZs is contained within TAN3: Simplified Planning Zones. The guidance reiterates at paragraph 3 that local planning authorities have a statutory duty to keep under review whether SPZ schemes are desirable in their area.</p> <p>The benefits of SPZs are set out in paragraph 3 of TAN3 and include speed and certainty for developers, reducing costly delays and providing flexibility to make changes within the framework of a scheme. From the local authority's perspective a SPZ can be a means of directing development to where they wish it to happen and to generate private sector interest in an area. An SPZ would operate for a period of 10 years and achieves its effects by granting planning permission for specific types of development within its designation. Subject to complying with any conditions or limitations any conforming development would not require a separate planning application.</p> <p>Paragraph 9 of TAN3 states that in respect of the creation of SPZs: "Older industrial estates or other sites in need of regeneration and sites in single ownership may be particularly suitable." Treforest Industrial Estate is within the single ownership of the Treforest Unit Trust and the owners are looking at undertaking a programme of regeneration to improve the estate. As such the Estate would be wholly suitable to be designated as a SPZ and is proven as being an effective planning tool which can help complement the economic regeneration objectives of the development plan. Following discussions with the Head of Development and Regeneration and Director of Planning it has been proposed that whilst the Council do not feel able due to resources to progress a SPZ at Treforest Industrial Estate, they are prepared to create Supplementary Planning Guidance for Treforest Industrial Estate. Whilst less preferable to our client, an SPG would set out the acceptable uses at the Estate, including Class B1(a) offices, along with greater delegated powers for Officers to determine individual planning applications at the Estate. Representations are made later in this submission on this subject.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
13	8	C2 Test? Does not have regard to national policy?													
												Yes			
14	8	C3 Test? Does not have regard to Wales Spatial Plan?													
												Yes			
17	8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?													
												Yes			
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													
												Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													
												Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D7			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: p.039		Site: 839//SSA 25.1						Treforest Industrial Estate			PEX Session:					
Policy: CS 9		Map:						Issue: Waste Management								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>		
2 3	Representation text	
<p>Policy CS9 – Waste Management</p> <p>We object to the requirement within the policy for the provision of community recycling facilities to be made in accordance with Policy SSA 25. The provision of community recycling facilities on Treforest Industrial Estate would conflict with SEGRO's objective of regenerating the Estate for a mix of uses including Class B1(a) offices and is contrary to other changes that SEGRO are seeking to the LDP through the submission of these representations. SEGRO is seeking to create an attractive location for new businesses, including High Tech Manufacturing, Knowledge Based Industries and quality office space. Waste recycling facilities are considered to be incompatible with such aspirations and would undermine the wider economic regeneration objectives of the Plan especially for the SSA.</p>		
8 7	Previous Representation No	
2022		
21 11	Why attend Examination?	
The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.041							Site:			PEX Session:							
Policy: CS 11				Map:			Issue: Climate Change										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.	
2 3	Representation text	
	Policy CS11 – Climate Change SEGRO do not object in principle to the provisions of Policy CS11 but request that it is amended to acknowledge that it may not be technically feasible and/or viable to meet the requirements of the policy on all occasions. This is already recognised at paragraph 4.34 in relation to Policy CS2.	
8 7	Previous Representation No	
	2022	
21 11	Why attend Examination?	
	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D9			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.045						Site:			PEX Session:						
Policy: AW 2				Map:			Issue: Design								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>		
2 3	Representation text	
<p>Policy AW2 – Sustainable Locations</p> <p>The policy as drafted does not include a criterion that the preference for development in sustainable locations should be on previously developed land. This should be added to clarify that development on previously developed sites is sequentially preferable to greenfield sites.</p>		
8 7	Previous Representation No	
<p>2022</p>		
21 11	Why attend Examination?	
<p>The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.</p>		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
<p><i>Item Question</i> <i>Reply</i> Tick box Replies</p>			
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D10			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.045							Site:			PEX Session:							
Policy: AW 3				Map:				Issue: Affordable Housing									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>		
2 3	Representation text	
<p>Policy AW3 This policy has been omitted and as such the remaining policies should be renumbered for clarity.</p>		
8 7	Previous Representation No	
2022		
21 11	Why attend Examination?	
<p>The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.</p>		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.047							Site:		PEX Session:								
Policy: AW 5				Map:				Issue: Design									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Policy AW5 – New Development</p> <p>The requirement to meet certain environmental and building standards is covered by other legislation namely, Building Regulations. As such we feel that a policy requiring the same as that already controlled by another system of regulation is unnecessary. As such Section B) of the policy should be deleted.</p> <p>If the Council do not accept this proposed change we object to the requirement in Section B) that commercial schemes greater than 1,000 square metres should achieve as a minimum the Very Good BREEAM standard. We think that it is unreasonable to apply a blanket requirement for BREEAM Very Good to be achieved on all Class B and other commercial uses as there is no recognition of the nature, type of buildings or the occupiers involved. This is particularly prevalent in industrial buildings which by their very nature are different to office accommodation.</p>
4 5	Changes sought	<p>Any policy seeking BREEAM Very Good needs to be flexible and as such needs to allow for the consideration of the feasibility and viability of achieving a Very Good standard in the proposed development. Consequently we suggest Section B) 4 of the Policy should be rewritten to state:</p> <p>"Commercial schemes of 1,000 square metres and over should seek to achieve as a minimum the Very Good BREEAM (or equivalent) standard unless it can be demonstrated that it is not feasible or economically viable to do so.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.049							Site:			PEX Session:						
Policy: AW 6				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Policy AW6 – Design and Placemaking</p> <p>We object to the number of requirements that will need to be satisfied as part of a development proposal. This is considered too prescriptive as not all 16 criteria will be applicable in every case and as such we feel that it is unnecessary to include all of them in the policy. This is particularly relevant considering it is the Council's intention to prepare Supplementary Planning Guidance on both Placemaking and Residential Design that will provide more detailed guidance.</p> <p>We object to the requirement in the policy for commercial developments of 10,000 square metres to be accompanied by a comprehensive masterplan as the threshold of 10,000 square metres is considered too low. We feel that it is unnecessary to submit a comprehensive masterplan for such developments as the level of supporting information accompanying a proposal of this scale would be sufficient to enable the authority to determine the application without the need for a comprehensive masterplan to be submitted as well.</p> <p>If a threshold is to be used we propose that this be raised to at least 50,000 square metres of commercial development.</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D13			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.057							Site:		PEX Session:							
Policy: AW 11				Map:			Issue: Employment									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	<p>We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.</p> <p>We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.</p>
2 3	Representation text	<p>Policy AW11 – Existing Employment and Retail Uses</p> <p>We propose for reasons of clarity that this policy is split into two so that it is clear that the first part covers existing retail units and the second for existing employment areas. In relation to existing employment areas we feel that these areas should be identified on the Proposals Map and related to the policy.</p> <p>We support the Policy in terms of promoting the potential re-use of existing employment areas for sui generis, other employment generating and ancillary uses. We support this flexibility in Policy AW11, as previously the policies covering re-use of existing employment areas were very rigid and overly restrictive.</p> <p>Whilst acknowledging that re-use of employment areas for other sui generis and other uses may be appropriate we feel that it should also be made explicit that existing employment areas can be re-used for the full range of Class B employment uses as well. Widening out the permitted uses on existing employment areas will help with meeting the changing accommodation demands of employers and the Borough as a whole.</p>
4 5	Changes sought	<p>Subsection 5 of the policy sets out the criteria that must be met in seeking to re-use an employment site. We propose that some additional words are added to clarify these. Currently it is not clear whether all four tests have to be met, and we assume this is not the case. Consequently we propose that it should read as follows (with the suggested additional wording underlined): (<u>##</u> NB no underline facility - additional wording is the 3 'OR's' in capitals at the end of points a,b, and c).</p> <p>"5. In the case of employment sites:</p> <p>a) A landbank of employment sites suitable to accommodate a range of employment uses across the plan area is maintained; OR</p> <p>b) The proposed alternative use would not prejudice adjoining employment land; OR</p> <p>c) The proposed use is for a sui generis use, which exhibits the characteristics of B1, B2 or B8 uses and which could appropriately be accommodated on an employment site; OR</p> <p>d) The proposed use is a small, ancillary use which falls outside the B-Class uses but which supports the wider function of an employment area without affecting the integrity of the sites."</p>
8 7	Previous Representation No	2022
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
19	8	CE4 Test?		Not flexible to deal with changing circumstances?													Yes
<i>Item Question</i>										<i>Reply</i>					Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?													Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes		

2022.D14

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Document: Deposit Draft, p.115

Site: 839//SSA 25.1 Treforest Industrial Estate

Delete Site

PEX Session:

Policy: SSA 25

Map:

Issue: Waste Management

Summary:

<i>Item Question</i>		Representation Text
1	2	Issue Summary We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.
2	3	Representation text Policy SSA25 Provision of Community Recycling Facilities SEGRO object to the safeguarding of the site, identified on the Proposals Map as SSA 25.1, on Treforest Industrial Estate for the continuation of, or future provision of community recycling facilities. This is contrary to SEGRO's aspirations to regenerate the Estate as a high quality business and employment location and feel that any extension to the existing facility will compromise the future development of Estate. The Policy as drafted does not contain any provision to ensure that adjacent users are not adversely affected by the operation of such a facility.
8	7	Previous Representation No 2022
21	11	Why attend Examination? The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.

<i>Item Question</i>		<i>Reply</i>	Soundness Tests
17	8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes
<i>Item Question</i>		<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D15			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft		Site: 839//SSA 25.1							Treforest Industrial Estate			PEX Session:					
Policy:				Map:				Issue: Policy Omission									
Summary:																	

Item Question **Representation Text**

1 2 Issue Summary

We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007.

We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.

2 3 Representation text

Omissions from the Local Development Plan

In ultimately seeking a SPZ at Treforest Industrial Estate SEGRO feel that a site specific policy relating to Treforest Industrial Estate is essential and would assist with guiding development at the Estate by establishing a range of permitted uses. The new policy should specifically identify Treforest Industrial Estate as a priority area for regeneration and list the type of uses which planning permission would be granted for, as agreed with the Head of Development and Regeneration. These would include Class B1 (including offices), B2 and B8 and small scale retailing (Class A), non-residential institutions (Class D1) and leisure and recreation uses (Class D2) to serve the employees at the Estate and immediate area, along with appropriate sui generis uses. Our suggested wording of the Policy would be:

“Within Treforest Industrial Estate as defined on the Proposals Map development and change of use, for offices, industrial, business and warehouse uses (Use Classes B1, B2 and B8) will be granted planning permission. Other uses including retailing (Class A1), cafes/restaurants (Class A3), non residential institutions (Class D1), assembly and leisure (Class D2) and appropriate sui generis uses will be permitted where they are complementary to the employment area.”

Adopting such a policy would establish the policy framework within which a SPZ could be created at the Estate. Following discussions with the Head of Development and Regeneration and Director of Planning regarding the creation of a SPZ at Treforest Industrial Estate, Officers have suggested the production of an SPG in the first instance as a pre cursor to an SPZ. Objections have previously been submitted to the Preferred Strategy consultation to the omission of the creation of a SPZ at Treforest Industrial Estate and these remain.

Production of SPG could be undertaken to further explain the policy that we are proposing for Treforest Industrial Estate for inclusion within the Local Development Plan. This could provide guidance on the quantum of additional floorspace that would be permitted along with details of the system of delegation to Officers in determining planning applications at the Estate.

If a SPG is to be produced as a pre-cursor to a SPZ a site specific policy for Treforest Industrial Estate is necessary. Guidance set out in paragraph 5.2 of Local Development Plans Wales (2005) states:

“SPG does not form a part of the development plan but must be consistent with it. It may take the form of site specific guidance such as master plans, design guides or area development briefs, or thematic such as shopfront guidance or detailed car parking standards. It should be clearly cross-referenced to the relevant adopted plan policy or proposal, which it supplements, and may be issued separately from the plan.”

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4	5	Changes sought													
In summary and the changes that we would like made to the plan are as follows:															
1. Introduction of a site specific policy to include the range of uses as suggested in the draft Policy above;															
2. Commitment within the Plan that a SPZ will be created at Treforest Industrial Estate over the Plan period; and															
3. Production of SPG to act as an interim measure until the SPZ is adopted.															
We would be grateful if you could give consideration to our representations and continue to advise us of the progress of the Local Development Plan. In the meantime, if you have any questions or consider a meeting would prove helpful then please do not hesitate to contact either Mark Sitch or myself.															
8	7	Previous Representation No													
2022															
21	11	Why attend Examination?													
The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.															
<i>Item Question</i>													<i>Reply</i>		Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D16			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.25, para.4.2.						Site:			PEX Session:						
Policy:				Map:				Issue: Core Strategy							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary	We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.	
2 3	Representation text	Chapter 4 Core Strategy We support the strategy set out in the Local Development Plan (LDP) of the Council taking a different approach to development in the north and south of the Borough and agree that the unique characteristics and availability of land suitable for development dictate that a different policy should be pursued for those areas that are in decline and those which are experiencing growth (paragraph 4.2).	
8 7	Previous Representation No	2022	
21 11	Why attend Examination?	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2022.D17			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.26, para.4.7						Site:			PEX Session:						
Policy:				Map:				Issue: Core Strategy							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.	
2 3	Representation text	
	Paragraph 4.7	
	We support the identification that the Southern Strategy Area (SSA) should be the emphasis for sustainable growth that benefits the Borough as a whole. Treforest Industrial Estate is located within the SSA and is suitable for redevelopment to make more efficient use of previously developed land. Our previous discussions with Officers at the Council in respect of the creation of a SPZ at Treforest Industrial Estate have focused on the economic growth and creation of jobs that a SPZ could deliver. As such we feel that the identification of a SPZ at Treforest Industrial Estate would be entirely consistent with contributing to sustainable economic growth in an area that has experienced decline from traditional manufacturing industries and which would benefit the Borough as a whole.	
8 7	Previous Representation No	
	2022	
21 11	Why attend Examination?	
	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2022.D18			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.26, para.4.13							Site:			PEX Session:							
Policy:				Map:				Issue: Core Strategy									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	We are instructed by SEGRO Plc to submit representations to the Rhondda Cynon Taf Local Development Plan – Deposit Draft. SEGRO who act on behalf of the owners, Treforest Unit Trust, manage the Treforest Industrial Estate. We are in on-going discussions with Officers about the potential to create a Simplified Planning Zone at the Estate and our representations to the Local Development Plan reflect this principal objective. Our representations should be read in conjunction with those submitted on behalf of SEGRO at the Preferred Strategy consultation stage (Objector Reference: 2022) in February 2007. We set out our representations to the Deposit Draft with reference to the relevant paragraph or Policy.	
2 3	Representation text	
	Paragraph 4.13 The paragraph recognises that due to topographical constraints it will be difficult to accommodate significant growth within the Principal Town of Pontypridd and that land for residential development to accommodate the growing population of Pontypridd will need to be provided in the nearby settlements of Church Village, Llantwit Fardre, Treforest and Beddau. In seeking to accommodate additional residential development within surrounding settlements to Pontypridd this would need to be balanced with an equivalent provision of employment land in order to create mixed and balance communities. As such we consider that Treforest Industrial Estate is well placed for redevelopment and intensification of employment uses that could assist with generating sustainable economic development and contributing to the creation of mixed and balanced communities within the SSA.	
8 7	Previous Representation No	
	2022	
21 11	Why attend Examination?	
	The creation of an SPZ at Treforest Industrial Estate is considered to be of strategic significance for the borough in delivering economic investment and job creation.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2025.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106						Site: 529/538		Mwyndy			New Site		PEX Session:		
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Amendment of the LDP to include candidate site 538	
2 3	Representation text The Mwyndy area is identified within the LDP Preferred Strategy as being key to the successful implementation of the strategy(SIC). A mixed used development would greatly enhance the whole area.	
4 5	Changes sought Amendment of the LDP to include candidate site 538 as a mixed office, industrial & residential development.	
6 6	Candidate Site Ref No 538	

Item	Question	Reply	Soundness Tests
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035				Site: 500/509		Forgemasters Site				New Site		PEX Session:			
Policy: CS 6				Map:				Issue: Employment							
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Comment- the allocation of 50 ha represents an over-allocation of land. Please see supporting information.		
2 3	Representation text The site can make a positive contribution toward providing employment space. Please see supporting information.		
6 6	Candidate Site Ref No Part of the wider site now being considered was submitted as site 509.		
21 11	Why attend Examination? The site is large and there are a range of issues at stake including housing, employment, transport and retail. It is also at an important strategic location.		
Item	Question	Reply	Soundness Tests
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Over-allocation will have repercussions for the supply of land. Whilst a safety net is provided, this indicates that the loss of some sites will be acceptable.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.043				Site: 500/509		Forgemasters Site				New Site		PEX Session:			
Policy: AW 1				Map:						Issue: Housing Requirement					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Object	
	The policy will result in a shortfall of housing against the requirement.	
2 3	Representation text	
	-Over-reliance on windfall sites -Non urban capacity assessment to inform small site and windfall allowance Please see supporting information	
	We have a number of concerns regards the delivery of 14,850 new homes as proposed by Policy AW 1. We are concerned by the large reliance upon small sites and windfall sites to provide housing. Paragraph 9.2.5 of Planning Policy Wales requires local planning authorities to ensure that sufficient land is genuinely available to provide a 5-year supply of land for housing judged. To be considered available sites must be free, or readily freed, from planning, physical and ownership constraints, and capable of being developed. We understand that no urban capacity study has informed the contribution of small and windfall sites, and that the figures are based on past experience only. We therefore consider that these two sources of supply should be removed, or at the least be removed until later in the LDP lifetime, when an urban housing capacity study can be undertaken. Additional sites should be allocated for housing to ensure a 5 year land supply and to meet the overall housing requirement. Such an approach would accord with the frontloaded, evidence based approach of the LDP process.	
	The 2007 Joint Housing Land Availability Study (JHLAS) informs the LDP but an updated JHLAS was completed in July 2008. It identifies the potential availability of 3,328 dwellings, including small site projections. The LDP identifies availability of 5,496 dwellings from the capacity of large sites and the potential of small and windfall sites. Against the JHLAS figure there is a shortfall of 2,168 dwellings. This is a significant gap in the housing requirement that the site can help to fill.	
	It also appears that some double counting has occurred in the JHLAS, as proposed allocations including Llwynpia Hospital, Potters Field Trecynon and Treherbert Hospital are included within the JHLAS. This has the effect of increasing the shortfall of dwellings by above 2,168 dwellings.	
	Whilst the SA/SEA has considered sites against the objectives of the LDP it is not clear whether issues of marketability, viability or delivery have been considered. The development at Fernhail Colliery may not come forward in the plan period and other sites in the northern area particularly, such as land south of Hirwaun, may not be deliverable in the short/medium term.	
4 5	Changes sought	
	Additional housing sites should be allocated to fill the gap in housing supply.	
	Please see supporting information.	
6 6	Candidate Site Ref No	
	509 is part of this wider site	
21 11	Why attend Examination?	
	The site is large and there are a range of issues at stake including housing, employment, transport and retail. It is also at an important strategic location.	

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<i>Item Question</i>										<i>Reply</i>		Soundness Tests				
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes				
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of further housing sites will help ensure the housing requirement is met. Please see supporting information.														
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106							Site: 500/509 Forgemasters Site			New Site			PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Object - the site should be allocated for housing development	
2 3	Representation text Please see supporting information. Over-reliance on small and windfall sites, not based on an assessment of urban housing capacity/potential. Site can help to fill the gap in the housing requirement and provide housing for the community.	
4 5	Changes sought The site should be allocated for residential development. Please see supporting information.	
6 6	Candidate Site Ref No 509 is part of this wider site	
21 11	Why attend Examination? The site is large and there are a range of issues at stake including, housing, employment, transport and retail. It is also at an important strategic location.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Help meet the housing requirement and fill the gap that currently exists in the LDP.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112				Site: 806//SSA 20.7		Taffs Well Station				New Site		PEX Session:				
Policy: SSA 20		Map:		Issue: Transportation												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	Support the inclusion of Taffs Well station for improvements to park and ride, in particular, the provision of additional parking spaces.	
2 3	Representation text	
	Please see supporting information.	
	6.6 Transport Improvements	
	Transport is of key importance. The proposed development seeks to capitalise on the transport links not only for the increased intensity of use of the site proposed by the redevelopment, but also for the improvement of the transport network as a whole. Nearly 250 park and ride spaces will be created and an opportunity exists to improve National Cycle Network Route 8, the Taff Trail, which runs through the site. Such improvements could include lighting and better signage to inform existing and future residents of the cycle link.	
	The whole site is no more than 200 metres walking distance of Taffs Well train station, with regular services running to Cardiff Central and Pontypridd.	
	There is scope for a high degree of connectivity with the surrounding network of pedestrian routes, and provision for new linkages can be made through the site.	
	We support the park and rise improvements at Taffs Well proposed by policy SSA20. In particular, additional park and ride spaces at Taffs Well Station will make a significant contribution to improving journey times and accessibility at a well known congestion bottle neck. This area of the transport network has implications for the whole of the County Borough. Providing park and ride spaces will help relieve congestion, improve journey times, encourage the use of public transport and reduce CO2 emissions.	
	We have met with Arriva Trains, who confirmed that they would support additional park and ride spaces in this location.	
4 5	Changes sought	
	None in respect of policy SSA 20 (.7).	
21 11	Why attend Examination?	
	The site is large and there are a range of issues at stake including housing, employment, transport and retail. It is also at an important strategic location.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D5			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109				Site: 500/509		Forgemasters Site				New Site		PEX Session:			
Policy: SSA 15				Map:				Issue: Retail							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Object - the site should be allocated for retail development.	
2 3	Representation text The site should be allocated for retail development to meet local needs and also fulfil wider needs due to the strategic location and excellent transport links. Please see supporting information.	
4 5	Changes sought The site should be allocated for retail development in Policy SSA15	
6 6	Candidate Site Ref No 509	
21 11	Why attend Examination? The site is large and there are a range of issues at stake including, housing, employment, transport and retail. It is also at an important strategic location.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Retail facilities to provide services to the Taffs Well and wider community. Please see supporting statement.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035				Site:						New Site		PEX Session:				
Policy: CS 6				Map:						Issue: Employment						
Summary:																

Item Question

Representation Text

2 3 Representation text

In terms of employment we note that the allocation of 50 hectares of land by policy CS6 includes a safety net of some 33 ha based on past take up rates. NLP undertook an Employment Land Review in August 2008 on behalf of Council. The report identified 180 hectares of allocated employment land available, 126 hectares of which was in Taf Ely. The report recommends the allocation of 50 hectares of land and this recommendation is carried forward into the Deposit Draft LDP. However, NLP forecast a requirement of 21 hectares of land and then provide a safety margin of around 33 hectares based on past take up. These forecasts are combined (and rounded down) to create the 50 hectare allocation, which paragraph 9.52 of the NLP report confirms represents an: "over-allocation of land to contribute towards the achievement of the important policy objectives".

In total, the Rhondda Cynon Taf Employment Land Availability Schedule 2008 identifies 448.48 hectares of available employment land. The ongoing future supply of land in the LDP is based upon an over-provision of land despite the rationalisation of existing employment allocations. Whilst NLP forecast the need for 21 hectares, the LDP seeks to allocate 118 hectares of Land including the strategic sites. As such the loss of part of the site will not detrimental to the supply of land in the County Borough.

2027.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.045				Site:						New Site		PEX Session:				
Policy: AW 2				Map:						Issue: Design						
Summary:																

Item Question

Representation Text

2 3 Representation text

Bullet Point 1 of policy AW2 should be amended to exclude the reference to 'in the northern strategy area'. Allowing growth beyond settlement boundaries may aid development in the northern area but the disadvantages of such a strategy could be significant. Sustainability issues such as poor transport links, and poor access to jobs and services could arise. The current policy wording may also include to a sporadic pattern of development, encroachment into the countryside and the unnecessary loss of greenfield sites. Bullet point 8 of the policy should be amended to read 'the proposed development does not cause significant harm to a green wedge...'. The assessment of development proposals should be evidence based and include an assessment of the impacts of development and any other material considerations. There may be instances where it is beneficial to develop sites within a Green Wedge or SINC. Some of the allocated sites are subject to SINC designations.

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046										Site:		New Site		PEX Session:		
Policy: AW 4				Map:				Issue: Planning Obligations								
Summary:																

Item Question

Representation Text

2 3 Representation text

DTZ acknowledges the principle of S106 contributions in order to support development proposals, as sought by Policy AW4. We would however remind the Council that the contributions sought must satisfy the relevant tests, and also request that flexibility and realism is maintained to ensure that development is not constrained, and the wider objectives of the LDP are achieved.

2027.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.073										Site: 4//NSA 7 0STR Robertstown/Abernant		PEX Session:				
Policy: NSA 7				Map:				Issue: Strategic Sites								
Summary:																

Item Question

Representation Text

2 3 Representation text

Policy NSA 7 should be revised as we do not consider that the site would provide for 600 dwellings. The residential area is about 13.2 hectares but some land will be given over to a new school, which we estimate will require about 1 ha. Without the school development would need to be at 45 dwellings per hectare to reach 600 dwellings and at 49 dwellings per hectare with the school. These are relatively high densities, which are at odds with the SA/SEA which advises that development should limit impact on the adjacent countryside and retain a 'parkland setting'. High density development is proposed on the footprint of the hospital but high density development will not be viable in this location, particularly as there is a large supply of affordable, 2 bedroom houses in the immediate and local area. We consider that an overall density of 35 dwellings per hectare is more realistic and the housing allocation should be reduced to 440 units to reflect this.

2027.D10			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.077										Site: 654//NSA 9.4 Rear of Birchwood, Llwydcoed		Settlement Boun		PEX Session:		
Policy: NSA 9				Map:				Issue: Housing Allocation								
Summary:																

Item Question

Representation Text

2 3 Representation text

We object to housing allocations 4 and 6 under Policy NSA 9. About 50% of the Old Brickworks (site 4) is densely covered with trees, many of which are covered by TPO's. Removal of these trees would cause significant harm. If the existing trees are to remain it is unlikely that the 175 dwellings will be provided as the remainder of the site would need to be developed at densities of 60-70 dph which is unrealistic in this area. We therefore recommend that this allocation is reduced in scale, to 80 dwellings.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2027.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Delete Site	PEX Session:
Site: 656//NSA 9.6 Nant y Wenallt, Abernant Road, Abernant																
Policy: NSA 9				Map:				Issue: Housing Allocation								
Summary:																

Item Question

Representation Text

2 3 Representation text

We object to housing allocations 4 and 6 under Policy NSA 9. We consider that site 6 (land at Nant Y Wenallt, Abernant Road) should not be allocated for housing. It will result in loss of a greenfield site, small loss of SINC and encroachment into the countryside. It is not a logical urban extension or infill site.

2027.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	New Site	PEX Session:
Site:																
Policy: NSA 12				Map:				Issue: Settlement Boundary								
Summary:																

Item Question

Representation Text

2 3 Representation text

DTZ has concerns with Policy NSA 12 in relation to the policy for development adjoining settlement boundaries. The policy only allows development adjacent to settlement boundaries where it would consist of 10 or less dwellings. The policy does not allow development adjoining the principal town of Aberdare. The proposed Policy may result in unplanned and piecemeal development in less sustainable rural areas.

2027.D13			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	New Site	PEX Session:
Site:																
Policy: NSA 16				Map:				Issue: Employment								
Summary:																

Item Question

Representation Text

2 3 Representation text

Policy NSA 16 makes provision for the employment led mixed use development of redundant industrial sites, to support the re-development of such sites. We support the reasoning of the policy and agree that modern occupiers often have less land take and mixed use schemes can add vitality and be more financially viable. However, flexibility should be built into the policy to allow the loss of employment land where it can be justified. Employment uses at some sites may not be feasible due to issues such as impact on residential amenity, poor access, low attractiveness to the market, the availability of more attractive sites or the site is simply in the wrong location. Such reasons may explain why an employment site is vacant and mixed use schemes will not overcome fundamental geographic or market issues. There may be instances where employment is not the most appropriate use.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2027.D14			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107						Site:				New Site		PEX Session:			
Policy: SSA 12				Map:				Issue: Affordable Housing							
Summary:															

Item Question

Representation Text

2 3 Representation text

Policy SSA 12 regarding affordable housing should acknowledge that no, or lower affordable housing provision will be acceptable where there is no demonstratable affordable housing need or where it can be demonstrated that 40% provision would prevent the delivery of key sites.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2028.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106				Site: 185/182		WPD Depot				New Site		PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Object-the housing site should be allocated for residential development	
2 3	Representation text The site was submitted and assessed at the candidate site stage and subsequently identified in the Deposit Draft put to Members, for residential development. However, due to a break down in communications between Planning Policy and Development Control, the site has been omitted from the Deposit public consultation version. The Council has indicated to us during previous discussions, that it was the Planning Policy's teams impression that the site was consented for residential development. This is not the case as the planning application was deferred from Committee. The site is in accordance with the LDP Strategy, sustainability appraisal, and wider aims and objectives. The sites allocation for residential development was agreed by Council Members who did not raise issue with its inclusion in the Deposit Plan they approved for public consultation. We therefore consider that the sites allocation should be reinstated. Whilst it is accepted that the site falls within the settlement boundary, like other proposed allocations within the settlement boundary, the site should be allocated in the LDP. Further, we presume that the site is still accounted for in the LDP, but as an existing housing 'commitment'. If the site is not re-allocated, there will be a shortfall in the LDP housing requirement because at the present time there is no certainty that consent will be granted for the current application. I enclose a copy of the representation submitted to the Preferred Strategy in February 2007.	
4 5	Changes sought The site should be re-instated and allocated for residential development	
6 6	Candidate Site Ref No 182	
8 7	Previous Representation No 182	
9 7	Why no previous Representation Copy enclosed	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The site is sustainable and suitable for development. The LDP process has confirmed that the site should be allocated for residential development		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit								Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons								Yes					

2031.D1

Document: Deposit Draft, p.108, para.6.157 - 6.158 Site: Settlement Boun PEX Session:

Policy: SSA 13 Map: Issue: Settlement Boundary

Summary:

Item	Question	Representation Text
1	2 Issue Summary	
	A settlement boundary should be included around the site edged in red on the attached plan under the provisions of policy SSA 13.	
2	3 Representation text	
	It is submitted that a settlement boundary should be included around this part of Beddau as shown on the attached plan. Related submissions have been made that this site should be allocated for housing and that the special landscape areas be deleted from those parts of the site that are proposed for housing. The site adjoins existing residential development to the north and will be contained by the existing woodland to the south and east. The allocation of this site would comprise a logical extension of this part of Beddau and would also relate well to the housing allocation to the east made under SSA 10.15.	
4	5 Changes sought	
	The settlement boundary should be amended to include the site at Beddau as shown on the attached plan under the provisions of policy SSA10.	
9	7 Why no previous Representation	
	Submissions were made in respect of this site and related issues but not in relation to the settlement boundary as these were not identified until the Deposit Plan stage.	
21	11 Why attend Examination?	
	This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17	8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20	9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The allocation of the site shown on the attached plan for housing and the related inclusion of a settlement boundary would help meet housing needs on this part of the Borough. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site to the south of Beddau is available to meet short term housing need. Further, the site comprises a logical extension of this part of the settlement within strong physical boundaries provided by the woodland. The allocation of the site for housing and the inclusion of a settlement boundary would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3	4 Seek changes? Any changes to be made to the Plan?	Yes	
5	6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7	7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2031.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149										Site:		New Site		PEX Session:		
Policy: SSA 10				Map:				Issue: Housing Allocation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The site is edged in red on the attached plan should be allocated for residential development under the provisions of policy SSA 10.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate residential development. The site adjoins existing residential development on the northern side of Brynteg Road and relates well to existing built form. The allocation of this site would comprise a logical extension to this part of Beddau and would relate well to allocation SSA 10.15 to the east. The site has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide an element of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal. The scheme involves the retention of areas of woodland which form part of SINC 144 identified on the Constraints map. Mitigation measures would be taken if necessary to reduce any possible adverse impact. See attached letter for further detail.	
4 5	Changes sought	
	The site, shaded in brown, should be allocated for residential development under the provisions of policy SSA10.	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site to the south of Beddau is available to meet short term housing need. Further, the site comprises a logical extension of this part of the settlement, relates well to existing development and would be well contained within strong physical boundaries provided by the surrounding woodland.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2031.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183		Site: 827//SSA 23.5		Llantrisant Surrounds		Amend site boun		PEX Session:							
Policy: SSA 23		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The Special Landscape Area designation which affects those parts of this this proposed for housing should be deleted.	
2 3	Representation text	
	This site comprises part of a special landscape area designated under SSA 23.5. Those parts of the site which are proposed for housing do not merit such inclusion in landscape terms and it is considered that the SLA should apply only to the wooded areas of this site. The part of the site which is proposed for housing is not of special value in landscape terms and is an area which could appropriately be developed. See attached letter for further detail.	
4 5	Changes sought	
	The site should be deleted from the Special Landscape Area designation made under the provisions of policy SSA 23.5.	
9 7	Why no previous Representation	
	Submissions were made in respect of this site and related issues but not in relation to the special landscape area designation as these were not identified until the deposit plan stage.	
21 11	Why attend Examination?	
	The designation and extent of special landscape designations is one which is fundamental to the soundness of the LDP. The submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP. These issues should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108				Site: 597/606 Meadow View, adj				Settlement Boun		PEX Session:					
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary A settlement boundary should be included around the site edged in red on the attached plan under the provisions of policy SSA13.	
2 3	Representation text It is submitted that a settlement boundary should be included around this part of Efail Isaf as shown on the attached plan. Related submissions have been made that this site should be allocated for housing and that the greenwedge should be deleted from this site. The site adjoins existing residential development to the south and will be contained by the Church Village By Pass to the northwest. The allocation of this site would comprise a logical consolidation of this part of Efail Isaf.	
4 5	Changes sought A settlement boundary should be included around Land at Efail Isaf as shown on the attached plan under the provisions of policy SSA13.	
6 6	Candidate Site Ref No 606	
9 7	Why no previous Representation Submissions were made in respect of this site and related issues but not in relation to the settlement boundary as these were not identified until the Deposit Plan stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of the site shown on the attached plan for housing and the related inclusion of a settlement boundary would help meet housing needs in this part of the Borough. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Efail Isaf is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within strong physical boundaries. The allocation of the site for housing and the inclusion of a settlement boundary would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 to 6.183																
Site: 830//SSA 23.8 Efail Isaf, Garth & Nantgarw Western Slopes Amend site boun PEX Session:																
Policy: SSA 23 Map: Issue: Environment																
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The site shown edged in red on the attached plan should be deleted from the Special Landscape Area Designation.	
2 3	Representation text The site shown edged in red on the attached plan is included as part of a Special Landscape Area designation. The character of the land, which is traversed by electricity pylons and which will be affected by the construction of the Church Village By- does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the Special Landscape Area designation made under the provisions of policy SSA 23.8.	
6 6	Candidate Site Ref No 605 part	
9 7	Why no previous Representation Representation were made in respect of part of this site at the Preferred Strategy stage, but not in respect of the Special Landscape Area designation, as the boundaries and extent of this designation were not known at this stage.	
21 11	Why attend Examination? The extent of the Special Landscape Area designations is a fundamental issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D3			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113		Site: 821//SSA 22.7		Efail Isaf & Llantwit Fardre		Amend site boun		PEX Session:							
Policy: SSA 22		Map:		Issue: Environment											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The site should be excluded from the green wedge designation.	
2 3	Representation text This site is included in a green wedge designation between Efail Isaf and Llantwit Fardre. It is not considered that the site merits inclusion within this designation.	
4 5	Changes sought The site should be deleted from the Green Wedge designation made under the provisions of policy SSA 22.7.	
6 6	Candidate Site Ref No 606 part	
9 7	Why no previous Representation Submissions were made in respect of part of this site and related issues but not in relation to the green wedge as these were not identified until the Deposit Plan stage.	
21 11	Why attend Examination? The location and extent of green wedge designations is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Green Wedge would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108, para.6.157 - 6.158		Site:		Settlement Boun		PEX Session:										
Policy: SSA 13		Map:		Issue: Settlement Boundary												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary A settlement boundary should be included around the site edged in red on the attached plan under the provisions of policy SSA 13.	
2 3	Representation text It is submitted that a settlement boundary should be included around this part of Efail Isaf as shown on the attached plan. The site comprises approximatley 0.2 hectares of land which is located between existing residential development to the east and the proposed Church Village By-Pass to the north west. The allocation of this site would comprise a logical limit for development in this part of Efail Isaf.	
4 5	Changes sought The settlement boundary of Efail Isaf should be amended to include the site shown on the attached plan under the provisions of policy SSA13.	
6 6	Candidate Site Ref No 605 part	
9 7	Why no previous Representation Submissions were made in respect of this site at the Preferred Strategy stage. However, no submissions were made in respect of the settlement boundary as these were not known until the publication of the Deposit Plan.	
21 11	Why attend Examination? The identificaiton of the settlement boundary around Efail Isaf is an issue which should be considered at Examination rather than by written representations. The site propsoed to be included within the settlement boundary is suitable to accommodate residential development and could help meet housng needs.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The amendment of the settlement boundary would extend this part of Efail Isaf up to logical limits and the site included within the revised limits would be physically contained by existing housing and the proposed By Pass. This site, comprising 0.22 hectares, is suitable to accommodate housing and would help meet local housing needs. It would be avalibale for development in the early part of the LDP period. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The amended settlement boundary and development of this site for housing would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D5			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149				Site: 595/604		The Willows adj				New Site		PEX Session:			
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged in red on the attached plan should be allocated for residential development under the provisions of policy SSA 10.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate residential development. The site relates well to surrounding development with strong physical boundaries on all sides. The allocation of this site would comprise a logical consolidation of Efail Isaf. The site has reasonable access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the borough, including local needs and could also provide an element of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development under the provisions of policy SSA10.	
6 6	Candidate Site Ref No	
	604	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Efail Isaf is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within strong physical boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.114, para.6.180 - 6.183																
Site: 830//SSA 23.8 Efail Isaf, Garth & Nantgarw Western Slopes Amend site boun PEX Session:																
Policy: SSA 23																
Map:																
Issue: Environment																
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The Special Landscape Designation which affects a small part of this site in the south should be deleted.	
2 3	Representation text The small triangular shaped part of this site in the south is affected by a special landscape designation. It is not considered logical to include this part of the site which is contained by the proposed By Pass, Heol Creigiau and residential development within Special Landscape Area designation and the site does not merit such inclusion in landscape terms.	
4 5	Changes sought The site should be deleted from the Special Landscape Area Designation made under the provisions of policy SSA 23.8.	
6 6	Candidate Site Ref No 604	
9 7	Why no previous Representation Submissions were made in respect of this site and related issues but not in relation to the special landscape area designation as these were not identified until the deposit stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Special Landscape Area would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D7			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108, para.6.157 - 6.158		Site: 595/604		The Willows adj		Settlement Boun		PEX Session:							
Policy: SSA 13		Map:		Issue: Settlement Boundary											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
A settlemt boundary should be included around the site edged in red on the attached plan under the provisions of policy SSA13.		
2 3	Representation text	
It is submitted that a settlement boundary should be included around this part of Efail Isaf as shown on the attached plan. Related submissions have been made that this site should be allocated for housing and that the special landscape designation should be deleted form the small part of the site which it affects. The site relates well to surrounding development with strong physical boundaires on all sides. The allocation of this site would comprise a logical consolidation of Efail Isaf.		
4 5	Changes sought	
A settlement boundary should be included around Land at Efail Isaf as shown on the attached plan under the provisions of policy SSA13.		
6 6	Candidate Site Ref No	
604		
9 7	Why no previous Representation	
Submissions were made in respect of this site and related issues but not in relation to the settlement boundary as these were not identified until the deposit plan stage.		
21 11	Why attend Examination?	
This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
The allocation of the site shown on the attached plan for housing and the related inclusion of a settlement boundary would help meet housing needs in this part of the Borough. Concern is expressed regarding the deliverability of the allocated housing land suppply, particularly in the earlier part of the LDP period. The site at Efail Isaf is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within strong physical boundaires. The allocation of the site for housing and the inclusion of a settlement boundary would make the plan's policies robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D8			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149		Site: 597/606		Meadow View, adj		New Site		PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged in red on the attached plan should be allocated for residential development under the provisions of policy SSA 10.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate residential development . The site adjoins existing residential development to the south and will adjoin the Church Village By Pass along its north-west boundary. The allocation of this site would comprise a logical consolidation of this part of Efail Isaf. The site has reasonable access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide an element of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development under the provisions of policy SSA10.	
6 6	Candidate Site Ref No	
	606	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Efail Isaf is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within strong physical boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2033.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.113, para.6.176 - 6.179		Site: 821//SSA 22.7		Efail Isaf & Llantwit Fardre		Amend site boun		PEX Session:								
Policy: SSA 22		Map:		Issue: Environment												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The site should be excluded from the green wedge designation.	
2 3	Representation text This site is included in a green wedge designation between Efail Isaf and Llantwit Fardre. It is not considered that the site merits inclusion within this designation. The allocation of this site for housing would not undermine the Council's intention to prevent the coalescence of the two settlements. The site would be largely contained by existing development and the proposed Church Village By Pass.	
4 5	Changes sought The site should be deleted from the Green wedge designation made under the provisions of policy SSA 22.7.	
6 6	Candidate Site Ref No 606	
9 7	Why no previous Representation Submissions were made in respect of this site and related issues but not in relation to the green wedge as this was not identified until the Deposit Plan stage.	
21 11	Why attend Examination? This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The deletion of the site from the Green Wedge would make the plan's policies more logical and robust and compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
2035.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.090, para.6.97- 100		Site: 773//NSA 25.5		Cynon Valley Northern Slopes		Amend site boun		PEX Session:						
Policy: NSA 25		Map:		Issue: Environment										
Summary:														

Item	Question	Representation Text
1 2	Issue Summary The removal of a small part of a larger woodland from the designation of NSA 25.5	
2 3	Representation text In conjunction with this representation, other representations have been advanced in respect of NSA9 and NSA 12 regarding the allocation of the adjacent land for housing and a change to the settlement boundary. The exclusion of the area shown on the attached plan from the Special Landscape Area would not have any major impact on the designation, and would permit a vehicular access to be provided to a redundant bowling green facility owned by the Council. Such provision would pass through a low lying area of woodland which has previously been thinned. With the retention of the higher and larger are of woodland, the overall impact on the SLA would be acceptable.	
4 5	Changes sought Omissions of the designation NSA 25.5 from the land shown on the attached plan.	
6 6	Candidate Site Ref No 548	
21 11	Why attend Examination? The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period to meet housing needs is one which is fundamental to the soundness of the plan and is an issue which should be dealt with at examination rather than by written representations. The exclusion of land from the NSA 25.5 designation is warranted as enabling development in this instance, and would have little impact on the overall intentions of the policy.	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The changes to the designation in conjunction with the other changes proposed would permit the adjacent sites to be developed in the early part of the LDP period. Concerns have been expressed regarding the deliverability of certain of the LDP housing allocations and removal of the SLA designation would potentially permit early development of the land and adjacent sites. The removal of the site from the SLA designation would have no great impact on the aims of the policy, and the larger more elevated area of adjacent woodland would be retained and make a visual contribution to the SLA and is compliant with national policy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2035.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077, para.6.44 - 45		Site: 539/548		Maes y Dderwen, Aberffrw		New Site		PEX Session:							
Policy: NSA 9		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The site edged red on the attached plan should be allocated for residential development under the provisions of NSA 9.		
2 3	Representation text	
It is submitted that this site is suitable to accommodate residential development. The site relates well to existing development limits and would comprise a logical rounding off of development in this part of Aberffrw. In addition, there is scope to extend the development to open up potentially an additional area of Council land at the former bowling green site. The allocation would add to the range and choice of sites available locally, and has good access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough and is available for development in the early part of the plan period being an economically viable proposal		
4 5	Changes sought	
The site should be allocated under the provisions of policy NSA 9.		
6 6	Candidate Site Ref No	
548		
21 11	Why attend Examination?	
The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable particularly in the earlier part of the LDP period to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at examination rather than by written.		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Aberffrw is available to meet short term housing need. Further, the site comprises a logical consolidation/rounding off of this part of the settlement, and could also open up previously developed land owned by the Council. The site is appropriate for housing development and its allocation would make the LDP policies more robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2035.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.079, para.6.55 - 61							Site:		Settlement Boun PEX Session:								
Policy: NSA 12				Map:				Issue: Settlement Boundary									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary The settlement boundary should be amended to include the site edged red on the attached plan under the provisions of Policy NSA12.	
2 3	Representation text It is submitted that the settlement boundary should be amended to include the land which is contained bewteen existing housing development and the cemetery. In addition, it should also be amended to include a part of the woodland to the north sufficient to provide access to the Council owned redundant bowling facility which currently lacks adequate vehicular access. Related submissions have been made that these sites should be allocated for housing. The site relates well to existing development with clear boundaires, and would comprise a logical consolidation/ rounding off of this part of Aberffrwd.	
4 5	Changes sought The settlement boundary around Aberffrwd should be amended to include the site shown edged red on the attached plan, under the provisions of Polciy NSA 12.	
6 6	Candidate Site Ref No 548	
21 11	Why attend Examination? This submission is related to representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable particularly in the earlier part of the LDP period to meet the housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at examination rather than by written representations. The same applies to the identification of settlement boundaries.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The allocation of the site for housing and the related amendment to the settlement boundary would help meet housng needs in Aberffrwd/ Mountain Ash. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Aberffrwd is avialible to meet short term housing need. Further the site comprises a logical consolodation/rounding off of this part of the settlement to existing boundaires and would also permit the development of the Council's redundant bowling greens. The inclusion of the site within the settlement boundary and its allocation for housing would make the plan's policies more robust.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2036.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106, para.6.148 - 6.149		Site: 342/343		Llwynpennau Cottages rear		New Site		PEX Session:								
Policy: SSA 10		Map:		Issue: Housing Allocation												
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The site edged red on the attached plan should be allocated for residential development under the provisions of policy SSA 10.	
2 3	Representation text	
	It is submitted that this site is suitable to accommodate residential development. The site relates well to existing built up limits adjoining existing residential development to the north east and Gadairwen House and associated properties to the south. The allocation of this site would comprise a logical consolidation of this part of Groesfaen. The site has reasonable access to local services, facilities, employment opportunities as well as public transport. The site would help meet housing needs of the Borough, including local needs and could also provide an element of affordable housing. The site is available for development in the early part of the plan period and comprises an economically viable proposal.	
4 5	Changes sought	
	The site should be allocated for residential development under the provisions of policy SSA10.	
6 6	Candidate Site Ref No	
	343	
21 11	Why attend Examination?	
	The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period to meet housing needs is one which is fundamental to the soundness of the LDP and is an issue which should be considered at Examination rather than by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Groesfaen is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within logical physical boundaries.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2036.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108, para.6.157 - 6.158		Site: 342/343		Llwynpennau Cottages rear		Settlement Boun		PEX Session:							
Policy: SSA 13				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
A settlement boundary should be drawn around Groesfaen as shown on the attached plan under the provisions of policy SSA 13. The site edged in red on the plan should be included within the settlement boundary.		
2 3	Representation text	
It is submitted that a settlement boundary should be drawn around Groesfaen, which comprises a sizeable settlement, and that the site edged in red on the attached plan should be included within it. A settlement boundary was identified around Groesfaen in the adopted Rhondda Cynon Taf (Taff Ely) Local Plan (a copy of extract enclosed) and it is considered that the settlement should have a defined settlement boundary carried forward in the LDP. Groesfaen is listed in the Council's paper on the roles and functions of settlements as a settlement in Appendix 17. There is no justification by the Council for the omission of a settlement boundary around Grosefaen. Related submissions have been made that this site should be allocated for housing. The site adjoins existing residential development to the north east and south and comprises a logical consolidation of this part of Groesfaen.		
4 5	Changes sought	
A settlement boundary should be included around Groesfaen as shown on the attached plan under the provisions of policy SSA13 and the site edged in red should be included within it.		
6 6	Candidate Site Ref No	
343		
9 7	Why no previous Representation	
Submissions were made in respect of this site and related issues but not in relation to the settlement boundary as these were not identified until the Deposit Plan stage.		
21 11	Why attend Examination?	
The inclusion of a settlement boundary around Groesfaen is a fundamental issue which should be considered at Examination rather than by written representations. This submission is related to other representations requesting the allocation of this site for housing. The need to ensure that there is an adequate extent, range and choice of housing sites which are deliverable, particularly in the earlier part of the LDP period, to meet housing needs is one which is fundamental to the soundness of the LDP and is a further issue which should be considered at the examination rather than by written representations.		

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
It is submitted that a settlement boundary should be identified around Groesfaen, which comprises a sizeable settlement. A settlement boundary was identified around it in the Adopted Local Plan and there is no sound reason to change this approach. The exclusion of a settlement boundary around Groesfaen is considered to be inappropriate. The allocation of the site shown on the attached plan for housing and the related inclusion of a settlement boundary would help meet housing needs in this part of the Borough. Concern is expressed regarding the deliverability of the allocated housng land supply, particularly in the earlier part of the LDP period. The site at Groesfaen is available to meet short term housing need. Further, the site comprises a logical consolidation of this part of the settlement within strong physical boundaires. The allocation of the site for housing and the inclusion of a settlement boundary would make the plan's policies more robust.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											No		

2048.D1 O I M

Document: Deposit Draft, p.046 Site: 6//SSA 7 0STR Cwm Colliery PEX Session:

Policy: AW 4 Map: Issue: Planning Obligations

Summary:

Item	Question	Representation Text
1	2 Issue Summary	Objection to policy [AW 4].
2	3 Representation text	DTZ objects to policy AW 4 on the grounds that in its current form, it is insufficiently flexible and unrealistic given the constraints of strategic sites. No recognition is made to the effect that obligations can have on the viability of schemes where there are abnormal development costs.
4	5 Changes sought	DTZ proposes that policy AW 4 is altered to make specific reference within the policy to allow applicants to negotiate revised terms if it can be demonstrated that the contributions requested would make a scheme financially unviable. DTZ also proposes that the policy is altered to allow payments to be phased over time, in order to respond to market conditions. This will ensure that development is not constrained, and the wider objectives of the LDP are achieved.
9	7 Why no previous Representation	The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.
21	11 Why attend Examination?	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Item	Question	Reply	Soundness Tests
19	8 CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20	9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.

Item	Question	Reply	Tick box Replies
3	4 Seek changes? Any changes to be made to the Plan?	Yes	
7	7 Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047		Site: 6//SSA 7 0STR Cwm Colliery						PEX Session:							
Policy: AW 5		Map:		Issue: Design											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ object to the requirement [in AW 5] that new development should meet the "Very Good" as a minimum for BREEAM of Eco-homes.	
2 3	Representation text	
	DTZ consider that the sustainable design requirements detailed in policy AW 5 are overly onerous and will adversely affect the viability of development schemes. This will reduce the delivery on new housing and may lead to a compromise of other benefits sought in conjunction with development proposals. DTZ also objects to the requirements for all major developments (10 units or more) to provide as least 10% of their predicted energy requirement from on-site renewable energy sources. DTZ request that the policy incorporates a greater level of flexibility where seeking energy efficiency provision. Site-specific circumstances may mean it is not viable to deliver 10% renewable energy and this must be recognised in the policy.	
4 5	Changes sought	
	DTZ requests that the wording [of AW 5] be amended to read: B) Sustainable Design 1. The design minimises energy loss and use; 2. Where viable commercial schemes of 1,000 sq. m. and over achieve as a minimum the "Good" BREEAM (or equivalent) standard; 3. Where viable residential schemes of 10 or more units achieve as a minimum the "Good " Eco-homes (or equivalent) target; and 4. Where viable commercial schemes with a floorspace of 1,000 sq. m. and residential schemes of 10 or more units should provide at least 10% of predicted energy requirements from on-site renewable sources.	
9 7	Why no previous Representation	
	The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.052		Site: 6//SSA 7 0STR Cwm Colliery							PEX Session:							
Policy: AW 7		Map:			Issue: Design											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Proposed alteration to policy [AW 7].	
2 3	Representation text DTZ wish to highlight that very occasionally there are cases where the demolition of listed buildings or structure is unavoidable. It is important to recognize the demolition of any listed buildings may occur were there is clear and convincing evidence that all reasonable efforts have been made to sustain the existing uses or find viable new uses, and these efforts have failed; that preservation in some form of charitable or community ownership is not possible or suitable or that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition.	
4 5	Changes sought In accordance with Welsh Office Circular 61/96: "Planning and the Historic Environment: Historic Buildings and Conservation Areas", policy AW 7 should state that in determining proposals concerning listed buildings the following criteria should be considered: # the condition of the building and the cost of repairing and maintaining it in relation to its importance and the value derived from its continued use; # the adequacy of efforts made to retain the building in use; and # the merits of alternative proposals for the site.	
9 7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the plan sets out a coherent strategy from which its policies and allocations logically flow.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2048.D4			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.098		Site: 6//SSA 7 0STR Cwm Colliery						PEX Session:								
Policy: SSA 7		Map:		Issue: Strategic Sites												
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary		
	DTZ supports the principle of the allocation of the Former Cwm Colliery and Coking Works as Strategic Site allocated for the development of 800 dwellings and 1.9 hectares of employment development.		
2 3	Representation text		
	The Colliery is a large derelict, brownfield site that needs to be redeveloped. The site is in a strategic and sustainable location that would help achieve the aims and objectives of the LDP as well as deliver significant benefits to the County Borough.		
4 5	Changes sought		
	See representation prepared in relation to Policy SSA 7 - Former Cwm Colliery and Coking Works.		
21 11	Why attend Examination?		
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.034		Site: 6//SSA 7 0STR Cwm Colliery							PEX Session:							
Policy: CS 5		Map:							Issue: Affordable Housing							
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Objection to policy [CS 5]	
2 3	Representation text DTZ question the use of the Fordhams Study as the basis for the policy. RCT have not undertaken an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including the likely impact upon overall levels of housing delivery. The need to undertake viability testing when setting new affordable housing requirements is highlighted by the landmark Blythe Valley DC vs. Persimmon Homes (North East) Limited [2008] Court of Appeal Case (Case no. C1/2008/1319). The case turned on the requirement to undertake viability assessments for assessing the percentage of affordable housing. Blythe Valley's Core Strategy affordable housing policy was based on a housing study completed by Fordhams. The study found that so high was the need for affordable housing that it would equate to 83% of the borough's annual housing land requirement. That however, was not regarded as viable on new housing sites and the study recommended a proportion of 40% affordable housing "on best practice across the country". The Fordhams study was clearly not viability tested, but needs tested. The Court of Appeal quashed the relevant policy as it was not based on an informed assessment of economic viability of proportions of affordable housing.	
4 5	Changes sought A Strategic Housing Market Assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities.	
9 7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the strategy policies are realistic and appropriate and are founded on a robust and credible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.098		Site: 6//SSA 7 0STR Cwm Colliery							PEX Session:							
Policy: SSA 7				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Proposed policy alteration [SSA 7]	
2 3	Representation text DTZ support the allocation of the Cwm Colliery and Coking Works as a strategic site suitable for mixed use development. In order to develop the Cwm Coking Works site, abnormally high infrastructure costs will be incurred on account of the need for land remediation, off-site highway improvements, listed building protection and funding community benefits. As a result the following [5] issues are raised: 1. DTZ contend that the requirement for a new school is not based on an assessment of the current pupil capacity at surrounding local schools. It is also likely that the financial cost of providing a new school as opposed to enhancing an existing facility would render any scheme unviable. The proposed houses would increase the number of children in the area to be accommodated at local schools. The Council's School Organisation Plan has been used to project forward pupil numbers in all schools to 2011 and to assess the capacity of local schools to accommodate the increased numbers of pupils. It is common ground with the Council that the secondary school and Welsh medium primary school would have adequate capacity. There is currently a shortfall of places at the surrounding local English medium primary schools. The proposed development would result in the need for additional classrooms, and CPL would propose to make a financial contribution to be used for their construction (based on the Council's own cost formula). This approach is in accordance with the findings of the recent appeal decision concerning the development of the site. 2. DTZ objects to the proposed phasing requirements. The requirement for the restoration of the colliery tips, clearance and remediation of the coking works and the preservation of the listed cooling towers to be completed before development commences is unrealistic and likely to delay the development of the strategic site. The development of the site will be able to take place in tandem with its remediation. DTZ also questions the rationale behind the requirement for no more than 25% of the residential development being completed before the new access from Parish Road is opened. 3. DTZ request that clarity is provided on the percentage of affordable housing sought. The recent appeal decision relating to development of the site demonstrates that a 10% affordable housing provision was considered acceptable given the abnormal redevelopment costs. In relation to this, please see the specific representation prepared in relation to Policy SSA 12 - affordable housing [2048/D9]. 4. DTZ raises no objection to the principle of the proposed employment development, however any allocation must be viable and based on market demand. 5. The policy require the preservation of the listed cooling towers and the site owners are doing everything possible to achieve this. However, if it is not technically feasible to retain the towers, the criteria contained in Welsh Office Circular 61/96: "Planning and the Historic Environment: Historic Buildings and Conservation Areas" should be applied when determination any application on the site.	
4 5	Changes sought # Removal of the requirement for new school, or clarity provided on how a new school would be funded. # Recognition of land contamination issues and other "abnormal" site costs and the associated impact on viability. # Removal of the need for restoration of the colliery tips, clearance and remediation of the coking works site and preservation of the listed cooling towers to be completed before any development is started. # Requirement for remediation strategy to be agreed in partnership with the Environment Agency and RCT Environmental Health.	
9 7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
21	11			Why attend Examination?											
Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.															
<i>Item Question</i>										<i>Reply</i>			Soundness Tests		
17	8			CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?											Yes
20	9			Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan											
The proposed changes will ensure that the policies and allocations are realistic and appropriate and founded on a robust and credible evidence base.															
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4			Seek changes? Any changes to be made to the Plan?											Yes
7	7			Previous Representations? Did you make any previous representations on this issue during the Cons											No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D7			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106		Site: 6//SSA 7 0STR Cwm Colliery						PEX Session:							
Policy: SSA 10		Map:		Issue: Housing Allocation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Proposed policy alteration [SSA 10].	
2 3	Representation text DTZ raises no specific to the housing allocations detailed in policy SSA 10 [sic]. Notwithstanding this, in the event that housing allocations are not considered to be deliverable, a higher proportion of housing should be allocated on deliverable strategic sites in the Southern Strategy Area.	
4 5	Changes sought In the event that housing allocations detailed at policy SSA 10 are not deliverable, a higher proportion of housing should be allocated on deliverable strategic sites in the Southern Strategy Area. This will ensure that sufficient land is available for the construction of the Council's target of 2,954 dwellings.	
9 7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107		Site: 6//SSA 7 0STR Cwm Colliery							PEX Session:							
Policy: SSA 11		Map:			Issue: Design											
Summary:																

Item	Question	Reply	Soundness Tests
1 2	Issue Summary Policy objection [SSA 11]		Representation Text
2 3	Representation text Local Planning Authorities should develop housing density policies having regard to the characteristics of the area, including the current and proposed mix of uses. DTZ objects to policy SSA 11 on the grounds that no justification is provided for requiring net residential density to be a minimum of 35 dwellings per hectare. DTZ also question why the minimum density required in the South Strategy Area is higher than that required in the Northern Strategy Area.		
4 5	Changes sought DTA request that Policy SSA 10 is altered to require net residential density to be a minimum of 30 dwellings per hectare.		
9 7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.		
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.		
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the plan sets out a coherent strategy from which its policies and allocations logically flow.		
3 4	Seek changes? Any changes to be made to the Plan?	Yes	Tick box Replies
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.107		Site: 6//SSA 7 0STR Cwm Colliery							PEX Session:							
Policy: SSA 12		Map:			Issue: Affordable Housing											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ objects to policy SSA 12 on the basis that the 40 per cent figure has been arbitrarily selected and is not derived from a robust and credible evidence base.	
2 3	Representation text	
	With reference to the Former Cwm Colliery and Coking Works, Tyn-y-nant (Strategic Site SSA 7) where a 40% affordable housing requirement is unviable.	
	The recent appeal decision relating to the development for the former Cwm Colliery and Coking Works, Tyn-y-nant demonstrates that a 10% affordable housing provision was considered acceptable given the abnormal redevelopment costs.	
	The 2006 Housing Needs Assessment conducted by Fordhams, demonstrates that the need for affordable housing would equate to 88% of the borough's annual housing land requirement. That, however, was regarded as not viable on new housing sites and the study recommended a proportion of 40 per cent affordable housing "on the basis of best practice across the country."	
	DTZ objects to Policy SSA 12 on the basis that the 40 per cent figure has been arbitrarily selected and is not derived from a robust and credible evidence base. The 40 per cent requirement fails to reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.	
	Secondly, the likely impact on the 'delivery' of housing (i.e house building) of setting such figures of affordable housing has not been taken into account.	
	The need to undertake viability testing when setting new affordable housing requirements is highlighted by the landmark Blyth Valley DC vs Persimmon Homes (North East) Limited [2008] Court of Appeal case (Case No: C1/2008/1319).	
	The case turned on the requirement to undertake viability assessments for assessing the percentage of affordable housing. Blythe Valley's Core Strategy affordable housing policy was based on a housing study completed by Fordhams. The study found that so high was the need for affordable housing that it would equate to 83 per cent of the borough's annual housing land requirement. That however, was regarded as not viable on new housing sites and the study had recommended a proportion of 40 per cent affordable housing "on best practice across the country". The Fordhams study was clearly not viability tested, but needs tested. The Court of Appeal quashed the relevant policy as it was not based on an informed assessment of the economic viability of proportions of affordable housing.	
	Technical Advice Note (TAN) 2: Planning And Affordable Housing (2006) stated that when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability.	
	DTZ question the use of Fordhams study as the basis for the policy. A Strategic Housing Market Assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities.	
4 5	Changes sought	
	The 40% requirement should be removed. A Strategic Housing Market Assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed.	
9 7	Why no previous Representation	
	The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
21	11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.													
<i>Item Question</i>										<i>Reply</i>			Soundness Tests		
17	8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence? Yes													
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the strategy policies are realistic and appropriate and are founded on a robust and credible evidence base.													
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan? Yes													
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons No													

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Document: Deposit Draft, p.115

Site: 6//SSA 7 0STR Cwm Colliery

PEX Session:

Policy: SSA 24

Map:

Issue: Environment

Summary:

<i>Item Question</i>										Representation Text					
1	2	Issue Summary Proposed policy alteration [SSA 24]													
2	3	Representation text DTZ is fully supportive of the proposed land reclamation schemes included in Policy SSA 24. Notwithstanding this, it is vital to ensure that all reclamation schemes are viable and achievable.													
4	5	Changes sought DTZ request that additional information is provided to demonstrate that the proposed remediation schemes are viable and achievable.													
9	7	Why no previous Representation The PS did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.													
21	11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.													
<i>Item Question</i>										<i>Reply</i>			Soundness Tests		
18	8	CE3 Test? No clear mechanisms for implementation and monitoring? Yes													
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that there is a clear mechanism for implementation and monitoring.													
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons No													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2048.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.043		Site: 3//NSA 6 OSTR Phurnacite Plant							New Site		PEX Session:						
Policy: AW 1				Map:				Issue: Housing Requirement									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Objection to policy	
2 3	Representation text DTZ have a number of concerns regarding the delivery of 14, 850 new homes as proposed by Policy AW1. DTZ are concerned by the large reliance on small sites and windfall sites to deliver new housing. Pparagraph 9.2.5 of Planning Policy Wales requires local planning authorities to ensure that sufficeient land is genuinely available to provide a 50year supply of land for housing. In order to ensure that the delivery target proposed by Policy AW1 is met the Phurnacite Plant Strategic Site should be reallocated for housing development to ensure a 5 year land supply and to meet the overall housing requirement. Such an approach would accord with the frontloaded, evidence based approach of the LDP process. The 2007 Joint Land Avaliability Study (JHLAS) has informaed the LDP and an updated JHLAS was completed in july 2008. The study identifies the potential delivery of 3,328 dwellings, including small site projections. The LDP identifes delivery of 5, 496 dwellings, from the capacity of large sites and the potential od small and windfall sites. Against the JHLAS figure there is a shortfall of 2,168 dwellings. This is a significnt gap in the housing requirement that the Phurnacite Paint can help fill.	
4 5	Changes sought There is overreliance on small and windfall sites. As such DTZ propose that the Phurnacite Plant Strategic site which is allocated for housing development to ensure that the delivery target identified by policy AW1 is achieved.	
9 7	Why no previous Representation The former Phurnacite Plant was previously allocated for housing development in the LDP Preferred Strategy. Its allocation was removed following concerns over potential flood risk issues. In conjunction with the Welsh Assembly Government a master planning process for the site, including a flood consequences report is being undertaken to demonstrate the development of the site for housing is suitable.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with soley by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The propsoed changes to the LDP will ensure that the overall housing delivery target will be achieved.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2048.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.046							Site:			PEX Session:							
Policy: AW 4				Map:			Issue: Planning Obligations										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Objection to policy	
2 3	Representation text DTZ objects to policy AW4 on the grounds that in its current form it is insufficiently flexible and unrealistic given the constraints of strategic sites. No recognition is made to the effect that obligations can have on the viability of schemes where there are abnormal development costs.	
4 5	Changes sought DTZ proposes that Policy AW14 is altered to make specific reference within the policy to allow applicants to negotiate revised terms if it can be demonstrated that the contributions requested would make a scheme financially unviable. DTZ also proposes that the policy is altered to allow payments to be phased over time, in order to respond to market conditions. This will ensure that development is not constrained, and the wider objectives of the LDP are achieved.	
9 7	Why no previous Representation The Preferred Strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D13			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.047							Site:			PEX Session:						
Policy: AW 5				Map:			Issue: Design									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ object to the requirement that new development should meet the 'Very Good' as a minimum for BREEAM or Eco-homes.	
2 3	Representation text	
	DTZ consider that the sustainable design requirements detailed in policy AW5 are overly onerous and will adversely affect the viability of development schemes. This will reduce the delivery of new housing and may lead to a compromise of other benefits sought in conjunction with development proposals.	
	DTZ also objects to the requirements for all major development (10 units or more) to provide at least 10% of their predicted energy requirement from on-site renewable energy sources. DTZ request that the policy incorporates a greater level of flexibility when seeking energy efficiency provision. Site specific circumstances may mean it is not viable to deliver 10% renewable energy and this must be recognised in the policy.	
4 5	Changes sought	
	DTZ request that the wording be amended to read:	
	B) Sustainable Design	
	1. The design minimises energy loss and use;	
	2. Where viable commercial schemes of 1000sq.m and over achieve as a minimum the 'Good' BREEAM (or equivalent) standard.	
	3. Where viable residential schemes of 10 or more units achieve as a minimum the 'Good' Eco-Homes (or equivalent) target; and	
	4. Where viable commercial schemes with a floor-space of 1000sq.m and residential schemes of ten or more units should provide at least 10% of predicted energy requirements from on site renewable sources.	
9 7	Why no previous Representation	
	The Preferred Strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D14			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032, para.4.3.7		Site: 3//NSA 6			OSTR Phurnacite Plant			New Site			PEX Session:					
Policy: CS 3		Map:			Issue: Strategic Sites											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	DTZ support the allocation of the Phurnacite Plant Site, Abercwmboi (Policy NSA6) as a Strategic Site. Notwithstanding this, it is proposed that paragraph 4.3.7 is altered to include a reference to the sites' potential to accommodate 500 residential units.
2 3	Representation text	The site was previously allocated for housing development in the LDP Preferred Strategy. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequence Assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms. Due to the cost of the site remediation it is considered that without the inclusion of residential development the proposed employment development will be unviable.
4 5	Changes sought	Proposed uses at Site3- Phurnacite Plant Site, Abercwmboi to be altered to read: Residential Development of 500 units; and Formal Recreation Space Viable employment development based on market demand (5.9 hectares)
6 6	Candidate Site Ref No	The representation proposes a new use on the former Phurnacite Plant, Abercwmboi Strategic Site (Policy NSA6)
9 7	Why no previous Representation	The former Phurnacite Plant was previously allocated for housing development in the LDP Preferred Strategy. Its allocation was removed following concerns over potential flood risk issues. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences Assessment is being prepared as part of the work to demonstrate that the residential development of the site is acceptable in flood risk terms.
21 11	Why attend Examination?	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	The proposed changes will ensure that the allocations are realistic and appropriate and founded on a robust and credible evidence base.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D15			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033		Site: 3//NSA 6							OSTR Phurnacite Plant			New Site		PEX Session:		
Policy: CS 4				Map:				Issue: Housing Requirement								
Summary:																

Item Question	Representation Text
1 2 Issue Summary	DTZ objects to policy CS4 on the grounds that it does not recognise the potential of the Phurnacite Plant, Abercwmboi to contribute to RCT's housing requirement.
2 3 Representation text	<p>A master planning process for the Phurnacite Plant, Abercwmboi is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms.</p> <p>The site was previously allocated for housing development in the LDP preferred strategy. DTZ can demonstrate that there are serious constraints to the development of other sites listed in Policy CS4 which will reduce the estimated rate of housing development.</p> <p>The former Fernhill Colliery Site (Policy NSA5) should be removed from the housing supply. It is currently identified to provide 400 dwellings but costly land reclamation, ground condition engineering works and low land values are likely to combine to make redevelopment unviable. The developer has proposed 800 dwellings for the site and the cut in proposed house numbers is likely to make the scheme unviable. Further, significant community and transport investment is required as the site is not in a sustainable location.</p> <p>Land at Robertstown Strategic Site (Policy NSA7) should be revised as the site will not deliver 600 dwellings. The residential area is about 13.2 hectares and development would need to be at 45 dwellings per hectare to reach 600 dwellings. Development at this density would be at odds with the SA/SEA which advises that development should limit impact on the adjacent countryside and retain a 'parkland setting'. High density development is proposed on the footprint of the hospital but high density development will not be viable in this location, particularly as there is a large supply of affordable, 2 bedroom houses in the immediate and local area. We consider that the overall density of 35 dwellings per hectare is more realistic and the housing allocation should be reduced to 440 units to reflect this.</p> <p>To ensure that the Council meets its target delivery of 4,400 dwellings on strategic sites it is vital that the phurnacite plant site is reallocated for housing development.</p>
4 5 Changes sought	Policy CS4 should allocate the former Phurnacite Plant in Abercwmboi for the development of 500 dwellings.
6 6 Candidate Site Ref No	The representation proposes a new use on the former Phurnacite Plant, Abercwmboi Strategic Site (Policy NSA 6)
9 7 Why no previous Representation	The former Phurnacite Plant was previously allocated for housing development in the LDP Preferred Strategy. Its allocation was removed following concerns over potential flood risk issues. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of the works to demonstrate that the residential development of the site is acceptable in flood risk terms.
21 11 Why attend Examination?	Our objection relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the allocation are realistic and appropriate and founded on a robust and credible evidence base.
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D16			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.034							Site:			PEX Session:						
Policy: CS 5				Map:			Issue: Affordable Housing									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Objection to policy	
2 3	Representation text DTZ question the use of Fordham's study as the basis for the policy. RCT have not undertaken an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery. The need to undertake viability testing when setting new affordable housing requirements is highlighted by the landmark Blyth Valley DCvs Persimmon Homes (North East) Limited (2008) Court of Appeal case (Case No: C1/2008/1319). The case turned on the requirement to undertake viability assessments for assessing the percentage of affordable housing. Blythe Valley's Core Strategy affordable housing policy was based on a housing study completed by Fordhams. The study found that so high was the need for affordable housing that it would equate to 83 per cent of the borough's annual housing land requirement. That however, was regarded as not viable on new housing sites and the study had recommended a proportion of 40 per cent affordable housing "on best practice across the country". The Fordhams study was clearly not viability tested, but needs tested. The Court of Appeal quashed the relevant policy as it was not based in an informed assessment of the economic viability of proportions of affordable housing.	
4 5	Changes sought A strategic housing market assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities.	
9 7	Why no previous Representation The preferred strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our objection relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the strategy policies are realistic and appropriate and are founded on a robust and credible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D17			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.071		Site: 3//NSA 6							OSTR Phurnacite Plant			New Site		PEX Session:		
Policy: NSA 6				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text	
1 2	Issue Summary Proposed alteration to policy		
2 3	Representation text DTZ supports the allocation of the Phurnacite Plant Site, Abercwmboi (Policy NSA5) as a Strategic Site. The site is deliverable and will contribute significantly to achieving the overall aims and objectives of the LDP. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Governemtn. A flood consequences assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms. It is therefore considered that the site should be allocated for the development of 500 residential units. Due to the cost of site remediation it is considered that without the inclusion of residential development the proposed employment development will be unviable. The proposed employment development should be viable and based on market demand. DTZ question the requirement for a new school. The development of 500 dwellings would create a need for approximately 100-200 primary and secondary school places. These numbers would not support a new school. A review of the capacity of schools local to the site has been undertaken. As at January 2007, the Single Education Plan demonstrates that the two primary schools closest to the site are Capcoch Primary school and Glenboi Primary school, which have 16 and 94 surplus spaces respectively. Mountain Ash Comprehensive is the closest secondary school to the site and has 401 surplus places. These figures demonstrate that the provision of a new school is not required.		
4 5	Changes sought As a result of the masterplanning process to demonstrate that the residential development of the site is acceptable in floodrisk terms Policy NSA6 should allocate the site for the development of 500 residential units. It is proposed that the reference to providing a new school is removed fro paragraph 6.31 of the LDP of alternatively clarity is included on how the school is to be funded. Policy AW4 enables the Council to seek planning obligations, including education facilities.		
6 6	Candidate Site Ref No The representation proposes a new use on the former Phurnacite Plant , Abercwmboi Strategic Site (Policy NSA6)		
9 7	Why no previous Representation The former Phurnacite Plant was previously allocated for housing development as part of mixed use allocation in the LDP Preferred Strategy.		
21 11	Why attend Examination? Our representaion relates to a fundemantal part of the LDP which cannot be satisfactorily dealt with solely by written representations.		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the policies and allocation are not realistic and appropriate and are founded in a robust and credible evidence base. The proposed changes will also ensure that the strategic site allocation is delivered.	
<hr/>																
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D18			<input type="checkbox"/>	O		M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077						Site:			PEX Session:						
Policy: NSA 9				Map:		Issue: Housing Allocation									
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary		
	DTZ objects to Policy NSA9 on the grounds that the allocated housing sites are free, or readily freed, from planning, physical and ownership constraints, and capable of being developed.		
2 3	Representation text		
	Paragraph 9.2.5 of Planning Policy Wales requires local planning authorities to ensure that sufficient land is genuinely available to provide a 5-year supply of land for housing. To be considered available sites must be free, or readily freed, from planning, physical and ownership constraints, and capable of being developed. DTZ object to housing allocations 4 and 6 under Policy NSA 9. About 50% of the Old Brickworks (site 4) is densely covered with trees, many of which are covered by TPO's. Removal of these trees would cause significant harm. If the existing trees are to remain it is unlikely that the 175 dwellings will be provided as the remainder of the site would need to be developed at densities of 60-70 dph which is unrealistic in this area. We therefore recommend that this allocation is reduced in scale, to 80 dwellings. We consider that site 6 (land at Nant y Wenallt, Aberant Road) should not be allocated for housing. It will result in loss of a greenfield site, small loss of SINC and encroachment into the countryside. It is not a logical urban extension or infill site.		
4 5	Changes sought		
	Further strategic sites in the Northern Strategy Area should be allocated for housing development to ensure that sufficient land is available for the construction of the Councils target of 1,595 dwellings.		
9 7	Why no previous Representation		
	The sites allocated under Policy NSA9 were not included in the LDP Preferred Strategy.		
21 11	Why attend Examination?		
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the allocations are realistic and appropriate and are founded on robust and credible evidence base.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D19			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: p.078				Site:								PEX Session:			
Policy: NSA 11				Map:								Issue: Affordable Housing			
Summary:															

Item Question	Representation Text
1 2 Issue Summary	
	DTZ objects to Policy NSA11 on the basis that the 20 per cent figure has been arbitrarily selected and is not derived from a robust and credible evidence base.
2 3 Representation text	
	With reference to the Former Phurancite Plant, Abercwmboi (Strategic Site NSA6) where a 20% affordable housing requirement is unviable. The 2006 Housing Needs Assessment conducted by Fordhams, demonstrates that the need for affordable housing would equate to 88% of the borough's annual housing land requirement. That, however, was regarded as not viable on new housing sites and the study recommended a proportion of 40 per cent affordable housing "on the basis of best practice across the country." DTZ objects to Policy NSA11 on the basis that the 20 per cent figure has been arbitrarily selected and is not derived from a robust and credible evidence base. The 20 per cent requirement fails to reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Secondly, the likely impact on the „delivery of housing (i.e house building) of setting such figures of affordable housing has not been taken into account. The need to undertake viability testing when setting new affordable housing requirements is highlighted by the landmark Blyth Valley DC vs Persimmon Homes (North East) Limited [2008] Court of Appeal case (Case No: C1/2008/1319). The case turned on the requirement to undertake viability assessments for assessing the percentage of affordable housing. Blythe Valley's Core Strategy affordable housing policy was based on a housing study completed by Fordhams. The study found that so high was the need for affordable housing that it would equate to 83 per cent of the borough's annual housing land requirement. That however, was regarded as not viable on new housing sites and the study had recommended a proportion of 40 per cent affordable housing "on best practice across the country". The Fordhams study was clearly not viability tested, but needs tested. The Court of Appeal quashed the relevant policy as it was not based on an informed assessment of the economic viability of proportions of affordable housing. Technical Advice Note (TAN) 2: Planning And Affordable Housing (2006) stated that when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability. DTZ question the use of Fordhams study as the basis for the policy. A Strategic Housing Market Assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities.
4 5 Changes sought	
	The 20% requirement should be removed. A Strategic Housing Market Assessment should be undertaken to provide an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed
9 7 Why no previous Representation	
	The Preferred Strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.
21 11 Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the strategy policies are realistic and appropriate and are founded on a robust and credible evidence base.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														No

2048.D20 O I M

Document: Deposit Draft, p.083 Site: PEX Session:

Policy: NSA 16 Map: Issue: Employment

Summary:

Item	Question	Representation Text
1 2	Issue Summary Proposed policy alteration	
2 3	Representation text DTZ question policy NA16 on the grounds that in its current form it has the potential to conflict with the delivery of strategic site allocations on redundant emploment sites.	
4 5	Changes sought The requirement for proposals for the redevelopment of vacant industrial sites to be employment led should not apply to strategic sites which have specfic mixed use allocations.	
9 7	Why no previous Representation The Preferred Strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible to assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundemantal part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that policies and allocations logically flow.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D21			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.091						Site:			PEX Session:						
Policy: NSA 27				Map:			Issue: Environment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Proposed policy alteration	
2 3	Representation text DTZ is fully supportive of the proposed land reclamation schemes included in Policy NSA 27. Notwithstanding this it is vital to ensure that all reclamation schemes are viable and achievable.	
4 5	Changes sought DTZ request that additional information is provided to demonstrate that the proposed remediation schemes are viable and achievable.	
9 7	Why no previous Representation The Preferred Strategy did not include the level of detail contained in the Draft Deposit. As such it was impossible assess the need to make representations.	
21 11	Why attend Examination? Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure there are clear mechanisms for implementation and monitoring.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2048.D22			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.071									Site: 3//NSA 6	OSTR Phurnacite Plant				New Site	PEX Session:		
Policy: NSA 6									Map:	Issue: Strategic Sites							
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ supports the allocation of the phurnacite plant site, Abercwmboi (Policy NSA6) as a Strategic site. Notwithstanding this, it is proposed that paragraph 4.3.7 is altered to include a reference to the sites' potential to accommodate 500 residential units.	
2 3	Representation text	
	The site was previously allocated for housing development in the LDP preferred strategy. A master planning process for the site being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms.	
	Due to the cost of the site remediation it is considered that without the inclusion of residential development the proposed employment development will be unviable.	
4 5	Changes sought	
	Proposed uses at Site 3- phurnacite plant site, Abercwmboi to be altered to read:	
	- residential development of 500 units; and - formal recreation space - viable employment based on market demand (5.9 hectares)	
6 6	Candidate Site Ref No	
	The representation proposes a new use on the former phurnacite plant abercwmboi strategic site(policy NSA6)	
9 7	Why no previous Representation	
	The former phurnacite plant was previously allocated for housing development in the LDP preferred strategy. Its allocation was removed following concerns over potential flood risk issues. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of the work to demonstrate that the residential development of the site is acceptable in flood risk terms.	
21 11	Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the allocations are realistic and appropriate and founded on robust and credible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
7	7																Previous Representations? Did you make any previous representations on this issue during the Cons No

2048.D23			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.077				Site: 656//NSA 9.6 Nant y Wenallt, Abernant Road, Abernant				Delete Site				PEX Session:					
Policy: NSA 9				Map:				Issue: Housing Allocation									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ objects to Policy NSA9 on the grounds that the allocated housing sites are free, or readily freed, from planning, physical and ownership constraints, and capable of being developed.	
2 3	Representation text	
	Paragraph 9.2.5 of Planning Policy Wales requires local planning authorities to ensure that sufficient land is genuinely available to provide a 5 year supply of land for housing. To be considered available sites must be free, or readily freed, from planning, physical and ownership constraints, and capable of being developed.	
	DTZ object to housing allocations 4 and 6 under Policy NSA 9. About 50% of the Old Bricks (site 4) is densely covered with trees, many of which are covered by TPO's. Removal of these trees would cause significant harm. If the existing trees are to remain it is unlikely that the 175 dwellings will be provided as the remainder of the site would need to be developed at densities of 60-70 dph which is unrealistic in this area. We therefore recommend that this allocation is reduced in scale to 80 dwellings.	
	We consider that site 6 (land at Nant y Wenallt, Abernant Road) should not be allocated for housing. It will result in loss of a green field site, small loss of SINC and encroachment into the countryside. It is not a logical urban infill site.	
4 5	Changes sought	
	Further strategic sites in the Northern Strategy Area should be allocated for housing development to ensure that sufficient land is available for the construction of the Council's target of 1, 595 dwellings.	
9 7	Why no previous Representation	
	The sites allocated under Policy NSA 9 were not included in the LDP Preferred Strategy.	
21 11	Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the allocations are realistic and appropriate and are founded on robust and credible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D24			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.077		Site: 654//NSA 9.4 Rear of Birchwood, Llwydcoed							PEX Session:							
Policy: NSA 9				Map:				Issue: Housing Allocation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ objects to policy NSA9 on the grounds that the allocated housing sites are free, or readily freed from planning, physical and ownership constraints, and capable of being developed.	
2 3	Representation text	
	Paragraph 9.2.5 of Planning Policy Wales requires local planning authorities to ensure that sufficient land is genuinely available to provide a 5-year supply of land for housing. To be considered available sites must be free, or readily freed from planning, physical and ownership constraints, and capable of being developed.	
	DTZ object to housing allocations 4 and 6 under Policy NSA 9. About 50% of the Old Brickworks (site 4) is densely covered with trees, many of which are covered by TPO's. Removal of these trees would cause significant harm. If the existing trees are to remain it is unlikely that the 175 dwellings will be provided as the remainder of the site would need to be developed at densities of 60-70 dph which is unrealistic in this area. We therefore recommend that this allocation is reduced in scale, to 80 dwellings.	
	We consider that site 6 (land at Nant Y Wenallt, Abernant Road) should not be allocated for housing. It will result in loss of a greenfield site, small loss of SINC and encroachment into the countryside, it is not a logical urban extension or infill site.	
4 5	Changes sought	
	Further strategic sites in the Northern Strategy Area should be allocated for housing development to ensure that sufficient land is available for the construction of the Council's target of 1,595 dwellings.	
9 7	Why no previous Representation	
	The sites allocated under policy NSA9 were not included in the LDP Preferred Strategy.	
21 11	Why attend Examination?	
	Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	The proposed changes will ensure that the allocations are realistic and appropriate and are founded on robust and credible evidence base.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D25			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.069										Site: 2//NSA 5 0STR Fernhill Colliery, Blaenrhondda			Delete Site		PEX Session:	
Policy: NSA 5				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	DTZ objects to policy CS4 on the grounds that it does not recognise the potential of the Phurnacite Plant, Abercwmboi to contribute to RCT's housing requirement.	
2 3	Representation text	
	A master planning process for the Phurnacite Plant, Abercwmboi is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms.	
	The site was previously allocated for housing development in the LDP preferred strategy. DTZ can demonstrate that there are serious constraints to the development of other sites listed in Policy CS4 which will reduce the estimated rate of housing development.	
	The former Fernhill Colliery Site (Policy NSA5) should be removed from the housing supply. It is currently identified to provide 400 dwellings but costly land reclamation, ground condition engineering works and low land values are likely to combine to make redevelopment unviable. The developer has proposed 800 dwellings for the site and the cut in proposed house numbers is likely to make the scheme unviable. Further, significant community and transport investment is required as the site is not in a sustainable location.	
	Land at Robertstown Strategic Site (Policy NSA7) should be revised as the site will not deliver 600 dwellings. The residential area is about 13.2 hectares and development would need to be at 45 dwellings per hectare to reach 600 dwellings. Development at this density would be at odds with the SA/SEA which advises that development should limit impact on the adjacent countryside and retain a 'parkland setting'. High density development is proposed on the footprint of the hospital but high density development will not be viable in this location, particularly as there is a large supply of affordable, 2 bedroom houses in the immediate and local area. We consider that the overall density of 35 dwellings per hectare is more realistic and the housing allocation should be reduced to 440 units to reflect this.	
	To ensure that the Council meets its target delivery of 4,400 dwellings on strategic sites it is vital that the Phurnacite plant site is reallocated for housing development.	
4 5	Changes sought	
	Policy CS4 should allocate the former Phurnacite Plant in Abercwmboi for the development of 500 dwellings.	
6 6	Candidate Site Ref No	
	The representation proposes a new use on the former Phurnacite Plant, Abercwmboi Strategic Site (Policy NSA 6)	
9 7	Why no previous Representation	
	The former Phurnacite Plant was previously allocated for housing development in the LDP Preferred Strategy. Its allocation was removed following concerns over potential flood risk issues. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of the works to demonstrate that the residential development of the site is acceptable in flood risk terms.	
21 11	Why attend Examination?	
	Our objection relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the allocation are realistic and appropriate and founded on a robust and credible evidence base.
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2048.D26			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.073		Site: 4//NSA 7 0STR Robertstown/Abernant							PEX Session:							
Policy: NSA 7				Map:				Issue: Strategic Sites								
Summary:																

Item Question	Representation Text
1 2 Issue Summary	DTZ objects to policy CS4 on the grounds that it does not recognise the potential of the Phurnacite Plant, Abercwmboi to contribute to RCT's housing requirement.
2 3 Representation text	<p>A master planning process for the Phurnacite Plant, Abercwmboi is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of this work to demonstrate that the residential development of the site is acceptable in flood risk terms.</p> <p>The site was previously allocated for housing development in the LDP preferred strategy. DTZ can demonstrate that there are serious constraints to the development of other sites listed in Policy CS4 which will reduce the estimated rate of housing development.</p> <p>The former Fernhill Colliery Site (Policy NSA5) should be removed from the housing supply. It is currently identified to provide 400 dwellings but costly land reclamation, ground condition engineering works and low land values are likely to combine to make redevelopment unviable. The developer has proposed 800 dwellings for the site and the cut in proposed house numbers is likely to make the scheme unviable. Further, significant community and transport investment is required as the site is not in a sustainable location.</p> <p>Land at Robertstown Strategic Site (Policy NSA7) should be revised as the site will not deliver 600 dwellings. The residential area is about 13.2 hectares and development would need to be at 45 dwellings per hectare to reach 600 dwellings. Development at this density would be at odds with the SA/SEA which advises that development should limit impact on the adjacent countryside and retain a 'parkland setting'. High density development is proposed on the footprint of the hospital but high density development will not be viable in this location, particularly as there is a large supply of affordable, 2 bedroom houses in the immediate and local area. We consider that the overall density of 35 dwellings per hectare is more realistic and the housing allocation should be reduced to 440 units to reflect this.</p> <p>To ensure that the Council meets its target delivery of 4,400 dwellings on strategic sites it is vital that the Phurnacite plant site is reallocated for housing development.</p>
4 5 Changes sought	Policy CS4 should allocate the former Phurnacite Plant in Abercwmboi for the development of 500 dwellings.
6 6 Candidate Site Ref No	The representation proposes a new use on the former Phurnacite Plant, Abercwmboi Strategic Site (Policy NSA 6)
9 7 Why no previous Representation	The former Phurnacite Plant was previously allocated for housing development in the LDP Preferred Strategy. Its allocation was removed following concerns over potential flood risk issues. A master planning process for the site is being undertaken in conjunction with the Welsh Assembly Government. A flood consequences assessment is being prepared as part of the works to demonstrate that the residential development of the site is acceptable in flood risk terms.
21 11 Why attend Examination?	Our objection relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Item Question	Reply	Soundness Tests
17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The proposed changes will ensure that the allocation are realistic and appropriate and founded on a robust and credible evidence base.													
<i>Item Question</i>															
3	4	Seek changes? Any changes to be made to the Plan?										<i>Reply</i>		Tick box Replies	
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

2049.D1 S I M

Document: Deposit Draft, p.110 Site: PEX Session:

Policy: SSA 16 Map: Issue: Retail

Summary:

<i>Item Question</i>		Representation Text
2	3	Representation text Policy SSA 16 – The Retail Hierarchy Tesco welcomes the allocation of Llantrisant (including Talbot Green) as a Principal Town Centre within the Southern Area of the County Borough. Taken in the context of the Core Strategy, this allocation represents a true reflection of the relative strength of the respective centres in retaining the retail expenditure of the surrounding community, whilst providing scope for the emphasis on sustainable growth that will benefit the local area and Rhondda Cynon Taf as a whole, in line with Paragraph 4.7 of the Plan.

21	11	Why attend Examination? In order to present evidence on behalf of our client.													
<i>Item Question</i>															
3	4	Seek changes? Any changes to be made to the Plan?										<i>Reply</i>		Tick box Replies	
										No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2049.D2			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.082				Site: 676//NSA 14.4		Cae Mawr Industrial Estate, Treorchy		Delete Site		PEX Session:					
Policy: NSA 14		Map:		Issue: Employment											
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	Objection to Policy NSA 14.4 Cae Mawr Industrial Estate, Treorchy.

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
2	3	Representation text												
Policy NSA 14 (4) – Cae Mawr Industrial Estate, Treorchy														
<p>Policy NSA 14 (4) allocates the Cae Mawr Industrial Estate, Treorchy for employment development. The site is classed as non-strategic and is described as a 3.6 hectare (“ha”) flat site which is part of an existing larger industrial estate.</p> <p>Tesco OBJECTS to this allocation and contends that the site is unviable for employment development. Tesco contends that the proposed allocation of this site has been progressed without appropriate consideration or justification for employment development. Furthermore, the allocation of the site for employment development was not sought by the landowner during the candidate site submission process.</p> <p>National guidance states that "the identification of sites should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed". This is reflected in the document entitled "Candidate Site Assessment Methodology" published by the Council in August 2006. This document states that all sites will be assessed by means of a two stage process, ensuring that a comprehensive and complete evaluation of all sites is undertaken before recommendations are made on future land allocations.</p> <p>In the 2008 Employment Land Study, Nathaniel Litchfield and Partners (“NLP”) concluded that there is some 280 ha of available employment land in Rhondda Cynon Taf (“RCT”), of which 170 ha is in Taff Ely, 95 ha is in the Cynon Valley and 15 ha is in the Rhondda Valley. This is considerably more than is likely to be required over the plan period. NLP considered the Cae Mawr Industrial Estate when assessing the quality and potential of undeveloped and redundant employment sites in Rhondda Cynon Taf and concluded that it was of “average” quality.</p> <p>Nineteen sites, amounting to some 184 ha of land, were assessed to be of higher quality than Cae Mawr Industrial Estate, including 22 ha at two sites in Hirwaun. Given this large supply of better quality land and the 21 ha County-wide requirement, it is extremely unlikely that the site would be developed for employment use.</p> <p>Whilst most of the “good” and “very good” sites are not in the Northern Strategy Area, it is wholly unrealistic to assume that businesses will be attracted to sites in this area just because they are allocated for employment use. Many sites in the Northern Strategy Area, including Cae Mawr Industrial Estate are not attractive to the market and are therefore not suitable for employment use. This view was surprising given the fact that NLP express concerns in the study about the general deliverability of sites in the northern area due to the need for significant infrastructure development.</p> <p>As such, we contend that an “average” quality site in the northern area is unlikely to be developed. Moreover, Cae Mawr Industrial Estate is not recommended by NLP in the study as one of the most appropriate employment development locations to accommodate future growth.</p> <p>The site was thoroughly assessed by the Council’s external consultants for its suitability for employment use. However, their professional recommendations have been disregarded and the site has been arbitrarily allocated for employment. As such, Tesco consider the Local Development Plan allocation to be in breach of national guidance and unsound.</p>														

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
																<p>In light of our comments above, we have undertaken our own review of the site's credentials and sought specialist advice from relevant consultants regarding its development potential.</p> <p>In terms of market demand and the potential role of the subject site, local commercial agents have advised that the changing nature of the office and industrial property markets is altering the sites and premises requirements of potential occupiers. This is creating a mismatch between the supply of sites and premises, and occupier demand in many locations. In Treorchy, further employment growth is driven by service sector jobs which often fall outside Class B uses. Furthermore, Treorchy has not performed well in a time of high economic growth in terms of job creation. The site has been actively marketed for a period significantly longer than a year, during a period of high economic activity, but no interest was realised at the site. Considering the current economic climate, which is forecast to continue for the foreseeable future, it is not considered that any employment demand will be forthcoming at the site.</p> <p>This view is supported by the "Economic Development Prospects and Employment Land Implications" report, undertaken by Arup in 2006 to feed into the LDP evidence base. This recognises that the site has been particularly difficult to let and requires substantial investment in terms of access and property.</p> <p>Whilst the site is identified in the Draft Deposit LDP for employment use, it is considered that the proposed allocation is unsound and will not stand up to the scrutiny of a Planning Inspector. Although the site may meet some of the allocation criteria, such as the preference for the use of previously developed land and proximity to existing urban development, the site is not attractive to potential employment occupiers.</p> <p>As demonstrated in the RCT Employment Land Study, the site is of only <input type="checkbox"/> average <input type="checkbox"/> quality. In light of the large supply of existing employment land and the continuation of a strategy of over-provision of employment land in the LDP, compared to forecast need, the site will not be attractive to the market compared to alternative sites and is very unlikely to be developed for employment use. NLP do not include the site in their recommendations of employment development locations.</p>
4	5			Changes sought												<p>The available evidence therefore points to this site being both unsuitable and unviable for new employment development. As such, Tesco assert that there is no reasonable basis and no solid, sound evidence base to support this allocation. We therefore request that this allocation be deleted from the LDP.</p>
9	7			Why no previous Representation												<p>There were no corresponding policies or strategies to make similar representation to in the Preferred Strategy.</p>
21	11			Why attend Examination?												<p>In order to present evidence on behalf of our client.</p>
<i>Item Question</i>										<i>Reply</i>		Soundness Tests				
17	8			CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?												Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response		
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The available evidence therefore points to this site being both unsuitable and unviable for new employment development. As such, Tesco assert that there is no reasonable basis and no solid, sound evidence base to support this allocation. We therefore request that this allocation be deleted from the LDP.															
Item Question															Reply	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?														Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														No	

2049.D3 S I M

Document: Deposit Draft, p.085 Site: PEX Session:

Policy: NSA 18 Map: Issue: Retail

Summary:

Item	Question	Representation Text
1	2	Issue Summary Welcomes the allocation of Treorchy as a key settlement.
2	3	Representation text Policy NSA 18 (2) – The Retail Hierarchy In accordance with page 29 of the Wales Spatial Plan (July 2008 Update) which refer to Key Settlements as “the focus for the region’s future regeneration”, Tesco welcomes the allocation of Treorchy as a Key Settlement. In conjunction with the Core Strategy, which seeks to “focus growth in areas where the maximum social and economic benefits can be achieved” (Para. 4.10) by providing greater opportunities for investment, this position recognises the importance of Treorchy as a retail centre. The allocation reflects the context of the site in the local and wider areas, and also its potential to retain a significant proportion of retail expenditure from the surrounding population.
21	11	Why attend Examination? In order to present evidence on behalf of our client.

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>SA/SEA</i>	<i>NO FRTHR EVID. Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2049.D4			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.109						Site: 704//SSA 15.3		Land east of Mill Street, Tonyrefail				Delete Site		PEX Session:	
Policy: SSA 15				Map:				Issue: Retail							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	Objection to Policy SSA 15.3 Land east of Mill Street, Tonyrefail.	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response	
2	3	Representation text													
		Policy SSA15 (3) – Retail Allocation at Land East of Mill Street, Tonyrefail													
		<p>Policy SSA15 allocates land in the Southern Strategy Area for retail development. Allocation CS7/SSA15(3) indicates 2,000 sq m of retail floorspace (convenience and comparison) at Land East of Mill Street, Tonyrefail. CS7/SSA15 (3) states that the land is suitable for either a retail centre or a retail store to provide a mixture of convenience and comparison shopping.</p> <p>Tesco OBJECTS to this allocation and contend that the site is both unsuitable and unviable for retail development. Tesco contends that the proposed allocation of this site has been progressed without any meaningful consideration of its suitability for development of any nature, particularly retail development.</p> <p>The allocation of the site for retail development was not sought by the landowner in promotion as a Candidate Site, nor is it suitable for such development. The site was initially put forward for residential development and the submission contained very limited supporting information or justification for this use. Welsh Assembly Government ("WAG") guidance states that "the identification of sites should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed". This is reflected in the document entitled "Candidate Site Assessment Methodology" published by the Council in August 2006. This document states that all sites will be assessed by means of a two stage process, ensuring that a comprehensive and complete evaluation of all sites is undertaken before recommendations are made on future land allocations. No evidence of such an assessment has been provided, and, consequently, Tesco consider the Local Development Plan to be in breach of WAG guidance and unsound.</p> <p>In the absence of such an assessment we have undertaken our own review of the site's credentials and sought specialist advice from relevant consultants regarding its development potential. In planning policy terms, the site lies outside the development boundary as defined by the adopted Taff Ely Local Plan and is, under the current planning policy framework, a site on which any form of development is likely to be strongly resisted. In retail terms, the site is beyond the defined town centre and existing shops. In practical terms any entrance to a retail store/stores on the site would be at least 300 metres from existing town centre shops.</p> <p>In terms of highways and accessibility, there are two major issues at the site. Firstly, Mill Street is no more than 7 metres wide with intermittent on-street parking. This effectively reduces the width of the road to just one usable lane in parts. The second significant issue is the access to the site itself. The supporting text to allocation CS7/SSA15(3) states that "access would be from a new road linking High Street and Mill Street". The Candidate Site submission proposed that the existing access, between Nos. 43 and 45 Mill Street, would serve the site. We would comment that the existing vehicular access to the site is inadequate and could not accommodate goods vehicles entering the site from Mill Street. Even if this junction could be widened, which would require the culverting of the existing watercourse, it would not resolve issues regarding the capacity of Mill Street to accommodate additional traffic. While there is potential to construct a new road from the roundabout at the south of Mill Street running towards the south-eastern side of the site, this would be prohibitively expensive in support of a small scale development. It would also result in increased traffic along Mill Street from the north. It is considered that the access constraints at this site render the allocation in conflict with Policy SSA4, in particular Criterion 5, which states that development within the settlement of</p>													

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
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Tonyrefail should "promote accessibility to services by a range of sustainable modes of transport".

In terms of landscaping, Aspect Landscape Planning ("Aspect") has identified a number of landscape and visual impact constraints. The character of the site is predominantly rural with only limited interaction with the urban fringe. Although the site can be seen in the context of the town from certain vantage points, the site remains, in large, isolated fields set within a mature treescape framework separating the site from the urban edge. The topography of the site rises sharply to the south creating a landform which in itself has material landscape value. It is considered that the development of the site would adversely impact the setting of this landscape resource.

The existing vegetation structure is also a positive characteristic of the site, whilst the treescape creates a number of discreet parcels that will be removed during development, further eroding the landscape quality and value of the site. In summary, Tesco considers that there are significant landscape and visual constraints relating to the site that would materially affect its deliverability.

Aspect Ecology has also surveyed the site and established that the hedgerows and lush pasture situated within the site are likely to be considered a Habitat of Principal Importance and that, as such, any development could detrimentally affect these nationally recognised habitats. There are also areas of woodland within the site which could provide foraging habitat and shelter for a range of species, including bats. The habitats present at the site could also provide potentially suitable terrestrial habitats for dormice, great crested newt and, to a slightly lesser extent, otters.

WA Fairhurst has also advised on the flood risk potential of the site. Fairhurst identified that an open watercourse flows past the site with a crossing into it and a further culvert under Mill Street. Extreme flows in the watercourse could lead to inundation of the culverts and overland flows through the site and across Mill Street. Additionally, a large area to the west of the site drains into the watercourse together with a number of ground water sources. In extreme events, sewers in the urban area to the north of the site will be inundated, resulting in additional overland flows towards the site. Fairhurst has advised that, in line with TAN 15, a flood consequence assessment will need to be carried out for the 1 in 1000 year event. Based on the potential flows towards the site and the limited capacity of the existing culvert, it is likely, in Fairhurst's view, that the flood depths and velocities at the access to the site will be in excess of the indicative standards set out in the guidance.

In summary, Tesco contends that there are a number of significant constraints that would render this site unsuitable for retail development.

With regard to the suitability of the site in commercial terms, it is understood from local agents that the site has been reviewed and rejected in the recent past by a discount food retailer. Tesco also examined this site earlier this year and rejected it on grounds of its highway accessibility, lack of visual prominence and the cost of bringing the site to a developable standard.

4 5 Changes sought

The available evidence suggests that this site is both unsuitable and unviable as a foodstore location. In the absence of any solid, sound evidence base to the contrary, we request that this allocation be deleted from the LDP.

21 11 Why attend Examination?

In order to present evidence on behalf of our client.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Soundness Tests				
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes				
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2049.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.109				Site: 702//SSA 15.1		Land adjacent to Pontypridd Retail Park		Delete Site		PEX Session:							
Policy: SSA 15				Map:		Issue: Retail											
Summary:																	

Item	Question	Representation Text
1	2 Issue Summary	
	Objection to Policy SSA 15(1) - Land adjacent to Pontypridd Retail Park (Brown Lenox)	
2	3 Representation text	
	SSA 15 (1) – Land Adjacent to Pontypridd Retail Park (Brown Lenox)	
	Appendix 1 – Retail Allocations	
	Tesco OBJECTS to the proposed allocation of the Brown Lenox site on land adjacent to Pontypridd Retail Park for a foodstore.	
	The potential of this site to accommodate a foodstore was considered in detail at a call-in inquiry. In dismissing the application on 6 June 2006, the Welsh Assembly Government concluded that the site was inappropriate for such a use.	
	Subsequent to that refusal, outline planning consent has been resolved to be granted for bulky goods retail at this site. This was considered acceptable by officers because it was sequentially preferable and more feasible in comparison to other sites allocated for bulky goods retail within the Local Plan. Furthermore, the proposal would provide a key opportunity to redevelop a strategically important location at the gateway to Pontypridd.	
	It is incumbent upon the LPA before allocating this out-of-centre site for a foodstore to consider all available town centre and edge-of-centre locations. However, it is apparent that no such assessment has been undertaken through the LPA's Candidate Sites Methodology.	
	The assessment of the locational credentials of this site is limited to an officer conclusion (At Appendix 1c) that "the site is an accessible location for the wider town." This is not a sequential assessment as required by national guidance. It fails to recognise that the site is well beyond the 800 metres walking distance considered by the Institute of Highways and Transportation ("IHT") as acceptable for food shopping; that it is poorly served by public transport, and that orientation of the site will not easily facilitate linkage between the store and the adjacent retail park.	
	It also fails to assess other out of centre sites that offer equal or greater scope for linkage by non-car modes. Therefore, no basis for the assertion of the Plan that the site is "a sequentially preferable site for retail development that cannot be located in the defined retail core".	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
4	5	Changes sought															
Tesco considers that this proposed allocation has been made without objective assessment of the planning merits of this site nor in consideration of the ability of other sites to meet the identified need. Consequently, Tesco request that this proposed allocation should be deleted in its entirety.																	
21	11	Why attend Examination?															
In order to present evidence on behalf of our client.																	
<i>Item Question</i>										<i>Reply</i>		Soundness Tests					
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?										Yes					
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2049.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.037							Site:			PEX Session:							
Policy: CS 7				Map:				Issue: Retail									
Summary:																	

Item	Question	Representation Text	
1 2	Issue Summary Objection to CS 7 - Retail Developments		
2 3	Representation text Policy CS 7 – Retail Development		
	<p>Tesco OBJECTS to the allocation of 33,500 sq m retail floorspace development at Policy CS7, for a number of reasons.</p> <p>Firstly, the overall quantum of floorspace proposed to be allocated appears to be entirely arbitrary. The figures adopted acknowledge, but do not reflect, advice given to the local planning authority by Nathaniel Lichfield and Partners (“NLP”). The NLP data itself is, in Tesco’s view, flawed insofar as it is based upon historic survey and expenditure data.</p> <p>Tesco’s particular concern relates to the proposed distribution of the identified capacity across the LPA area. 69% of the identified need is proposed to be met at a single site at Talbot Green, with less than 9% of the identified need proposed to be met in the Northern Strategy Area.</p> <p>Tesco considers that the strategy is inconsistent with national guidance. Retail development is an acknowledged driver of regeneration in Wales and is supported at page 127 of the Wales Spatial Plan July 2008 Update, which acknowledges the role of retail in creating sustainable valleys communities.</p> <p>Moreover, Tesco does not consider that such a disparity of retail floorspace distribution is consistent with the Core Strategy of the Plan, with its emphasis (at Para 4.4) of building sustainable communities in the north to halt the process of depopulation and decline. To focus 92% of new retail development in the south of the County Borough is entirely inappropriate and inconsistent with a fundamental objective of the LDP.</p>		
4 5	Changes sought		
	Therefore, Tesco considers that this strategy should be reviewed and a distribution of future retail development identified that is more equitable.		
21 11	Why attend Examination?		
	In order to present evidence on behalf of our client.		
Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?														
												Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														
												No				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
2049.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.037				Site: 723//CS 7.1		Site 7 Mwyndy								PEX Session:		
Policy: CS 7				Map:						Issue: Retail						
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	Objection to the allocation of 23,200 sq m of retail floorspace at Mwyndy/Talbot Green.
2	3 Representation text	<p>Tesco also OBJECTS to the allocation of 23,200 sq m of retail floorspace at Mwyndy/Talbot Green.</p> <p>Talbot Green is a thriving town centre and its continued vitality and viability is supported by national guidance in MIPPS 02/2005. The proposed allocation is predicated upon "a specific need to decongest existing convenience (food) provision" in Talbot Green. The motivation for this policy is to relieve trade from Tesco 's existing town centre store.</p> <p>The Tesco store at Talbot Green is the anchor to the remainder of the defined centre. Any impact upon it would most certainly harm the vitality and viability of both that store and the centre as a whole. It is of considerable concern that the perceived 'need' to address overtrading at Tesco was at no time raised with the company.</p> <p>Moreover, the proposed allocation includes (as detailed under Policy SSA8) some 19,500 sq m net of comparison goods floorspace. This will be in direct competition with other retailers represented within the defined centre of Talbot Green.</p> <p>Therefore, this allocation is in direct conflict with national guidance on retailing in MIPPS 02/2005 on impact grounds alone.</p> <p>It is also apparent that this allocation fails to consider whether the proposed floorspace can be disaggregated onto sites within or immediately adjacent to the town centre of Talbot Green, or indeed, Pontypridd. The proposed allocation falls on an out-of-centre site poorly related both to existing town centre shops, residential areas, employment uses and public transport. Consequently, the allocation fails the sequential approach to site selection as set out in national guidance on retailing in MIPPS 02/2005.</p> <p>Tesco also OBJECTS to the allocation of this site for retail for more detailed site specific reasons. These objections are set out in representations to Policy SSA8.</p>
4	5 Changes sought	Tesco seeks the review of the quantum and distribution of retail within this policy and the deletion of all references to the proposed out of centre retail development at Mwyndy.
9	7 Why no previous Representation	There were no corresponding policies or strategies to make similar representation to in the Preferred Strategy.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>		
<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?															
												Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons															
												No					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2049.D8			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.037				Site: 723//CS 7.1		Site 7 Mwyndy				Delete Site		PEX Session:			
Policy: CS 7				Map:				Issue: Retail							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Objection to Policy CS 7 - Retail Development (Mwyndy/Talbot Green).	
2 3	Representation text Policy CS 7 – Retail Development (Mwyndy/Talbot Green) Tesco OBJECTS to the allocation of 23,220 sq m retail floorspace development to take place within Strategic Site 7 on land at Mwyndy/Talbot Green on the grounds that the allocation appears to be an arbitrary floorspace allocation based upon the findings of NLP's March 2008 update of the boroughwide Retail Capacity Assessment. Our review of the Assessment is dealt with in detail within Tesco's representation in respect of Policy CS 7. However, that representation identifies significant flaws in the approach adopted in determining retail capacity, rendering it unreliable as an estimation of quantitative need. For example, the data upon which the economic assessment is based is derived from dated sources and does not reflect upto-date local rates of per capita expenditure. A robust and up-to-date assessment is required to inform such a substantial development allocation. In the absence of such information, the allocation at Policy CS 7 is considered to be unsound. Furthermore, at Paragraph 4.7, the Plan highlights the need for a "managed form of growth which will consolidate existing settlement patterns" in the Southern Strategy Area. A retail development of this size and nature, on a site outside the Principal Town of Llantrisant/Talbot Green, will be to the detriment of the vitality and viability of the existing town centre, drawing investment, expenditure and footfall out of the centre. This conflicts directly with the objectives of Planning Policy Wales MIPPS 02/2005: Retailing and Town Centres.	
21 11	Why attend Examination? In order to present evidence on behalf of our client.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2049.D9			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.25, para.4.3						Site:			PEX Session:							
Policy:				Map:				Issue: Core Strategy								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Objection to the Plan's strategy to split the County Borough into Northern and Southern Strategy Areas.	
2 3	Representation text Core Strategy – Northern and Southern Strategy Areas Tesco OBJECTS to the Plan's strategy to split the County Borough into Northern and Southern Strategy Areas on the grounds that it represents an arbitrary division of the County Borough without regard to the functional relationship between settlements.	
4 5	Changes sought Policies within the plan such as CS 7 (retail development), should reflect the focus on regenerating areas of deprivation within the County Borough. This issue is dealt with in greater detail in Tesco's objection to Policy CS 7.	
9 7	Why no previous Representation There were no corresponding policies or strategy to make similar representation to in the Preferred Strategy.	
21 11	Why attend Examination? In order to make full representation and present evidence on behalf of our Client.	

Item	Question	Reply	Soundness Tests
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2049.D10			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.075							Site:			PEX Session:							
Policy: NSA 8				Map:			Issue: Strategic Sites										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Objection to Policy NSA8 - Land South of Hirwaun.	
2 3	Representation text Policy NSA 8 – Land South of Hirwaun Tesco OBJECTS to the omission of allocated retail floorspace from the Indicative Concept Map for Policy NSA 8. The Policy states that 2,000 sq m of retail floorspace is allocated to be developed on Land South of Hirwaun. No such corresponding area for retail development is depicted on the map.	
4 5	Changes sought Tesco wish to see this map amended to show the proposed location for retail development.	
9 7	Why no previous Representation There were no corresponding policies or strategies to make similar representation to in the Preferred Strategy.	
21 11	Why attend Examination? In order to present evidence on behalf of our client.	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2049.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.047							Site:			PEX Session:							
Policy: AW 5				Map:				Issue: Design									
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Objection to the Plan's omission of a policy which sets out a framework for the consideration of proposals for retail development in edge-of-centre and out-of-centre locations.	
2 3	Representation text Policy AW 5 – New Development Tesco OBJECTS to the Plan's omission of a policy which sets out a framework for the consideration of proposals for retail development in edge-of-centre and out-of-centre locations. Planning Policy Wales, Ministerial Interim Planning Policy Statement ("MIPPS") 02/2005 and Technical Advice ("TAN") 4 states that such development is required to satisfy the tests of need, the sequential approach to site selection and impact. In addition, at paragraph 10.2.13, MIPPS 02/2005 states that development plans should "include criteria based policies against which proposals coming forward on unallocated sites can be judged."	
4 5	Changes sought Tesco suggest that area wide policies that clearly define the criteria under which applications for edge-of-centre and out-of-centre retail development will be considered should be included within the LDP. This will ensure that its policies provide comprehensive coverage for future retail development proposals in the County Borough and compliance with national planning policy.	
21 11	Why attend Examination? In order to present evidence on behalf of our client.	

Item	Question	Reply	Soundness Tests
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2049.D12			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.037, para.4.62							Site:		PEX Session:						
Policy: CS 7				Map:			Issue: Retail								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Objection to Paragraph 4.62	
2 3	Representation text Paragraph 4.62 - Key Economic Trends	
	Tesco OBJECTS to Paragraph 4.62 insofar as it is our view that the data used by the Council's retail consultants, Nathaniel Litchfield and Partners ("NLP") in their Retail Capacity Assessment, Quantitative Update, published in March 2008, upon which the findings of the Plan are based, is derived from dated sources and does not reflect up-to-date local rates of per capita expenditure.	
4 5	Changes sought In order to make reasonable assumptions on retail trading patterns, an up-to-date assessment drawing upon current data is essential.	
21 11	Why attend Examination? In order to present evidence on behalf of our client.	

Item	Question	Reply	Soundness Tests
17 8	CE2 Test? Not realistic and appropriates and/or not founded on robust and credible evidence?	Yes	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2049.D13			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.031				Site:								PEX Session:			
Policy: CS 2				Map:				Issue: Strategy Areas							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Support to Policy CS 2 - Development in the South.	
2 3	Representation text Policy CS 2 – Development in the South Tesco SUPPORT the Plan's identification of the importance of promoting the regeneration of Talbot Green and the recognition of its role as an area of social and economic growth at Point 4. The facilitation of sustainable growth at Talbot Green in line with national planning policy and the aims of the Core Strategy to maintain "a managed form of growth which will consolidate existing settlement patterns" (Para. 4.7) is welcomed.	
21 11	Why attend Examination? In order to present evidence on behalf of our client.	

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2049.D14			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.095						Site:								PEX Session:	
Policy: SSA 3				Map:										Issue: Principal Towns & Key Settlements	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Support Point 5 of Policy SSA 3 - Development in the Principal Town of Llantrisant/Talbot Green.		
2 3	Representation text Policy SSA 3 – Development in the Principal Town of Llantrisant/Talbot Green Tesco SUPPORT Point 5 of the above policy with regard to the promotion of opportunities for new retail development in the Principal Town of Llantrisant/Talbot Green. In the context of the Plan's Core Strategy, this Policy will enhance the status of Llantrisant/Talbot Green as a retail centre, whilst improving the ability of the centre to retain retail expenditure, through a "managed form of growth." (Para. 4.7)		
21 11	Why attend Examination? In order to present evidence on behalf of our client.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2049.D15			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.100						Site:						Delete Site		PEX Session:	
Policy: SSA 8					Map:				Issue: Strategic Sites						
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	Objection to Policy SSA 8 - Mwyndy / Talbot Green Area.	

REPRESENTATION DETAIL by: Representation No**Rhondda Cynon Taf County Borough Council Local Development Plan**

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l SA/SEA</i>	<i>NO FRTHR EVID. Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
2	3	Representation text												
		Policy SSA 8 – Mwyndy/Talbot Green Area												
		Tesco OBJECTS to the proposed allocation of Mwyndy/Talbot Green Area under Policy SSA8 for development that includes 23,200 sq m of retail floorspace.												
		Tesco is the anchor store within the town centre of Talbot Green. The existing store trades well and its success, alongside that of the Talbot Green Shopping Park, creates a town centre that is both vital and viable.												
		The proposed allocation of this significant quantum of retail floorspace, at an out-of-centre site, poorly related to existing shops; residential areas; employment; and public transport, will have a potentially harmful effect on the vitality and viability of the existing centre, in direct conflict with the aims and objectives of national guidance on retail policy contained in MIPPS 02/2005.												
		At Paragraph 6.139, the justification for such a significant development is that the proposal will assist in clawing back trade lost further afield. However, Talbot Green is one of the most successful retail centres in South Wales, with representation from many retailers not seen in larger settlements, such as Pontypridd, Bridgend or other regional centres. The level of trade retention is very high for both food and non-food retailing and there is no further evidence to suggest that the benefits of additional out-of-centre retail development in this location outweigh the harm that would be caused to Talbot Green town centre.												
		Tesco would also question the process by which this site has come to be proposed to be allocated. Welsh Assembly Government ("WAG") guidance states that "the identification of sites should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed". This is reflected in the document entitled "Candidate Site Assessment Methodology" published by the LPA in August 2006. This document requires that a comprehensive and complete evaluation of all sites is undertaken prior to proposed allocations being taken forward. However, in this case there is no evidence of such an assessment taking place prior to this proposed allocation. The proposed allocation has, therefore, been made in a manner inconsistent with WAG guidance and is unsound.												
		In addition to objecting to the fundamental principle of the allocation as outlined above, Tesco has also asked its consultants to examine the constraints of the site itself. Tesco's comments in respect of highways, landscaping and visual amenity and ecology are summarised below and will be expanded upon in evidence to the LDP Inquiry should this proposed allocation be taken forward.												
		Highways												
		It is unfortunate that while a detailed study of the highways network in the vicinity of this site was completed for the LPA by Hyder Consulting in 2007, this has not yet been made available for examination by interested parties.												
		Tesco's highway consultants note however that Policy SSA 8 will result in significant additional traffic pressure. The development of SSA8 will place an inevitable strain on the existing A473/A4119 corridor, causing further congestion and creating a 'bottleneck' effect at peak times.												

REPRESENTATION DETAIL by: Representation No**Rhondda Cynon Taf County Borough Council Local Development Plan**

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
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Landscaping and Visual Amenity

Tesco's landscape consultant has assessed the site and concluded that the proposal will have a significant adverse effect on the existing natural landscape character and visual amenity of the area.

A Landscape Supporting Statement has been prepared (appended to these representations for ease of reference, ref: 4672.LSSS.001) which at Paragraph 5.3, concludes that:

"the designated strategic site, referred to as SSA8: Mwyndy/Talbot Green Area is not appropriate to accommodate the degree of development outlined within the LDP without significant material impacts upon the landscape character and visual amenities of the localised area which ... would be contrary to Policies CS3, AW6, AW7, AW8 and paragraph 6.182."

Furthermore, the Statement identifies that the area of development proposed would also encroach on the currently undisturbed local valley side, which forms a key landscape element within the surrounding undisturbed fields. The loss of open space and expansion of urban areas would result in a significant encroachment into the wider rural setting and would "seem to promote the coalescence of the urban areas of Talbot Green, Pontyclun and Hendy."

Finally, the Statement recommends that:

"the strategic site, as illustrated within the Deposit Draft LDP, should be removed to prevent significant landscape and visual impacts within the setting of Talbot Green and Llantrisant and another site considered."

Ecology

Tesco's ecological consultant has reviewed the site and considers the development to be inappropriate on grounds of its potential impact on a number of Sites of Importance for Nature Conservation (SINC) and the natural habitats of a number of protected animal species.

An ecological survey and assessment were undertaken in March 2009 (appended to these representations for ease of reference, ref: RJ/ECO-1866.Brief Note.dv1) to appraise the habitats present within the site and identify their potential to support protected and notable species.

The assessment shows that "a significant proportion" of the site comprises five SINC's as well as six UK BAP Priority Habitats. It concludes that:

"the proposed development will directly and/or indirectly impact upon a number of SINC's situated within or immediately adjacent to

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
															'Strategic Site 7', which could also impact a number of protected and noteworthy species."
															Furthermore, Tesco's consultants have noted that the allocation runs contrary to the LPA's duty in respect of "the Habitat Regulations (1994) (as amended) and the NERC Act (2006) to conserve biodiversity... [and] the requirement of national and local planning policy to conserve SINCs."
4	5			Changes sought											Tesco considers that for the reasons set out above, the allocation of this site for retail development as proposed in Policy SSA 8, is inconsistent with national guidance and raises serious concerns with regard to the future health of Talbot Green town centre, highways, landscape and ecology. Tesco therefore requests that this allocation be deleted.
21	11			Why attend Examination?											In order to present evidence on behalf of our client.

Item	Question	Reply	Soundness Tests
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes
Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

2052.D1 C W M

Document: Deposit Draft, p.111 Site: 792//SSA 18.1 Tonyrefail Bypass/Ynysmaerdy-Coed Ely Dualling PEX Session:

Policy: SSA 18 Map: Issue: Transportation

Summary:

Item	Question	Representation Text
1	2	Issue Summary National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.
2	3	Representation text SSA 18.1: Major Road Schemes [Tonyrefail Bypass and Ynysmaerdy to Coed Ely Dualling] National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2052.D3			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.109		Site: 700//SSA 14.2							Coed Ely, Tonyrefail			PEX Session:				
Policy: SSA 14				Map:				Issue: Employment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.		
2 3	Representation text	
SSA 14.2: Employment Allocations [Coed Ely, Tonyrefail]		
National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.		

2052.D4			<input type="checkbox"/>	S	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.087		Site: 750//NSA 21.1							Land south of Hirwaun			PEX Session:				
Policy: NSA 21				Map:				Issue: Transportation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.		
2 3	Representation text	
NSA 21.1 Park and Ride / Park and Share Provision [Strategic site 5 Land South of Hirwaun]		
National Grid wish to draw the Council's attention to the fact that a high pressure gas pipeline running adjacent to the above allocation. National Grid would be grateful if the Council would consider the location of the pipeline in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high pressure gas pipelines, is provided within the covering letter that accompanies this representation.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2052.D5			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.100		Site: 7//SSA 8 0STR Mwyndy						PEX Session:							
Policy: SSA 8		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.	
2 3	Representation text SSA 8: Mwyndy / Talbot Green area National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.	

2052.D6			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.088		Site: 753//NSA 22.1 Aberdare to Tower Colliery Line						PEX Session:							
Policy: NSA 22		Map:		Issue: Transportation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.	
2 3	Representation text NSA 22.1: Rail Network and Station Improvements [Aberdare - Tower freight line] National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2052.D7			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075		Site: 5//NSA 8 0STR Hirwaun/Penywaun							PEX Session:							
Policy: NSA 8		Map:			Issue: Strategic Sites											
Summary:																

Item Question

Representation Text

1 2 Issue Summary

National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.

2 3 Representation text

NSA 8: Land South of Hirwaun

National Grid wish to draw the Council's attention to the fact that there is a high pressure gas pipeline running adjacent to the above allocation. National Grid would be grateful if the Council would consider the location of the pipeline in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high pressure gas pipelines, is provided within the covering letter that accompanies this representation.

2052.D8			<input type="checkbox"/>	C	W	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.039		Site: 733//CS 9.2 Hirwaun Industrial Estate							PEX Session:							
Policy: CS 9		Map:			Issue: Waste Management											
Summary:																

Item Question

Representation Text

1 2 Issue Summary

National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.

2 3 Representation text

CS 9.2: Waste Management [Hirwaun Industrial Estate]

National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2052.D9			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.115		Site: 834//SSA 24 .1						Coed Ely, Tonyrefail			PEX Session:				
Policy: SSA 24				Map:				Issue: Environment							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.		
2 3	Representation text	
SSA 24.1: Land Reclamation Schemes [Coed Ely]		
National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.		

2052.D10			<input type="checkbox"/>	C	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.112		Site: 795//SSA 19.1						Rail line Pontyclun - Beddau			PEX Session:				
Policy: SSA 19				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
National Grid requests that they are adequately consulted, and that the assets, operating procedures and practices of National Grid are considered, during the formulation of relevant planning policies.		
2 3	Representation text	
SSA 19.1: Rail Network and Station Improvements [Pontyclun - Beddau freight line]		
National Grid wish to draw the Council's attention to the fact that a high voltage overhead electricity line crosses the above allocation. National Grid would be grateful if the Council would consider the location of the overhead line in their assessment of any allocation and specific development proposals for the site. Details of National Grid policy and guidelines concerning development in the vicinity of high voltage overhead lines, is provided within the covering letter that accompanies this representation.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2053.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106				Site: 406/410		Hendy Quarry				New Site		PEX Session:			
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
The Hendy Quarry Site (Candidate site id: 410) is a highly suitable site for residential development under LDP policy SSA10 and, as such, the policy should include the site accordingly.		
2 3	Representation text	
A number of housing allocations under LDP policy SSA10 are located on greenfield development locations. Candidate site 410 provides a sequentially preferable development location, which constitutes a predominantly brownfield development site. This coupled with its highly sustainable and suitable location, results in site 410 having considerable merit compared to other allocated greenfield sites in the locality.		
It is therefore considered that Policy SSA10 should be amended to include site 410.		
Please refer to covering letter for further information.		
4 5	Changes sought	
Policy SSA10 should be amended to include the Hendy Quarry site (site 410).		
Please refer to covering letter for further information.		
6 6	Candidate Site Ref No	
410		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Test C2: The allocation of site 410 under policy SSA10 supports national policy			
Test CE2: The allocation of site 410 under policy SSA10 will ensure that the policies and allocations of the Deposit LDP have been formed under consideration of appropriate site/ policy appraisal, and a firm evidence base.			
Test CE1: The allocation of site 410 under Policy SSA10 will ensure that the LDP allocations and policies logically flow and are consistent with a conherent strategy.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2053.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.109										Site: 406/410 Hendy Quarry		New Site		PEX Session:		
Policy: SSA 14				Map:				Issue: Employment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
The Hendy Quarry site (candidate site id: 410) is a highly suitable site for employment development under LDP policy SSA14 and as such, the policy should include the site accordingly.		
2 3	Representation text	
Candidate site 410 provides a predominantly brownfield, highly sustainable and suitable location for employment. This results in site 410 having considerable merit as an allocated employment site.		
It is therefore considered that Policy SSA14 should be amended to include site 410.		
Please refer to covering letter for further information.		
4 5	Changes sought	
Policy SSA14 should be amended to include the Hendy Quarry site (site 410).		
Please refer to covering letter for further information		
6 6	Candidate Site Ref No	
410		

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Test C2: The allocation of site 410 under Policy SSA14 supports national policy			
Test CE2: The allocation of site 410 under Policy SSA14 will ensure that the policies and allocations of the Deposit LDP have been formed under consideration of appropriate site/policy appraisal, and a firm evidence base.			
Test CE1: The allocation of site 410 under Policy SSA14 will ensure that the LDP allocations and policies logically flow and are consistent with a coherent strategy.			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2053.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.100										Site: 406/410 Hendy Quarry		Amend site boun PEX Session:				
Policy: SSA 8				Map:			Issue: Strategic Sites									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The Henday Quarry Site (Candidate site id: 410) is highly suitable for mixed use development and would make a highly suitable addition to the Talbot Green/ Mwyndy development area, as allocation under LDP policy SSA8 and, as such, the LDP should be amended accordingly.	
2 3	Representation text	
	The majority of land allocated under policy SSA8 constitutes greenfield development locations. Candidate site 410 provides a sequerentially preferable development location, which constitutes a predominantly brownfield development site. This coupled with its highly sustainable and suitable location, results in site 410 having considerable merit compared to other allocoated greenfield sites in the locality.	
	It is therefore considered that policy SSA should be ammended to include site 410.	
	Please refer to covering letter for further information.	
4 5	Changes sought	
	Policy SSA8 should be ammended to include the Hendy Quarry site (410) within the Talbot Green/ Mwyndy development area.	
	Please refer to covering letter for further information.	
6 6	Candidate Site Ref No	
	410	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Test C2: The allocation of site 410 under Policy SSA8 supports national policy.		
	Test CE2: The allocation of site 410 under policy SSA8 will ensure that the policies and allocations of the Deposit LDP have been formed under consideration of appropriate site/ policy appraisal , and a firm evidence base.		
	Test CE1: The allocation od site 410 under Policy SSA8 will ensure that the LDP allocation and policies logically flow and are consistant with a coherent strategy.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.106							Site:		New Site			PEX Session:				
Policy: SSA 10				Map:			Issue: Housing Allocation									
Summary:																

Item	Question	Representation Text
1	2 Issue Summary	To include in the Housing Allocation fields in Beddau bounded by the A473 to the west, High Mead to the South, disused railway line and Church Village Bypass to the east and the land to Rhiwsaeson to the north. Grid reference ST:306632/184122 refers. Field Refs 6110, 6106 and 5800.
2	3 Representation text	<p>The fields adjoining the A473 in Beddau are bounded by the A473 to the west, High Mead to the south, the disused railway line and Church Village Bypass to the east and the land to Rhiwsaeson to the north. The fields extend to 2.1 acres or so. Please contact the objector if you need a location map.</p> <p>The fields are a brown field site, having previously been the location of a coal mine with adit, a concrete block works and transfer station for cattle en-route to the old slaughter houses in Pontypridd. The mine shaft is still visible today, though attempts to fill the shaft have been made by previous occupiers of the site. Over half of the site has been subjectde to significant hardcore landfill to provide an alternative access to the then operational Rhiwsaeson municiple refuse tip to the east of the fields, but this access was never completed and adopted due to the closure of the tip.</p> <p>The fields have been disused for over 10 years and the fields are no longer viable for livestock or horses, etc as the boundaries are not secure. Furthermore, it is not economically viable to repair the fences for livestock usgae as the payback period would be in excess of 25 years. The fields are not suitable for crops or hay because the soil is of inferior quality and indeed the southern half of the site has only a very thin layer of soil over the previous landfill.</p> <p>The fields are currently plagued with constant fly-tippingand vandalism and are a haven for anti-social behaviour such as underage drinking and drig taking on the premises.</p> <p>Considering Planning Policy Wales 2002, Figure 2.1 - definition of previously developed land - this site os clearly previously developed land (brownfield site) used for mineral extraction and remains in a largely unrestored state with the mine shaft still exposed, uncapped and potential safety hazard, though the shaft does appear to have been filled in over time by previous owners of the land.</p> <p>MIPPS 01/2006 makes a clear distinction between development adjoining a settlement, development in the countryside and development in the open countryside. With reference to these definitions, the site being proposed falls into the category of adjoining a settlement.</p> <p>In policy SSA 10, reference 15 refers to land south of Brynteg Court in Beddau, which is a green field site, has already been included in the land proposed fro development, and lies directly to the west of the site bring proposed. According to MIPPS 01/2006 brownfield sites should be allocated for development before green field sites, but because of the process and policies adopted by the Council to identify Candidate Sites for the LDP the proposed site was excluded from the list of candidate sites even thoug I consistently and continually progressed development of the site through the local planning process over the past 10 years. This procedure adopted by the Council has caused an inconsistency with regard to MIPPS 01/2006 directives on development land search sequence.</p> <p>Development of this site would fully comply with the objectives and directives specified in MIPPS 01/2006 and the relevant aspects of Planning Policy Wales 2002, and resolve an inconsistency in allocating a large Greenfield site in preference to the brownfield site being proposed.</p> <p>A Site Assessment of the proposed site is attached.</p>
4	5 Changes sought	The settlement boundary for Beddau, and the Housing Allocations section needs to be amended to include the fields in Beddau bounded by the A473 to the west, High Mead to the south, disused railway line and Church Village Bypass to the east and lane to Rhiwsaeson to the north. If a location plan is required, please notify the objector.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
6	6			Candidate Site Ref No											
<p>I was not aware that Candidate Sites were being sought by the Council, I was not aware that there was a deadline for submitting candidate sites as part of the LDP process and I was not asked by the Council to propose any Candidate Sites. If I had been included in the request for Candidate Sites process, or had been made aware of the deadlines I would have proposed the site now being put forward.</p>															
21	11			Why attend Examination?											
<p>To ensure that my representations are fully understood and presented in the best possible way to the Inspector.</p>															

Item	Question	Reply	Soundness Tests
10	8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes
12	8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes
13	8	C2 Test? Does not have regard to national policy?	Yes
14	8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes
16	8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes
19	8	CE4 Test? Not flexible to deal with changing circumstances?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	
<p>To ensure the LDP is compatible with the MIPPS 01/2006.</p> <p>To ensure consistency between implementation of the northern and southern housing policies.</p> <p>To ensure the southern housing policy is flexible enough to cope with changes ro circumstances over the life of the LDP.</p> <p>To ensure a potential greater supply of available lower cost housing land and thereby keep land prices relatively low in order to contribute to realistic housing costs.</p> <p>To ensure efficient land usage.</p> <p>To reuse vacant and previously occupied land.</p> <p>To ensure that the settlement definitions are consistent with the MIPP 01/2006 in regard to the priorities and search sequence fro allocating land for housing usage.</p>			

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D2			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:		New Site			PEX Session:				
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	To include in the Housing allocation fields in Beddau bounded by the A473 to the west, High Mead to the south, disused railway and Church Village to the east and lane to Rhiwsaeson to the north. Grid reference ST:306632/184122 refers. Field Refs 6110, 6106 and 5800.
2 3	Representation text	<p>The fields adjoining the A473 in Beddau are bounded by the A473 to the west, High Mead to the south, the disused railway line and Church Village Bypass to the east and the land to Rhiwsaeson to the north. The fields extend to 2.1 acres or so. Please contact the objector if you need a location map.</p> <p>The fields are a brown field site, having previously been the location of a coal mine with adit, a concrete block works and transfer station for cattle en-route to the old slaughter houses in Pontypridd. The mine shaft is still visible today, though attempts to fill the shaft have been made by previous occupiers of the site. Over half of the site has been subject to significant hardcore landfill to provide an alternative access to the then operational Rhiwsaeson municipal refuse tip to the east of the fields, but this access was never completed and adopted due to the closure of the tip.</p> <p>The fields have been disused for over 10 years and the fields are no longer viable for livestock or horses, etc as the boundaries are not secure. Furthermore, it is not economically viable to repair the fences for livestock usage as the payback period would be in excess of 25 years. The fields are not suitable for crops or hay because the soil is of inferior quality and indeed the southern half of the site has only a very thin layer of soil over the previous landfill.</p> <p>The fields are currently plagued with constant fly-tipping and vandalism and are a haven for anti-social behaviour such as underage drinking and drug taking on the premises.</p> <p>Considering Planning Policy Wales 2002, Figure 2.1 - definition of previously developed land - this site is clearly previously developed land (brownfield site) used for mineral extraction and remains in a largely unrestored state with the mine shaft still exposed, uncapped and potential safety hazard, though the shaft does appear to have been filled in over time by previous owners of the land.</p> <p>MIPPS 01/2006 makes a clear distinction between development adjoining a settlement, development in the countryside and development in the open countryside. With reference to these definitions, the site being proposed falls into the category of adjoining a settlement.</p> <p>In policy SSA 10, reference 15 refers to land south of Brynteg Court in Beddau, which is a green field site, has already been included in the land proposed for development, and lies directly to the west of the site being proposed. According to MIPPS 01/2006 brownfield sites should be allocated for development before green field sites, but because of the process and policies adopted by the Council to identify Candidate Sites for the LDP the proposed site was excluded from the list of candidate sites even though I consistently and continually progressed development of the site through the local planning process over the past 10 years. This procedure adopted by the Council has caused an inconsistency with regard to MIPPS 01/2006 directives on development land search sequence.</p> <p>Development of this site would fully comply with the objectives and directives specified in MIPPS 01/2006 and the relevant aspects of Planning Policy Wales 2002, and resolve an inconsistency in allocating a large Greenfield site in preference to the brownfield site being proposed.</p> <p>A Site Assessment of the proposed site is attached.</p>
4 5	Changes sought	The settlement boundary for Beddau, and the Housing Allocations section needs to be amended to include the fields in Beddau bounded by the A473 to the west, High Mead to the south, disused railway line and Church Village Bypass to the east and lane to Rhiwsaeson to the north. If a location plan is required, please notify the objector

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
8	7	Previous Representation No													
I was not aware that Candidate Sites were being sought by the Council, I was not aware that there was a deadline for submitting Candidate Sites as part of the LDP process and I was not asked by the Council to propose any Candidate Sites. If I had been included in the request for Candidate Sites, or had been made aware of the deadline I would have proposed the site now being put forward.															
21	11	Why attend Examination?													
To ensure that my representations are fully understood and presented in the best possible way to the Inspector.															

Item	Question	Reply	Soundness Tests
10	8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes
12	8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes
13	8	C2 Test? Does not have regard to national policy?	Yes
14	8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes
16	8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes
17	8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes
19	8	CE4 Test? Not flexible to deal with changing circumstances?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	
To ensure the LDP is compatible with the MIPPS 01/2006.			
To ensure consistency between the implementation of the northern and southern housing policies.			
To ensure the southern housing policy is flexible enough to ope with chages to circumstances over the life of the LDP.			
To ensure a potential greater supply of available lower cost housing land and thereby keep land prices relatively low in order to contribute to reaslistic housing costs.			
To ensure efficient land usage.			
To reuse vacant and previously occupied land.			
To ensure that the settlement definitions are consistent with the MIPP 01/2006 in regard to the priorities and search sequence for allocating land for housing usage.			

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D3			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:		Settlement Boun PEX Session:							
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The settlement boundary for Beddau is incorrect.	
2 3	Representation text The revised Beddau settlement boundary has been incorrectly drawn around the revised settlement without any reference to potential future development sites. The settlement also includes a Greenfield area allocated to housing , contrary to MIPP 01/2006) and excludes a brownfield area which would be far more suitable for housing allocation (fields immediately to he (sic) north of High Mead).	
4 5	Changes sought The settlement boundary for Beddau needs to be drawn in a manner consistent with MIPPS 01/2006 and include all brownfield development sites within the vicinity before any green field sites are included for housing.	
6 6	Candidate Site Ref No Yes This representation regards the implementation and interpretation of what the settlement should contain znd its compatibility with MIPPS 01/2006. No	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the vest possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan To ensure the LDP is compatible with the MIPPS 01/2006. To ensure consistency between the implementation of the northern and southern housing policies. To ensure the southern housing policy is flexible enough to cope with changes to circumstances over the life of the LDP. To ensure a potential greater supply of available lower cost housing land and thereby keep land prices relatively low in order to contribute to realistic housing costs. To ensure efficient land usage. To reuse vacant and previously occupied land. To ensure that the settlement definitions are consistent with the MIPP 01/2006 in regard to the priorities of allocating land for housing usage.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D4			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038							Site:			PEX Session:						
Policy: CS 8				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The dualling of the Church Village Bypass should be included in the major road schemes of the plan.	
2 3	Representation text We all appreciate that the decision to down-grade the Church Village Bypass was taken purely fro financial reasons. The original traffic studies and investigations all concluded that the Church Village Bypass scheme needed to be a dual carriageway, so it is entirely likely that throughout the life of the LDP the traffic levels on the Church Village Bypass will increase to the levels predicted in the original studies. Consequently it is highly probable that during the life of the LDP a proposal to upgrade the Church Village bypass will need to be progressed, so it needs to be included in the LDP. Indeed, the land-take currently being undertaken for the Church Village Bypass.	
4 5	Changes sought Include possible Church Village Bypass dualling scheme in the major road schemes of the plan.	
6 6	Candidate Site Ref No No	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To ensure that the plan actually reflects potential and likely schemes during the life of the plan. To ensure that the LDP complies with local and national governement policies and directives. To ensure the LDP actually reflects the actions being carried out by the Council.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D5			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.111							Site:			PEX Session:						
Policy: SSA 18				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The dualling of the Church Village Bypass should be included in the major road schemes of the plan.	
2 3	Representation text We all appreciate that the decision to down-grade the Church Village Bypass was taken purely fro financial reasons. The original traffic studies and investigations all concluded that the Church Village Bypass scheme needed to be a dual carriageway, so it is entirely likely that throughout the life of the LDP the traffic levels on the Church Village Bypass will increase to the levels predicted in the original studies. Consequently it is highly probable that during the life of the LDP a proposal to upgrade the Church Village bypass will need to be progressed, so it needs to be included in the LDP. Indeed, the land-take currently being undertaken for the Church Village Bypass.	
4 5	Changes sought Include possible Church Village Bypass dualling scheme in the major road schemes of the plan.	
6 6	Candidate Site Ref No Yes	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To ensure that the plan actually reflects potential and likely schemes during the life of the plan. To ensure that the LDP complies with local and national government policies and directives. To ensure the LDP actually reflects the actions carried out by the Council.		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
<i>Item Question</i>										<i>Reply</i>		Tick box Replies				
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:			PEX Session:						
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The land allocated for development has not followed the propritised search sequence as defined in MIPPS 01/2006.	
2 3	Representation text The land allocated for development has not followed the propritised search sequence as defined in MIPPS 01/2006 as it contains green field sites in preference to available brown-field sites in the areas. This appears to stem from the methodology and processes adopted by the Council during the drafting of the LDP and the closed consultation undertaken with the Council's preferred/known list o landowners and agents, etc.	
4 5	Changes sought Inclusion and consideration of all available brown field sites in the Candidate Site Assessment process, not just those made known to the Council during their consultations with hteir chosen participants. The methodology should have started with an evaluation of the brown field sites in the domain, then assess those before moving on to general evaluations including green field sites. A 2 stage consultation process would also have been acceptable whereby the Candidate Sites register was closed, followed by a public invitation for landowners of brown-field sites only to put forward their land for consideration for development.	
6 6	Candidate Site Ref No Yes and No	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan To ensure that the plan actually reflects government policies. To ensure consistency across local authorities. To ensure good, open public involvement. To promote open government and access for all. To ensure Council decision making is open and transparent.
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038							Site:			PEX Session:						
Policy: CS 8				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	A major new road scheme needs to be included in the LDP to provide a new access to the M4 Motorway.	
2 3	Representation text	
	Currently there are major issues with the major traffic routes at the 'ends of the A473' joining the M4 motorway. The congested areas of concern are at Upper Boat and along the A470 towards M4 at Coryton, and also the A473-A4119 route to M4 Junction 34 at Miskin.	
	The primary cause of the congestion is that traffic from all of the villages along the A473 (Talbot Green, Llantrisant, Beddau, Llantwit Ffardre (sic), Church Village, Tonteg, etc) have to pass one of these areas to access the M4 major road network and travel to the major employment centres of Cardiff and beyond. There is no doubt that these areas are currently over-congested and in desperate need of relief. The situation will not get any better with the introduction of the Church Village Bypass as the new bypass will direct the same traffic volumes to the same M4 access points.	
	What is needed has been proposed for the previous version of the LDP, but subsequently withdrawn, and that was to provide a 'mid-link' between the A473 or Church Village Bypass to M4 Junction 34 roads.	
4 5	Changes sought	
	Include a major road scheme to link the A473 or Church Village Bypass to the M4.	
6 6	Candidate Site Ref No	
	Yes and No.	
8 7	Previous Representation No	
	Not known.	
21 11	Why attend Examination?	
	To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan To ensure sustainability of the road and transport networks. To ensure the road networks can cope with the planned developments in the LDP.	
<hr/>																
<i>Item</i>	<i>Question</i>														<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?													Yes	
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D8			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038							Site:			PEX Session:						
Policy: CS 8				Map:			Issue: Transportation									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	A new major road scheme needs to be included in the LDP to provide a new access to the M4 Motorway.	
2 3	Representation text	
	Currently there are major issues with the major traffic routes at the 'ends of the A473' joining the M4 Motorway. The congested areas of concern are at Upper Boat and along the A470 towards M4 at Corytonm and also the A473 - A4119 route to M4 Junction 34 at Miskin.	
	The primary cause of the congestion is that traffic from all of the villages along the A473 (Talbot Green, Llantrisant, Beddau, Llantwit Ffardre (sic), Church Village, Tonteg, etc) have to pass one of these areas to access the M4 and major road network and travel to the major employment centres of Cardiff and beyond. There is no doubt that these areas are currently over-congested and in desperate need of relief. The situation will not get any better with the introduction of the Church Village Bypass as the new Bypass will direct the same traffic volumes to the same M4 access points.	
	What is needed has been proposed for the previous version of the LDP, but subsequently withdrawn, and that was to provide a 'mid-link' between the A473 or Church Village Bypass to M4 Junction 33, or other such access point so as to reduce the existing bottlenecks.	
	With the proposed developments in the Northern Areas of the plan, more and more traffic from the northern settlements will be using the A470 and A4119 accesses to the M4 and so congestion will inevitably increase. A re-introduction of the 'mid-link' between the A473 or Church Village Bypass to the M4 Junction, or other suitable access point, would certainly relieve the existing congestion hot spots around the A470-M4 Coryton and A4119 to M4 Junction 34 roads.	
4 5	Changes sought	
	Include a new major road scheme to link the A473 or Church Village Bypass to the M4.	
6 6	Candidate Site Ref No	
	Yes and No	
8 7	Previous Representation No	
	Not known.	
21 11	Why attend Examination?	
	To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>	
19	8	CE4 Test?		Not flexible to deal with changing circumstances?						Yes						
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan												
		To ensure sustainability of the road and transport networks.														
		TO ensure the road networks can cope with the planned developments in the LDP.														
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?														Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons														Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:			PEX Session:						
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary This policy must allow provision of development adjoining the settlement boundaries.	
2 3	Representation text To comply with MIPPS 01/2006, this policy must allow provision for developments adjoining the settlement boundaries.	
4 5	Changes sought This policy needs to be amended to allow provision of developments adjoining the settlement boundaries to comply with MIPPS 01/2006.	
6 6	Candidate Site Ref No Yes This representation regards the implementation and interpretation of what the settlements should contain and its compatibility with MIPPS 01/2006.	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
20	9			Why changes satisfy Soundness											Give details why the changes you propose will ensure that the Plan To ensure the LDP is compatible with MIPPS 01/2006. To ensure consistency between the implementation of the northern and southern housing policies. To ensure the southern housing policy is flexible enough to cope with changes to circumstances over the life of the LDP. To ensure a potential greater supply of available lower cost housing land and thereby keep land prices relatively low in order to contribute to realistic housing costs. To ensure efficient land usage. To reuse vacant and previously occupied land. To ensure that the settlement definitions are consistent with the MIPP 01/2006 in regard to the priorities of allocating land for housing usage.

<i>Item</i>	<i>Question</i>	<i>Reply</i>	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D10			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032				Site: 712//CS 3.6		Cwm Colliery, Tyn-y-Nant		Delete Site		PEX Session:					
Policy: CS 3		Map:		Issue: Strategic Sites											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary The proposals for the Cwm Colliery Redevelopment should be withdrawn from the plan and should not proceed any further.	
2 3	Representation text In September 2006 there was a Public Inquiry into the redevelopment of the Cwm Colliery site along the same proposals as those in the current version of the LDP draft. CPL lost the Public Inquiry and the Welsh Assembly Inspector threw out the proposals. Let's not waste any more public money by following a proposal that has already been scrutinised and deemed inappropriate, and let's listen to the views of the local people in Beddau who successfully fought against the redevelopment proposals and won their case at the Public Inquiry. Subsequent to the Inquiry, the people of Beddau were promised a public amenity, similar to a country park, so let's not progress a policy which has already determined that housing and employment development on the Cwm Colliery site is inappropriate and NOT in the public interest. In addition to the concerns already raised at the Inquiry in 2006, should the proposed development progress there would be substantial issues in the areas of: Hazardous waste on the site. Traffic issues on Parish Road and the new 'Cadwallader Yard' junction. NB these will not be resolved by the construction of the Church Village Bypass. The sustainability of providing yet another primary school in Beddau when existing primary pupil numbers in the villages are decline.	
4 5	Changes sought Complete removal of the proposal (including any related policy references) to re-develop the Cwm Colliery site for anything other than public amenity purposes.	
6 6	Candidate Site Ref No Yes and No.	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
16	8	CE1 Test?		Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth						Yes					
17	8	CE2 Test?		Not realistic and appopriates and/or not founded on robust and credible evidence?						Yes					
19	8	CE4 Test?		Not flexible to deal with changing circumstances?						Yes					
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
				To ensure the LDP is compatible with the directives from the Welsh Assembly in relation to the Public Inquiry in 2006.											
				To ensure the LDP complies with local public opinion and desires.											
				To ensure that the integrity of the village is not compromised.											
				To ensure sustainability of the existing infrastructure in the village, including transport (road networks) and education facilities.											
				To provide the village with designated open spaces and amenity land as directed by national policies.											
<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?											Yes		
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											Yes		

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D11			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.098		Site: 6//SSA 7 0STR Cwm Colliery							Delete Site		PEX Session:					
Policy: SSA 7		Map:			Issue: Strategic Sites											
Summary:																

Item	Question	Representation Text
1 2	Issue Summary	
	The proposals for the Cwm Colliery Redevelopment should be withdrawn from the plan and should not proceed any further.	
2 3	Representation text	
	In September 2006 there was a Public Inquiry into the redevelopment of the Cwm Colliery site along the same proposals as those in the current version of the LDP draft. CPL lost the Public Inquiry and the Welsh Assembly Inspector threw out proposals.	
	Let's not waste any more public money by following a proposal that has already been scrutinised and deemed inappropriate, and let's listen to the views of the local people in Beddau who successfully fought against the redevelopment proposals and won their case at the Public Inquiry.	
	Subsequent to the Inquiry, the people of Beddau were promised a public amenity, similar to a country park, so let's not progress a policy which has already determined that housing and employment development on the Cwm Colliery site is inappropriate and NOT in the public interest.	
	In addition to the concerns already raised at the Inquiry in 2006, should the proposed development progress there would be substantial issues in the areas of:	
	Hazardous waste on the site.	
	Traffic issues on Parish Road and the new Cadwallader Yard' junction. NB these will not be resolved by the construction of the Church Village Bypass.	
	The sustainability of providing yet another primary school in Beddau when existing primary pupil numbers in the village are in decline.	
4 5	Changes sought	
	Complete removal of the proposal (including any related policy references) to re-develop the Cwm Colliery site or anything other than public amenity purposes.	
6 6	Candidate Site Ref No	
	Yes and No.	
8 7	Previous Representation No	
	Not known.	
21 11	Why attend Examination?	
	To ensure my representations are fully understood and presented in the best possible way to the Inspector	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
15	8	C4 Test?	Toes not have regard to RCT Community Plan?							Yes					
16	8	CE1 Test?	Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth							Yes					
17	8	CE2 Test?	Not realistic and appopriates and/or not founded on robust and credible evidence?							Yes					
19	8	CE4 Test?	Not flexible to deal with changing circumstances?							Yes					
20	9	Why changes satisfy Soundness	Give details why the changes you propose will ensure that the Plan To ensure the LDP is compatible with the directives from the Weslh Assembly in relation to the Public Inquiry in 2006. To esnure the LDP complies with local public opinion and desires. To ensure that the integrity of the village is not compromised. To ensure sustainability of the existing infrastructure in the Village, including tranSPORT (road networks) and education facilities. To provide the village with designated open spaces and amenity land as directed by national policies.												
<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes?	Any changes to be made to the Plan?							Yes					
7	7	Previous Representations?	Did you make any previous representations on this issue during the Cons							Yes					

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D12			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.111									Site: 792//SSA 18.1 Tonyrefail Bypass/Ynysmaerdy-Coed Ely Dualling			PEX Session:				
Policy: SSA 18				Map:				Issue: Transportation								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary There is no need to improve the whole of the Tonyrefail Bypass to a dual carriageway.	
2 3	Representation text The Tonyrefail Bypass dualling scheme is not required as the traffic flows quite manageable along that route. There are some local bottlenecks, especially at the Royal Glamorgan Hospital entrance roundabout, but they could easily (and cheaply) be resolved with only local dualling. The portions of the Tonyrefail bypass to the north of Coed Ely flow freely and dualling is not required from that point to the north.	
4 5	Changes sought Amendment of the Tonyrefail Bypass dualling scheme to only dual the required stretches of road to alleviate current traffic flow bottlenecks.	
6 6	Candidate Site Ref No Yes and No.	
8 7	Previous Representation No Not known.	
21 11	Why attend Examination? To ensure that my representations are fully understood and presented in the best possible way to the Inspector.	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
13 8	C2 Test? Does not have regard to national policy?	Yes	
14 8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan To ensure the LDP only covers relevant and practical schemes. To ensure that attention and priority is given to relevant and effective road schemes that will actually solve a problem.		

Item	Question	Reply	Tick box Replies
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REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2055.D13			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.032							Site:			PEX Session:						
Policy: CS 3				Map:			Issue: Strategic Sites									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary The Candidate Sites Methodology is fundamentally flawed.	
2 3	Representation text The Candidate Sites Methodology is fundamentally flawed and has failed to consider potentially useful brownfield sites for development because the Council's consulted with a restricted set of landowners and developers. MIPP 01/2006 clearly and explicitly defines a prioritisation process for candidate sites when determining hosing, etc allocations for the new LDPs in Wales. Top priority is the re-use of old, vacant brown-field sites, followed (after many other land designations) by green-field sites. The Councils approach has been to evaluate the candidate sites already registered on their database and choose the best sites by comparing against a Council defined matrix of criteria, which presumably has been (loosely) based on MIPPS 01/2006 and other core documents from WAG and Central Government. The Candidate Sites register for the LDP was frozen in August 2006 before the start of any of the public consultations. This has led to the vast majority of the candidate sites, which are green field sites, being considered for development in the LDP in advance and therefore with a higher priority, of other (including brownfield) sites in the LDP area. Additionally, other brown-field sites in the county borough may be more suitable for development than the green field sites that have already been assessed by the council (at the Council's expense) and allocated to fill the development needs of the area. Consequently, we are in the position that brown-field sites that were not on the original Candidate list for the LDP presumably now have to go through an evaluation process at the owners expense, and some owners may not be able to afford to promote their brown field sites for development, but would have been able to had the council published the closing date for sites to be included in the Candidate Sites Register. To ensure that all of the candidate sites are assessed in line with MIPPS 01/2006 priorities, the council should have published the Candidate Sites closing date so that all relevant sites could be included in the Candidate Sites Evaluation process, and then the sites be assessed in priority order as specified in MIPPS 01/2006. We now have the position that green field sites have been allocated for development in preference to brown field sites in the areas. Additionally, it is not clear (nor defined), how the council identified the developers, agents and landowners to write to during the Candidate Sites invitation period in September 2005. Personally, I have made my desires very clear and explicit to the council, both during the Public Inquiry for the previous LDP and subsequently in my various and numerous planning applications to develop the site since then. I am surprised, therefore, that I was not included in the Candidate Sites invitation round as I am the owner of a brownfield site, as the Council knows well. This is a procedural issue with the way that the Council has decided to conduct its Candidate Sites evaluation process and public consultation.	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
4	5			Changes sought											
<p>The LDP and its associated methodology, delivery and public engagement documentation needs to include transparency in the invitation process and be open and fair to ALL suitable landowners, not just those that the council choose to engage with.</p> <p>There needs to be an equal and open invitation to ALL landowners to put forward candidate sites for development.</p>															

21	11			Why attend Examination?											
<p>To ensure that my representations are fully understood and presented in the best possible way to the inspector.</p>															

Item	Question	Reply	Soundness Tests
12	8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes
13	8	C2 Test? Does not have regard to national policy?	Yes
14	8	C3 Test? Does not have regard to Wales Spatial Plan?	Yes
16	8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes
19	8	CE4 Test? Not flexible to deal with changing circumstances?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan	
<ul style="list-style-type: none"> ·To ensure fairness ·To ensure open and transparent public consultation ·To give everyone an equal chance of representation ·To give everyone an equal opportunity. 			

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2062.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.25, para.4.4						Site:			PEX Session:						
Policy:				Map:			Issue: Core Strategy								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary No mention is made of the need for building for religious / moral instruction use	
2 3	Representation text Jehovah's Witnesses are a growing part of the community. As such they need meeting places within those communities for moral education and worship. I would like to refer to some points in the ODPM Planning Document: Diversity and Equality in planning. Para 9 Para 2 states: the Governments commitment is to have planning policies which are relevant to the lives that people live today, and which take into account the needs of all sections of society. Planning Policy Statement 1: Delivering Sustainable Development. Page 17 Para 42 Planning Authorities should build a clear understanding of the make-up, interests and needs of communities in their areas. Communities will be made up of many different interest groups, for example, relating to a particular place,...values or religion. Some of these will be well established and represented. But some groups may be less well equipped to engage with the planning system. An inclusive approach should be taken to ensure that different groups have the opportunity to participate and are not disadvantaged in the process.	
4 5	Changes sought The provision of community facilities to specifically mention "places of worship" to keep pace with new development and rectify current deficiencies (sic). The council will in principle regard former community/public buildings and former commercial/industrial premises located outside residential areas as the most appropriate locations for places of worship and associated community activities, subject to such buildings satisfying other requirements set out in the policy.	
9 7	Why no previous Representation This is a newly formed position as Planning Representative	

Item	Question	Reply	Soundness Tests
13 8	C2 Test? Does not have regard to national policy?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan It will come into line with ODPM Planning Documents and will provide places of workshop and moral education for local communities as populations increase.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D1			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document:Deposit Draft 3: Vision and Objectives		Site:		PEX Session:											
Policy:		Map:		Issue: Vision & Objectives											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Support for para. 3.3.		
2 3	Representation text LDP Vision & Objectives We support the LDP Strategy to "build sustainable communities that ensure everyone has access to housing, jobs and essential services and that all new development is supported by necessary social and physical infrastructure" (paragraph 3.3 refers).		
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

2080.D2			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document:Deposit Draft 4: Core Strategy		Site:		PEX Session:											
Policy:		Map:		Issue: Core Strategy											
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Support for para. 4.10.		
2 3	Representation text Core Strategy We also support the definition of Llantrisant as a Principal Town within the LDP Core Strategy which confirms that "new development opportunities will be focused in 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" (paragraph 4.10 refers).		
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D3			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.031				Site:										PEX Session:	
Policy: CS 2				Map:										Issue: Strategy Areas	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Support for designation of Llantrisant / Talbot Green as a principal town.		
2 3	Representation text Core Strategy In accordance with the objectives of the LDP Core Strategy, Policies CS2 and CS3 of the Plan identify land at Maxibrite Ltd. and the wider area as a Strategic Development Site including some 500 dwellings, 32 ha of employment land, 23,200 sq m of retail floorspace and 10,000 sq m of leisure development. In this regard, we support the designation of Llantrisant as a Principal Town in principle and also the identification of the representation site within a Strategic Development Site.		
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D4			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.032				Site:										PEX Session:	
Policy: CS 3				Map:										Issue: Strategic Sites	
Summary:															

Item	Question	Representation Text	
1 2	Issue Summary Support for inclusion of rep site in strategic site.		
2 3	Representation text Core Strategy In accordance with the objectives of the LDP Core Strategy, Policies CS2 and CS3 of the Plan identify land at Maxibrite Ltd. and the wider area as a Strategic Development Site including some 500 dwellings, 32 ha of employment land, 23,200 sq m of retail floorspace and 10,000 sq m of leisure development. In this regard, we support the designation of Llantrisant as a Principal Town in principle and also the identification of the representation site within a Strategic Development Site.		
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.		
Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D5			<input type="checkbox"/>	S	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033						Site:								PEX Session:	
Policy: CS 4				Map:				Issue: Housing Requirement							
Summary:															

<i>Item Question</i>														Representation Text		
1	2	Issue Summary Support for CS 4.5.														
2	3	Representation text Core Strategy In addition to the above, the principle of circa 500 dwellings being allocated within the Mwyndy / Talbot Green area is supported (Policy CS4 refers) together with 32ha of employment land within Policy CS6.														
21	11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.														
<i>Item Question</i>														<i>Reply</i>	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?													No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D6			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.035		Site: 7//SSA 8 0STR Mwyndy							PEX Session:							
Policy: CS 6				Map:				Issue: Employment								
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Objection to CS 6.2.	
2 3	Representation text Core Strategy	
<p>In addition to the above, the principle of circa 500 dwellings being allocated within the Mwyndy / Talbot Green area is supported (Policy CS4 refers) together with 32ha of employment land within Policy CS6. Notwithstanding the above, it is noted that Policy CS6 only refers to the allocation of B1 'business and light industrial uses' within the area which conflicts with the proliferation of B2 and B8 uses within Mwyndy Industrial Estate including the representation site itself (B2 use). Whilst it is accepted that the undeveloped land to the north enjoys an extant planning permission for a business park (B1), the grant of consent was not conditional upon the removal of the adjacent B2 and B8 uses within the Mwyndy Industrial Estate. In this regard, it is considered that Policy CS6 Part 2 should be amended to designate B2 and B8 uses within the Strategic Development Site.</p>		
4 5	Changes sought Policy CS 6.2 should be amended to include B2 and B8 uses.	
9 7	Why no previous Representation The site-specific land use planning implications of the LDP were not known at the preferred strategy stage.	
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan "See supporting statement."		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2080.D7			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.057							Site:			PEX Session:							
Policy: AW 11				Map:			Issue: Employment										
Summary:																	

Item	Question	Representation Text
1 2	Issue Summary Objection to AW 11.2 & 5.	
2 3	Representation text Whilst the principle of seeking to protect quality employment sites from alternative uses is supported in principle, it is considered that Policy AW11 of the Plan should be amended to delete the requirement for a period of marketing to be undertaken. Paragraph 5.62 of the Plan refers to the appropriateness of requiring a 2 year marketing period to confirm that the site is no longer required for employment purposes, whilst paragraph 5.63 of the Plan confirms that in 'exceptional circumstances' a marketing exercise may not be required. Given that the prerequisite of the Policy is to protect the best quality employment sites and to ensure that sufficient industrial land is retained to cater for need within the County Borough, it is considered that the requirement to undertake a period of marketing is somewhat irrelevant and that such a requirement should be deleted from the Policy given the contradictory advice set out within the supporting text. It is also considered that Policy AW11 should be supported by Supplementary Guidance which confirms the quantum and quality of employment land required to be protected in order to confirm the requirements of Part 5 of the Policy.	
4 5	Changes sought Policy AW11 should be amended to delete the requirement for a period of marketing to be undertaken. Policy AW11 should be supported by Supplementary Guidance which confirms the quantum and quality of employment land required to be protected in order to confirm the requirements of Part 5 of the Policy.	
9 7	Why no previous Representation The site-specific land use planning implications of the LDP were not known at the preferred strategy stage.	
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan "See supporting statement."		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
2080.D8			<input type="checkbox"/>	S	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Document: Deposit Draft, p.095							Site:			PEX Session:							
Policy: SSA 3				Map:			Issue: Principal Towns & Key Settlements										
Summary:																	

<i>Item Question</i>															Representation Text		
1	2	Issue Summary Support for SSA 3.															
2	3	Representation text The identification of Llantrisant as a Principal Town within Policy SSA3 is supported and particularly the intention to support new development which reinforces the role of Llantrisant as a Principal Town.															
21	11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.															
<i>Item Question</i>															<i>Reply</i>	Tick box Replies	
3	4	Seek changes? Any changes to be made to the Plan?														No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D9			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.100		Site: 7//SSA 8 OSTR Mwyndy							PEX Session:							
Policy: SSA 8				Map:				Issue: Strategic Sites								
Summary:																

Item	Question	Representation Text
1	2 Issue Summary Qualified support for SSA 8.	
2	3 Representation text <p>Whilst Policy SSA8 identifies the representation site and wider area for “500 dwellings, 32 ha of employment land, 23,200 sq m of new retail floorspace, 10,000 sq m of leisure floorspace, a primary school, library/community facility and informal amenity space”, it is considered that the Indicative Concept Plan should afford a greater degree of flexibility for the disposition and mix of uses identified within the Strategic Development Site to be considered and confirmed at the planning application stage. The Concept Plan has limited weight given its ‘Indicative’ status and in this regard the planning application process should guide the detailed implementation of the land uses defined within Policy SSA8.</p> <p>Paragraph 6.142 of the Plan confirms that a major business park is proposed at Mwyndy Cross and that “existing uses can either be incorporated or redeveloped, although removal of the Maxibrite briquettes plant is desirable in amenity terms”. The site falls within Class B2 ‘General Industrial’ use and there are currently no plans for the closure or relocation of the facility which at present offers significant economic benefits to the local and wider area. The plant employs 40 staff (the majority of which live locally) with wider benefits to local business and the community. As mentioned previously, the planning permission for the business park (B1) was not conditional upon the removal of the adjacent B2 and B8 uses within the Mwyndy Industrial Estate. In the absence of any plans for the removal of such uses, therefore, it is considered inappropriate to refer to the removal of the Maxibrite Plant within the Plan. The reference within paragraph 6.142 to the “removal of the Maxibrite briquettes plant” should be deleted from the Plan in this regard.</p> <p>Whilst the principle of the designation of the representation site is supported, a greater degree of flexibility should be allowed within the Policy to allow for a mix of land uses at the representation site including employment, commercial and residential uses. Such uses are considered to be compatible with adjacent land uses in the immediate area. Given that the LDP plan period extends until 2021, it is considered reasonable that the Plan should accommodate sufficient flexibility to allow for any change of circumstances that may emerge within the Plan period. In this regard, it is proposed that the Indicative Concept Plan should offer a greater degree of flexibility for a mix of land uses to the east of the A4119 to reflect the mix of existing land uses in the area which include industrial, commercial and residential uses.</p> <p>The principle of development at the representation site is acceptable given the existing use of the site and also that the mix of land uses would be compatible with adjoining uses which include residential properties, a pub and industrial / commercial uses. Whilst the lake is identified as a SINC within Policy AW8 of the Plan, the enclosed Ecology Survey confirms that the development of the site would not unacceptably affect the designated SINC (which relates only to the existing lake), and also that the remaining site offers no ecological constraint to its future development. In addition, a Noise Survey has been carried out at the site which confirms that the comprehensive redevelopment of the site for employment, commercial and residential uses is acceptable in principle subject to the detailed design and layout arrangements being confirmed at the planning application stage. Whilst the site enjoys existing access to the A4119 via the adjacent Industrial Estate, the comprehensive redevelopment of the site offers an opportunity to rationalise the access arrangements to the area with the potential to gain access to the A4119 to the north adjacent to Arthur Llewellyn Jenkins. Indeed, the recent planning permission for the business park to the north of the site included proposals for a grade-separated junction arrangement which offers an opportunity to rationalise the access into the representation site. Such details are capable of being adequately controlled at the planning application stage.</p> <p>The majority of the site lies outside the defined floodplain and although a small part of the site lies within ‘Zone B’, such a designation does not preclude the development of the site in principle, the details of which are capable of being adequately controlled at the planning application stage. In addition, it is noted that the Consultation Zones associated with the explosive store located in the area do not preclude the principle of development of the site, the detailed implications of which would be agreed in consultation with the Health and Safety Executive at the planning application stage.</p>	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT in parts</i>	<i>EVIDENCE Add'l</i>	<i>NO FRTHR EVID. SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
4	5			Changes sought											
<p>The Indicative Concept Plan should afford a greater degree of flexibility for the disposition and mix of uses.</p> <p>The reference within paragraph 6.142 to the "removal of the Maxibrite briquettes plant" should be deleted from the Plan.</p> <p>A greater degree of flexibility should be allowed within the Policy to allow for a mix of land uses at the representation site including employment, commercial and residential uses.</p> <p>The Indicative Concept Plan should offer a greater degree of flexibility for a mix of land uses to the east of the A4119 to reflect the mix of existing land uses in the area which include industrial, commercial and residential uses.</p>															
9	7			Why no previous Representation											
<p>The site-specific land use planning implications of the LDP were not known at the preferred strategy stage.</p>															
21	11			Why attend Examination?											
<p>The submitted representations require the exchange of oral rather than written evidence.</p>															
<i>Item Question</i>										<i>Reply</i>		Soundness Tests			
19	8			CE4 Test? Not flexible to deal with changing circumstances?											
20	9			Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan "See supporting statement."											
<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4			Seek changes? Any changes to be made to the Plan?											
7	7			Previous Representations? Did you make any previous representations on this issue during the Cons											

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2080.D10			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.108							Site:		Settlement Boun PEX Session:							
Policy: SSA 13				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Objection to settlement boundary at Mwyndy.	
2 3	Representation text Whilst the representation site and wider area is identified as a Strategic Development Site within Policy SSA8, it is noted from the Proposals Map that the land to the east of the A4119 lies outside the defined settlement boundary which would appear to be a drafting error on the Proposals Map. Given that the site is allocated for development and that the settlement boundary defines the urban area within which the principle of new development will be accepted, it is considered appropriate that the parts of the Strategic Development Site which lie to the east of the A4119 should be included within the settlement boundary in accordance with the requirements of Policy SSA13.	
4 5	Changes sought The parts of the Strategic Development Site 8 which lie to the east of the A4119 should be included within the settlement boundary in accordance with the requirements of Policy SSA13.	
9 7	Why no previous Representation The site-specific land use planning implications of the LDP were not known at the preferred strategy stage.	
21 11	Why attend Examination? The submitted representations require the exchange of oral rather than written evidence.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan "See supporting statement."		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2101.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.075				Site: 5//NSA 8		OSTR Hirwaun/Penywaun				New Site		PEX Session:			
Policy: NSA 8				Map:				Issue: Strategic Sites							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>NSA8 Object to allowance of 75% phasing development before infrastructure is in place. This should be no more than 10 to 25%. There is existing lack of infrastructure. The development should not take place at all until road networks are improved to Aberdare. Development of Tower site should be for green space and / or tourism.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P75 NSA8 6.43 Object to the figure of 75%. This should be significantly lower, i.e. in the region of 10% to 25% maximum due to severe lack of infrastructure. The Council should ensure existing settlement and population is provided with the infrastructure required prior to increasing the settlement to such a proposed extent.</p> <p>P76 Tower Map This development should not go ahead until Aberdare road links are improved. The area highlighted purple for employment site should be provided as a green open space (particularly due to the open space lost in and around Hirwaun in recent years). Alternatively, development for tourism would be supported, such as a country park with horse riding, fishing, cycling and walking facilities, adventure playgrounds etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response	
20	9			Why changes satisfy Soundness												
<p>Give details why the changes you propose will ensure that the Plan</p> <p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2:</p> <p>P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.</p> <p>The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>																
Item	Question											Reply	Tick box	Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2101.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site: 467/473		Hirwaun Ironworks, North		Delete Site		PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	NSA12 Remove Gloucesters site in Hirwaun from Settlement Boundary (as identified on Sheet 1). It failed Candidate Site Assessment so should be removed. There is possibility of planning lapsing and should therefore not exist in the settlement boundary until (if) site is developed as it is not suitable for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community
2 3	Representation text	P79 NSA12 The Gloucesters site in Hirwaun should not benefit from settlement boundary status, it should be outwith this boundary. Should the outline planning permission currently related to the site lapse, or not come to fruition due to appeal / protest / village green status, it should not be considered as an area of settlement / suitable for housing in relation to other new policies within this LDP. The Gloucesters site failed the Candidate Site Assessment, but yet still managed to gain outline planning, in complete contradiction to a number of policies within this LDP. Should the Gloucesters be built upon it will be the loss of an important community space for which the Council should provide an alternative space in the village. We propose the site at Tower Colliery, currently proposed as an employment site. This could be a green open space for all, or could provide employment via green tourism.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
																The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.
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<i>Item</i>	<i>Question</i>											<i>Reply</i>	<i>Tick box Replies</i>			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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2101.D3			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088		Site: 754//NSA 22.2						Former railway site Hirwaun			PEX Session:				
Policy: NSA 22				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	NSA22 Rail Network, relating to Hirwaun specifically, the potential station has been given detailed planning for housing development & the other alternative is in Brecon Beacons National Park LDP as a potential site for development. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	P 88 NSA22 Rail Network In relation to the former Train Station at Hirwaun, the land inside the settlement boundary which could have been used to develop / reopen a railway station has already been committed to housing development, with planning permission gained recently. Land opposite and outside the settlement boundary is at threat from Candidate site proposals in the Brecon Beacons LDP.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN			

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Rhondda Cynon Taf County Borough Council Local Development Plan

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2101.D4			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.088				Site:								PEX Session:			
Policy: NSA 23				Map:				Issue: Transportation							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA23 Bridleways / access for horse riders should be considered in conjunction with cycle routes. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text NSA23 Cycle Network WHAT ABOUT BRIDLEWAYS? There is little mention of bridleways in this plan, yet there are over 3,300 passported horses in RCT. There is a Bridleways group working in partnership with organisations such as the Groundwork Trust, the Local Access Forum etc, trying to build strategic routes from Caerphilly, through RCT, to Neath Port Talbot. Yet, the Council gives little attention to this. Why not create more bridleways as ANY USER (walkers, cyclists etc), are entitled to use a Bridleway, yet horse riders cannot / are not permitted (by law) to use cycle ways / footpaths. Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for. Partnership working would make far more sense than attempting to create two routes for different users across the same locations. Horse riding complies with RCT's Healthy Living and Outdoors policies etc, but horse riders are frequently being forgotten / having their existing access which they have used for over 20 years removed. NB: Horses cannot ride safely on tarmac paths, so again liaison with the British Horse Society and Briar's Bridleways will ensure safe recommended surfaces. There are certain barriers used to prevent motor cyclists which prevent horses access, so again liaison with relevant bodies to find suitable / recommended barriers, steps etc. Recommend use joined up thinking and liaison between groups to ensure access for ALL, which includes horse riders. Horse riding is prolific in RCT, yet has historically gone unnoticed due to there being sufficient access off road to go riding. However, as more and more paths (used for over 20 years), get blocked / tarmaced there will be more riders on the road causing significant hazard. I understand a lot of work has been conducted in the South of RCT, but until these paths are joined up with the North and become strategic routes, there will always be an issue as only 7% of horse owners own horse transport (we cannot ride down the A470 to access the paths South of RCT!).	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
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<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?										Yes				
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes				

REPRESENTATION DETAIL by: Representation No

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2101.D5			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.089						Site:			PEX Session:						
Policy: NSA 24				Map:			Issue: Environment								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary NSA24 Green wedge to prevent Rhigos and Hirwaun merging should be identified	
<p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>		
2 3	Representation text NSA 24 Green Wedges Suggest identification of a Green Wedge between Hirwaun and Rhigos to prevent the two villages spreading and merging in the future.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.</p> <p>Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
2101.D6			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.091		Site: 778//NSA 26 Cynon Valley River Park						PEX Session:						
Policy: NSA 26				Map:				Issue: Environment						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary NSA26 Hirwaun should benefit from the Cynon Valley River Park Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community	
2 3	Representation text NSA 26 River Park Hirwaun should benefit from the Cynon Valley River Park.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons Yes													

REPRESENTATION DETAIL by: Representation No

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2101.D7			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.030				Site: 467/473		Hirwaun Ironworks, North				Delete Site		PEX Session:			
Policy: CS 1				Map:						Issue: Strategy Areas					
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1).	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	CS1 Gloucesters site, Hirwaun: request to remove from settlement boundary. This is a designated SINC and should outline planning not come to fruition, the site should not be within the settlement boundary for future.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12	
	#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.	
	#Tower employment site to become tourism destination / green space.	
	#Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.		
	Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Asessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.		
	The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
	There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

<i>Rep'n No</i>	<i>Accssn No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source Type</i>	<i>Mode</i>	<i>Status</i>	<i>Modified</i>	<i>Petition of</i>	<i>TREAT</i> <i>in parts</i>	<i>EVIDENCE</i> <i>Add'l</i>	<i>NO FRTHR EVID.</i> <i>SA/SEA</i>	<i>Repr Council</i>	<i>Officer</i>	<i>Recommendation</i>	<i>Response</i>
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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Rhondda Cynon Taf County Borough Council Local Development Plan

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2101.D8			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.032				Site: 711//CS 3.5 South of Hirwaun				PEX Session:						
Policy: CS 3				Map:				Issue: Strategic Sites						
Summary:														

Item	Question	Representation Text
1 2	Issue Summary CS3 Housing settlements should not be next to busy roads (I.e. housing site in Hirwaun on both sides of newA465) Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text CS3 p32 4.37 Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
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20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aassessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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2101.D9			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.033		Site: 717//CS 4.3						Hirwaun (South)			PEX Session:				
Policy: CS 4				Map:				Issue: Housing Requirement							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS4 Housing Site 3 (Land South of Hirwaun) should be carefully and properly planned and integrated as has the potential to become an isolated 'suburb'.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS4 Concern that the proposed development site south of Hirwaun will not integrate well with remainder of village due to dualling of A465. It should not act as a 'suburb'. The area should be properly integrated with the existing village and a green wedge should be designated between this settlement and Rhigos to prevent the two from merging (e.g as has happened with Trecynon and Cwmdare for example).</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
<p>Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.</p> <p>There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN</p>			

Item	Question	Reply	Tick box Replies
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3	4	Seek changes? Any changes to be made to the Plan?										Yes			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes			

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2101.D10			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.038		Site: 727//CS 8.a4						Aberdare Bypass		PEX Session:					
Policy: CS 8		Map:		Issue: Transportation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059. The A4059 should be carefully planned and the 'ecit' route should not be at Croes Bytchan as there will be no direct access to new A465, thus moving rather than solving the problem, and increasing safety issues.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P38 CS8 The strategic site at Hirwaun should only be permitted subject to the creation / extension of the Aberdare bypass A4059 (proposed within this LDP). The development should not take place in isolation – the surrounding infrastructure must be in place first.</p> <p>The A4059 must be carefully planned in conjunction with the A465 dualling. Currently, the A4059 is illustrated as linking from the current Aberdare bypass to the Croes Bychan junction. With the current A465 plans, this should be changed, as there will be an overbridge at Croes Bychan so no direct access to A465. This will either push traffic directly through the centre of Hirwaun village, OR via Croes Bychan which will prove extremely dangerous and could affect safety of current businesses as there is a Riding School, Livery Yard and Farms, thus many horses and slow moving vehicles which use the Croes Bychan Road. This should be reconsidered in line with the direct access to the A465 or you will just be directing the existing traffic problem elsewhere, but not solving it.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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20	9			Why changes satisfy Soundness												Give details why the changes you propose will ensure that the Plan
				Point 1:												I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.
				Point 2:												P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP.
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				<i>Item Question</i>												<i>Reply</i>
				3	4											Seek changes? Any changes to be made to the Plan?
																Yes
				7	7											Previous Representations? Did you make any previous representations on this issue during the Cons
																Yes

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2101.D11			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.039						Site:								PEX Session:	
Policy: CS 9				Map:				Issue: Waste Management							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS9 ensure road infrastructure is sufficient. Ensure waste received is not travelling so far to reach the site that it impacts detrimentally upon RCTs carbon footprint.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>CS9 Waste Management</p> <p>Site at Hirwaun may be a suitable site in isolation, but will it be suitable when considered with other proposed developments in terms of additional vehicles etc. Road network and infrastructure must be improved and made sufficient to support additional heavy vehicles. There should be restrictions around the catchment area of the waste (i.e. in the locality and / or neighbouring authorities), in line with climate change policy.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?		
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
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<i>Item Question</i>										<i>Reply</i>		Tick box Replies					
3	4	Seek changes? Any changes to be made to the Plan?										Yes					
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										Yes					

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2101.D12			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.040			Site:			PEX Session:									
Policy: CS 10			Map:			Issue: Minerals									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	<p>CS10 We object to an opencast coalmine which will impact negatively upon the surrounding area and people. We propose the site to be used as a green space / country park or tourism employment site which will have a LONG TERM sustainable future, creating local jobs and a community benefit.</p> <p>Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.</p>
2 3	Representation text	<p>P40 CS10 Minerals We object to open cast coal mining.</p> <p>The objection is based upon social, economic and environmental grounds. There is no confidence that jobs will be provided to local people. The number of jobs created through opencast mining (as opposed to deep mining) is minimal. We are not confident of a safeguard balance in extraction of minerals. It has not been made explicit what planning gain / community benefits are being offered (if at all). What are the agreements and closure plans in terms of replacing the landscape, habitats etc to their former / current status. An open cast mine is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.</p> <p>The proposition if such a site opening here is already causing anxiety and stress amongst residents who are concerned about their health and wellbeing, their quality of life, the visual and airborne impacts. This coupled with the additional proposals for wind farms, housing development, road development, waste facility development is too much to bear for many people. If we are forced to have 'clean' energy from wind farms, why must we then have an open cast coalmine AND an energy from waste facility? It is acknowledged in various health impact assessment that the proposal of an individual facility / planning proposal can detriment to human health in relation to mental well being due to the stress caused by the perception of what will be built, but to impose such significant infrastructure changes all within the same area should surely be revised. Hirwaun should not bear the burden of all of RCT's energy issues. It is the largest authority in Wales, yet al;l major development in line with National strategy and strateginc / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. It is also in the Council's interest to do so, as the more heightened people's awareness of this situation, the more opposition each planning application will face. Hirwaun is not trying to diminish its responsibility but believes in fair distribution, which is not apparent in this LDP.</p> <p>If the case for the site is employment, it would be far more beneficial and sustainable, with longer term gain in terms of jobs, human health, recreation, leisure and so on, to use the proposed site as a tourism area. This would be sustainable and local people could be employed to manage, maintain, garden / landscape / provide and teach recreational activities such as fishing, canoeing, horse riding, cycling, walking, camping / accommodation, and other associated outdoor activities, provide catering facilities etc.</p>
4 5	Changes sought	<p>#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12</p> <p>#Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further.</p> <p>#Tower employment site to become tourism destination / green space.</p> <p>#Add green wedge between Hirwaun and Rhigos.</p>

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19	8	CE4 Test?		Not flexible to deal with changing circumstances?											Yes
20	9	Why changes satisfy Soundness		Give details why the changes you propose will ensure that the Plan											
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<i>Item</i>	<i>Question</i>											<i>Reply</i>	Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?											Yes		
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons											Yes		

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Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2101.D13			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.041						Site:			PEX Session:						
Policy: CS 11				Map:			Issue: Climate Change								
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	
	CS11 Wales has a plan to achieve One Planet Living by 2050. Some of the policies, in particular CS10 will counteract this.	
	Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text	
	p41 CS11 Minerals extraction will lead to increased carbon dioxide (CO2), plus additional green house gas emissions. There is therefore potential for CS10 to have a detrimental effect upon CS11. Minerals extraction (as proposed for Hirwaun mountain) is in complete contradiction to the Welsh Assembly's Sustainable Development agenda and aim towards achieving a 'One Planet Wales' by 2050. Open cast mining will contribute significantly in its extraction, transportation and end use as a fuel source, plus its associated by-products, to climate change and green house gas emissions. The UK is regulated by the Intergovernmental Panel for Climate Change (IPCC) and has signed up to the Kyoto Protocol to reduce greenhouse gas emissions by 3% per annum, across all sectors (e.g. housing, industry, power generation, waste etc), but an open cast coal mine will work against this.	
4 5	Changes sought	
	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
	Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Aessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.		
	There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURITY AGREEMENT WHERBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

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<i>Item Question</i>										<i>Reply</i>		Tick box Replies			
3	4	Seek changes? Any changes to be made to the Plan?													Yes
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													Yes

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2101.D14			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.046			Site:			PEX Session:									
Policy: AW 4			Map:			Issue: Planning Obligations									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary AW4 Bridleways / horse access must be considered. There is only talk of walkers / cyclists. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.	
2 3	Representation text P46 AW4 Bridleways Suggest convene and work together with 'Briar's Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.	
4 5	Changes sought #Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision. Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned. There should be a period during the production of any new / revised LDP where no major planning decisions are made until the new LDP is finalised to prevent such a thing happening again. LARGE PLANNING APPLICATIONS SHOULD BE SUBJECT TO A PREMATURETY AGREEMENT WHEREBY THEY SHOULD NOT BE DECIDED UPON DURING THE INTERIM PERIOD BETWEEN AN EXISTING (OUT OF DATE) LD PLAN AND AN EMERGING NEW LD PLAN		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons															Yes

2101.D15 S W M

Document: Deposit Draft, p.054 Site: PEX Session:

Policy: AW 8 Map: Issue: Environment

Summary:

Item Question	Representation Text
1 2 Issue Summary AW8 agree that natural environment should be protected.	
2 3 Representation text AW8 States that the natural environment is to be protected and enhanced, and no permission for development on designated SINC sites – agree with this. Only permitted where not unacceptably disruptive / damaging – agree with this. However, the Gloucesters site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.	

Item Question	Reply	Tick box Replies
3 4 Seek changes? Any changes to be made to the Plan?	No	
7 7 Previous Representations? Did you make any previous representations on this issue during the Cons	Yes	

REPRESENTATION DETAIL by: Representation No

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2101.D16			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.059			Site:			PEX Session:									
Policy: AW 13			Map:			Issue: Renewable Energy/Wind farms									
Summary:															

Item	Question	Representation Text
1 2	Issue Summary	AW13 opposed to large windfarm which would be blight on landscape. This should be considered with all other applications taking place as it is too much for one community to bear having numerous large infrastructure in its locality. Each development proposed in a single area needs to be considered in conjunction with one another. It is currently proposed that Hirwaun has a wind farm, opencast coalmine, significant housing development, waste management facilities etc. The proposals may be considered as suitable in this area in isolation, but together they are overwhelming for the local community.
2 3	Representation text	AW13 Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.
4 5	Changes sought	#Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12 #Reconsider A4059 end route at Croes Bychan OR allow flexibility in the plan to change this route so it doesn't detrimentally affect safety and businesses in Croes Bychan and / or Hirwaun further. #Tower employment site to become tourism destination / green space. #Add green wedge between Hirwaun and Rhigos.

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan		
Point 1: I have not ticked C or some CE tests as I have not read each of the other strategies/ neighbouring authority development plans etc, so cannot make an informed decision.			
Point 2: P1 and CE4 are related to in conjunction. With referral to the Gloucesters site, Hirwaun, the site failed Candidate Site Assessment whilst in the interim LDP period, but managed to gain outline planning at the same time as this LDP was not finalised. There should be a mechanism / flexibility of the LDP to acknowledge and change site status as time moves on, even if an LDP is in place. The planning criteria should take heed of what is in the LDP, but not rely on it to make a planning decision as areas change over time. The Gloucesters is a different site to the original 'brownfield' status it was given prior to the 1980's and should never have been included in the last LDP. The site should now AT LEAST be removed from the SETTLEMENT BOUNDARY (as per Sheet 1), so it does not gain planning in the future should the existing planning lapse / be overturned.			
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Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	

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7	7	Previous Representations? Did you make any previous representations on this issue during the Cons													

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2215.D1			<input type="checkbox"/>	O	I	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.112		Site: 795//SSA 19.1 Rail line Pontyclun - Beddau						PEX Session:							
Policy: SSA 19		Map:		Issue: Transportation											
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Inadequate provision of infrastructure Justification for the above policy	
2 3	Representation text I wish to oppose the inclusion of policy SSA 19.1. The grounds are that no adequate appraisal of the planning benefit has been carried out to justify the inclusion of this policy. Despite requesting a financial viability appraisal for the policy under the Freedom of Information Act your authority has failed to comply. I attended the exhibition at Llantrisant Leisure Centre to view the Strategic Highways Assessment Report 2007 it was not available. I was advised it is shortly to be made available on the internet. The position is that the scheme is said to have cost a benefit ratio of between 2.0 and 4.2%. Is this based on high or low traffic growth or on best or lowest achievement of planning aspirations by population growth? How can that be right? It has a capital cost of 23m and relies on a subsidy of 1m per annum in running costs. How long can Welsh Assembly Government sustain the continued support of rail subsidy here and elsewhere? At what year does it become a viable i.e. self-financing. I ask again please provide a copy of this appraisal. In transportation terms how has the do nothing situation been compared with the do something situation? How has other planning and transportation dis-benefits been discounted from the gains? For example community severance and improved access to business by alternative highway proposals currently prevented by the policy. In March 2007 it was stated that the GRIP stage of the process had not been carried. Therefore this policy remains as only "outline conception" and has remained so since 1982. A robust multi-modal transport appraisal should be carried to demonstrate the benefits. The A473/A4119 Roundabout is recognised by your authority as a major congestion point in the Plan area. Yet despite your authority's aspirations for making all the current planning policy proposal acceptable your authority has no plans to resolve this congestion. Your expert witness defence of your authority's decision to refuse a planning consent at the Mwyndy Business Park was totally inadequate. There was no rebuttal evidence given to counter the journey time evidence provided by the Appellant's traffic expert. The Inspector determined the application on this basis. Adequate time, resource and the examination of the accident record of the prior three years would have totally discredited this evidence. The very least that now needs to be provided is TRANSYT or PARAMICS model or both to be prepared showing the impact of Mwyndy and subsequent impacts in transportation terms of the current proposals. It would also assist your authority in assessing the transport impact resulting from consideration of the International Business Park. It is indeed odd that a Planning Officer in your authority should recommend consent at Mwyndy and request a holding objection for the International Business School of Cardiff City Council particularly as there is no apparatus or information on which to base an assessment of the transport impact of either. This was clearly a WAG/RCT Cabinet forced decision. My primary objection to Mwyndy is its scale and the impact the business development will have on its adjacent environs.	
4 5	Changes sought Policy removed	
9 7	Why no previous Representation Was not aware of consultation	

Item	Question	Reply	Soundness Tests
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	

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<i>Item Question</i>										<i>Reply</i>			Tick box Replies		
3	4	Seek changes? Any changes to be made to the Plan?										Yes			
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit										No			
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons										No			

2218.D1

O

W

M

Yes

43

Document: Deposit Draft, p.106

Site: 688//SSA 10.10 Hafod Wen \ Concorde Drive, Tonyrefail

Delete Site

PEX Session:

Policy: SSA 10

Map:

Issue: Housing Allocation

Summary:

<i>Item Question</i>		Representation Text
1	2	Issue Summary Petision against proposed housing west of Hafod Wen. (SIC)
2	3	Representation text The residents are highly opposed to the development of the adjacent land (10.10)

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2240.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Settlement boundary at Werfa Lane, Abernant.	
2 3	Representation text We would like it [the settlement boundary] amended to include land at Parish Road, Abernant (see plan attached).	
4 5	Changes sought See Q3.	
9 7	Why no previous Representation This is not a strategic issue.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The Plan should give flexibility to allow development of this land as there may well be development on SW and SE sides of this land.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

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2240.D2			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079						Site:				Settlement Boun		PEX Session:			
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Settlement boundary at Moss Row, Abernant.	
2 3	Representation text We would like it [the settlement boundary] amended to include land opposite 3 Moss Row, Abernant.	
4 5	Changes sought See Q3.	
9 7	Why no previous Representation This is not a strategic issue.	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan As there are existing buildings on the land, the plan should be flexible enough to allow possible future development.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

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2248.D1			<input type="checkbox"/>	O	I	M		Yes	96	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Document: Deposit Draft, p.106						Site: 685//SSA 10.7		Gwern Heulog, Coed Ely				Delete Site		PEX Session:	
Policy: SSA 10				Map:				Issue: Housing Allocation							
Summary:															

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
1 2	Issue Summary	
	I object to SSA 10.7 being allocated to the LDP	

Filtered to show: (All representations)

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2 3 Representation text

Findings of the Candidate Site Assessment Process 2009.

Evidence included[Marked appendix 1 attached],shows there to be an inconsistency,in opinions.....to that end,I offer my own.I understand that with so many sites to assess,and with so few staff to cover the subject rigorously...I have the advantage of living here & making comments which may affect myself & family on a daily basis.

Stage Assessment 1.....page 308/527.

As evidence I include[marked appendix 2] measurements taken myself,which are taken to the nearest multiple marked down on my pedometer.

Item.1 ,2,3,4....A car is absolutely necessary for work,and site is not within reasonable distance to a public[in excess of 700metres] services route & they do not interconnect,also the access is via a steep hill..measures 1 in 8.

Item.5.It can be evidenced from Stage 3 Assessment..Input 4.."Tylcha Fach level is located close to the entrance to the site",either way this becomes front or back to the site,there is a constant fast flowing source of heavily discoloured water very rich in nitrates comeing from the source of this,The stream is called "Nant Melyn" [Yellow Brook in English]....the front street is called "Nant Melyn",the houses being approx 100years old,indicates the brook has always been there...at present it forms its egress via a natural path,cut out of the mountain to a formed culvet.....so flooding down stream of the proposed site, is a possibility....there is no suggestions as to how this would be mitigated in the Assessment.

Item.6.The land is beautiful green pasture land....Item 7..Stage 3 Assessment shows Countryside Council for Wales input..with 35 species present....we know that a colony of bats live in/near The Old Level.

8..The land is Greenfield land[evidence included photograph]...Item 9..The Level worked for many years,has entry been made to find if any stalagmitic evidence is available??there is local evidence they do exist.....Item 10..The views/ vistas from the opposite side are beautiful[see photo].....Item 11..See answer for item 7.....Item..12...The fact that access to construct any houses on Candidate Site 403 is up the steep access,and via an already very busy & indeed dangerous junction,plus the impact the construction traffic would have on all the houses either side of the road,many of the homes on Gwern Heulog have been occupied for 5/6years & now have small children,some of whom walk to school,and as play facilitie,s (sic) are nil,the roads are the only place to play,this aspect has not been factored in to this particular site proposal.....Item..13....This would have a dramatic impact on views,from across the Valley & due to its high prominence,would be visible from behind the development,from the open countryside beyond.....Item...14...The sewage system in this area suffers from Hydraulic overloading,this is evidenced in Stage 3 Assessment..page 76/123..Item 12 Welsh Water input...Item...15...The result given is based on an assumption,as it is not known,this site would only conjoin one part of the existing development,there are open fields beyond & either side of it...Item..16..There is no continuity,or enclosure,please see Item15...Item...17..Absolutely not,there is no way ANYONE here who live already,would walk the distance shown on the attached measurement,s (sic) of this area.....also parking is virtually impossible in The High Street..shopping is either a car to Somerfield[1.96miles] or a tip to Tesco in The Talbot Green[3.5miles]. 18..n honest answer,100%,..no,these fields have been here for hundreds of years..to build on them would be sacrilege.....yes,I hear the answer..NIMBY comment.....totally wrong,Gwern Heulog/The Meadows,is constructed from very steep, poor quality[clay] agricultural land,which was very steep and extremely difficult to construct....using (sic),a "cut & fill" principle of building...the whole of candidate site 403,is outside the settlement boundary of Coedely[evidenced by appendix marked 8] & forms an unjustified development into the open countryside.

Stage 2 Assessment...page 152/254.

Objective.1..The development being so high up a steep hill do not meet the desires of The Welsh Assembly Governments requirements,insofar as they are promoting that "a home will be available where ever anyone so choose,s" (sic),who is going to choose to be isolated from any form of community,from shops & away from a bus service?...how are the disabled going to access the steep hill??//how are the "cyclists" going to negotiate the road humps & the very narrow access to the junction & then push the bike back up a very steep hill!!!...if we have any of The Moslem (sic) faith,they would need to travel 16miles to the nearest Mosque to pray,up to 4times!!!!.....so the statement "a mix of dwelling types for all needs" ...is overstated...it would be largely people who have nowhere else to live are just places there.....this is a tried and failed policy.

Objective 2, 3&4..I dis- agree on all as shown in Assessment 1.

Objective 5..This cannot be achieved,the location is so rural[see evidence of amenity distances].

Objective..7..I disagree,residents are so close to Talbot Green this is closer in the car.

Objective..8..Agreed,but The LDP does not evidence that " suitable local labour" ,should be given opportunities" ,is not evidenced anywhere in the assessment,in excess of 36,000[evidence SA appraisals pg 133/786 enfusion Jan 2009] people outmigrate to work weekly from RCT via A4119 & A470....the work from construction,is transient & temporary.

Objective.9...N/ A.

Objective.10..Absolutely dis-agree,this cannot "enhance the landscape" ...to use a well worn phrase - "It would be like Penrhys".

Objective..11..It is not evidenced how SSA10.7, would enhance the wildlife habitat,the hedgerows would be permanently damaged & the bat population would be driven from "The Level" ,and obvious loss of 33 other affected species.

Objective.12..This is not evidenced.

Objective..13..All the evidence shows a motor car is 100% necessary to be able to live, work & shop here...I disagree Blue score.

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l SA/SEA	NO FRTHR EVID. Repr Council	Officer	Recommendation	Response
														Objective..14..I fail to see where this is evidenced in this assessment,how a Blue score can be reached. Objective..15..There is a shortage of land for allotments in this area,that would be an efficient use of this land,the visual impact on the vistas/ views would be totally unacceptable,and I fail to see how an orange score is achieved.
4	5			Changes sought										SSA 10.7 has some inconsistencies with evidence recorded in June 2008, It should be withdrawn until the areas of concern are checked independantly
9	7			Why no previous Representation										I was only aware of this when the planning application was put in June 3rd 2008.
21	11			Why attend Examination?										The nature of some of my objections need to be addressed verbally

Item	Question	Reply	Soundness Tests
17	8	CE2 Test? Not realistic and appopriates and/or not founded on robust and credible evidence?	Yes
20	9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan An independent check on this inclusion will ensure that the LDP is formed on a robust and credible evidence base, it can be seen this site was a late entry and as such treated differently	

Item	Question	Reply	Tick box Replies
3	4	Seek changes? Any changes to be made to the Plan?	Yes
5	6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No
7	7	Previous Representations? Did you make any previous representations on this issue during the Cons	No

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

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Rep'n No	Accssn No	Date Lodged	Late?	Source Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2256.D1			<input type="checkbox"/>	O	W	M			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079				Site:				Settlement Boun		PEX Session:					
Policy: NSA 12				Map:				Issue: Settlement Boundary							
Summary:															

Item	Question	Representation Text
1 2	Issue Summary Amend settlement boundary to exclude former Girls' School playing fields at Abernant	
2 3	Representation text The site is flooded and would be useless for residential development	
4 5	Changes sought Deletion of that part of Girls's School playing field from the Plan on Deposit	
9 7	Why no previous Representation Not necessary at the time	

Item	Question	Reply	Soundness Tests
10 8	P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc	Yes	
12 8	C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a	Yes	
15 8	C4 Test? Toes not have regard to RCT Community Plan?	Yes	
16 8	CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth	Yes	
17 8	CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?	Yes	
18 8	CE3 Test? No clear mechanisms for implementation and monitoring?	Yes	
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan They will ensure that the land will remain as a green wedge between Abernant/Plasdraw and Cwmbach communities.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	No	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	

REPRESENTATION DETAIL by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

Rep'n No	Accssn No	Date Lodged	Late?	Source	Type	Mode	Status	Modified	Petition of	TREAT in parts	EVIDENCE Add'l	NO FRTHR EVID. SA/SEA	Repr Council	Officer	Recommendation	Response
2260.D1			<input type="checkbox"/>	O	I	M				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Document: Deposit Draft, p.079							Site:		Settlement Boun PEX Session:							
Policy: NSA 12				Map:			Issue: Settlement Boundary									
Summary:																

Item	Question	Representation Text
1 2	Issue Summary Boundary move.	
2 3	Representation text I wish to include a piece of land as indicated on drawing provided	
4 5	Changes sought It's a piece of land that can be built on.	
21 11	Why attend Examination? To explain verbally	

Item	Question	Reply	Soundness Tests
19 8	CE4 Test? Not flexible to deal with changing circumstances?	Yes	
20 9	Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan The local area will be cleaned up.		

Item	Question	Reply	Tick box Replies
3 4	Seek changes? Any changes to be made to the Plan?	Yes	
5 6	Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit	Yes	
7 7	Previous Representations? Did you make any previous representations on this issue during the Cons	No	