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<th>NO FRTHR EVID.</th>
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**Document:** Deposit Draft, p.046  
**Map:** Policy: AW 4  
**Site:**  

**Summary:**  
Issue: Planning Obligations

**Item Question**  
**Representation Text**

1  
**Issue Summary**  
*Objection to policy*

2  
**Representation text**  
We object 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.

3  
**Changes sought**  
We propose that Policy AW4 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. We also propose 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.

4  
**Candidate Site Ref No**  
206

5  
**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.

6  
**Why attend Examination?**  
Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

7  
**CE4 Test? Not flexible to deal with changing circumstances?**  
Yes

8  
**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.

9  
**Seek changes? Any changes to be made to the Plan?**  
Yes

10  
**Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit**  
Yes

11  
**Previous Representations? Did you make any previous representations on this issue during the Cons**  
No
We object to the requirement that new development should meet the 'Very Good' as a minimum for BREEAM or Eco-Homes.

We 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. We also object to the requirements for all major developments (10 units or more) to provide at least 10% of their predicted energy requirement from on-site renewable energy sources. We 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.

We request that the wording be amended to read:

1. The design minimises energy loss and use;
2. Where viable commercial schemes of 1000 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 floor-space of 1000 sq.m and residential schemes of ten or more units should provide at least 10% of predicted energy requirements from on-site renewable sources.

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations. 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.

The proposed changes will ensure that the LDP is reasonably flexible to enable it to deal with changing circumstances.
**Issue Summary**

Proposed alteration to policy

**Representation Text**

We wish to highlight that very occasionally there are cases where the demolition of listed buildings or structures is unavoidable. It is important to recognise that demolition of any listed building may occur where there is clear and convincing evidence that all reasonable efforts have been made to sustain 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.

**Changes sought**

In accordance with Welsh Office Circular 61/96: Planning and the Historic Environment: Historic Buildings and Conservation Areas, Policy AW7 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.

**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.

**Why attend Examination?**

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.
**Issue Summary**

We support 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.

**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.

**Changes sought**

See representation prepared in relation to Policy SSA7 – Former Cwm Colliery and Coking Works

**Why attend Examination?**

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.
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Document: Deposit Draft, p.098  
Policy: SSA 7  
Map:  
Site: 6i/SSA 7 0STR Cwm Colliery  
PEX Session:  
Issue: Strategic Sites

Summary:

We support 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.

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.

See representation prepared in relation to Policy SSA7 – Former Cwm Colliery and Coking Works

Candidate Site Ref No: 206

Why attend Examination?

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations

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<td>6 6 Candidate Site Ref No</td>
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Document: Deposit Draft, p.034
Policy: CS 5
Site: Map:
Issue: Affordable Housing

Summary:

**Objection to policy**

We question the use of 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 their likely impact upon overall levels of housing delivery. The failure to undertake viability testing is highlighted by the Blyth Valley DC vs Persimmon Homes court of appeal case where the authority's affordable housing policy was quashed. The policy was based on a housing study completed by Fordhams which was not viability tested, but needs tested.

**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.

**Candidate Site Ref No**

206

**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.

**Soundness Tests**

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<td>17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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The proposed changes will ensure that the strategy policies are realistic and appropriate and are founded on a robust and credible evidence base.

**Tick box Replies**

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</table>
We support the allocation of the Cwm Colliery and Coking Works as a strategic site suitable for mixed use development. In order to develop the adjacent Cwm Coking Works site, which needs to be considered in the same context as the former colliery 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 issues are raised:

1. We 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 the landowners 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. We object to the proposed phasing requirements. The requirement for the restoration of the colliery tips, clearance and remediation of the coking works site and preservation of the listed cooling towers to be completed before development commences is unrealistic and is likely to delay the development of this strategic site. The development of the site will be able to take place in tandem with its remediation. We also question 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. We request that clarity is provided on the percentage of affordable housing sought. The recent appeal decision relating to the 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.

4. We raise no objection to the principle of the proposed employment development however any allocation must be viable and be based on market demand.

5. The policy requires 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 determining any application on the site.
### 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.

### Why attend Examination?

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

#### Soundness Tests

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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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</table>
Summary:

Proposed policy alteration

We raise no specific to the housing allocations detailed in Policy SSA 10. 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.

Changes sought

In the event that the 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.

Candidate Site Ref No

206

Why attend Examination?

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Why changes satisfy Soundness?

Give details why the changes you propose will ensure that the Plan

The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.

Item Question

Representation Text

Soundness Tests

Tick box Replies

1

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

2

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

The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.

Item Question

Reply

3

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

4

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

5

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

6

Candidate Site Ref No

206

Why attend Examination?

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

Why changes satisfy Soundness?

Give details why the changes you propose will ensure that the Plan

The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.

Item Question

Representation Text

Soundness Tests

Tick box Replies

1

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

2

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

The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.
**Issue:** Housing Requirement

**Representing:**

1. **Proposal:**
   - We raise no specific to the housing allocations detailed in Policy SSA 10. 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.

2. **Changes sought:**
   - In the event that the 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.

3. **Candidate Site Ref No:**
   - 206

4. **Why attend Examination?**
   - Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

5. **Why changes satisfy Soundness?**
   - The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.

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**Policy:** CS 4

**Site:**

**Summary:**

- Proposed policy alteration

**Rep'n No** | **Accssn No** | **Date Lodged** | **Late?** | **Source Type** | **Mode Status** | **Modified** | **Petition of** | **TREAT in parts** | **EVIDENCE** | **NO FRTHR EVID.** | **Repr Council** | **Officer** | **Recommendation** | **Response**
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**Document:** Deposit Draft, p.033

**Map:**

**Policy:** CS 4

**Site:**

**PEX Session:**

**Item Question** | **Representation Text**
--- | ---
1.2 | Issue Summary
   - Proposed policy alteration

2.3 | Representation text
   - We raise no specific to the housing allocations detailed in Policy SSA 10. 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 the 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.

6.6 | Candidate Site Ref No
   - 206

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.

18.9 | Why changes satisfy Soundness?
   - Give details why the changes you propose will ensure that the Plan
   - The proposed changes will ensure that the plan is reasonable flexible to enable it to deal with changing circumstances.

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**Item Question** | **Reply**
--- | ---
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
## Issue Summary

Policy objection

Local Planning Authorities should develop housing density policies having regard to the characteristics of the area, including the current and proposed mix of uses. We object 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. We also question why the minimum density required in the Southern Strategy area is higher than that required in the Northern Strategy Area.

## Changes sought

- We request that Policy SSA 10 is altered to require net residential density to be a minimum of 30 dwellings per hectare.

## Previous Representations

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.

## Why attend Examination?

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.
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<th>Soundness Tests</th>
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<td>We object 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.</td>
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<td>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.” We object 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 failure to undertake viability testing is highlighted by the Blyth Valley DC vs Persimmon Homes court of appeal case where the authority’s affordable housing policy was quashed. The policy was based on a housing study completed by Fordhams which was not viability tested, but needs tested. 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. We 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.</td>
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<td>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.</td>
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### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL** by: Representation No

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<tr>
<th>Representation Text</th>
<th>Changes sought</th>
<th>Why no previous Representation</th>
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<tr>
<td>We are fully supportive of the proposed land reclamation scheme included in Policy SSA24. Notwithstanding this, it is vital to ensure that all reclamation schemes are viable and achievable.</td>
<td>We request that additional information is provided to demonstrate that the proposed remediation schemes are viable and achievable.</td>
<td>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.</td>
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**Item Question**

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<td>2.3 Representation text</td>
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<td>4.5 Changes sought</td>
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<td>9.7 Why no previous Representation</td>
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**Why attend Examination?**

Our representation relates to a fundamental part of the LDP which cannot be satisfactorily dealt with solely by written representations.

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**Item Question**

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<tr>
<td>1.2 Issue Summary</td>
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<td>2.3 Representation text</td>
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| General support is given to the provision of the above Policy emphasis will be on building strong, sustainable communities and where residential and commercial development is promoted in locations which will support and reinforce the roles of the Principal Towns of Aberdare and other key settlements. |
### Representation Detail

**Issue Summary**


### Representation Text

1. **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. In this context the identification of the Strategic Site - Land at Robertstown, Aberdare (also referred to in Policy CS 3) is also generally supported but it is considered that the site boundary should be extended to include the submission Sites (Representations on Policy NSA 7 refer).
### Issue Summary


2. 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. In this context the identification of the Strategic Site - Land at Robertstown, Aberdare (also referred to in Policy CS 3) is also generally supported but it is considered that the site boundary should be extended to include the submission Sites (Representations on Policy NSA 7 refer).

### Issue Summary


2. Representation text

   Northern Strategy Area Policy NSA1 - Development in the Principal Town of Aberdare.

   The policy is supported as it recognises the need for development to reinforce the role of Aberdare as a principal town. The development of the land west of Abernant Road, subject to these representations, would contribute to, and complement, the overall scheme by providing a link between the strategic site and land to the north east where work to prepare the site for residential development has already commenced.

   Opportunities exist, therefore, for a wider form of development in order to maximise opportunities for an urban expansion area, providing a range and mix of housing types and other uses, on land which has differing characteristics, and which relates well to the town centre and a wide range of public transport and leisure facilities. Few other development opportunities of this nature exist so close to principal town centres in South Wales.
### Rhondda Cynon Taf County Borough Council Local Development Plan

#### REPRESENTATION DETAIL

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Document: Deposit Draft, p.079

Map: Policy: NSA 12

Site: Issue: Settlement Boundary

Summary:

**Item Question**


2. **Representation text**

   Northern Strategy Area Policy NSA 12 - Housing Development within and adjacent to Settlement Boundaries.

   This policy is supported as it allows for limited forms of development (up to 10 units) outside settlement boundaries in Northern Strategy Area where appropriate criteria are met. These include circumstances where the scale, form and density of the proposed development does not affect the amenity or character of the site, surroundings, or wider area.
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Document: Deposit Draft, p.077
Policy: NSA 9
Map: Site:
Issue: Housing Allocation

Summary:

**Issue Summary**

Despite its inclusion in the Settlement Boundary as identified on the Proposals Map (Sheet 1), we object to the omission of land west of Abernant Road as an allocation for housing development.

**Representation Text**

The development of the site if linked to the proposed strategic site allocation to the south and west will integrate well with the strategic allocation as well as with proposed and committed housing land to the north and east, as such it will not lead to a ribbon from of development, result in the coalescence of settlements, or create a fragmented settlement pattern.

**Changes sought**

Include the objection site as a housing land allocation.

**Why no previous Representation**

Detailed boundaries not shown at Strategy Stage.

**Why attend Examination?**

To present full case before Inspector.

**Soundness Tests**

CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

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

The site needs to be identified for housing in order to be compatible with surrounding sites allocated or with extant planning permission.

**Tick box Replies**

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

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

Previous Representations? Did you make any previous representations on this issue during the Cons No
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<tr>
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<td>2</td>
<td>Although support is generally given to the identification of the 'Land at Robertstown/Abernant, Aberdare' Strategic Site, the Policy is objected to on the grounds that the boundary of the Strategic Site should be extended to the east and west to include the objection sites.</td>
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<td>4</td>
<td>The boundary of the Strategic Site as drawn purely concentrated on land in the interests of two parties i.e. Aberdare Developments, at Robertstown, and the North Glamorgan NHS Trust, at the General Hospital site. It is apparent that these areas have been included in the Strategic Site allocation without consideration of how adjoining land should relate to the development.</td>
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<td>5</td>
<td>Changes sought Include the sites in the Robertstown/Abernant Strategic Site Boundary.</td>
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<tr>
<td>11</td>
<td>Why attend Examination? To present full case before Inspector.</td>
</tr>
<tr>
<td>17</td>
<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes</td>
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<tr>
<td>20</td>
<td>Why changes satisfy Soundness Test? Give details why the changes you propose will ensure that the Plan The Strategic Site as it stands in these other ownerships which would potentially achieve a more integrated and comprehensive scheme to contribute further to sustainability and placemaking objectives.</td>
</tr>
<tr>
<td>3</td>
<td>Seek changes? Any changes to be made to the Plan? Yes</td>
</tr>
<tr>
<td>5</td>
<td>Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit No</td>
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**Representations**

**Rhondda Cynon Taf County Borough Council Local Development Plan**

**Representation No**: 3304.D9

**Document**: Deposit Draft, p.073

**Site**: 4/NSA 7 0STR Robertstown/Abernant

**Policy**: NSA 7

**Map**: Policy: NSA 7

**Overview**

*Issue Summary*

Although support is generally given to the identification of the 'land at Robertstown/Abernant, Aberdare' Strategic Site, the Policy is objected to on the grounds that the boundary of the Strategic Site should be extended to the east and west to include the objection sites.

*Representation Text*

The boundary of the Strategic Site as drawn purely concentrated on land in the interests of two parties i.e. Aberdare Developments, at Robertstown, and the North Glamorgan NHS Trust, at the General Hospital site. It is apparent that these areas have been included in the Strategic Site allocation without consideration of how adjoining land should relate to the development.

*Changes sought*

Include the sites in the Robertstown/Abernant Strategic Site Boundary.

*Why attend Examination?*

To present full case before Inspector

*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 is sound.

The strategic site as it stands ignores land in these other ownerships which would potentially achieve a more integrated and comprehensive scheme to contribute further to sustainability and placemaking objectives.

*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 Consultation Period? No
### Summary:
The proposals map is supported in terms of the inclusion of the Abernant Road site within the Residential Settlement Boundary but objected to as it should include the submission site as an extension to the strategic land release at Robertstown/Abernant.

In order to achieve a more comprehensive form of development the strategic site should be extended to consolidate the urban area at this location, including the objection site, land proposed for development on the Hospital site, and land currently being developed on the Short Brothers site to the north-east.

### Representation Text

1. **Issue Summary**
   
   The proposals map is supported in terms of the inclusion of the Abernant Road site within the Residential Settlement Boundary but objected to as it should include the submission site as an extension to the strategic land release at Robertstown/Abernant.

2. **Representation text**
   
   In order to achieve a more comprehensive form of development the strategic site should be extended to consolidate the urban area at this location, including the objection site, land proposed for development on the Hospital site, and land currently being developed on the Short Brothers site to the north-east.

3. **Changes sought**
   
   Include the objection site within the wider strategic site.

4. **Why no previous Representation**
   
   Detailed strategic site boundaries not identified.

5. **Why changes satisfy Soundness**
   
   Give details why the changes you propose will ensure that the Plan will achieve consistency in maximising benefits of the Strategic Site in terms of consolidating the urban form and achieving a fully sustainable scheme.

### Item Question

1. **CE2 Test?**
   
   Not realistic and appropriate and/or not founded on robust and credible evidence?

2. **Soundness Tests**
   
   Yes

3. **Seek changes?**
   
   Any changes to be made to the Plan?

4. **Tick box Replies**
   
   Yes

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

6. **Previous Representations?**
   
   Did you make any previous representations on this issue during the Cons?

7. **Previous Representations?**
   
   Did you make any previous representations on this issue during the Cons?
<table>
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<th>Item</th>
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<td>9</td>
<td>Why no previous Representation</td>
<td>Detailed strategic site boundaries not identified.</td>
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<td>21</td>
<td>Why attend Examination?</td>
<td>To present full case before Inspector.</td>
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<td>20</td>
<td>Why changes satisfy Soundness</td>
<td>Give details why the changes you propose will ensure that the Plan will achieve consistency in maximising benefits of the Strategic Site in terms of consolidating the urban form and achieving a fully sustainable scheme.</td>
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</table>

**Soundness Tests**

- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

**Tick box Replies**

- Site submitted as Candidate? If Rep’n is for inclusion of a new site, did you submit as a Candidate Site? No
- Previous Representations? Did you make any previous representations on this issue during the Cons Consultation? No
**Item Question** | **Representation Text**
--- | ---
1 | **Issue Summary**
The wording in the Description of Development should be elaborated upon to emphasise that the site should be developed subject to satisfying all of the relevant policy and site planning tests, not just absence of harm to the Taff St scheme. Notably in this case it should indicate that it should be developed comprehensively in a manner that facilitates the proper integration of the site with the adjacent Pontypridd Retail Park and the Pontypridd town centre.

2 | **Representation text**
Pontypridd Retail Park lies immediately adjacent to the proposed retail allocation under Policy SSA 15.1. It is a retail park that was developed some years ago and improvements or redevelopment are being contemplated by the owners. The proposed redevelopment of the Brown Lennox site for retail purposes provides the opportunity for effective integration of the sites in order to provide better shopping facilities for the public by improving linkages for customers, better public transport provision and also improved highway access. Comprehensive development and effective integration should therefore be a stated requirement. The owners of Pontypridd Retail Park are entirely willing to cooperate in facilitating a comprehensive form of development.

The Appendix does not make clear the undetermined retail scheme for the site (now resolved to be approved by the council) is for a non-food use restricted to bulky goods only. Our clients are concerned that in view of the traffic problems already experienced in the area other forms of retail use, such as a foodstore, with higher levels of traffic generation may exacerbate these existing problems.

3 | **Changes sought**
The text at Appendix 1 C should be amended to indicate that the allocation is subject to tests other than merely having no detriment to the redevelopment of the Taff St, Pontypridd site. Notably the description should indicate that the allocation is subject to satisfying all of the relevant tests in Policy SSA 1 and in this instance it should be specifically stated that the proposed development will be required to integrate effectively with the adjacent Pontypridd Retail Park to ensure comprehensive form of development. This should include visual and physical connection to enable good quality highway linkage for customers, service vehicles and public transport, together with convenient inter-linkage for shoppers.

4 | **Why no previous Representation**
Not referred to in the Preferred Strategy.

**Item Question** | **Reply** | **Soundness Tests**
--- | --- | ---
12 | **C1 Test?** Does not have regard to other relevant plans, policies and strategies relating to the area or a | Yes
13 | **C2 Test?** Does not have regard to national policy? | Yes
16 | **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth | Yes
20 | **Why changes satisfy Soundness** Give details why the changes you propose will ensure that the Plan | The proposed changes will make it more consistent with government guidance and other policies of the LDP.

**Item Question** | **Reply**
--- | ---
3 | **Seek changes?** Any changes to be made to the Plan? | Yes
## Issue Summary

Support protection for the retail development of the town centre site.

### Representation Text

Extant full planning permission exists, under reference 02/0919/10, for "Demolition of existing buildings, construction of retail development, car park, incorporating bridge structures, office block and improvement of existing road junctions" in the centre of Pontypridd (known as the Angharad Walk scheme).

Permission was granted on the 9 December 2004 and accordingly is extant until the end of the year.

The allocation of the land adjacent to Pontypridd Retail Park under policy SSA15 (1) for 3,500 - 5,500sqm of comparison or convenience retail floor space should not be allowed to prejudice the appropriate redevelopment of Pontypridd centre.

Accordingly, we support phrases within Appendix 1C such as:

* "...subject to no detriment to the redevelopment of the in centre Taff Street, Pontypridd Site*;*

* A food-store of 3,354m2 net convenience (food) and comparison (non food) floor-space has been refused on this site, as there was insufficient retail need to support the convenience (food) stores proposed on both the in-centre Gas Road / Precinct site and the Brown Lenox site [03/0625]*; and

* "It is vital that development here does not frustrate the retail development of the town centre site.*"

### Changes sought

N/A.

### Why attend Examination?

N/A.

### Soundness Tests

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

N/A.

### Tick box Replies

#### Seek changes? Any changes to be made to the Plan?

No
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

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**Document:** Deposit Draft, p.108

**Policy:** SSA 13

**Site:** Settlement Boundary

### Summary:

**Issue:** Settlement Boundary

**Issue Summary**

The settlement boundary adjoining Fairview Gilfach Goch to be amended to exclude existing development.

**Representation Text**

The garages playground and bungalow at the Eastern side of Fairview are located outside the settlement boundary. It is considered that the settlement boundary should be amended so that these built development fall within the settlement area. The area should also be deleted from the SINC 169.

**Changes sought**

The settlement boundary should be amended as indicated on the attached plan (Ref: JCC9040:01)

**Why no previous Representation**

Not instructed at that time.

---

**Item Question**

1 2 Issue Summary

The settlement boundary adjoining Fairview Gilfach Goch to be amended to exclude existing development.

2 3 Representation text

The garages playground and bungalow at the Eastern side of Fairview are located outside the settlement boundary. It is considered that the settlement boundary should be amended so that these built development fall within the settlement area. The area should also be deleted from the SINC 169.

4 5 Changes sought

The settlement boundary should be amended as indicated on the attached plan (Ref: JCC9040:01)

9 7 Why no previous Representation

Not instructed at that time.

---

**Item Question**

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

---

**Item Question**

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

The proposed change is to reflect the existing circumstances pattern in the area. The plan should respond to the existing circumstances.

---

**Item Question**

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

---

**Item Question**

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

---

**Soundness Tests**

**Tick box Replies**
### Issue Summary
Areas of built development should be excluded from any SINC designation and included within the settlement boundary where they adjoin the existing settlement.

### Representation text

The principle of landscape protection is supported and the plan contains extensive SINC designations. However, where there is built development adjoining an existing settlement it should fall within the settlement boundary rather than within the SINC. This can be done without prejudicing the landscape protection objectives.

### Changes sought

Amend the constraints plan to exclude the area shown on the enclosed plan and for that area be included within the Settlement Boundary.

### Why no previous Representation

Not instructed at that time.

### Why changes satisfy Soundness

The proposed change would reflect existing circumstances.

### Soundness Tests

17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

18. CE4 Test? Not flexible to deal with changing circumstances? Yes

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

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 Site? No

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

### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL** by: Representation No

**Document:** Deposit Draft, p.046  
**Site:** 562/571 Ferrari’s bakery  
**Policy:** AW 4  
**Map:**  
**PEX Session:** Issue: Planning Obligations

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<tr>
<td>1</td>
<td>Issue Summary</td>
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<tr>
<td></td>
<td>My client objects to the specific wording [of para. 5.19].</td>
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<tr>
<td>2</td>
<td>Representation text</td>
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<tr>
<td></td>
<td>Para. 7 of Welsh Office Circular 13/97 advises that planning obligations should be:</td>
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|               | (i) necessary;  
|               | (ii) relevant to planning;  
|               | (iii) directly related to the proposed development;  
|               | (iv) fairly & reasonably related in scale and kind to the proposed development;  
|               | (v) reasonable in all other respects. |
|               | This is reiterated in PPW at section 4.7. |
|               | Instead of referring to the above 5 points, para. 5.19 refers to requesting contributions where they are, “reasonable, realistic and necessary”. |
|               | We accept that reasonableness and necessity effectively replicate points (I) and (v), above. However, reference to “realistic” is undefined and therefore, problematic. Moreover, failure to mention points (ii), (iii) and (iv) is troubling, especially when read in conjunction with para 5.18 (see specific representation in this regard). |
| 3             | Changes sought     |
|               | The text at paragraph 5.19 should be replaced with: |
|               | “Requests for contributions will, however, be carefully balanced and will only be requested where they are necessary, relevant, directly related to the proposed development, fairly and reasonable related in scale and kind to the proposed development, and reasonable in all other respects, in accordance with section 4.7 on PPW and Circular 13/97.” |
| 4             | Why no previous Representation |
|               | Detailed matter not covered by PS. |
| 5             | Why changes satisfy Soundness |
|               | Give details why the changes you propose will ensure that the Plan |
|               | The proposed wording would respect the policy and advice set out in PPW and Welsh Office Circular 13/97. |
| 6             | Seek changes? Any changes to be made to the Plan? |
|               | Yes |
| 7             | Previous Representations? Did you make any previous representations on this issue during the Cons |
|               | No |

09/06/2009
My client objects to the detailed wording of this policy [AW 4].

Para. 7 of Welsh Office Circular 13/97 advises that planning obligations should be:

(i) necessary;
(ii) relevant to planning;
(iii) directly related to the proposed development;
(iv) fairly & reasonably related in scale and kind to the proposed development;
(v) reasonable in all other respects.

This is reiterated in PPW at section 4.7.

As currently worded, policy AW 4 makes no reference to the above Circular advice, either in the policy itself or the reasoned justification.

Reference is made to the potential for planning obligations where developments rely on existing services, facilities and infrastructure, or related works. All development will rely on existing services etc to some extent, often with no unacceptable detrimental impact.

We consider that explicit reference is needed, either within the policy text or the reasoned justification, that obligations will only be required where they would meet the tests set out at para. 7 of Circular 13/97.

An explicit statement should be made, either within the policy text or the reasoned justification, that obligations will only be required where they would meet the tests set out at para 7 of Circular 13/97.

Detailed matter not covered by PS.
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<th>Rep'n No</th>
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Document: Deposit Draft, p.075  
Policy: NSA 8  
Site: 562/571 Ferrari's bakery  
Issue: Strategic Sites  
PEX Session:  

**Summary:**  
Our client objects to Policy NSA 8 and the allocation of land to the south of Hirwaun for a 2,000 sq m retail store and medical/community centre.
Paragraphs 6.38 to 6.43 of the Deposit Draft LDP explains that a strategic corridor of land south of the A465 is allocated for residential, employment, retail and community development and the Council's vision for this strategic site is the enhancement of Hirwaun as a key settlement. However the LDP goes on to explain that the site is subject to a number of constraints, which include recent coal mining activity, coal reserves, a high-pressure gas main and safety zone as well as Sites of Importance for Nature Conservation and SSSI. Furthermore the LDP explains that the proposals for the site are linked to the proposed dualling of the A465 Heads of the Valleys trunk road from Hirwaun to Abergavenny which involves a 1.4 km length of new road through part of the site. Indeed paragraph 6.43 of the LDP advises that other than the residential and business park aspects, all other development of the strategic site (i.e. retail, community, commercial and education facilities) must await implementation of the dualling of the A465 trunk road through the site and conversion of the existing southern bypass to a local road. The Welsh Assembly Government has confirmed that works to this section of the A465 trunk road is now not programmed to start until 2017 and is unlikely to be completed before 2020.

As already explained in our representations to Policy NSA 3, the 2008 Hirwaun Village Study explains how Hirwaun has accommodated a large amount of residential development in recent years in relation to its modest size but this has not been replicated in an increased provision of local services and facilities. The consequence of this has been an unsustainable level of development and a situation whereby a wide range of basic needs are not served. This, according to the report, has created a sense of community dissatisfaction with local people having to travel for a wide range of services. In terms of retail provision the report advises that this is limited and performs a solely 'top up' function and that it is evident that the vast majority of residents shop elsewhere for their larger, weekly shop. As for health facilities, the report explains that Hirwaun has only one primary health care facility, however, this surgery is outdated, small, in a poor condition and not to current standards. Furthermore consultations with the Local Health Board have revealed concerns over its ability to adequately meet the (current and future) medical needs of the local community.

The report goes on to explain that the starting point in the establishment of a vision for the future development of Hirwaun must therefore be a commitment to redress the imbalance in the provision of local services. This would be important in ensuring that, where possible, local residents in Hirwaun can be better served without having to travel to surrounding centres and that Hirwaun can appropriately and fully perform its role in serving the surrounding, smaller settlements. The report also notes that the local challenge is to ensure that any future population growth contributes towards the enhancement of the village rather than further undermining its strength and profile as has been the case in recent years.

It is clear from this report that there is a need to enhance existing retail and health facilities in Hirwaun to meet the needs of both existing and future residents. This is not disputed. However given that the strategic site, allocated under policy NSA 8, is unlikely to come forward for retail or health/community uses before 2020, it is considered that alternative land capable of being developed in the short term should be allocated for such uses to meet existing need. My client therefore wishes to promote the Ferrari’s Bakery site as an alternative site for mixed-use development including a foodstore (2,000 sq m net), health centre and housing (9 units).

The Ferrari’s Bakery site occupies approximately 2.1 hectares of land within the settlement boundary of Hirwaun. The brownfield site contains a number of vacant interlinked industrial buildings of differing ages, formerly used as a bakery. Surrounding uses include open Greenfield land to the west, residential to the north and east and the A465 Heads of the Valleys Road to the immediate south. The site is located approximately 350 metres to the south west of Hirwaun town centre and is easily accessible by all modes of transport including public transport. Furthermore the site has excellent access to the A465, which provides access to the nearby towns of Aberdare, Penywau, Rhigos and Croesbychan.

A retail study has recently been undertaken by RPS (please refer to attached report), which assesses whether there is a need for additional retail floorspace in Hirwaun both in terms of quantitative and qualitative need. The RPS retail study concludes that there is a demonstrable quantitative need for both convenience and comparison goods floorspace in Hirwaun to support a new food store at the Ferrari's Bakery site.

In terms of qualitative need, national guidance states that there may be justification for new provision where:

- It supports the objectives and strategy of an up-to-date development plan or policies in national guidance;
- It is highly accessible by walking, cycling or public transport;
- It contributes to a substantial reduction in car journeys;
- It contributes to the co-location of facilities in existing town, district, local or village centres;
- It significantly contributes to the vitality, attractiveness and viability of such a centre; or where
- It would alleviate a lack of convenience provision in a disadvantaged area.

In response to the above criteria the RPS retail study offers the following conclusions:

- The provision of a new food store at the Bakery site would provide a step-change in both the quantity and quality of food and non-food retail offer in Hirwaun. Its development would therefore strongly accord with the objectives of the emerging LDP in which Hirwaun is identified as a “Key Settlement”. Furthermore it would make significant strides in addressing the widely acknowledged deficit of local services and infrastructure, increasing the capacity of the village to be more self-sufficient and environmentally sustainable.
The former Bakery site is 'brownfield' land served by existing public transport infrastructure, and within convenient walking distance of a substantial residential catchment. Furthermore, it is well located to meet the needs of any proposed southern extension to the village.

The proposed food store would facilitate substantial reductions in car journeys. Survey based evidence confirms significant numbers of journeys are made to superstores outside of Hirwaun. The provision of a food store at the Bakery site will offer a genuine alternative closer to home, and a significant proportion of residents are likely to switch to a more conveniently located alternative. Convenience goods shopping takes place on a more frequent basis than for comparison goods, hence it is much more important to have adequate food shopping facilities close to where people live.

The proposed development, in reducing expenditure leakage will increase the potential for linked trips to be made to Hirwaun’s town centre. At present, it is likely that additional comparison goods expenditure also leaks from the village during food shopping trips. The proposed development therefore has significantly more potential to improve rather than harm the vitality and viability of the town centre.

The presence of only one food retailer in Hirwaun (The Co-Op) severely compromises competition and choice for local residents. This is particularly the case for those residents without access to the private car who may not be able to visit stores in Aberdare or Merthyr Tydfil very easily. The former Bakery site is in a highly accessible location and would provide a considerable improvement in terms of access to wider range of products and services without closer proximity to their home.

The RPS retail study also considers the application of the sequential test to assess whether there are any sequentially preferable sites in, or on the edge of the town centre, which are capable of accommodating a food store. The report concludes that a store capable of meeting the main food shopping needs of Hirwaun residents can only be accommodated in an out-of-centre location. The focus must therefore be, the most appropriate out-of-centre site to accommodate this need, taking into account the requirements of national planning guidance, and the capability of the site to deliver the use within a reasonable timescale. Taking this into account the RPS Retail study concludes that there are only two out-of-centre sites which are capable of accommodating a new foodstore, they are the former Ferrari’s Bakery site and Land to the south of Hirwaun (proposed strategic site 5). It is considered that the Ferrari’s Bakery site is superior in all aspects to the proposed allocated Strategic Site for the following reasons:

- It is definitely brownfield rather than land that has "blended into the landscape" and may "reasonably be considered part of the natural surroundings" (PPW, Figure 2.1);
- It is capable of being developed in the short term;
- It is better linked to the existing settlement pattern of Hirwaun and therefore offers greater potential for linked trips to the town centre;
- It benefits from established public transport linkages; [ends]

The allocation of the former Ferrari’s Bakery site at the Bryngelli Industrial Estate for a mixed use development to include a foodstore, health centre and housing.

This together with the other representations made by Scarford (Hirwaun) Ltd have implications for the development of a strategic site. The form and deliverability of retail development in Hirwaun is of critical importance to the growth of Hirwaun and the County Borough as a whole and it would be beneficial for the Inspector to consider the matter in detail at an examination.

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

The Ferrari’s Bakery Site is capable of being developed in the short term and therefore its redevelopment for mixed-use comprising retail, health centre and housing meets the objectives of the LDP strategy for Hirwaun.
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Seek changes? Any changes to be made to the Plan? Yes

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

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

The recognition that the key settlements, which include Hirwaun, are expected to act as district centres where the emphasis will be on convenience (food) shopping with an element of day-to-day comparison shopping is supported.
Paragraphs 6.38 to 6.43 of the Deposit Draft LDP explains that a strategic corridor of land south of the A465 is allocated for residential, employment, retail and community development and the Council’s vision for this strategic site is the enhancement of Hirwaun as a key settlement. However the LDP goes on to explain that the site is subject to a number of constraints, which include recent coal mining activity, coal reserves, a high-pressure gas main and safety zone as well as Sites of Importance for Nature Conservation and SSSI. Furthermore the LDP explains that the proposals for the site are linked to the proposed dualling of the A465 Heads of the Valleys trunk road from Hirwaun to Abergavenny which involves a 1.4 km length of new road through part of the site. Indeed paragraph 6.43 of the LDP advises that other than the residential and business park aspects, all other development of the strategic site (i.e. retail, community, commercial and education facilities) must await implementation of the dualling of the A465 trunk road through the site and conversion of the existing southern bypass to a local road. The Welsh Assembly Government has confirmed that works to this section of the A465 trunk road is now not programmed to start until 2017 and is unlikely to be completed before 2020.

As already explained in our representations to Policy NSA 3, the 2008 Hirwaun Village Study explains how Hirwaun has accommodated a large amount of residential development in recent years in relation to its modest size but this has not been replicated in an increased provision of local services and facilities. The consequence of this has been an unsustainable level of development and a situation whereby a wide range of basic needs are not served. This, according to the report, has created a sense of community dissatisfaction with local people having to travel for a wide range of services. In terms of retail provision the report advises that this is limited and performs a solely ‘top up’ function and that it is evident that the vast majority of residents shop elsewhere for their larger, weekly shop. As for health facilities, the report explains that Hirwaun has only one primary health care facility, however, this surgery is outdated, small, in a poor condition and not to current standards. Furthermore consultations with the Local Health Board have revealed concerns over its ability to adequately meet the (current and future) medical needs of the local community.

The report goes on to explain that the starting point in the establishment of a vision for the future development of Hirwaun must therefore be a commitment to redress the imbalance in the provision of services. This would be important in ensuring that, where possible, local residents in Hirwaun can be better served without having to travel to surrounding centres and that Hirwaun can appropriately and fully perform its role in serving the surrounding, smaller settlements. The report also notes that the local challenge is to ensure that any future population growth contributes towards the enhancement of the village rather than further undermining its strength and profile as has been the case in recent years.

It is clear from this report that there is a need to enhance existing retail and health facilities in Hirwaun to meet the needs of both existing and future residents. This is not disputed. However given that the strategic site, allocated under policy NSA 8, is unlikely to come forward for retail or health/community uses before 2020, it is considered that alternative land capable of being developed in the short term should be allocated for such uses to meet existing need. My client therefore wishes to promote the Ferrari’s Bakery site as an alternative site for mixed-use development including a foodstore (2,000 sq m net), health centre and housing (9 units).

The Ferrari’s Bakery site occupies approximately 2.1 hectares of land within the settlement boundary of Hirwaun. The brownfield site contains a number of vacant interlinked industrial buildings of differing ages, formerly used as a bakery. Surrounding uses include open Greenfield land to the west, residential to the north and east and the A465 Heads of the Valleys Road to the immediate south. The site is located approximately 350 metres to the south west of Hirwaun town centre and is easily accessible by all modes of transport including public transport. Furthermore the site has excellent access to the A465, which provides access to the nearby towns of Aberdare, Penywaun, Rhigos and Cwysbychan.

A retail study has recently been undertaken by RPS (please refer to attached report), which assesses whether there is a need for additional retail floorspace in Hirwaun both in terms of quantitative and qualitative need. The RPS retail study concludes that there is a demonstrable quantitative need for both convenience and comparison goods floorspace in Hirwaun to support a new food store at the Ferrari’s Bakery site.

In terms of qualitative need, national guidance states that there may be justification for new provision wherever:

- It supports the objectives and strategy of an up-to-date development plan or policies in national guidance;
- It is highly accessible by walking, cycling or public transport;
- It contributes to a substantial reduction in car journeys;
- It contributes to the co-location of facilities in existing town, district, local or village centres;
- It significantly contributes to the vitality, attractiveness and viability of such a centre; or where
- It would alleviate a lack of convenience provision in a disadvantaged area.

In response to the above criteria the RPS retail study offers the following conclusions:

- The provision of a new food store at the Bakery site would provide a step-change in both the quantity and quality of food and non-food retail offer in Hirwaun. Its development would therefore strongly accord with the objectives of the emerging LDP in which Hirwaun is identified as a “Key Settlement”. Furthermore it would make significant strides in addressing the widely acknowledged deficit of local services and infrastructure, increasing the capacity of the village to be more self-sufficient and environmentally sustainable.
The former Bakery site is 'brownfield' land served by existing public transport infrastructure, and within convenient walking distance of a substantial residential catchment. Furthermore, it is well located to meet the needs of any proposed southern extension to the village.

The proposed food store would facilitate substantial reductions in car journeys. Survey based evidence confirms significant numbers of journeys are made to superstores outside of Hirwaun. The provision of a food store at the Bakery site will offer a genuine alternative closer to home, and a significant proportion of residents are likely to switch to a more conveniently located alternative. Convenience goods shopping takes place on a more frequent basis than for comparison goods, hence it is much more important to have adequate food shopping facilities close to where people live.

The proposed development, in reducing expenditure leakage will increase the potential for linked trips to be made to Hirwaun’s town centre. At present, it is likely that additional comparison goods expenditure also leaks from the village during food shopping trips. The proposed development therefore has significantly more potential to improve rather than harm the vitality and viability of the town centre.

The presence of only one food retailer in Hirwaun (The Co-Op) severely compromises competition and choice for local residents. This is particularly the case for those residents without access to the private car who may not be able to visit stores in Aberdare or Merthyr Tydfil very easily. The former Bakery site is in a highly accessible location and would provide a considerable improvement in terms of access to a wider range of products and services without closer proximity to their home.

The RPS retail study also considers the application of the sequential test to assess whether there are any sequentially preferable sites in, or on the edge of the town centre, which are capable of accommodating a food store. The report concludes that a store capable of meeting the main food shopping needs of Hirwaun residents can only be accommodated in an out-of-centre location. The focus must therefore be on the most appropriate out-of-centre site to accommodate this need, taking into account the requirements of national planning guidance, and the capability of the site to deliver the use within a reasonable timescale. Taking this into account the RPS Retail study concludes that there are only two out-of-centre sites which are capable of accommodating a new foodstore, they are the former Ferrari’s Bakery site and Land to the south of Hirwaun (proposed strategic site 5). It is considered that the Ferrari’s Bakery site is superior in all aspects to the proposed allocated Strategic Site for the following reasons:

- It is definitely brownfield rather than land that has "blended into the landscape" and may "reasonably be considered part of the natural surroundings" (PPW, Figure 2.1);
- It is capable of being developed in the short term;
- It is better linked to the existing settlement pattern of Hirwaun and therefore offers greater potential for linked trips to the town centre;
- It benefits from established public transport linkages; [ends]
We object to the allocation of land at Strategic Site 5 (Land south of Hirwaun) for the construction of a 2,000 sq m of new retail floorspace.
Paragrapshs 6.38 to 6.43 of the Deposit Draft LDP explains that a strategic corridor of land south of the A465 is allocated for residential, employment, retail and community development and the Council’s vision for this strategic site is the enhancement of Hirwaun as a key settlement. However the LDP goes on to explain that the site is subject to a number of constraints, which include recent coal mining activity, coal reserves, a high-pressure gas main and safety zone as well as Sites of Importance for Nature Conservation and SSSI. Furthermore the LDP explains that the proposals for the site are linked to the proposed dualling of the A465 Heads of the Valleys trunk road from Hirwaun to Abergavenny which involves a 1.4 km length of new road through part of the site. Indeed paragraph 6.43 of the LDP advises that other than the residential and business park aspects, all other development of the strategic site (i.e. retail, community, commercial and education facilities) must await implementation of the dualling of the A465 trunk road through the site and conversion of the existing southern bypass to a local road. The Welsh Assembly Government has confirmed that works to this section of the A465 trunk road is now not programmed to start until 2017 and is unlikely to be completed before 2020.

As already explained in our representations to Policy NSA 3, the 2008 Hirwaun Village Study explains how Hirwaun has accommodated a large amount of residential development in recent years in relation to its modest size but this has not been replicated in an increased provision of local services and facilities. The consequence of this has been an unsustainable level of development and a situation whereby a wide range of basic needs are not served. This, according to the report, has created a sense of community dissatisfaction with local people having to travel for a wide range of services. In terms of retail provision the report advises that this is limited and performs a solely ‘top up’ function and that it is evident that the vast majority of residents shop elsewhere for their larger, weekly shop. As for health facilities, the report explains that Hirwaun has only one primary health care facility, however, this surgery is outdated, small, in a poor condition and not to current standards. Furthermore consultations with the Local Health Board have revealed concerns over its ability to adequately meet the (current and future) medical needs of the local community.

The report goes on to explain that the starting point in the establishment of a vision for the future development of Hirwaun must therefore be a commitment to redress the imbalance in the provision of locations. This would be important in ensuring that, where possible, local residents in Hirwaun can be better served without having to travel to surrounding centres and that Hirwaun can appropriately and fully perform its role in serving the surrounding, smaller settlements. The report also notes that the local challenge is to ensure that any future population growth contributes towards the enhancement of the village rather than further undermining its strength and profile as has been the case in recent years.

It is clear from this report that there is a need to enhance existing retail and health facilities in Hirwaun to meet the needs of both existing and future residents. This is not disputed. However given that the strategic site, allocated under policy NSA 8, is unlikely to come forward for retail or health/community uses before 2020, it is considered that alternative land capable of being developed in the short term should be allocated for such uses to meet existing need. My client therefore wishes to promote the Ferrari’s Bakery site as an alternative site for mixed-use development including a foodstore (2,000 sq m net), health centre and housing (9 units).

The Ferrari’s Bakery site occupies approximately 2.1 hectares of land within the settlement boundary of Hirwaun. The brownfield site contains a number of vacant interlinked industrial buildings of differing ages, formerly used as a bakery. Surrounding uses include open Greenfield land to the west, residential to the north and east and the A465 Heads of the Valleys Road to the immediate south.

The site is located approximately 350 metres to the south west of Hirwaun town centre and is easily accessible by all modes of transport including public transport. Furthermore the site has excellent access to the A465, which provides access to the nearby towns of Aberdare, Penywaun, Rhigos and Croesbychan.

A retail study has recently been undertaken by RPS (please refer to attached report), which assesses whether there is a need for additional retail floorspace in Hirwaun both in terms of quantitative and qualitative need. The RPS retail study concludes that there is a demonstrable quantitative need for both convenience and comparison goods floorspace in Hirwaun to support a new food store at the Ferrari’s Bakery site.

In terms of qualitative need, national guidance states that there may be justification for new provision where:

\[ \text{It supports the objectives and strategy of an up-to-date development plan or policies in national guidance;} \]\n\[ \text{It is highly accessible by walking, cycling or public transport;} \]\n\[ \text{It contributes to a substantial reduction in car journeys;} \]\n\[ \text{It contributes to the co-location of facilities in existing town, district, local or village centres;} \]\n\[ \text{It significantly contributes to the vitality, attractiveness and viability of such a centre; or where} \]\n\[ \text{It would alleviate a lack of convenience provision in a disadvantaged area.} \]

In response to the above criteria the RPS retail study offers the following conclusions:

\[ \text{The provision of a new food store at the Bakery site would provide a step-change in both the quantity and quality of food and non-food retail offer in Hirwaun. Its development would therefore strongly} \]\n\[ \text{accord with the objectives of the emerging LDP in which Hirwaun is identified as a “Key Settlement”. Furthermore it would make significant strides in addressing the widely acknowledged deficit of local services and infrastructure, increasing the capacity of the village to be more self-sufficient and environmentally sustainable.} \]
### Changes sought

The allocation of the former Ferrari’s Bakery site at the Bryngelli Industrial Estate for a mixed use development to include a 2,000 sq m (net) food store.

Policy NSA 17 changed to delete reference to Strategic Site 5 and make reference instead to new retail floorspace at the above site.

### Why no previous Representation

Detailed matter not covered in PS.

### Why attend Examination?

This together with the other representations made by Scarford (Hirwaun) Ltd have implications for the development of a strategic site. The form and deliverability of retail development in Hirwaun is of critical importance to the growth of Hirwaun and the County Borough as a whole and it would be beneficial for the Inspector to consider the matter in detail at an examination.

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<th>Item</th>
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<td>16</td>
<td>CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth</td>
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<td>17</td>
<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
<td>Yes</td>
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<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
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The allocation of a site for new retail floorspace which is capable of being brought forward for development in the short term thereby providing a much needed facility for the existing residents of Hirwaun is compatible with the objectives of the LDP.

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The former Bakery site is ‘brownfield’ land served by existing public transport infrastructure, and within convenient walking distance of a substantial residential catchment. Furthermore, it is well located to meet the needs of any proposed southern extension to the village.

The proposed food store would facilitate substantial reductions in car journeys. Survey based evidence confirms significant numbers of journeys are made to superstores outside of Hirwaun. The provision of a food store at the Bakery site will offer a genuine alternative closer to home, and a significant proportion of residents are likely to switch to a more conveniently located alternative.

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Our client objects to the wording of Policy NSA 16.

In 2006 the Council commissioned a study to analyse the demand for employment land within the County Borough and to review the current employment land offer and streams of employment land that may be available in the future. The study entitled ‘RCT Economic Development Prospects and Employment Land Implications Study (2006)’ found that there was an adequate supply of employment land at present, with some indication of an actual oversupply. One of the key conclusions of the report however is that the current supply does not meet future needs, in terms of:

- The type of employment sites and units available – specifically smaller, flexible space is required.
- Meeting the demand from micro-businesses.
- The quality of office space.

The report recognised that there are significant geographical differences in terms of both demand and supply of employment land in RCT. The southern end of the Borough is seen as a good location for businesses with good transport links whereas the northern areas, possess a poor supply and have a low demand for employment land.

The key recommendations of the report were that:

- There is a need to develop a clear framework for investment intervention.
- There is a need to develop a more responsive planning policy framework that offers more flexibility, especially with regard to mixed use developments (underline added).
- Employment sites should be rationalised.
- Investment is needed to ensure that sites are improved in terms of access and connectivity.
- There is a need for greater dialogue with the private sector to encourage better design and environmental improvements.

The report also recommends that given the differences that exist between the northern and southern areas of RCT, different approaches are required in these areas. The two factors that need to be taken into consideration are:

- An appreciation of the higher levels of demand for employment sites within southern areas of RCT.
- An appreciation that there is still need to ensure that employment sites remain in the more northern areas of RCT.

The recognition that many of the older and redundant industrial sites in the Northern Strategy Area are unsuitable to meet the needs of modern industry is supported. However taking into account the findings of the ‘RCT Economic Development Prospects and Employment Land Implications Study’ it is considered that where it has been demonstrated that an employment site is genuinely redundant in terms of the current and future needs of the employment market, there should not be a need to undertake a marketing exercise and that all redevelopment proposals should be supported i.e. not just employment-led schemes particularly where they are shown to contribute to the wider regeneration of the area and/or meet identified needs.
Policy NSA 16 should be reworded to read as follows: [words in square brackets to be deleted:]

1. The premises and/or site has been assessed and is genuinely redundant i.e. In terms of the current and future needs of the employment market;
2. That it has been marketed locally at a price that reflects its condition and commercial value and for a period of time that reflects the likely demand for the size of premises;
3. The development is compatible with other uses in the locality and there are no significant adverse impacts on the amenities enjoyed by local residents;
4. The redevelopment of derelict, unsightly, underused and vacant land for new employment led mixed uses will have a positive effect in regeneration terms;
5. The Site is not allocated in Policy NSA 14.

Paragraph 6.69 should be deleted.

Paragraph 6.73 should be reworded to read as follows:

In considering mixed-use proposals, the Council will expect to see well designed schemes which include a mixture of uses such as housing, amenity space, community facilities and commercial development amongst other uses, as appropriate to the site. Proposals should clearly demonstrate how the mixture of uses has been developed and how they will contribute to the wider regeneration of the area.
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<td>The recognition that the “key settlement” of Hirwaun needs an increased provision of local services and facilities including improvements in the retail, leisure, education and health sectors is supported. However my client objects to the wording of paragraph 6.14, which notes that “through the identified Strategic Site, Hirwaun will continue to experience significant new development”. This is at odds with Policy NSA 3, the heading for which makes it clear that the policy refers to proposals for residential, commercial and community development within any part of Hirwaun (subject to the criteria listed).</td>
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<td>Representation text</td>
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<td>Paragraph 6.15 of the Deposit Draft LDP makes reference to the Hirwaun Village Study which was undertaken by Nathaniel Lichfield and Partners (NLP) in 2008 on behalf of the Council. The report provides detailed information about Hirwaun and was produced in order to inform the LDP process. The Hirwaun Village Study report at section 4 explains how Hirwaun has accommodated a large amount of residential development in recent years in relation to its modest size but this has not been replicated in an increased provision of local services and facilities. The consequence of this has been an unsustainable level of development and a situation whereby a wide range of basic needs are not served. This, according to the report, has created a sense of community dissatisfaction with local people having to travel for a wide range of services. The report goes on to explain that the starting point in the establishment of a vision for the future development of Hirwaun must therefore be a commitment to redress the imbalance in the provision of local services. This would be important in ensuring that, where possible, local residents in Hirwaun can be better served without having to travel to surrounding centres and that Hirwaun can appropriately and fully perform its role in serving the surrounding, smaller settlements. The report also notes that the local challenge is to ensure that any future population growth contributes towards the enhancement of the village rather than further undermining its strength and profile as has been the case in recent years. It is clear from this report that there is a need to enhance existing facilities to address the deficiencies in provision that has been allowed to emerge to meet the needs of both EXISTING and FUTURE residents of Hirwaun. Therefore to link “large scale commercial proposals” with the proposed Strategic Site, with long timescales, is inappropriate as it will fail to address the need for an increased provision of local services and facilities and is likely to exacerbate a mismatch between residents and services.</td>
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<td>Changes sought</td>
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<tr>
<td></td>
<td>Delete the first sentence of paragraph 6.14</td>
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<tr>
<td>7</td>
<td>Why no previous Representation</td>
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<tr>
<td></td>
<td>Detailed matter not covered in the Preferred Strategy.</td>
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<tr>
<td>11</td>
<td>Why attend Examination?</td>
</tr>
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<td></td>
<td>This together with the other representations made by Scarford (Hirwaun) Ltd have implications for the development of a strategic site. The form and deliverability of retail development in Hirwaun is of critical importance to the growth of Hirwaun and the County Borough as a whole and it would be beneficial for the Inspector to consider the matter in detail at an examination.</td>
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**Soundness Tests**

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<tr>
<th>Item Question</th>
<th>CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth</th>
<th>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence</th>
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<td>16</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>17</td>
<td>Yes</td>
<td>Yes</td>
</tr>
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</table>
### ISSUE SUMMARY

The definition of Hirwaun as a “key settlement” is supported. My client further supports the recognition that Hirwaun is in an excellent strategic location and is capable of assimilating significant additional commercial development.

### REPRESENTATION TEXT

Hirwaun is identified as being a “key settlement” and as such it is appropriate that it should act as a focal point for growth in Rhondda Cynon Taf over the plan period. Hirwaun has considerable opportunity for providing a greater level and range of facilities to meet the needs of the local community and make a positive contribution to the vitality and viability of RCT as a whole.

In order for Hirwaun to become a sustainable community that meets the needs of the local community it serves, there is a need to provide a wide range of facilities and services, including commercial, leisure and community development. Providing a range of facilities will reduce the need for its residents to travel and will lead to investment being retained within Hirwaun.
### Representation Text

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
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</thead>
<tbody>
<tr>
<td>1 2</td>
<td>Support the recognition that in the Northern Strategy Area, which includes Hirwaun, there will be an emphasis on building strong, sustainable communities.</td>
</tr>
<tr>
<td>2</td>
<td>We support the recognition that sustainable growth is achieved by promoting residential and commercial development in locations which support and reinforce the roles of key settlements and by promoting the reuse of underused and derelict land and buildings.</td>
</tr>
</tbody>
</table>

### Item Question

<table>
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<tr>
<td>3 4</td>
<td>Seek changes? Any changes to be made to the Plan?</td>
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Document: Deposit Draft, p.032
Site: 562/571  Ferarri's bakery
Policy: CS 3
Map: PEX Session:

Summary: Whilst my client accepts that there is a need for new retail facilities to serve the settlement of Hirwaun and its surrounding communities, my client objects to the allocation of Land South of Hirwaun (Policy NSA 8) as a strategic site which includes the development of new retail floorspace.

Item Question

1  Issue Summary

   Whilst my client accepts that there is a need for new retail facilities to serve the settlement of Hirwaun and its surrounding communities, my client objects to the allocation of Land South of Hirwaun (Policy NSA 8) as a strategic site which includes the development of new retail floorspace.
Paragraphs 6.38 to 6.43 of the Deposit Draft LDP explains that a strategic corridor of land south of the A465 is allocated for residential, employment, retail and community development and the Council’s vision for this strategic site is the enhancement of Hirwaun as a key settlement. However the LDP goes on to explain that the site is subject to a number of constraints, which include recent coal mining activity, coal reserves, a high-pressure gas main and safety zone as well as Sites of Importance for Nature Conservation and SSSI. Furthermore the LDP explains that the proposals for the site are linked to the proposed dualling of the A465 Heads of the Valleys trunk road from Hirwaun to Abergavenny which involves a 1.4 km length of new road through part of the site. Indeed paragraph 6.43 of the LDP advises that other than the residential and business park aspects, all other development of the strategic site (i.e. retail, community, commercial and education facilities) must await implementation of the dualling of the A465 trunk road through the site and conversion of the existing southern bypass to a local road. The Welsh Assembly Government has confirmed that works to this section of the A465 trunk road is now not programmed to start until 2017 and is unlikely to be completed before 2020.

As already explained in our representations to Policy NSA 3, the 2008 Hirwaun Village Study explains how Hirwaun has accommodated a large amount of residential development in recent years in relation to its modest size but this has not been replicated in an increased provision of local services and facilities. The consequence of this has been an unsustainable level of development and a situation whereby a wide range of basic needs are not served. This, according to the report, has created a sense of community dissatisfaction with local people having to travel for a wide range of services. In terms of retail provision the report advises that this is limited and performs a solely ‘top up’ function and that it is evident that the vast majority of residents shop elsewhere for their larger, weekly shop. As for health facilities, the report explains that Hirwaun has only one primary health care facility, however, this surgery is outdated, small, in a poor condition and not to current standards. Furthermore consultations with the Local Health Board have revealed concerns over its ability to adequately meet the (current and future) medical needs of the local community.

The report goes on to explain that the starting point in the establishment of a vision for the future development of Hirwaun must therefore be a commitment to redress the imbalance in the provision of local services. This would be important in ensuring that, where possible, local residents in Hirwaun can be better served without having to travel to surrounding centres and that Hirwaun can appropriately and fully perform its role in serving the surrounding, smaller settlements. The report also notes that the local challenge is to ensure that any future population growth contributes towards the enhancement of the village rather than further undermining its strength and profile as has been the case in recent years.

It is clear from this report that there is a need to enhance existing retail and health facilities in Hirwaun to meet the needs of both existing and future residents. This is not disputed. However given that the strategic site, allocated under policy NSA 8, is unlikely to come forward for retail or health/community uses before 2020, it is considered that alternative land capable of being developed in the short term should be allocated for such uses to meet existing need. My client therefore wishes to promote the Ferarri’s Bakery site as an alternative site for mixed-use development including a foodstore (2,000 sq m net), health centre and housing (9 units).

The Ferrari’s Bakery site occupies approximately 2.1 hectares of land within the settlement boundary of Hirwaun. The brownfield site contains a number of vacant interlinked industrial buildings of differing ages, formerly used as a bakery. Surrounding uses include open Greenfield land to the west, residential to the north and east and the A465 Heads of the Valleys Road to the immediate south. The site is located approximately 350 metres to the south west of Hirwaun town centre and is easily accessible by all modes of transport including public transport. Furthermore the site has excellent access to the A465, which provides access to the nearby towns of Aberdare, Penywaun, Rhigos and Croesbychan.

A retail study has recently been undertaken by RPS (please refer to attached report), which assesses whether there is a need for additional retail floorspace in Hirwaun both in terms of quantitative and qualitative need. The RPS retail study concludes that there is a demonstrable quantitative need for both convenience and comparison goods floorspace in Hirwaun to support a new food store at the Ferrari’s Bakery site.

In terms of qualitative need, national guidance states that there may be justification for new provision where:

- It supports the objectives and strategy of an up-to-date development plan or policies in national guidance;
- It is highly accessible by walking, cycling or public transport;
- It contributes to a substantial reduction in car journeys;
- It contributes to the co-location of facilities in existing town, district, local or village centres;
- It significantly contributes to the vitality, attractiveness and viability of such a centre; or where
- It would alleviate a lack of convenience provision in a disadvantaged area.

In response to the above criteria the RPS retail study offers the following conclusions:

- The provision of a new food store at the Bakery site would provide a step-change in both the quantity and quality of food and non-food retail offer in Hirwaun. Its development would therefore strongly accord with the objectives of the emerging LDP in which Hirwaun is identified as a “Key Settlement”. Furthermore it would make significant strides in addressing the widely acknowledged deficit of local services and infrastructure, increasing the capacity of the village to be more self-sufficient and environmentally sustainable.
The former Bakery site is 'brownfield' land served by existing public transport infrastructure, and within convenient walking distance of a substantial residential catchment. Furthermore, it is well located to meet the needs of any proposed southern extension to the village.

The proposed food store would facilitate substantial reductions in car journeys. Survey based evidence confirms significant numbers of journeys are made to superstores outside of Hirwaun. The provision of a food store at the Bakery site will offer a genuine alternative closer to home, and a significant proportion of residents are likely to switch to a more conveniently located alternative.

Convenience goods shopping takes place on a more frequent basis than for comparison goods, hence it is much more important to have adequate food shopping facilities close to where people live.

The proposed development, in reducing expenditure leakage will increase the potential for linked trips to be made to Hirwaun’s town centre. At present, it is likely that additional comparison goods expenditure also leaks from the village during food shopping trips. The proposed development therefore has significantly more potential to improve rather than harm the vitality and viability of the town centre.

The presence of only one food retailer in Hirwaun (The Co-Op) severely compromises competition and choice for local residents. This is particularly the case for those residents without access to the private car who may not be able to visit stores in Aberdare or Merthyr Tydfil very easily. The former Bakery site is in a highly accessible location and would provide a considerable improvement in terms of access to wider range of products and services without closer proximity to their home.

The RPS retail study also considers the application of the sequential test to assess whether there are any sequentially preferable sites in, or on the edge of the town centre, which are capable of accommodating a food store. The report concludes that a store capable of meeting the main food shopping needs of Hirwaun residents can only be accommodated in an out-of-centre location. The focus must therefore be on the most appropriate out-of-centre site to accommodate this need, taking into account the requirements of national planning guidance, and the capability of the site to deliver the use within a reasonable timescale. Taking this into account the RPS Retail study concludes that there are only two out-of-centre sites which are capable of accommodating a new foodstore, they are the former Ferrari’s Bakery site and Land to the south of Hirwaun (proposed strategic site 5). It is considered that the Ferrari’s Bakery site is superior in all aspects to the proposed allocated Strategic Site for the following reasons:

- It is definitely brownfield rather than land that has “blended into the landscape” and may “reasonably be considered part of the natural surroundings” (PPW, Figure 2.1);
- It is capable of being developed in the short term;
- It is better linked to the existing settlement pattern of Hirwaun and therefore offers greater potential for linked trips to the town centre;
- It benefits from established public transport linkages; [ends]

The allocation of new retail floorspace for Hirwaun should be deleted from Strategic site 5 (Land south of Hirwaun) and allocated to an alternative site at the former Ferrari’s Bakery site at the Bryngelli Industrial Estate.

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### Changes sought

- The former Bakery site is 'brownfield' land served by existing public transport infrastructure, and within convenient walking distance of a substantial residential catchment. Furthermore, it is well located to meet the needs of any proposed southern extension to the village.

- The proposed food store would facilitate substantial reductions in car journeys. Survey based evidence confirms significant numbers of journeys are made to superstores outside of Hirwaun. The provision of a food store at the Bakery site will offer a genuine alternative closer to home, and a significant proportion of residents are likely to switch to a more conveniently located alternative.

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- The proposed development, in reducing expenditure leakage will increase the potential for linked trips to be made to Hirwaun’s town centre. At present, it is likely that additional comparison goods expenditure also leaks from the village during food shopping trips. The proposed development therefore has significantly more potential to improve rather than harm the vitality and viability of the town centre.

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Document: Deposit Draft, p.037  
Policy: CS 7  
Site: 562/571  
Ferari's bakery  

**Summary:**
Whilst we support the recognition that there is a need for new retail floorspace in order to reduce the leakage of retail expenditure from RCT, to strengthen the role of the retail centres in the key settlements and to meet local need in sustainable locations we object to the limited quantum and the reference under Policy CS 7 that land for the provision of local retail development is allocated under Policy NSA 17.

**Issue Summary**

1. **Item Question**
   - Representation Text
   
   Whilst we support the recognition that there is a need for new retail floorspace in order to reduce the leakage of retail expenditure from RCT, to strengthen the role of the retail centres in the key settlements and to meet local need in sustainable locations we object to the limited quantum and the reference under Policy CS 7 that land for the provision of local retail development is allocated under Policy NSA 17.
Please refer to the representations made in respect of Policies NSA 8 and NSA 17:

Paragraphs 6.38 to 6.43 of the Deposit Draft LDP explains that a strategic corridor of land south of the A465 is allocated for residential, employment, retail and community development and the Council’s vision for this strategic site is the enhancement of Hirwaun as a key settlement. However the LDP goes on to explain that the site is subject to a number of constraints, which include recent coal mining activity, coal reserves, a high-pressure gas main and safety zone as well as Sites of Importance for Nature Conservation and SSSI. Furthermore the LDP explains that the proposals for the site are linked to the proposed dualling of the A465 Heads of the Valleys trunk road from Hirwaun to Abergavenny which involves a 1.4 km length of new road through part of the site. Indeed paragraph 6.43 of the LDP advises that other than the residential and business park aspects, all other development of the strategic site (i.e. retail, community, commercial and education facilities) must await implementation of the dualling of the A465 trunk road through the site and conversion of the existing southern bypass to a local road. The Welsh Assembly Government has confirmed that works to this section of the A465 trunk road is now not programmed to start until 2017 and is unlikely to be completed before 2020.

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It is clear from this report that there is a need to enhance existing retail and health facilities in Hirwaun to meet the needs of both existing and future residents. This is not disputed. However given that the strategic site, allocated under policy NSA 8, is unlikely to come forward for retail or health/community uses before 2020, it is considered that alternative land capable of being developed in the short term should be allocated for such uses to meet existing need. My client therefore wishes to promote the Ferrari’s Bakery site as an alternative site for mixed-use development including a foodstore (2,000 sq m net), health centre and housing (9 units).

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A retail study has recently been undertaken by RPS (please refer to attached report), which assesses whether there is a need for additional retail floorspace in Hirwaun both in terms of quantitative and qualitative need. The RPS retail study concludes that there is a demonstrable quantitative need for both convenience and comparison goods floorspace in Hirwaun to support a new food store at the Ferrari’s Bakery site.

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- It supports the objectives and strategy of an up-to-date development plan or policies in national guidance;
- It is highly accessible by walking, cycling or public transport;
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- It contributes to the co-location of facilities in existing town, district, local or village centres;
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In response to the above criteria the RPS retail study offers the following conclusions:

- The provision of a new food store at the Bakery site would provide a step-change in both the quantity and quality of food and non-food retail offer in Hirwaun. Its development would therefore strongly
Why attend Examination?

C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a

C1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighboring authorities.

Policy NSA 17 changed to delete reference to Strategic Site 5 and make reference instead to new retail floorspace at the above site.

Policy NSA 17: The allocation of the former Ferrari's Bakery site at the Bryngelli Industrial Estate for a mixed use development to include a food store.

The following reasons:

- It benefits from established public transport linkages;
- It is better linked to the existing settlement pattern of Hirwaun and therefore offers greater potential for linked trips to the town centre;
- It is definitely brownfield rather than land that has "blended into the landscape" and may "reasonably be considered part of the natural surroundings" (PPW, Figure 2.1);
- It is capable of being developed in the short term;
- It is better linked to the existing settlement pattern of Hirwaun and therefore offers greater potential for linked trips to the town centre;

The proposed development, in reducing expenditure leakage will increase the potential for linked trips to be made to Hirwaun's town centre. At present, it is likely that additional comparison goods expenditure also leaks from the village during food shopping trips. The proposed development therefore has significantly more potential to protect rather than harm the vitality and viability of the town centre.

The proposed development is in a highly accessible location and would provide a considerable improvement in terms of access to a wider range of products and services without closer proximity to local residents.

Please refer to the representations made in respect of Policies NSA 8 and NSA 17. No changes are necessary to Policy CS 7 if Policy NSA 17 is changed to refer to new retail floorspace at the Ferrari's Bakery Site.

NSA 8: The allocation of the former Ferrari's Bakery site at the Bryngelli Industrial Estate for a mixed use development to include a foodstore, health centre and housing.

NSA 17: The allocation of the former Ferrari's Bakery site at the Bryngelli Industrial Estate for a mixed use development to include a 2,000 sq m (net) food store.

Policy NSA 17 changed to delete reference to Strategic Site 5 and make reference instead to new retail floorspace at the above site.

Candidate Site Ref No

571.

Why no previous Representation

Detailed matter not covered by Preferred Strategy.

Why attend Examination?

This together with the other representations made by Scarfords (Hirwaun) Ltd have implications for the development of a strategic site. The form and deliverability of retail development in Hirwaun is of critical importance to the growth of Hirwaun and the County Borough as a whole and it would be beneficial for the Inspector to consider the matter in detail at an examination.
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<th>Officer</th>
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<td>9</td>
<td>CE2 Test?</td>
<td>Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>20 9</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
<td>The Ferrari's Bakery Site is capable of being developed in the short term and therefore its redevelopment for mixed-use comprising retail, health centre and housing meets the objectives of the LDP strategy for Hirwaun.</td>
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<tr>
<td>1</td>
<td>Issue Summary</td>
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<td>My client objects to the use of gross development areas to calculate contributions.</td>
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<tr>
<td>2</td>
<td>Representation text</td>
<td></td>
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<td></td>
<td>Paragraph 7 of Welsh Office Circular 13/97 advises that planning obligations should be:</td>
<td></td>
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<td></td>
<td>(iii) directly related to the proposed development;</td>
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<td></td>
<td>(iv) fairly and reasonably related in scale and kind to the proposed development;</td>
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<td></td>
<td>This is reiterated in Planning Policy Wales at section 4.7.</td>
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<td></td>
<td>The use of gross development areas which may be larger than the application site clearly contradicts the above and accordingly is not in line with government guidance.</td>
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<tr>
<td></td>
<td>Throughout the Circular it is made clear that obligations should only be sought for improvements that are necessary as a result of the development being proposed. Development on part of a gross development area is very unlikely to necessitate the same level of contribution as development of the gross area and accordingly, such larger contributions should not be sought.</td>
<td></td>
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<tr>
<td></td>
<td>Paragraph B16 of the Circular notes that 'where LPAs attempt to go beyond this guidance, the Secretary of State [now WAG] is likely to object to their draft policies’. The wording at paragraph 5.18 should thus be removed.</td>
<td></td>
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<td></td>
<td>The policy set out at paragraph 4.7 of PPW and in Circular 13/97 is up to date and appropriate.</td>
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<tr>
<td>4</td>
<td>Changes sought</td>
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<td>The text at paragraph 5.18 should be replaced with reference to the Assembly Government’s policy at section 4.7 of PPW and/or its circular guidance within Circular 13/97.</td>
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<td>The proposed wording would respect the policy and advice set out in Planning Policy Wales and Welsh Office Circular 13/97.</td>
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Document: Deposit Draft, p.077
Policy: NSA 9
Site: 324/325 Ynyshir W. large
Amend site boun

PEX Session:

Summary:

Assessment of submitted site is flawed
### Rhondda Cynon Taf County Borough Council Local Development Plan

#### REPRESENTATION DETAIL

**Filtered to show:** (All representations)

<table>
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<tr>
<th>Rep'n No</th>
<th>Date Lodged</th>
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<th>Source Type</th>
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<th>Response</th>
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**Representation text**

Has not had regards to the wider settlement of Ynyshir and misassessed see submitted representation.

4.1 We object to the stage 1 candidate site assessment findings for the site identified as Upper Gynor Place and Cae Sirol - reduced site. The representations are listed below in relation to each objective when issue taken with the council findings.

4.2 Objective 1; Market demand is low due to the current lack of variety. Development is undertaken when opportunities arise and is currently taking place on Cae Sirol.

4.3 Objective 3; The site can be accessed from Upper Gynol Place. Further to this the settlement boundary shown on the proposals map would indicate access could be made available from the Turberville Road area. It is also possible that Section 106 agreements associated with any development could also be used to improve the adjacent highway network for the mutual benefit of residents.

4.4 Objective 4; Ynyshir was developed prior to the advent of the motor vehicle and would at that time have been a model sustainable community. It is noted that the submission site is considerably closer to services and amenities than large parts of the existing fabric of Ynyshir. The services identified are best protected by increasing likely patronage which would not occur if the current population continues to decline. There are currently few employment opportunities within Ynyshir, and unlikely to be in the immediate future, and as such access to public transport is important to meet sustainability and equality objectives. These are provided by bus services, close to the submission site and the good rail service from the adjacent settlement of Porth, the closest rail station to Rhondda Fach Valley.

4.5 Objective 6; The site is not agricultural land.

4.6 Objective 8; Planning Policy Wales (2002) specifies what constitutes brownfield land specifies, the given definition being, 'previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage of development is included' (page 24). Planning policy guidance on Housing notes that amenity land is excluded unless it has known(SIC) potential for redevelopment. The current land uses are not agricultural, being used for stables, storage and arrange(SIC) of other uses. Neither can it be truly classed as amenity land, particularly given its limited usage by few persons. The site is unsightly and has redevelopment potential. As such it is considered that the site is brownfield.

4.7 Objective 10; It is considered that the site is unsightly, due to the development and land use upon it and the development would present an opportunity to remove the eyesore.

4.8 Objective 11; The site of Nature conservation Interest can be excluded from the submission site and the removal of current uses may help in protecting and enhancing the environmental value of them.

4.9 Objective 12; Whilst parts of the site are moderately steep there are also flatter parts that could accommodate development. A development or design brief may assist in this matter.

4.10 Objective 16; There is opportunity in Ynyshir to meet this objective due to the form of the settlement. It is considered that the submission site follows the line of Upper Gynor Place and that the settlement limit is shown on the LDP will assist in providing enclosure.

4.11 The findings of the sustainability Appraisal, particularly when the core objectives of the LDP and other strategies are considered, do not bear out to the findings of objective 18.

4.12 Accordingly the council is respectfully requested to revise the suitability of the site to a good or excellent classification and allocate the site within the settlement limits of Ynyshir and allocate as an identified housing site.

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### Changes sought

**Inclusion of Site**

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### Candidate Site Ref No

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<tr>
<th>Candidate Site Ref No</th>
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### Why no previous Representation

Because the site was assessed post submission
### Representation Details

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#### Soundness Tests

13  C2 Test? Does not have regard to national policy? Yes
15  C4 Test? Toes not have regard to RCT Community Plan? Yes
17  CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

20  Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan
Inclusion of site for residential purposes or inclusion within settlement limits. Policies and proposals map amended according to representations.

#### Tick box Replies

<table>
<thead>
<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>3 4 Seek changes? Any changes to be made to the Plan?</td>
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<tr>
<td>5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit</td>
<td>Yes</td>
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<tr>
<td>7 7 Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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<td>Representation Text</td>
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<tr>
<td>The methodology and criteria used should not have led to designation of an eyesore site on settlement boundary.</td>
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<tr>
<td>5.1 We object to the inclusion of the submission site's inclusion within the above designation.</td>
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<td>5.2 It would seem that a 'regimentally' agreed method of assessment has been used to identify Special landscape Areas as opposed to the WAG recommendation that the Countryside Council for Wales LANDMAP methodology be used to identify said designations. This may cause disparities with neighbouring areas. It would seem that the assessment methodology relies heavily on 'character area' assessment and does not include considerations such as biodiversity. This could result in a different designation being recommended.</td>
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<td>5.3 Policy NSA 25 identifies what matters have been considered in making the designation and it is considered that the submission site runs contrary to the following:</td>
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<td>Prominence - the site is only prominent from upland areas and not the valley floor. These are distant views and development of the site would not be prejudice in landscape areas terms.</td>
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<td>Unspoilt - the site is neither unspoilt nor of a pre-industrial nature.</td>
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<td>Remoteness - the site is neither remote, being adjacent to the urban fabric, nor tranquil given the uses on the site.</td>
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<td>Vulnerability and sensitivity - the site is not considered sensitive, it accommodates a range of uses and has no designations other than the SLA attached to it, nor vulnerable due to the type of uses currently taking place.</td>
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<tr>
<td>Setting for special landscapes - in terms of the wider landscape of Mynydd Troed Y Rhiw this is not a significant and if part of the setting for an SLA it is by definition a lower quality and should not be included as it detracts from the main designation.</td>
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<tr>
<td>5.4 Supporting paragraph 6.99 states that 'particular consideration has been given to the protection of unspoilt valley slopes and ridges which form a visual backdrop to the settlements of the area'. The submission site is not considered unspoilt and it is better integrated within the urban fabric than the wider mountain landscape.</td>
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<td>5.5 It is noted that open valley slope immediately south of the submission site has been both excluded from the designation and placed within the settlement limits which furthers the above consideration.</td>
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<td>5.6 According the council is respectfully requested to revise the boundary of Policy NSA 25.2 so as to remove the submitted site.</td>
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<td>Amend boundary of designation NSA 25.2 to exclude submitted site.</td>
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<td>Only related to housing at the time had not sought advice.</td>
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**Item Question:** Soundness Tests

- **12** 8  C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a neighbor? **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 compatible with plans of neighboring authority? **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

Exclude site from designation NSA 25.2

**Item Question:**

- **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**
Settlement boundary should be amended provided clarity site exclusion due to site limitation.

Ynyshir requires expansion to meet sustainability objectives see representation.

6.1 We object to the above policy and its illustration on the proposals map (sheet 1). It is considered that the policy does not provide sufficient clarity in land use terms and excludes which are suitable for development.

6.2 The purpose of the settlement boundary is to set the framework for development by guiding it to appropriate locations. It should include the best appropriate sites which have a realistic likelihood of being developed to meet the strategy objectives. Regeneration is an important objective in this part of RCT and sustainability should underpin this. The submission site helps deliver these objectives both directly and indirectly.

6.3 Policy NSA 12 specifies criteria (1-4) that should be met to allow development within settlement limits and the submission site would meet these criteria. In addition to this the supporting text to Policy NSA 2, which applies to certain key settlements (although Ynyshir is not listed it is assumed that the aims would apply to this settlement also) states that the council will support proposals for amongst other issues small-scale employment and residential development that are in sustainable locations. Para 6.11.

6.4 The following criteria (5-7) of the above policy relate to development beyond settlement limits and the site could seemingly meet these also. However the supporting text to this policy, para 6.60 specifies that these criteria only apply to sites of up to 0.3 hectares. The submission site meets the physical characteristics required for the, however the site would be excluded by virtue of its size. Whilst considerations regarding brownfield development may apply it is considered that the Plan should provide greater clarity by including the submission site within the settlement boundary.

6.5 This is reinforced by the adjacent land uses which would allow for the extension of the settlement boundary from the east to include the submission site. It would not create ribbon development as it extends the depth of the settlement and can reflect the terrace adjacent to the site. Suitable boundaries exist on site and could if required be strengthened as part of any development.

6.6 Paragraph 2.7.3 of Planning for Sustainability states that 'If the Assembly Government's objectives for the more sustainable use of land and buildings and the reuse of previously developed sites are to be achieved, local authorities and other stakeholders will need to be more proactive. Where ever possible, local authorities should work with landowners to ensure that suitable sites are brought forward for development and to serve a coherent approach to renewal.' Inclusion of this site within the settlement limits will assist in meeting this objective.

6.7 Accordingly the Council is respectively requested to revise the identified settlement boundary to include this submission site.

Revise settlement boundary to include submission site.
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<td>Exclusion of potential housing site</td>
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<td>2</td>
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<td>Site is suitable for development and expansion is required for wider sustainability objectives.</td>
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<td>7.1 We object to the above policy as it is considered that the submission site should be included in the identified housing allocations.</td>
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<td>7.2 The policy identifies sites upon which 10 or more dwellings are proposed. The submitted site is capable of accommodating above ten units and it is considered that it should be identified as a non-strategic allocation.</td>
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<td>7.3 It is contended that the settlement of Ynyshir requires housing provision in order to sustain the settlement. Within additional allocations the settlement will continue to decline, becoming increasingly less sustainable, and the quality of life of the existing residents deteriorate. It is noted that there are no residential allocation within Ynyshir despite considerable public investment being made in new and improved infrastructure. The nearest residential allocations are at Pentre and Wattstown.</td>
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<td>7.4 This should not be viewed in isolation but rather within the sustainability context of the Rhondda Fach Valley. In the upper strategy area some 1600 dwellings are proposed on allocated sitsed however only 120 (7.5%) of these dwellings are within this valley, an area that holds a considerably more significant proportion of the population. It could also be argued that the 3 allocations for residential use identified in the LDP in the Rhondda Fach are less sustainable than the submission site when assessed against policy AW2.</td>
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<td>7.5 Whilst the submission site may not normally be considered as a typical housing site initially, it is held that in Ynyshir this is a good option in terms of strategy objectives. The site can be satisfactory integrated into the landscape, making good use of existing features, and helps remove eyesores. Proposed settlement boundaries and topography of the site indicate that the site could form a logical expansion of the settlement. The sustainability appraisal bears this out. Areas of environmental worth can be avoided, and possibly enhanced whilst the landscape framework would not be jeopardised.</td>
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<td>7.6 Allocated sites should have a realistic likelihood of being developed, and my client is keen to do so, on the submission site, which will help provide a choice of housing type, something that is currently lacking in this part of the Rhondda and contribute towards the councils affordable housing objectives. Further to this its development may result in wider improvements to existing infrastructure, through S.106 agreements. There would also seem the possibility, that if the site were to be development in conjunction with the area identified to the south as being within settlement limits, that further community benefits eg service facilities and open space could be provided due to the size of development. I indeed this may prove more attractive to developers.</td>
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<td>7.7 Accordingly the Council is respectfully requested to include the submitted site within Policy NSA 9 as a housing allocation.</td>
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<td>Changes sought</td>
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<td>Identify site as a residential allocation within Policy NSA 9</td>
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**Item Question**

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Document: Deposit Draft, p.052
Policy: AW 7
Site: Map
Issue: Design
PEX Session:

**Summary:**
I would like horse riders to be considered in the new development plan. I would like them to be given the same consideration when developing off road access as cyclists and walkers. The new local development plan should link with the new Rights of Way Improvement Plan which identifies a lack of provision for horse riders in the county and for the need for new provision to be developed.

**Representation Text**

```
1 2

I would like horse riders to be considered in the new development plan. I would like them to be given the same consideration when developing off road access as cyclists and walkers. The new local development plan should link with the new Rights of Way Improvement Plan which identifies a lack of provision for horse riders in the county and for the need for new provision to be developed.
```
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.sgzimo.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 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 pursing 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!!

09/06/2009
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 its 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

British Horse Society (BHS) Membership UK: 67,757
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

British Cycling (BC) Membership UK: 18,400 - 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 of our members are Cycle Speedway riders

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)

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: ?

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.

Changes sought

- To consider equestrians when developing rights of way, a joined up approach between council departments and better consultation with horse riders in RCT through groups such as Briars Bridleways and Ynysybwl Riding Club.

- Links with the RCT Rights of Way Improvement plan

- Equestrians and horse riding to be considered equally with walking and cycling as valid healthy, outdoor activities.

- The safety concerns of horse riders be taken seriously and not ignored.

- Development of long distance routes for tourism and encouraging new business.

- The consideration of appropriate materials usage when constructing new paths which are access to all, or specifically for horses.

---

Item Question | Reply | Soundness Tests
--- | --- | ---
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 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

   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
**Representation Detail**

**by:** Representation No

**Filter to show:** (All representations)

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<th>Accssn No</th>
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**Document:** Deposit Draft, p.077

**Site:** 496/505 Rhigos Road adj

**Policy:** NSA 9

**Map:**

**Issue:** Housing Allocation

**PEX Session:**

**Summary:**

**Assessment of submitted site is flawed**

**We object to the strategic site assessment findings. It is unclear on how the sustainability 'scores' are derived or what, if any weighting is given to them, e.g what constitutes an excellent score. It is with regard to the sustainability findings that objection is primarily raised as it is felt that the appraisal has systematically down scored the site. This representations will concentrate on those objectives receiving a low sustainability classification.**

'Please see supporting evidence'.

Accordingly the Council is respectfully requested to revise the suitability of the site to a good or excellent score and allocate the site for development within the LDP.

**Changes sought**

Inclusion of site

**Candidate Site Ref No**

505

**Why no previous Representation**

Because the site was assessed post submission

**Item Question**

---

1 2 Issue Summary

---

**Representation Text**

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<thead>
<tr>
<th>Item Question</th>
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<tr>
<th>Item Question</th>
<th>Tick box Replies</th>
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<td>Why no previous Representation</td>
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09/06/2009
### Representation Text

We object to the strategic site assessment findings. It is unclear on how the sustainability 'scores' are derived or what, if any weighting is given to them, e.g. what constitutes an excellent score. It is with regard to the sustainability findings that objection is primarily raised as it is felt that the appraisal has systematically down scored the site. This representations will concentrate on those objectives receiving a low sustainability classification.

'Please see supporting evidence'.

Accordingly the Council is respectfully requested to revise the suitability of the site to a good or excellent score and allocate the site for development within the LDP.

---

### Changes sought

- Inclusion of site for residential purposes or inclusion within settlement limits. Policies and proposals map amended according to representations

---

### Why no previous Representation

Because the site was assessed post submission

---

### Soundness Tests

- C2 Test? Does not have regard to national policy? Yes
- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
- Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan
  - Inclusion of site for residential purposes or inclusion within settlement limits. Policies and proposals map amended according to representations
**Item Question** | **Representation Text**
---|---
1 | Overly reliant on site
2 | Damage to areas of importance
3 | No defensible boundary

We object to the size of the allocation identified on the proposals map and on page 76 of the written document. It is considered that the plan is overly reliant on this site being developed as it delivers a high proportion of the overall requirements for housing and employment. Objection is based on the magnitude and boundaries of the site however the ethos of the proposal is supported.

It is noted that the proposed boundaries of allocation NSA 8 in part follow similar boundaries to those proposed of the submission site being namely, adopted highways, haul roads and drainage ditches. The boundary to the south of the site follows no distinguishable or defensible boundary, unlike the submission site.

Whilst allocation NSA 8 does not include large areas of workings and brownfield land it also includes areas, which are greenfield. Further to this much of the site is identified, on the constraints map, as being a Site of Importance for nature Conservation. This coincides with the development areas as well as indicative areas of open space. The site is also visually prominent. The submission site does not have these encumbrances attached to it.

It is also noted that the size of the allocation could result in facilities within development being located further distant from areas within the site than those which could be located on the submission site.

It is respectively requested that the size of allocation NSA 8 is reduced to exclude areas of, particularly ecological value with the reduction being reallocated to the submission site.
<table>
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<tr>
<th>Item</th>
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<tbody>
<tr>
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<td>Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?</td>
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<td>7 7</td>
<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
<td>No</td>
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</tbody>
</table>
**Issue Summary**

- Settlement boundary should be amended
- Provide clarity
- Site exclusion due to size limitation

**Representation Text**

We object to the above policy and its illustration on the proposals map (sheet 1). It is considered that the policy does not provide sufficient clarity in land use terms and excludes sites which are suitable for development.

Accordingly the Council is respectfully requested to revise the identified settlement boundary to include this submission site.

**Changes sought**

Revise settlement boundary to include submitted site

**Why no previous Representation**

It could be considered implicit within representation

**Why changes satisfy Soundness**

Give details why the changes you propose will ensure that the Plan include site within settlement boundary

---

**Item Question**

1. Issue Summary
   - Settlement boundary should be amended
   - Provide clarity
   - Site exclusion due to size limitation

2. Representation text
   'For the reasons set out in supporting evidence'

3. We object to the above policy and its illustration on the proposals map (sheet 1). It is considered that the policy does not provide sufficient clarity in land use terms and excludes sites which are suitable for development.

4. Accordingly the Council is respectfully requested to revise the identified settlement boundary to include this submission site.

5. Revise settlement boundary to include submitted site

6. It could be considered implicit within representation

7. Why no previous Representation

8. Why changes satisfy Soundness
   Give details why the changes you propose will ensure that the Plan include site within settlement boundary

---

**Soundness Tests**

1. C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes

2. C2 Test? Does not have regard to national policy? Yes

3. CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes

4. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

---

**Tick box Replies**

5. Site submitted as Candidate? If Rep’n is for inclusion of a new site, did you submit as a Candidate Site Yes

6. Previous Representations? Did you make any previous representations on this issue during the Cons No
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Summary:

**Issue**: Housing Allocation

**Representation Text**

'For reasons set out in supporting evidence'

We object to the above policy as it is considered that the submission site should be included in the identified housing allocations.

According (sic) the council is respectfully requested to include the submitted site within Policy NSA 9 as a housing allocation.

**Changes sought**

Identify site as a residential allocation within Policy NSA 9

**Item Question**

**Representation Text**

Exclusion of potential housing site

'For reasons set out in supporting evidence'

We object to the above policy as it is considered that the submission site should be included in the identified housing allocations.

According (sic) the council is respectfully requested to include the submitted site within Policy NSA 9 as a housing allocation.

Identify site as a residential allocation within Policy NSA 9

**Soundness Tests**

12.  C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a

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

16.  CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth

17.  CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

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

Amend policy NSA 9 and proposals map

**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

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

09/06/2009
<table>
<thead>
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<td>1 2 Issue Summary</td>
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<tr>
<td>Inclusion of site for employment purposes</td>
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<td>2 3 Representation text</td>
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<tr>
<td>'For the reasons set out in supporting evidence'</td>
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<tr>
<td>We object to the above policy as it is considered that the submission site should be included as an identified employment allocation.</td>
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<tr>
<td>Accordingly the Council is respectfully requested to include the submitted site within Policy NSA 14 as an extension to the boundary of CS 9.2</td>
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<td>Include site as an employment allocation</td>
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<td>6 6 Candidate Site Ref No</td>
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<td>9 7 Why no previous Representation</td>
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<td>Was submitted as a residential site</td>
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<tr>
<td>Amend boundary of CS 9.2 or include within Policy NSA 14</td>
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<td>7 7 Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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</table>
**Representation Text**

Inclusion of site for employment purposes

'We object to the above policy as it is considered that the submission site should be included as an identified employment allocation. Accordingly the Council is respectfully requested to include the submitted site within Policy NSA 14 as an extension to the boundary of CS 9.2

Include site as an employment allocation

Was submitted as a residential site

---

### Soundness Tests

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Why changes satisfy Soundness

Amend boundary of CS 9.2 or include within Policy NSA 14

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### Tick box Replies

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

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<td>2</td>
<td>Issue Summary</td>
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<td>It is considered that the site has not been correctly appraised as set out in the representation document.</td>
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<td>We object to the stage 1 candidate site assessment findings for the site identified as Glyndale/Pant y Brad - smaller site No 372. The representations are listed below in relation to each objective when issue is taken with the council findings. (See supporting evidence).</td>
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<td>The analysis above (see supporting evidence) and the findings of the Sustainability Appraisal, particularly when the core objectives of the LDP and other strategies are considered, do not bear out to the findings of objective 18</td>
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<tr>
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<td>Site to be classified as good</td>
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<td>Assessment conducted post submission</td>
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<td>15</td>
<td>C4 Test? Does not have regard to RCT Community Plan?</td>
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Based on sound assessment and would be more effective as set out in representation.

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| 7             | Previous Representations? Did you make any previous representations on this issue during the Cons...
| 8             | No |

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The analysis above (see supporting evidence) and the findings of the Sustainability Appraisal, particular when the core objectives of the LDP and other strategies are considered, do not bear out to the findings of objective 18. Accordingly the council is respectfully requested to revise the suitability of the site to a good classification and allocate the site as an identified housing site and/or introduce a settlement boundary for Pant y Brad to include the submission site.

Site to be classified as good

Why no previous Representation
Assessment conducted post submission

C2 Test? Does not have regard to national policy?

C4 Test? Does not have regard to RCT Community Plan?

CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Based on sound assessment and would be more effective as set out in representation

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

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

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

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Policy is too restrictive particularly with regard to its use as support for other policies.

- Policy CS4 states that the Strategy focuses opportunities for additional housing in sustainable locations as defined by policy AW2. This effectively excludes all sites outside settlement boundaries in the southern strategy area. This may run contrary to government policy in terms of brownfield sites and other suitable sites. It is considered that exemptions should apply. A criteria specifying that applications for development in the southern strategy area that are not allocated require a sustainability appraisal maybe helpful in overcoming this.

- Policy AW2 also excludes development within Special Landscape Areas. As these are whole landscape scale character area designations it would preclude the development of a number of potential sites eg rounding off or infilling. There is no flexibility within this. As the other designations within this criteria are more tangible the SLA criteria should be removed or the boundaries made more detailed.

- An exceptions criteria specifies that social housing could be acceptable. Whilst this aim maybe laudable, it likely that the residents of any such development will be greater users of services and transport than other sectors of society. It would seem that in terms of a sustainability policy then private housing is better suited. In order to meet the aims and objectives of the LDP and Community Plan, bearing in mind the large scale residential development proposed in Tonyrefail, other forms of housing including upper end should be included also.

Accordingly the Council are respectfully requested to modify policy AW2 as setout above.

Changes sought

- A criteria specifying that applications for development in the southern strategy area that are not allocated require a sustainability appraisal maybe helpful in overcoming this.
- As the other designations within this criteria are more tangible the SLA criteria should be removed or the boundaries made more detailed.
- In order to meet the aims and objectives of the LDP and Community Plan, bearing in mind the large scale residential development proposed in Tonyrefail, other forms of housing including upper end should be included also.

Why no previous Representation

Was not considered in detail at the time.

Soundness Tests

- C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a
- C2 Test? Does not have regard to national policy?
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<td>Toes not have regard to RCT Community Plan?</td>
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<td>Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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<td>Will provide clarity and flexibility as setout in the representation</td>
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**Item Question**

**Tick box Replies**

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<td>Yes</td>
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<td>Previous Representations? Did you make any previous representations on this issue during the Cons?</td>
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### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

- **Filtered to show:** (All representations)

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- **Document:** Deposit Draft, p.114
- **Site:** 828/SSA 23.6
- **Policy:** SSA 23
- **Map:** Mynydd y Glyn & Nant Muchudd Basin
- **Issue:** Environment

**Summary:**

1. **Issue Summary**
   - The inclusion of the site within an SLA
2. **Representation text**
   - It is considered that the site is not of an SLA standard however its designation prevents changes to it as setout in the representation
3. **Changes sought**
   - Amend boundary of the SLA
4. **Candidate Site Ref No**
   - 372
5. **Why no previous Representation**
   - Constrictive nature of policy was not considered at the time

**Soundness Tests**

13. **C2 Test? Does not have regard to national policy?**
    - Yes
15. **C4 Test? Toes not have regard to RCT Community Plan?**
    - Yes
16. **CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth**
    - Yes
17. **CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?**
    - Yes
19. **CE4 Test? Not flexible to deal with changing circumstances?**
    - Yes
20. **Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan would better fit with national and local policies whilst meeting the criteria setout in the LDP**

**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**
   - Yes
7. **Previous Representations? Did you make any previous representations on this issue during the Cons**
   - No
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Document: Deposit Draft, p. 108  
Site: 371/372 Glyndale, Pant y Brad  
Settlement Boundary  
Policy: SSA 13  
Map:  
Issue: Settlement Boundary  
PEX Session:  

Summary: 

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<tr>
<td>2</td>
<td>Omission of settlements which should have a settlement limit and a rewording of policy. See representation</td>
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<td>4</td>
<td>Changes sought</td>
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<td>Inclusion of site within settlement boundary</td>
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Candidate Site Ref No: 372  

Why no previous Representation:  
Implicit in representation to allocate for housing  

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<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan will provide greater clarity and consistency (sic). See representation</td>
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Document: Deposit Draft, p. 106  
Map: Policy SSA 10  
Site: 371/372 Glyndale, Pant y Brad  
New Site: PEX Session:  
Summary:  

**Item Question** | **Representation Text** |
--- | --- |
1 2 | Issue Summary  
Inclusion of site for residential purposes |
3 4 | Representation text  
The site should be allocated for residential development. See representation |
5 6 | Changes sought  
Inclusion of site within Policy SSA 10 |
8 9 | Candidate Site Ref No  
372 |

**Item Question** | **Soundness Tests** |
--- | --- |
14 15 | C3 Test? Does not have regard to Wales Spatial Plan?  
Yes |
17 18 | CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?  
Yes |
19 20 | CE4 Test? Not flexible to deal with changing circumstances?  
Yes |

**Item Question** | **Reply** |
--- | --- |
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 |

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Document: Deposit Draft, p.110
Policy: SSA 16
Site: 

**Summary:**
Support for Policy SSA16 - The Retail Hierarchy

Policy SSA 16 – The Retail Hierarchy
RREEF and SWIP welcome 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.

**Item Question**
3 4 Seek changes? Any changes to be made to the Plan? No
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Document: Deposit Draft, p.100
Policy: SSA 8
Map: Site:

Summary:
Objection to SSA8 - Mwyndy / Talbot Green Area

Item Question

Representation Text

1 2 Issue Summary

Objection to SSA8 - Mwyndy / Talbot Green Area
Policy SSA 8 - Mwyndy / Talbot Green Area

RREEF and SWIP OBJECTS to the proposed allocation of Mwyndy / Talbot Green Area under Policy SSA 8 for development that includes 23,200 sq m of retail floorspace.

As the owner and landlord of Talbot Green Retail Park, RREEF and SWIP maintain a substantial land ownership within the Talbot Green town centre. The existing stores on the Park provide an anchor for retail expenditure in Talbot Green and their success, alongside that of the remainder of the retail facilities in Talbot Green town centre, creates an area 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 area, 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.

The justification for such a significant development at Paragraph 6.139 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.

RREEF and SWIP 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 principles of the development as outlined above, RREEF and SWIP have also asked their consultants to examine the constraints of the site itself. RREEF and SWIP's comments in respect of highways are summarised below and will be expanded upon in evidence to the LDP Inquiry should this proposed allocation be continued.

Highways

RREEF and SWIP's highways consultant assessed the highways network around the proposed development site in March 2009 (assessment appended for ease of reference, ref: 0903-50/REP/01). At paragraph 2.14 of the assessment, it is noted that Policy SSA 8 fails to meet the criteria set out in Technical Advice Note 18 ("TAN18") in that "the site is not located in a city, town or district centre and is not situated near a public transport interchange". Public transport provision for the proposed allocation site is "not considered to be of sufficient frequency and quality to be providing 'sustainable modes to the local and wider community' for retail development such as that proposed." (Para. 2.8)

Furthermore, RREEF and SWIP's consultants note that traffic problems already exist along the A473 and Cowbridge Road, particularly at the roundabout junction between the A473 and the A4119, to the east of the proposal site. In spite of the proposed plans to dual the A473, RREEF and SWIP's consultants contend that funding constraints associated with the SEWTA Regional Transport Plan are such that any improvement to the A473 is unlikely to take place during the Plan period. 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.

It is unfortunate that while a detailed study of the highways network in the vicinity of this site was completed by Hyder Consulting in 2007 for the LPA, this has not yet been made available for examination by interested parties.

RREEF and SWIP therefore request that this allocation be deleted.
### Rhondda Cynon Taf County Borough Council Local Development Plan

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**Item Question**: Why attend Examination?

**Reply**: In order to present evidence on behalf of our client.

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**Item Question**: CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

---

**Item Question**: Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan

**Reply**: RREEF and SWIP consider the reasons set out above that the allocation of this site for development such as proposed and specifically the quantum of retail proposed is inconsistent with national guidance and raises serious concerns with regard to the future health of Talbot Green town centre and highways.

RREEF and SWIP therefore request that this allocation be deleted.

---

**Item Question**: Seek changes? Any changes to be made to the Plan?

**Reply**: Yes

---

**Item Question**: Previous Representations? Did you make any previous representations on this issue during the Cons

**Reply**: Yes
**Item Question** | **Representation Text**
---|---
1 2 | Issue Summary
   | Objection to Policy CS 7 - Retail Developments
2 3 | Representation text
   | Paragraph 4.62 - Key Economic Trends
   | RREEF and SWIP OBJECT 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 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 in order to make reasonable assumptions on retail trading patterns, an up-to-date assessment drawing upon current data is essential.
**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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<td>Policy SSA 3 – Development in the Principal Town of Llantrisant/Talbot Green</td>
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<td>RREEF and SWIP 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 &quot;managed form of growth.&quot; (Para. 4.7)</td>
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Document: Deposit Draft, p.031  
Policy: CS 2  
Map:  
Issue: Strategy Areas  

**Summary:**  

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RREEF and SWIP 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.

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Document: Deposit Draft, p.037
Policy: CS 7
Map: Site:
Summary:

Item Question

1 2 Issue Summary

Objection to Policy CS 7.

09/06/2009
RREEF and SWIP OBJECT to the allocation of 33,500 sq m retail floorspace development at Policy CS7, for a number of reasons. 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 RREEF and SWIP’s view, flawed insofar as it is based upon historic survey and expenditure data.

RREEF and SWIP'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. RREEF and SWIP consider 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.

Moreover, RREEF and SWIP do 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.

Therefore, RREEF and SWIP consider that this strategy should be reviewed and a distribution of future retail development identified that is more equitable.

RREEF and SWIP also OBJECT to the allocation of 23,200 sq m of retail floorspace at Mwyndy/Talbot Green. Talbot Green is a thriving town centre and its continued vitality and viability is supported by national guidance in MIPPS 02/2005, whilst Talbot Green Retail Park draws a significant level of expenditure to the defined centre. Any impact upon the retailers which inhabit their ability to trade would most certainly harm the vitality and viability of both that Park and the centre as a whole.

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.

Therefore, this allocation is in direct conflict with national guidance on retailing in MIPPS 02/2005 on impact grounds alone.

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,
RREEF and SWIP also OBJECT to the allocation of this site for retail for more detailed site specific reasons. These objections are set out in representations to Policy SSA8.

RREEF and SWIP seek 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.

In order to present evidence on behalf of our client.

RREEF and SWIP seek 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.

### Item Question

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# Rhondda Cynon Taf County Borough Council Local Development Plan

## Representation Detail

Filtered to show: (All representations)

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**Document:** Deposit Draft, p.26, para.4.11

**Map:**

**Policy:**

**Site:**

**Issue:** Core Strategy

### Summary:

**Item Question**

1 2 Issue Summary

No Principal Town has been designated for the Rhondda

2 3 Representation text

The absence of a Principal Town in the Rhondda will exacerbate the decline of the two valleys. Priority will be given to the designated Principal Towns elsewhere, and funding, resources and effort will be concentrated on those centres. The lack of a Principal Town will be a real and psychological blow to the Rhondda and its inhabitants. It will lead to greater deprivation, dormitory towns and reduced community cohesion – all contrary to the espoused aims of the plan as outlined on p.22-23 and elsewhere.

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 made aware of the consultation.

### Changes sought

**Item Question**

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

Designating a Principal Town for the Rhondda will ensure more even development throughout Rhondda Cynon Taf. The absence of Principal Town status will relegate a significant section of the authority to secondary status.

### Previous Representations

**Item Question**

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
**Issue Summary**

Representation made in respect of proposed Sand and Gravel Resources and Green Wedge designations and SINC allocation on land shown as ‘Area 2’ on accompanying site location plan. It is noted that the SINC designation only applies to part of the site.

Please refer to the attached letter prepared by Parsons Brinckerhoff, dated 26 March 2009.

**Representation text**

The site has been allocated in Policy AW 14 of the LPD (sic) (“Land South of Tylegarw, Pontyclun”) as part of an area that shall be safeguarded from development which would sterilise or hinder the sand and gravel deposits contained in the land.

A buffer zone of 100m safeguards the boundaries of the resource from land uses which may sterilise or hinder the extraction of the deposit.

An objection is raised to this designation for the following reasons:

- The boundary of the designation is too widespread and it is not appropriate to safeguard this site as the evidence base to establish the quality and quantity of the mineral deposit and environmental constraints have not been robustly established. Minerals Technical Advice Note 1-Aggregates stipulates that "safeguarding does not indicate an acceptance of working, but that the location and quality of the mineral is known and the environmental constraints associated with extraction have been considered". Mineral deposits should therefore only be safeguarded from potentially sterilising development, where there is a realistic probability that the mineral protected is of a sufficient quality and quantity to be vaibly worked.

- The viability of working the deposit in this location is restricted by access constraints and the proximity of the land to sensitive receptors. Area 2 lies within 100m of the defined settlement boundary, which is contrary to Policy AW 15 - Community Amenity Protection Buffer Zones.

**Changes sought**

Recommended change to LDP

The boundary of the designation should be redrawn to omit Area 2 as the extent and viability of working the mineral resource, now and in the future, is limited.

It should be noted that there is no information as to Council’s approach to monitoring and reviewing those areas proposed to be safeguarded under AW 14 because of their potential mineral reserve.

**Why no previous Representation**

I attended meetings with RCTCBC in 2008 in relation to development of the site (refer to Mr Jim Bailey). Also delays due to the Environment Agency flood modelling not being available has delayed an application for development and at no time during discussions with the Authority was there any mention of our land being removed from the settlement boundary.

**Why attend Examination?**

To express views that may not necessarily be appreciated in consideration of a written submission.
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Please refer to the attached letter prepared by Parsons Brinckerhoff and dated 26 March 2009 for more detailed explanation

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Representations made in respect of proposed Sand and Gravel Resources and Green Wedge designations and SINC allocation on land shown as 'Area 2' on accompanying site location plan. It is noted that the SINC designation only applies to part of the site.

Please refer to the attached letter prepared by Parsons Brinckerhoff, dated 26 March 2009 for more detailed explanation.

### Representation Text

The site has been allocated as a SINC in Appendix 1 of the LDP (SINC 84: Ty-Draw - Pontyclun Floodmeadows). The extent of the allocation is indicated on the LDP constraints map. It is noted that the SINC only affects part of Area 2, but all elements of the SINC have regardless been considered in this representation.

An extended phase 1 walkover survey was conducted by Soltys Brewster on the 24th March 2009 to inform a detailed analysis of the proposed SINC allocation. The "Analysis of Citation of Ty-Draw (Pontyclun floodmeadows) as a Site of Important Nature Conservation (SINC)" accompanies this representation. The walkover survey is also provided as an appendix to the SINC analysis report, the key findings of which are outlined below:

- **H3 - Scrub** - there is no evidence of substantial areas of scrub habitat
- **H4, H7 & H8 - Grasslands** - there is no evidence of these grasslands on site under the current management regime and the potential for the re-establishment of the habitat has not been determined
- **H11 - Ferns, Reedbeds and Swamps** - there is no evidence of these habitats on site
- **S1 - Mammals** - No recent surveys appear to have been conducted by the Authority, and in order to meet the citation criteria these are considered necessary
- **S6 - Invertebrates** - No surveys appear to have been conducted and in order to meet the citation criteria these are considered necessary

### Changes sought

Recommended change to LDP

It is considered that further survey work is required to provide a robust evidence base for the SINC allocation. In the absence of this evidence Area 1 should be omitted from the SINC.

### Why no previous Representation

I attended meetings with RCTCBC in 2008 in relation to development of the site (refer to Mr Jim Bailey). Also delays due to the Environment Agency flood modelling not being available has delayed an application for development and at no time during discussions with the Authority was there any mention of our land being removed from the settlement boundary.

### Why attend Examination?

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Proposed changes will ensure an adequately robust evidence base is in place before determining whether or not identified designations should be imposed on the land.

Please refer to the attached letter prepared by Parsons Brinckerhoff and dated 26 March 2009 for more detailed explanation.

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**Document:** Deposit Draft, p.113  
**Map:** Policy: SSA 22  
**Site:**  
**Summary:**  
**Issue:** Environment  

**PEX Session:**  
**Item Question**  
**Representation Text**

1. **Issue Summary**  
   Representation made in respect of proposed Sand and Gravel Resources and Green Wedge designations and SINC allocation on land shown as ‘Area 2’ on accompanying site location plan. It is noted that the SINC designation only applies to part of the site.
   Please refer to the attached letter prepared by Parsons Brinckerhoff, dated 26 March 2009 and more detailed explanation.

2. **Representation text**
   The site has been allocated in Policy SSA 22 of the LDP (Land between Llanharan, Lanharry and Pontyclun) as a Green Wedge, in order to prevent coalescence between and within settlements, protect vulnerable and undeveloped land and urban form.
   An objection is raised to this designation for the following reasons:
   - The Welsh Assembly Government sets out guidance for the use of green wedges in section 2.6 of Planning Policy Wales (March 2002) - Managing urban form by means of Green Belts and green wedges. In particular the guidance states:
     "2.6.12 In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries".
   - The evidence base for the proposed designation of Area 1 is considered to be insufficiently robust to demonstrate that it is necessary to fulfil the purpose of the policy. Notably, the Green Wedge Topic Paper (August 2008) states that field assessment was undertaken to define the boundaries and characteristics of each wedge. With regard to landscape characteristics demonstrated within the "Land between Llanharan, Lanharry and Pontyclun" designation, the topic paper concludes, "The rural character of the green wedge creates a very clear divide between the built settlements of Llanharan and Lanharry". Area 2 cannot be said to fall within the land separating the two named settlements, and as such there does not appear to be a robust justification for including Area 2 within the designation on this basis.
   - One purpose of a green wedge identified by Council is to "protect vulnerable undeveloped land". This purpose suggests application of green wedges as a mechanism to resist development pressure on the periphery of established settlements generally. It does not give regard to the objectives for local designation of green wedges outlined by WAG in Section 2.6 of Planning Policy Wales, to manage urban form to safeguard countryside, agriculture, forestry, wildlife and recreation interests. There is nothing in the evidence base to indicate that Area 2 demonstrates any of these characteristics. To resist development pressure is not, alone, considered adequate justification for the designation.

4. **Changes sought**
   The boundary of the designation should be redrawn to omit Area 2 as the evidence base for its inclusion is not sufficiently robust.

9. **Why no previous Representation**
   I attended meetings with RCTCBC in 2008 in relation to development of the site (refer to Mr Jim Bailey). Also delays due to the Environment Agency flood modelling not being available has delayed an application for development and at no time during discussions with the Authority was there any mention of our land being removed from the settlement boundary.

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Representation made in respect of proposed Sand and Gravel Resources and Green Wedge designations and SINC allocation on land shown as ‘Area 1’ on accompanying site location plan.

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### Representation text

The site has been allocated in Policy AW 14 of the LPD (sic) ("Land South of Tylegarw, Pontyclun") as part of an area that shall be safeguarded from development which would sterilise or hinder the sand and gravel deposits contained in the land.

A buffer zone of 100m safeguards the boundaries of the resource from land uses which may sterilise or hinder the extraction of the deposit.

An objection is raised to this designation for the following reasons:

- The boundary of the designation is too widespread and it is not appropriate to safeguard this site as the evidence base to establish the quality and quantity of the mineral deposit and environmental constraints have not been robustly established. Part of the site has historically been subject to unauthorised mineral extraction and filled with inert waste. Minerals Technical Advice Note 1—Aggregates stipulates that "safeguarding does not indicate an acceptance of working, but that the location and quality of the mineral is known and the environmental constraints associated with extraction have been considered". Mineral deposits should therefore only be safeguarded from potentially sterilising development, where, it is proven that the mineral protected is of a sufficient quality and quantity to be viably worked.

- The viability of working the deposit in this location is restricted by access constraints and the proximity of the land to sensitive receptors. Area 1 lies within 100m of the defined settlement boundary, which is contrary to Policy AW 15—Community Amenity Protection Buffer Zones.

### Changes sought

Recommended change to LDP

The boundary of the designation should be redrawn to omit Area 1 as the extent and viability of working the mineral resource, now and in the future, is not proven and limited.

It should be noted that there is no information as to Council’s approach to monitoring and reviewing those areas proposed to be safeguarded under AW 14 because of their potential mineral reserve.

### Why no previous Representation

I attended meetings with RCTCBC in 2008 in relation to development of the site (refer to Mr Jim Bailey). Also delays due to the Environment Agency flood modelling not being available has delayed an application for development and at no time during discussions with the Authority was there any mention of our land being removed from the settlement boundary.

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### Issue Summary

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### Representation Text

The site has been allocated as a SINC in Appendix 1 of the LDP (SINC 84: Ty-Draw - Pontyclun Floodmeadows). The extent of the allocation is indicated on the LDP constraints map.

An extended phase 1 walkover survey was conducted by Soltys Brewster on the 24th March 2009 to inform a detailed analysis of the proposed SINC allocation. The "Analysis of Citation of Ty-Draw (Pontyclun floodmeadows) as a Site of Important Nature Conservation (SINC)" accompanies this representation. The walkover survey is also provided as an appendix to the SINC analysis report, the key findings of which are outlined below:

- **H3** - Scrub - there is no evidence of substantial areas of scrub habitat
- **H4, H7 & H8** - Grasslands - there is no evidence of these grasslands on site under the current management regime and the potential for the re-establishment of the habitat has not been determined
- **H11** - Ferns, Reedbeds and Swamps - there is no evidence of these habitats on site
- **S1** - Mammals - No recent surveys appear to have been conducted by the Authority, and in order to meet the citation criteria these are considered necessary
- **S6** - Invertebrates - No surveys appear to have been conducted and in order to meet the citation criteria these are considered necessary

### Changes sought

Recommended change to LDP

It is considered that further survey work is required to provide a robust evidence base for the SINC allocation. In the absence of this evidence Area 1 should be omitted from the SINC allocation.
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**Why changes satisfy Soundness**

Give details why the changes you propose will ensure that the Plan proposed changes will ensure an adequately robust evidence base is in place before determining whether or not identified designations should be imposed on the land.

Please refer to the attached letter prepared by Parsons Brinckerhoff and dated 26 March 2009 for more detailed explanation.

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Document: Deposit Draft, p.113
Policy: SSA 22
Map: Policy: SSA 22
Site: 

Summary:

Issue: Environment

Representation Text

1. Representation made in respect of proposed Sand and Gravel Resources and Green Wedge designations and SINC allocation on land shown as ‘Area 1’ on accompanying site location plan.

   Please refer to the attached letter prepared by Parsons Brinckerhoff and dated 26 March 2009 for more detailed explanation.

2. The site has been allocated in Policy SSA 22 of the LDP (Land between Llanharan, Lanharry and Pontyclun) as a Green Wedge, in order to prevent coalescence between and within settlements, protect vulnerable and undeveloped land and urban form.

   An objection is raised to this designation for the following reasons:

   - The Welsh Assembly Government sets out guidance for the use of green wedges in section 2.6 of Planning Policy Wales (March 2002) - Managing urban form by means of Green Belts and green wedges. In particular the guidance states:
     "2.6.12 In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries".

   The evidence base for the proposed designation of Area 1 is considered to be insufficiently robust to demonstrate that it is necessary to fulfil the purpose of the policy. Notably, the Green Wedge Topic Paper (August 2008) states that field assessment was undertaken to define the boundaries and characteristics of each wedge. With regard to landscape characteristics demonstrated within the "Land between Llanharan, Lanharry and Pontyclun" designation, the topic paper concludes; "The rural character of the green wedge creates a very clear divide between the built settlements of Llanharan and Llanharry". Area 1 cannot be said to fall within the land separating the two named settlements, and as such there does not appear to be a robust justification for including Area 1 within the designation on this basis.

   One purpose of a green wedge identified by Council is to "protect vulnerable undeveloped land". This purpose suggests application of green wedges as a mechanism to resist development pressure on the periphery of established settlements generally. It does not give regard to the objectives for local designation of green wedges outlined by WAG in Section 2.6 of Planning Policy Wales, to manage urban form to safeguard countryside, agriculture, forestry, wildlife and recreation interests. There is nothing in the evidence base to indicate that Area 1 demonstrates any of these characteristics. To resist development pressure is not, alone, considered adequate justification for the designation.

4. Changes sought

   Recommended change to LDP

   The boundary of the designation should be redrawn to omit Area 1 as the evidence base for its inclusion is not sufficiently robust.

9. Why no previous Representation

   I attended meetings with RCTCBC in 2008 in relation to development of the site (refer to Mr Jim Bailey). Also delays due to the Environment Agency flood modelling not being available has delayed an application for development and at no time during discussions with the Authority was there any mention of our land being removed from the settlement boundary.

21. Why attend Examination?

   To express views that may not necessarily be appreciated in consideration of a written submission.
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<td>CE3 Test? No clear mechanisms for implementation and monitoring?</td>
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<td>19</td>
<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
<td>Yes</td>
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**Soundness Tests**

Proposed changes will ensure an adequately robust evidence base is in place before determining whether or not identified designations should be imposed on the land.

Please refer to the attached letter prepared by Parsons Brinckerhoff and dated 26 March 2009 for more detailed explanation.

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**Tick box Replies**
### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representation Detail**

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman  
**Delete Site**  
**PEX Session:**

**Summary:**

**Issue:** Housing Allocation

**Item Question**  
**Representation Text**

1. I object to the housing allocation policy in the plan.

2. 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. 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. Why no previous Representation

I was not aware at the time of the proposed plan for this land.

17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

Yes

20. 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.

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 Site?

No

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

I object to the housing allocation policy in the plan.

### 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.

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I was not aware at the time of the proposed plan for this land.

### CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

Yes

### Why changes satisfy Soundness

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.

### Seek changes? Any changes to be made to the Plan?

Yes

### Site submitted as Candidate? If Rep’n is for inclusion of a new site, did you submit as a Candidate Site?

No

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

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Document: Deposit Draft, p.077
Policy: NSA 9
Site: 660/NSA 9.10 Godreaman Street, Godreaman
Delete Site
PEX Session:

**Policy:** NSA 9
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman

**Policy:** NSA 9
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman

**Summary:**

**Issue:** Housing Allocation

**Representations:**

1. **Issue Summary**
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4. **Why no previous Representation**
   - I was not aware at the time of the proposed plan for this land.

5. **Soundness Tests**
   - CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

6. **Tick box Replies**
   - Seek changes? Any changes to be made to the Plan? Yes
   - Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? No

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

---

**Note:**

- 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.
**Issue Summary**

I object to the housing allocation policy in the plan. The main Aman Swareg(sic) drain already overflow in my field and flows into the river Aman during heavy rain.

**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.

**Changes sought**

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**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**Soundness Tests**

- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
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**Tick box Replies**

- Seek changes? Any changes to be made to the Plan? Yes
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**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:**

**Issue:** Housing Allocation

1. **Issue Summary**  
   I object to the housing allocation policy in the plan.

2. **Representation Text**  
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4. **Why no previous Representation**  
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**Soundness Tests**

17. **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**  
   Yes

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**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 Site?**  
   No

7. **Previous Representations? Did you make any previous representations on this issue during the Cons?**  
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Document: Deposit Draft, p.077  
Site: 660/NSA 9.10  
Godreaman Street, Godreaman  
Delete Site  
Policy: NSA 9  
Map:  
Issue: Affordable Housing

**Summary:**

I object to the housing allocation policy in the plan.

**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.

**Why no previous Representation:**

I was not aware at the time of the proposed plan for this land.

**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  

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**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?  

No

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

No
### Issue: Housing Allocation

**Item Question**

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   - I object to the housing allocation policy in the plan.

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**Representation Text**

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**Tick Box Replies**

| **3** Seek changes? Any changes to be made to the Plan? | Yes |

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Document: Deposit Draft, p.077
Policy: NSA 9
Map: Policy: NSA 9
Site: 660/NSA 9.10 Godreaman Street, Godreaman
Delete Site

Summary:

Issue: Housing Allocation

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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman  
**Delete Site**

**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation

**PEX Session:**

**Item Question**

**1**  
Issue Summary

I object to the housing allocation policy in the plan.

**2**

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.

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CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

Yes

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

Yes

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Site submitted as Candidate?

No

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Document: Deposit Draft, p.077
Policy: NSA 9
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09/06/2009
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## Rhondda Cynon Taf County Borough Council Local Development Plan

### REPRESENTATION DETAIL

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10  
**Godreaman Street, Godreaman**  
**Delete Site**  
**PEX Session:**

**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation

### Item Question  
**Representation Text**

1. **Issue Summary**
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### Item Question  
**Reply**

5. **Soundness Tests**
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6. **Tick box Replies**
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Policy: NSA 9
Site: 660//NSA 9.10 Godreaman Street, Godreaman
Delete Site PEX Session:

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Issue: Housing Allocation

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**Policy:** NSA 9

**Summary:**

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#### Document: Deposit Draft, p.077

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#### Summary:

**Issue:** Housing Allocation

**PEX Session:**

1. **Issue Summary**
   
   I object to the housing allocation policy in the plan.

2. **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.

3. **Changes sought**
   
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4. **Why no previous Representation**
   
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5. **Soundness Tests**
   
   **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?** Yes

6. **Why changes satisfy Soundness**
   
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7. **Tick box Replies**

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

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09/06/2009 Page 4385 of 4851
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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10, Godreaman Street, Godreaman  
**Delete Site**  
**Policy:** NSA 9  
**Map:**  
**Issue:** Housing Allocation  
**PEX Session:**  

**Summary:**

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**Previous Representations?** Did you make any previous representations on this issue during the Cons?  
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### REPRESENTATION DETAIL

**by:** Representation No

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.077
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman
**Delete Site**

**PEX Session:**

**Summary:**

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**Site:** 660/NSA 9.10  
**Godreaman Street, Godreaman**  
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**PEX Session:**

**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation

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### Rhondda Cynon Taf County Borough Council Local Development Plan

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**Document:** Deposit Draft, p.077  
**Policy:** NSA 9  
**Site:** 660/NSA 9.10  
**Godreaman Street, Godreaman**  
**Delete Site**  

**PEX Session:**

**Map:**

**Site:** NSA 9.10  
**Godreaman Street, Godreaman**

**Summary:**

**Issue:** Housing Allocation

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09/06/2009  
Page 4396 of 4851
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**Rep'n No**: 3355.D1  
**Document**: Deposit Draft, p.077  
**Site**: 660/NSA 9.10, Godreaman Street, Godreaman  
**Map**: Map: NSA 9  
**Policy**: NSA 9  
**Delete Site**: PEX Session:  
**Site submitted as Candidate?** Yes  
**Previous Representations?** Yes  
**Late?** No  
**Source Type**: O  
**Mode Status**: W  
**Modified**: M  
**Petition of SA/SEA**: Yes  
**Repr Council Officer**:  
**Recommendation**:  
**Response**:  

**Reporter**

**Representation No**: 3355.D1  
**Accession No**: OW M  
**Lodged Date**: 09/06/2009  

**Summary**

**Issue**: Housing Allocation  
**PEX Session**: Item Question

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Document: Deposit Draft, p.077
Policy: NSA 9
Site: 660/NSA 9.10 Godreaman Street, Godreaman
Delete Site
PEX Session:

Map: Site: 660/NSA 9.10 Godreaman Street, Godreaman

Summary:

Issue: Affordable Housing

## Item Question

### 1 2

I object to the housing allocation policy in the plan.

### 2 3

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| Previous Representations? Did you make any previous representations on this issue |
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| No                                                                              |
**Rep'n No** | **Accssn No** | **Date Lodged** | **Late?** | **Source Type** | **Mode Status** | **Modified** | **Petition of** | **TREAT in parts** | **EVIDENCE** | **NO FRTHR EVID.** | **Repr Council** | **Officer** | **Recommendation** | **Response**
---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---
3359.D1 | O W M | | | | | | | | | | | | | | |

**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:**

I object to the housing allocation policy in the plan.

**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.

**Changes sought**

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**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**Soundness Tests**

**Item Question**  **Reply**

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.

**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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**Policy:** NSA 9  
**Item Question:** Representation Text

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**Document:** Deposit Draft, p.077  
**Site:** 660//NSA 9.10  
**Issue:** Housing Allocation  
**Map:** Godreaman Street, Godreaman  
**Delete Site:** PEX Session:

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**Issue Summary**

1. I object to the housing allocation policy in the plan.

2. 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.

3. Changes sought

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4. Why no previous Representation

   - I was not aware at the time of the proposed plan for this land.

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**Soundness Tests**

17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

20. Why changes satisfy Soundness

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**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 Site? No

7. Previous Representations? Did you make any previous representations on this issue during the Cons? No
3362.D1

Document: Deposit Draft, p.077
Policy: NSA 9
Site: 660//NSA 9.10 Godreaman Street, Godreaman
Delete Site
PEX Session:

Summary:
Issue: Housing Allocation

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**Site:** 660//NSA 9.10 Godreaman Street, Godreaman

**Delete Site**

**PEX Session:**

**Policy:** NSA 9

**Map:** Site: 660//NSA 9.10 Godreaman Street, Godreaman

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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman  
**Delete Site:** PEX Session: NSA 9  
**Reported Policy:** NSA 9.10

**Summary:**

**Issue:** Housing Allocation

1. **Issue Summary**
   - I object to the housing allocation policy in the plan.

2. **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. **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. **Why No Previous Representation**
   - I was not aware at the time of the proposed plan for this land.

17. **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**
   - Yes

20. **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.

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 Site?**
   - No

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

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Document: Deposit Draft, p.077
Policy: NSA 9
Map: Policy: NSA 9
Site: 660/NSA 9.10 Godreaman Street, Godreaman
Delete Site

Summary:

**Issue Summary**

I object to the housing allocation policy in the plan.

**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.

**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.

**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**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.

**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

**Document:** Deposit Draft, p. 106  
**Site:** 685//SSA 10.7  
**Map:** Gwern Heulog, Coed Ely  
**Delete Site:** PEX Session:

**Policy:** SSA 10  
**Map:** Issue: Housing Allocation

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**Summary:**

**Issue Summary**

I object to the proposed extension or any new development to The Meadows/Gwern Heulog Sites.

**Representation Text**

The development is currently oversubscribed in terms of all services, Welsh Water Stage 3 (see Appendix 3) Assessment reiterates this. Schools, Doctor's, dentist also oversubscribed. Beggars belief (sic) that proposals have reached this stage. See letter attached from Councillor. (Appendix 4).

**Changes sought**

Withdrawal of Candidate Site 403 from the plan

**Why no previous Representation**

This was not known in this community until Jan. 09m when developer/council posted up planning for the site. Although Council has evidence on its website that adverts were placed in Library's (sic), Local Paper etc. THERE WAS NO COMMUNITY INVOLVEMENT (sic). NO INDIVIDUAL LETTERS WERE SENT OUT TO HOUSEHOLDS.

**Why attend Examination?**

To represent the residents who have expressed their concerns.

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<tr>
<td>10 P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc</td>
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</table>
**Representative Detail**

**Document:** Deposit Draft, p.106

**Policy:** SSA 10

**Map:** Site: 685/SSA 10.7 Gwern Heulog, Coed Ely

**Site:**

**Map:** Site: 685/SSA 10.7 Gwern Heulog, Coed Ely

**Summary:**

**Issue:** Housing Allocation

**Discrepancy between whether access for site is through Tylcha Fach Level or through Gwern Heulog & The Meadows.**

**Representation Text:**

The junction of Gwern Heulog & Tylcha Fach [See Appendix 4] is now extremely dangerous. The steep Hill and curves on the Access has Already Resulted in Accidents - 1 being Head-on. An additional 200 + vehicles using this will eventually end in fatality.

**Changes sought:**

Withdrawal of candidate site 403

**Why no previous Representation:**

Only found out by accident in June 2008 The LDP existed - NO community involvement (sic)

See Attached Letter - Appendix 1.

**Why attend Examination?**

I wish to Bring to the Attention of the Inspector, in more detail, the anomalies And inaccuracies of Additional parts of the L.D.P. I am obliged to represent the people on the Petition.

**Soundness Tests**

10.9 C1 Test? Does not have regard to other relevant plans, policies and strategies realting to the area or a

17.8 CE2 Test? Not realistic and appropriately not founded on robust and credible evidence?

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

These are covered in my letter Appendix 1

See also letter Appendix 3

Not formed from Credible Evidence Base

**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 Consultation Period? No
### Issue Summary

SA objective 1 - Housing
The development of Candidate Site 403 will have BIG impact on Coedely and should not have been assessed. Policy states - B - NO DIRECT IMPACT!!

### Representation Text

See Letter Attached Appendix 2.
LDP was not formed from credible evidence base.

### Changes Sought

Withdrawal of Candidate Site 403 or FULL consultation with residents, which has not happened.

### Why No Previous Representation

See attached letter Appendix 1.
Only found out by off-chance in June 2008.
No Community Involvement (sic)
Poorly advertised by Local Authority.

### Why Attend Examination?

To point out further discrepancies in the L.D.P. I am obliged to represent the people on the Petition.

### Soundness Tests

- **P1 Test?** Not prepared in accordance with Delivery Agreement, including Community Involvement
- **P2 Test?** Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?
- **C1 Test?** Does not have regard to other relevant plans, policies and strategies relating to the area or a
- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?
- **CE4 Test?** Not flexible to deal with changing circumstances?

### Why Changes Satisfy Soundness Give Details Why the Changes You Propose Will Ensure That the Plan

See Letter Appendix 2.3 + 4
We must ensure "Our living space" AND "Our Health & Well Being" are maintained. Doctors, Dentists & Schools already saturated.
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<tr>
<td>1</td>
<td>Issue Summary</td>
<td>Myself and the residents on the petition have serious concerns about the 40% affordable housing allocation policy which is for the South of RCT… as opposed to the 20% policy for the North of RCT… the percentage should be equal. Also, there is not enough control shown in the policy for the monitoring of it, i.e. NONE of these houses should be sold to the developers who build them, or the &quot;moneyed&quot; portion of the housing industry…. The policy should be hard and fast as per Welsh Assembly Government Policy…. That all houses of this type should be allocated to Licensed &amp; regulated Landlords, to ensure the system is not abused, and is fit for purpose</td>
</tr>
</tbody>
</table>
### Issue Summary

I object to the housing allocation policy in the plan.

### 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.

### 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.

### Why no previous Representation

I was not aware at the time of the proposed plan for this land.

### Soundness Tests

- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?  **Yes**
- **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.

### Seek changes? Any changes to be made to the Plan?

**Yes**

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

**No**

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

**No**
**Issue Summary**

I object to the housing allocation policy in the plan.

**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.

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**Why no previous Representation**

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**Soundness Tests**

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.

**Tick box Replies**

- [ ] Seek changes? Any changes to be made to the Plan? Yes
- [ ] Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate? No
- [ ] Previous Representations? Did you make any previous representations on this issue during the Cons? No
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Document: Deposit Draft, p.077  
Site: 660/NSA 9.10  
Godreaman Street, Godreaman  
Delete Site  
PES Session:

**Summary:**  
Acess (SIC) to this development has been identified as via Foundry View & Godreaman Street. The access to this site via Foundry view is a small street with the only access point to the proposed area sited between 2 pieces of private land which does not appear to be wide enough to facilitate sufficient space to accommodate the level of traffic the proposed development.

**Item Question**  
1. How will the proposed access (SIC) be assessed and created and will consideration be given to providing access via the land now occupied by the community centre
2. How will the residents of the area be consulted
3. [ends]

**Representation Text**  

**Item Question**  
3. Seek changes? Any changes to be made to the Plan?  

**Reply**  
Yes
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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10 Godreaman Street, Godreaman  
**Delete Site**  
**PEX Session:**

**Summary:**

**Issue:** Housing Allocation

1. **Issue Summary**  
   I object to the housing allocation policy in the plan.

2. **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.

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4. **Why no previous Representation**  
   I was not aware at the time of the proposed plan for this land.

5. **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?  
   Yes

6. **Why changes satisfy Soundness**  
   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.

7. **Seek changes?** Any changes to be made to the Plan?  
   Yes

8. **Site submitted as Candidate?** If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?  
   No

9. **Previous Representations?** Did you make any previous representations on this issue during the Cons?  
   No
**Issue Summary**

I object to the housing allocation policy in the plan.

**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.

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**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**Soundness Tests**

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.
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### Why no previous Representation

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### CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?

Yes

### 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.

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No

### Previous Representations? Did you make any previous representations on this issue during the Consultation?

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Summary:  

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Item Question:  
Representation Text:  

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2 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.  
3 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.  
4 I was not aware at the time of the proposed plan for this land.  

Soundness Tests:  

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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:  

**Issue Summary**

1. I object to the housing allocation policy in the plan.

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**Document:** Deposit Draft, p.077  
**Site:** 660/NSA 9.10  
**Godreaman Street, Godreaman**  
**Delete Site**  
**PEX Session:**

**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation  
**PEX Session:**

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6. **Tick box Replies**

   3. **Seek changes? Any changes to be made to the Plan?**  
      
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      No

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

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**Document:** Deposit Draft, p.106, para.6.148  
**Site:** 691/SSA 10.13 West of Llechau, Llanharry  
**Delete Site**  
**PEX Session:**

**Policy:** SSA 10  
**Map:**

**Issue:** Housing Allocation

**Summary:**

1. I object to the housing allocation Policy SSA 10

2. I wish to object to the allocation of Site Number 13 in Policy SSA 10 (Land to the west of Llechau) for the following reasons:

   1. The site is in the open countryside, outside the settlement boundary for Llanharry which has been approved by the Council.
   2. New housing would have an adverse impact on the amenity of our existing dwellings and on the appearance of the local landscape.
   3. Trees, hedges, agricultural land and informal open spaces would be lost, which are important to the local community.
   4. New residents would be a considerable distance from the shops and other services in the centre of Llanharry, which would result in an unacceptable increase in traffic generation on the main roads and to and from the new houses.
   5. There are previous mineworkings in, on and near the site which would make it unsuitable for new housing.

3. Policy SSA 10.13 should be deleted from the new LDP.

4. It will prevent new housing development which is not in accord with modern principles for sustainable development.

5. Any changes to be made to the Plan?

---

**Soundness Tests**

- C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or area?
  - Yes

- C2 Test? Does not have regard to national policy?
  - Yes

- Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan

---

**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 Site?
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**Site:** 660/NSA 9.10 Godreaman Street, Godreaman  
**Delete Site**  
**PEX Session:**

**Summary:**

**Issue:** Housing Allocation  

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**Godreaman Street, Godreaman**  
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**Delete Site**  
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**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation

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<th>Representation Text</th>
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<td>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 &amp; pollution levels, visual amenity, loss of trees and landscaping, loss of wildlife.</td>
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<td>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.</td>
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<td>6</td>
<td>Why no previous Representation</td>
<td>I was not aware at the time of the proposed plan for this land.</td>
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<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>20</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
<td>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.</td>
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<td>3</td>
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**REPRESENTATION DETAIL**

**by:** Representation No

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.038

**Policy:** CS 8

**Map:**

**Site:**

**Issue:** Transportation

**PEX Session:**

**Summary:**

**Issue Summary**

The Rhigos Road (A4061) from Treherbert to Hirwaun has not been allocated with the LDP.

**Representation text**

1. We would like to have the Rhigos Road included in the Local Development Plan.
2. The Rhigos Road is the main arterial route from Treherbert to Hirwaun and also links to other roads along the Heads of the Valley.
3. The road experiences a high volume of traffic on a daily basis which has resulted in the poor condition of the road with drainage problems and Cats Eyes missing. The road has seen a number of closures recently due to inclement weather and safety issues such as snow and dense fog plus the condition of the road not being able to cope with the effects of these.
4. The condition and closure of the road has an economic impact to the local area with people being unable to get to their place of work and tourists unable to enjoy the surrounding scenery.
5. The Rhigos road is the Gateway for tourism as we have some fantastic scenery in the Rhondda, we will be promoting this area for tourism within the coming years and the condition of the road could have a detrimental effect on the tourism agenda if the road cannot be accessed.
6. Under section 4.71 The South East Transport Alliance Regional Transport Plan has identified 4 major road schemes as a priority. The Transport Plan identifies schemes for new roads, the Rhigos Road is already in existence and requires upgrading and regular maintenance. The inclusion and upgrading of this road could save millions of pounds as it is not a road that needs creating but an existing road that requires upgrading and maintenance.

**Changes sought**

We would like to see the Rhigos Road (A4061) included in the Local Development Plan and subsequently The South East Transport Alliance Regional Transport Plan.

**Why no previous Representation**

It was not until recently that it has been discovered that the Rhigos Road does not appear in The South East Transport Alliance Regional Transport Plan, representation had not been made during the consultation on the Preferred Strategy as the contents of the above Plan were not known and it was unsure if the road had been included or not.

**Soundness Tests**

17 8  CEZ Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

**Why changes satisfy Soundness**

Give details why the changes you propose will ensure that the Plan

The strategy, policies and allocations are not realistic and appropriate as the Rhigos Road does not appear on the Local Development Plan, therefore the strategies, policies and allocations are not relevant and do not relate to this site. No alternatives have been submitted for this site as the community would like the site upgraded and maintained and not alternatively used for other purposes. It is important that the site is included within the Local Development Plan and subsequently The South East Transport Alliance Regional Transport Plan.

**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
### Rhondda Cynon Taf County Borough Council Local Development Plan

**Filter to show:** (All representations)

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**Document:** Deposit Draft, p.082  
**Policy:** NSA 14  
**Map:** Site:  
**Issue:** Employment

**Summary:**

1. **Issue Summary**
   - The Burberry site at Ynyswen has not been allocated in the Local Development Plan.

2. **Representation text**
   - We would like to have the Burberry Site at Ynyswen included in the Local Development Plan. The current usage of the site is for Industry and Employment. Since the closure of the Burberry factory the number of people unemployed has increased significantly (an increase in RCT of 11% equating to 7,196 people) and whilst the current economic crisis continues there is little prospect of people obtaining jobs. Treherbert has been declared 33rd most deprived area in Wales (Index of Multiple Deprivation 2005), the Burberry site is vital to the area for any proposed inward investment. Under the Welsh Assembly Government Communities First Programme the remit for Communities First Partnerships over the next few years includes addressing Economic Inactivity and Child Poverty amongst other headings. We have found that the Upper Rhondda Fawr has depopulated over a number of years and with the increased proposal for housing development in this area in order for people to remain within a community all prospects have to be offered from housing to leisure facilities to work locally. A community that has some form of industry attracts other benefits such as increased shopping locally, tourism and economic vibrancy.

3. **Changes sought**
   - We would like to see the Burberry site at Ynyswen included in the Local Development Plan for Industry and Employment.

4. **Why no previous Representation**
   - The Burberry Factory at Ynyswen had not closed when consultation on the Preferred Strategy was undertaken.

**Item Question**: Representation Text

**Item Question**: Review

**Soundness Tests**

1. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?  
   - Yes

**Tick box Replies**

1. Seek changes? Any changes to be made to the Plan?  
   - Yes

2. Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?  
   - No

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

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09/06/2009  Page 4437 of 4851
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Document: Deposit Draft, p.030
Map: Policy: CS 1
Site: Issue: Strategy Areas

Summary: [CS 1 mentions tourism]

**Item Question**

1. Policies and Strategies relating to Tourism has not been included within the Local Development Plan as a single Policy and not be read in conjunction with other policies and documents.

2. We would like to have a single Tourism Policy and Strategy included in the Local Development Plan.

3. The information relating to TAN 13 suggests that this paper relating to tourism be read in conjunction with other policies and strategies. Tourism is an important part of our community’s future and we would like to see the Tourism agenda stand alone with its own policies and strategies.

4. The Heads of the Valleys agenda for this year focuses on Tourism and as such requires its own policies and strategies and not a TAN 13 document that has to be read in conjunction with other policies and documents.

5. Tourism for this and other areas would create jobs such as B&B’s, Cafes, local amenities such as parks, swimming pools plus regeneration work throughout the villages to ensure that this area meets the needs of the tourist.

6. We have some of the most beautiful scenery and walks in Treherbert, with SSSI along the mountainside and Pen Pych mountain which is the only flat top, 3 sided mountain in Europe. We are also looking at proposals for horse riding and cycling in the area. A single policy and strategy relating to tourism would help guide us through the delivery of the work required within our area.

7. A single Policy and Strategy would also share good practice and enable communities to know how the tourism agenda across Wales would work and what we should be doing to enhance and contribute to the Policy and Strategy to encourage tourists to visit and stay in the area.

8. The encouragement of the tourist would also have an economic impact in the area resulting in a need for a diversity in shopping products and a demand for overnight accommodation.

9. We would like to see a single Tourism Policy and Strategy included in the Local Development Plan.

10. It was not until recently that it has been discovered that the TAN13 which relates to Tourism has to be read in conjunction with other policies, strategies and documents and is not a stand alone Policy/Strategy. Representation had not been made during the consultation on the Preferred Strategy because the issue of Tourism was thought to have a Policy and Strategy of its own it was not until clarity was made relating to the TAN13 document that representation is now being made to the Local Development Plan.

11. The strategy, policies and allocations are not realistic and appropriate as Tourism does not appear with a single Policy and Strategy of its own in the Local Development Plan it has to be read in conjunction with other policies, strategies and documents. Therefore the strategies, policies and allocations may be relevant but are contained within other documents and do not appear robust. No alternatives have been submitted for this issue; however we would like a separate more robust document relating to tourism created. It is important that this issue is included within the Local Development Plan.

12. The strategy, policies and allocations are not realistic and appropriate as Tourism does not appear with a single Policy and Strategy of its own in the Local Development Plan it has to be read in conjunction with other policies, strategies and documents. Therefore the strategies, policies and allocations may be relevant but are contained within other documents and do not appear robust. No alternatives have been submitted for this issue; however we would like a separate more robust document relating to tourism created. It is important that this issue is included within the Local Development Plan.

**Item Question**

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

**Reply**

Yes
**Issue Summary**

I object to the housing allocation policy in the plan.

**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.

**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.

**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**Soundness Tests**

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.
### Issue Summary

I object to the housing allocation policy in the plan.

### Representation Text

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### Changes Sought

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### Why no previous Representation

I was not aware at the time of the proposed plan for this land.

### Soundness Tests

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Document: Deposit Draft, p.077
Map: Policy: NSA 9
Site: 660/NSA 9.10 Godreaman Street, Godreaman
Delete Site
PEX Session:

Policy: NSA 9
Map: Issue: Housing Allocation

Summary:

I object to the housing allocation policy in the plan.

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.

Changes sought:

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Why no previous Representation:

I was not aware at the time of the proposed plan for this land.

Soundness Tests:

17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
20. 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.

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

09/06/2009
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**Document:** Deposit Draft, p.077

**Map:** Policy: NSA 9

**Site:** 660//NSA 9.10 Godreaman Street, Godreaman

**Delete Site**

**PEX Session:**

**Issue:** Housing Allocation

**Summary:**

I object to the housing allocation policy in the plan.

**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.

**Changes sought**

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**Why no previous Representation**

I was not aware at the time of the proposed plan for this land.

**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.

**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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<td>I object to the inclusion of SSA 10.7 [Candidate Site 403] in the housing allocation.</td>
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<td>2 3</td>
<td>Representation text</td>
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<td></td>
<td>It is evidenced by the comments in Assessment 3 pg 76/123 Appendix 5.5. That access may be sought via the &quot;Level Route&quot;. Please see evidence attached. (Marked access highlight on Appendix 2).</td>
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<td>4 5</td>
<td>Changes sought</td>
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<td>A separate (sic) traffic &amp; Environmental Study of the whole area &amp; not just SSA 10.7</td>
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<td>Why no previous Representation</td>
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<td>I was not aware of this.</td>
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<td>Why attend Examination?</td>
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<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
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<td>With draw SSA 10.7, until further extensive reports are completed. Please see attached appendix No1 (Petition of 61 names attached).</td>
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**Summary:**

**Issue:** Environment

**Item Question**

1. **Issue Summary**
   - The appropriateness of the SLA designations on land that clearly does not meet the criteria set out in paragraph 6.97.

2. **Representation text**
   - To the rear of High Street, Porth (and in other locations), the SLA includes land that does not merit inclusion in such a designation, when considered in relation to the intention of SLAs and the criteria set out in paragraph 6.97.

3. **Changes sought**
   - The SLA boundary should be redrawn to include only land that meets criteria in paragraph 6.97.

4. **Why no previous Representation**
   - No instructions to do so.

**Soundness Tests**

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<th>Question</th>
<th>Reply</th>
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- C2: The proposed SLA does not have regard to paragraph 5.3.1 of Planning Policy Wales.
- CE2: The definition of SLA in the LDP is not realistic and does not follow evidence-based criteria set out in the LDP.

**Tick box Replies**

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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
<td>No</td>
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09/06/2009
### Issue Summary
The site (land east of Hafod Wen and north of Concorde Drive, Tonyrefail) is allocated for residential development under policy SSA 10.10. Reference is made in Appendix 1 to the site's status as a SSSI.

### Representation Text
We support the residential allocation of this site (SSA 10.10). Part of the site is designated as a SSSI. The reference in Appendix 1 states that the SSSI will need to be protected for its scientific value.

Appropriate mitigation, through habitat management of adjoining land in the same ownership, will enable our client's land to be developed for housing notwithstanding its SSSI status.

### Changes Sought
Appendix 1 should refer to appropriate habitat management of adjoining land within the SSSI as a means of enabling the allocated site to be developed for housing.

### Why No Previous Representation
No instruction to do so.

### Why Attend Examination?
It will be necessary to present detailed ecological evidence about that part of the site in our client's ownership.

### Soundness Tests
The allocation for housing of a site with SSSI designations requires more detailed explanation of how development can be achieved.

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**Item Question**

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<td>We support the residential allocation of this site (SSA 10.10). Part of the site is designated as a SSSI. The reference in Appendix 1 states that the SSSI will need to be protected for its scientific value. Appropriate mitigation, through habitat management of adjoining land in the same ownership, will enable our client's land to be developed for housing notwithstanding its SSSI status.</td>
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<td>Appendix 1 should refer to appropriate habitat management of adjoining land within the SSSI as a means of enabling the allocated site to be developed for housing.</td>
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<td>Why no previous Representation</td>
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<td>11</td>
<td>Why attend Examination?</td>
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<tr>
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<td>CE3 Test? No clear mechanisms for implementation and monitoring?</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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**Tick Box Replies**

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**Note:**

- **Document**: Deposit Draft, p.106, para.10
- **Map**: SSA 10
- **Site**: 688//SSA 10.10 Hafod Wen \ Concorde Drive, Tonyrefail
- **PEX Session**: Issue: Housing Allocation

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**Item Question**

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<tr>
<th>Item</th>
<th>Question</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Issue Summary</td>
</tr>
<tr>
<td>2</td>
<td>We support the residential allocation of this site (SSA 10.10). Part of the site is designated as a SSSI. The reference in Appendix 1 states that the SSSI will need to be protected for its scientific value. Appropriate mitigation, through habitat management of adjoining land in the same ownership, will enable our client's land to be developed for housing notwithstanding its SSSI status.</td>
</tr>
<tr>
<td>4</td>
<td>Appendix 1 should refer to appropriate habitat management of adjoining land within the SSSI as a means of enabling the allocated site to be developed for housing.</td>
</tr>
<tr>
<td>9</td>
<td>Why no previous Representation</td>
</tr>
<tr>
<td>11</td>
<td>Why attend Examination?</td>
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<td>18</td>
<td>CE3 Test? No clear mechanisms for implementation and monitoring?</td>
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<tr>
<td>20</td>
<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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**Tick Box Replies**

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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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<tr>
<td>3393.D3</td>
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</table>

Document: Deposit Draft, p. 106, para. 6.148  
Map: Policy: SSA 10  
Site: 688//SSA 10.10  
Hafod Wen \ Concorde Drive, Tonyrefail  
PEX Session:  
Policy: SSA 10  
Map:  
Issue: Housing Allocation  

Summary:  
Issue: Housing Allocation  

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
</table>
| 1 2 | Issue Summary  
The site (land east of Hafod Wen and north of Concorde Drive, Tonyrefail) is allocated for residential development under Policy SSA 10.10.  
| 2 3 | Representation text  
We support the residential allocation of the site (SSA 10.10)  
| 21 11 | Why attend Examination?  
We wish to attend the Examination if the site allocation is subject to objection by others.  
| 3 4 | Seek changes? Any changes to be made to the Plan?  
No  

09/06/2009
**REPRESENTATION DETAIL**  
by: Representation No

<table>
<thead>
<tr>
<th>Rep'n No</th>
<th>Access No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source Type</th>
<th>Mode Status</th>
<th>Modified</th>
<th>Petition of</th>
<th>TREAT in parts</th>
<th>EVIDENCE SA/SEA</th>
<th>NO FRTHR EVID.</th>
<th>Rep Council Officer</th>
<th>Recommendation</th>
<th>Response</th>
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Document: Deposit Draft, p.079, para.6.55  
Site: 627/636 119-130 High Street, Cymmer, rear  
Settlement Boundary  
Policy: NSA 12  
Map:  
Summary:  
Issue: Settlement Boundary  

**Item Question**  
Representation Text

1. **Issue Summary**  
The settlement boundary for Porth as drawn on the proposals Map (sheet 2).

2. **Representation text**  
The settlement boundary for Porth should be redrawn in accordance with the attached plan. This will enable urban fringe land to be included within settlement the boundary for consideration as a windfall residential development site under Policy NSA 12.

3. **Changes sought**  
The settlement boundary for Porth should be redrawn in accordance with the attached plan.

4. **Why no previous Representation**  
No instructions to do so.

**Item Question**  
Soundness Tests

5. **CE2 Test?**  
Given the extensive nature of the proposed SLA, the settlement boundary for Porth (which is a key settlement) is drawn unnecessarily tightly and, as such, will not allow the development of windfall sites which are a necessary and deliverable aspect of the LDP strategy.

6. **Site submitted as Candidate?**  
Yes

7. **Previous Representations?**  
No

**Item Question**  
Tick box Replies

8. **Seek changes?**  
Yes

9. **Site submitted as Candidate?**  
No

10. **Previous Representations?**  
No

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09/06/2009  
Page 4447 of 4851
**Representation Text**

<table>
<thead>
<tr>
<th>Representation No</th>
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<th>Recommendation</th>
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</tbody>
</table>

**Document:** Deposit Draft, p.077, para.6.44  
**Site:** 627/636  
**119-130 High Street, Cymmer, rear**  
**New Site**  
**P基于 Scenario:**

**Policy:** NSA 9  
**Map:**

**Summary:**

**Issue:** Housing Allocation  
**PEX Session:**

---

**Item Question**  
**Representation Text**

1. **Issue Summary**

   Allocation of an additional site for housing.

2. **Representation text**

   Please see attached, including sustainability appraisal.

   The represent or proposes the inclusion of the site for residential purposes. Supporting information in respect of the proposal is contained in a development matrix.

3. **Changes sought**

   The site should be allocated for residential development under Policy NSA9.

4. **Candidate Site Ref No**

   636

5. **Why no previous Representation**

   No instructions to do so.

---

**Item Question**

---

**Reply**

**Soundness Tests**

20. **Why changes satisfy Soundness**

   Give details why the changes you propose will ensure that the Plan

   Allocation of the site for housing will ensure that policy NSA 9 includes appropriate housing sites that meet the criteria of the sustainability appraisal and contribute to the strategy and strategic objectives of the LDP.

---

**Item Question**

---

**Reply**

**Tick box Replies**

3. **Seek changes? Any changes to be made to the Plan?**

   Yes

4. **Site submitted as Candidate? If Rep’n is for inclusion of a new site, did you submit as a Candidate Sit**

   Yes

---

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

   No
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<tbody>
<tr>
<td>2</td>
<td>Allocation of an additional site for housing.</td>
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<tr>
<td></td>
<td>Please see attached, including sustainability appraisal. The representor proposes the inclusion of the site for residential purposes. Supporting information in respect of the proposal is contained in a development matrix.</td>
</tr>
<tr>
<td>4</td>
<td>Changes sought</td>
</tr>
<tr>
<td></td>
<td>The site should be allocated for residential development under policy NSA 9.</td>
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<td>6</td>
<td>Candidate Site Ref No</td>
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<td>609</td>
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<td>9</td>
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<td></td>
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</table>
### Issue Summary

The Candidate Site Assessment Methodology identifies that following initial assessment a more detailed appraisal of sites will be made. There is no evidence or information included in the draft document to support this particular site and specifically in relation to vehicular access and environmental value of the land. Vehicular access is private and limited and the SINC implications are not clearly identified.

### Representation Text

Further information should be included in the appraisal to identify that a detailed appraisal of this site has been made. See Appendix 2 RCT Local Development Plan - Candidate Site Assessment Methodology.
<table>
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Document: Deposit Draft, p.040
Policy: CS 10
Summary:

**Issue:** Minerals

**PEX Session:**

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
</table>
| 2             | Policy CS 10 - Minerals

Objection to Policy CS 10 - Minerals

Policy CS 10 - Minerals

The proposed 20 year landbank to be maintained for the plan period for all aggregates is a positive approach. However there is no evidence to show the individual landbanks for sand and gravel and crushed rock will be maintained at the end of the plan period. This makes it difficult to determine if landbanks are being maintained in line with national policy requirement of 7 year minimum landbank for sand and gravel and 10 year minimum landbank for crushed rock (MTAN, Para 49). The plan is therefore unsound as it is inconsistent with national policy and fails soundness test C2.

**Changes sought**
The third point should also be reworded. It is not clear what 'necessary' development is and no explanation is offered in the accompanying text. As result the plan could be considered unsound, failing tests CE2 and CE3.

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

3395.D2

Document: Deposit Draft, p.060
Policy: AW 14
Summary:

**Issue:** Minerals

**PEX Session:**

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
</table>
| 2             | Policy AW14-Safeguarding of Minerals

The policy does not state how Mineral Safeguarding Areas will be defined and how they will fulfill a safeguarding function. There should be a set of criteria that future proposals would be judged against as devised in national policy (MTAN, Para. 32, bullet point 4). The document is therefore unsound as it is inconsistent with national policy, failing soundness test C2.

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</table>

**Document:** Deposit Draft, p.062  
**Site:**  
**Policy:** AW 15  
**Map:**  
**Issue:** Minerals  
**PEX Session:**

**Summary:**

Item Question: Representation text

Policy AW15 - Community Amenity Protection Buffer Zones

The way the policy is titled gives the impression communities and amenities will have a buffer zone. It would be better worded along the lines on 'Quarry Buffer Zones or Mineral Extraction Buffer Zones'.

The policy is too restrictive and inflexible. It does not take into consideration paragraph 7.1 (MTAN), which states ‘...minimum distances should be adopted unless there are clear and justifiable reasons for reducing the distance’. The policy as currently worded does not allow for this flexibility, which is inconsistent with national policy. The plan is therefore unsound failing tests C2 and CE4.

**Item Question** | **Representation Text**
---|---
2 3 | Representation text

**Soundness Tests**

<table>
<thead>
<tr>
<th>C2 Test?</th>
<th>CE4 Test?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does not have regard to national policy?</td>
<td>Not flexible to deal with changing circumstances?</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
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</tbody>
</table>

09/06/2009 Page 4452 of 4851
### Issue: Waste Management

**Representation Text**

We support policy CS 9 which allocates Hirwaun Industrial estate as a waste management site. Policy CS 9 should also allow an increased range of similar uses to include recycling and renewable energy facilities.

**Changes sought**

The policy or supporting text should explicitly state that the site will be appropriate for other uses such as recycling and renewable energy facilities, in addition to the waste management facility allocation.

**Why no previous Representation**

Recent instruction from client

**Why attend Examination?**

We deal with complex issues which should be dealt with in the form of an examination

**Soundness Tests**

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Reply</th>
<th>CE1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes</th>
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<tbody>
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<td>12 9</td>
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<td>17 8</td>
<td>Yes</td>
<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>Yes</td>
<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
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</table>

Will provide flexibility to enable it to deal with changing circumstances.

**Tick box Replies**

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<td>5 6</td>
<td>No</td>
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<td>7 7</td>
<td>No</td>
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</tbody>
</table>
**Issue Summary**

Include Hirwaun Industrial Estate into the strategic site 'Land south of Hirwaun'.

**Representation Text**

These representations relate to Hirwaun Industrial Estate and have been prepared on behalf of Ashtenne Industrial Fund Limited Partnership (AIFLP), who own a number of industrial units within this Estate.

There are a number of units within this Estate which are currently vacant, despite an active marketing campaign. It is our view that this site is becoming increasingly unviable for employment uses and the emerging Plan should provide for the redevelopment of the site for alternative (non-employment) uses.

The south east corner of the Industrial Estate abuts the north west corner of the "Land South of Hirwaun Strategic Site" (Policy NSA 8). We consider that the Hirwaun Industrial Estate should be incorporated into this strategic site area, to allow a more comprehensive, mixed use scheme to be developed in accordance with the RCT's aspirations for the Borough. This will help meet the objective of the Plan to enhance Hirwaun as a key settlement in RCT through residential, employment and community development (para. 6.40).

**Changes sought**

The conclusions of the NLP Employment Land Study (2008) identifies that much of the employment land in the Rhondda Valley is of a poor quality compared with the rest of RCT and strongly advises that allocating land for employment use alone will not be sufficient to encourage investment and growth. Rather, strategies should be put in place to encourage the take-up of investment land to the north of the RCT borough. The Study confirms this could include measures to improve the public image and profile of existing areas. The enhancement of the Strategic Site by including the Hirwaun Industrial Estate would therefore contribute to regenerating the area and RCT's objective of halting depopulation and economic decline.

In terms of the loss of some employment land, this needs to be considered in the context of the very high level of available employment land within the Borough (as identified in the NLP study). The NLP study recommends that some land of all employment types should be considered for release for alternative uses if there is found to be an oversupply of employment land in RCT.

In addition to the range of uses set out in Policy NSA 8, we also consider that by increasing the site area for this Strategic Site that hotel and leisure uses could also be incorporated into the range of uses suitable for this site. The land is in close proximity to the Brecon Beacons National Park, a popular tourist destination in South Wales, and we consider that there is potential for additional tourist accommodation and leisure uses in this area. This would further enhance inward investment into the Northern Strategic Area and enhance the role of Hirwaun as a Key Settlement.

**Why no previous Representation**

Recent instruction from client

**Why attend Examination?**

We deal with complex issues which should be dealt with in the form of an examination

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**Soundness Tests**

<table>
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<th>Item Question</th>
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<th>C1 Test?</th>
<th>Does not have regard to other relevant plans, policies and strategies relating to the area or a site?</th>
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<tbody>
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<td>C2 Test?</td>
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Previous Representations? Did you make any previous representations on this issue during the Cons

Will provide flexibility to enable it to deal with changing circumstances.
**Item Question**  | **Representation Text**
---|---
1 | The plan should recognise the future potential of the Ynysyboeth Industrial Estate for Housing Development
2 | These representations relate to the Ynysyboeth Industrial Estate and have been prepared on behalf of Ashtenne Industrial Fund Limited Partnership (AIFLP). AIFLP own the unit marked A on the attached site location plan (ref. WE30612/001). This site is located within the defined settlement boundary of Ynysboeth, and is accessed directly off the A4059. The AIFLP unit has been vacant since 2006 despite being actively marketed during this period. AIFLP market industrial property and they use a variety of advertisement tools including their website, Rhondda Cynon Taff's website and advertisement boards. Lambert Smith Hampton became joint marketing agents for the site in 2008. We consider that the marketing exercise, together with the poor quality of the site (see below) and other constraints such as relatively poor accessibility and lack of visability from the A4059, demonstrate that this site is no longer viable for employment uses. Unless the Plan is amended to allow alternative uses on the site, we consider that it is likely that the unit and land will remain vacant and become redundant and will detract from the quality of the area, further exacerbating the economic inequalities between the Rhondda Valley and Taff Valley to the south, in particular
3 | Allocation of Ynysyboeth Industrial Estate for housing development - to be developed in phases. Please see Appendix A for justification:
4 | On this basis we consider that the site should be allocated for an alternative use and that housing would be the most appropriate use for the site. In addition to the site owned by our clients we consider that the allocation could include the remainder of the Estate to be developed for housing, probably as later phases (areas A and B on the site location plan would be the first phase and area C as a later stage), as and when units become available. Housing development on the Ynysboeth Industrial Estate is also supported by the fact that the site is located within a defined settlement boundary (Policy NSA 12). Ynysboeth is an archetypal village within RCT, predominately characterised by residential dwellings. In addition, in line with the NLP Employment Study, residential development on this site would help regenerate the village and encourage more people to live in the Rhondda Valley, which in turn will help encourage economic investment.
5 | Why no previous Representation
6 | Recent instruction from client
7 | Why attend Examination?
8 | Complex issues raised by this representation which are best dealt with at examination
9 | Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan Will provide flexibility to enable it to deal with changing circumstances

**Soundness Tests**

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We are in objection to this application on the rights of access to the site. Potential access points including corner house street and from the adjacent car park currently serving the community centre and football ground. The application is also for 15 dwellings and in this day in age most homes have 2 cars thus resulting in an increase in traffic of approx 30 cars.

The car park adjacent to the community centre is in use on a daily basis for band practice where the car park is full. For football matches on Saturdays where the car park is full, sometimes spilling onto the main road (Merthyr Road). The other week AFC Llwydcoed played Aberystwyth, television camera were also present, the car park was full and Merthyr road so bad that emergency vehicles could not get passed and police had to get owners to move their cars even though the police were contacted weeks prior to inform them of the game. Sundays the under 11's and 14's play football on the field and yet again the car park was full.

Children have birthday parties at the community centre too. I cannot see how these extra 30 cars can get to their houses without the car park being made smaller which will cause terrible congestion on Merthyr road. I think passing this proposal with an extra 30 cars regularly passing the entrance of the community centre on a daily basis with children crossing to go to the field or coming out of the community centre, would be stupidly dangerous and an accident waiting to happen.

Another option is corner House Street, I also object to this as it is the main access route to Llwydcoed School. A lot of the children in this community walk to school through this street which at present I feel is exceptionally dangerous as there are no footpaths/pavements to walk on, so an extra 30 cars passing regularly again is obviously going to make the situation a lot worse.

We are in objection to this application on the rights of access to this site. Potential access points including corner house street and from the adjacent car park currently serving the community centre and football ground. The application is also for 15 dwellings and in this day in age most homes have 2 cars thus resulting in an increase in traffic of approx 30 cars.

The car park adjacent to the community centre is in use on a daily basis for band practice where the car park is full. For football matches on Saturdays where the car park is full, sometimes spilling onto the main road (Merthyr Road). The other week AFC Llwydcoed played Aberystwyth, television camera were also present, the car park was full and Merthyr road so bad that emergency vehicles could not get passed and police had to get owners to move their cars even though the police were contacted weeks prior to inform them of the game. Sundays the under 11's and 14's play football on the field and yet again the car park was full.

Children have birthday parties at the community centre too. I cannot see how these extra 30 cars can get to their houses without the car park being made smaller which will cause terrible congestion on Merthyr road. I think passing this proposal with an extra 30 cars regularly passing the entrance of the community centre on a daily basis with children crossing to go to the field or coming out of the community centre, would be stupidly dangerous and an accident waiting to happen.

Another option is corner House Street, I also object to this as it is the main access route to Llwydcoed School. A lot of the children in this community walk to school through this street which at present I feel is exceptionally dangerous as there are no footpaths/pavements to walk on, so an extra 30 cars passing regularly again is obviously going to make the situation a lot worse.
### Representation Text

#### Representation No: 3399.D1

**Document:** Deposit Draft, p. 106, para. 6.148  
**Site:** 691//SSA 10.13 West of Llechau, Llanharry  
**Policy:** SSA 10  
**Map:** Policy SSA 10

**Summary:**

I object to the housing allocation Policy SSA 10

---

#### Representation Text

I wish to object to the allocation of Site Number 13 in Policy SSA 10 (Land to the west of Llechau) for the following reasons:

1. The site is in the open countryside, outside the settlement boundary for Llanharry which has been approved by the Council.
2. New housing would have an adverse impact on the amenity of our existing dwellings and on the appearance of the local landscape.
3. Trees, hedges, agricultural land and informal open spaces would be lost, which are important to the local community.
4. New residents would be a considerable distance from the shops and other services in the centre of Llanharry, which would result in an unacceptable increase in traffic generation on the main roads and to and from the new houses.
5. There are previous mineworkings in, on and near the site which would make it unsuitable for new housing.

---

#### Changes sought

Policy SSA 10.13 should be deleted from the new LDP

---

#### Soundness Tests

- **C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes**
- **C2 Test? Does not have regard to national policy?** Yes
- **Why changes satisfy Soundness?** Give details why the changes you propose will ensure that the Plan It will prevent new housing development which is not in accord with modern principles for sustainable development

---

#### Tick box Replies

- **Seek changes? Any changes to be made to the Plan?** Yes
- **Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site** No
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Document: Deposit Draft, p.036, para.4.57  
Policy: CS 6  
Summary:  

Item Question  

1 2  
**Issue Summary**  
Wales International Business Park, Land north of Junction 33, Cardiff.  

2 3  
**Representation text**  
We write in connection to the above mentioned planning application, which is currently being considered by Cardiff Council, and referenced within the Deposit Draft RCT Local Development Plan (2006 - 2021) which is currently out to public consultation.  

We note the reference within the Deposit Draft RCT LDP to the Wales International Business Park which states:  
"The LDP recognises the role of Rhondda Cynon Taf in the Capital Region and that the provision of appropriate land for employment, housing and transport development is integral to the success of the wider region. Developments such as the Dragon Film Studios in Llanharan, the proposed International Business Park near Junction 33 of the M4 and the Training Centre for the Combined Armed Forces at RAF St Athan, will have regional economic benefits. The LDP will look to support these developments and ensure that the County Borough benefits from the opportunities they will deliver. The Strategic Sites at Mwyndy and Hirwaun have the potential to make a significant contribution to the economic development of the wider region and employment allocations on these sites have been identified to support regional economic initiatives (pg36)."  

We act as promoters of the Wales International Business Park, namely Westgate Park (Cardiff) ltd and the Welsh Assembly Government. We would like to express support for the above mentioned reference within your LDP.
**Representation Text**

Owen Banks Planning & Development Ltd has been instructed by [REPRESENTATION DETAIL](#) to make representations towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan. The representation is in the form of an objection to the setting of the residential settlement boundary at Ynysybwl, and therefore Policy SSA 13 ##(NB - is this a Typo? - should read ‘NSA 12’ as per the representation form - OJ. RCT)## of the Deposit Draft. It is considered that the limits be consequentially amended to reflect the reasons given later within this Report, and allow for a modest residential development of up to four dwellings.
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**Document:** Deposit Draft, p.060  
**Site:**  
**Policy:** AW 14  
**Map:**  
**Issue:** Minerals  
**PEX Session:**  
**Summary:**

**Item Question**

2 3 Representation text

The proposals indicate that the quarry will be extended within 160 meters (sic) of the nearest residential property and 165 meters (sic) of Cefn Primary school. I am deeply concerned about the blasting at the quarry and how it may compromise the structure.

**4 5 Changes sought**

The Glyncoch Community partnership wish to develop this area of land for pathways to link Glyncoch with Loops and Links paths as well as having a more pleasant walking route to Pontypridd town centre. The proposals would also give us a link to the out door.

**Item Question**

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

Yes

| 3403.D2  | O W M    |             |       |             |             |          |             |               |           |               |             |         |                |          |

**Document:** Deposit Draft, p.062  
**Site:**  
**Policy:** AW 15  
**Map:**  
**Issue:** Minerals  
**PEX Session:**  
**Summary:**

**Item Question**

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### Item Question

3 4  
**Reply**

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Objection to designation of area of land surrounding Glyncoch for extraction of minerals.
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8 7 | Previous Representation No
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21 11 | Why attend Examination?
There is not sufficient space within this form to do justice to our objections.
---|---
13 0 | C2 Test? Does not have regard to national policy? Yes
---|---
14 8 | C3 Test? Does not have regard to Wales Spatial Plan? Yes
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16 8 | CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes
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17 8 | CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?
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The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support out door learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
#### Rhondda Cynon Taf County Borough Council Local Development Plan

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Document: Deposit Draft, p.062  
Policy: AW 15  
Map:  
Site: 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd  
Delete Site  
PEX Session:  
Summary:  

**Issue Summary**

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

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**Soundness Tests**

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### Representation No: 3404.D4

**Document:** Deposit Draft, p.116

**Policy:** SSA 26

**Site:** 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd

**Issue:** Minerals

**Summary:**

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

**Representation Text:**

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**Rhondda Cynon Taf County Borough Council Local Development Plan**

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The proposals indicate that the quarry will be extended within 160 meters (sic) of the nearest residential property and 165 meters (sic) of Cefn Primary school. I am deeply concerned about the blasting at the quarry and how it may compromise the structure.

The Glyncoch Community partnership wish to develop this area of land for pathways to link Glyncoch with Loops and Links paths as well as having a more pleasant walking route to Pontypridd town centre. The proposals would also give us a link to the out door learning and to the community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
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**Document:** Deposit Draft, p.062  
**Site:**  
**Policy:** AW 15  
**Map:**  
**Issue:** Minerals  

**Summary:**  

**Item Question**  

**Representation Text**  

2 3  

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**Item Question**  

**Reply**  

3 4  

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

Yes

| 3405.D3  |           |             |       |             |             |          |             |               |           |              |             |         |                |         |

**Document:** Deposit Draft, p.116  
**Site:**  
**Policy:** SSA 26  
**Map:**  
**Issue:** Settlement Boundary  

**Summary:**  

**Item Question**  

**Representation Text**  

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**Reply**  

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**Document:** Deposit Draft, p.116
**Policy:** SSA 26
**Site:** 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd
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**Summary:**

**Issue:** Minerals

**PEX Session:**

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**Item Question**

2 3 Representation text

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4 5 Changes sought

The Glyncoch Community partnership wish to develop this area of land for pathways to link Glyncoch with Loops and Links paths as well as having a more pleasant walking route to Pontypridd town centre. The proposals would also give us a link to the out door.

**Item Question**

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

Reply

Tick box Replies

Yes

09/06/2009
Issue: Minerals

Representation Text:

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

Changes sought:

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

Previous Representation No:

Our representation is being made during the current public consultation period (5th February - 26 March 09)

Why attend Examination?

There is not sufficient space within this form to do justice to our objections.

Soundness Tests:

13  C2 Test? Does not have regard to national policy?  Yes
14  C3 Test? Does not have regard to Wales Spatial Plan?  Yes
16  CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth  Yes
17  CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations. ‘Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness’ (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

‘The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future’ (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
## Issue Summary

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

## Representation text

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

## Changes sought

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**Representation Text**

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**Document:** Deposit Draft, p.108  
**Policy:** SSA 13  
**Site:** Settlement Boundary  
**Issue:** Settlement Boundary  
**PEX Session:** Item Question

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Objection is raised to the non-inclusion of candidate site 539 a site for affordable housing in the Rhondda Cynon Taf Local Development Plan 2006-2021

Q3 Candidate site 540 (Site B) related to former allotment land within the settlement boundary for Pontypridd. It is an ideal site for the construction of affordable housing being within walking distance (400 metres) of shops and public transport facilities in the centre of Pontypridd. The candidate site assessment (stage one) ranked these latter attributes as 'excellent'. The delivery of 3000 affordable housing units over the fifteen year Plan period is a priority particularly in valley areas where socio-economic deprivation is high. Of this total 2396 units are to be delivered in the Southern Strategy Area and only 604 in the Northern Strategy Area. There would appear to be a mismatch between areas of greatest need and areas where demand is likely to be satisfied. Pontypridd occupies a central valley position and is ideally placed to accommodate a greater proportion of affordable housing.

There is no justification of Pontypridd’s affordable housing requirement to be met outside of the Town as stated in Draft LDP Chapter 4 Core Strategy (para. 4.13). Such a policy will have limited impact in sustaining Pontypridd as a principal town. The suggested recipient areas for Pontypridd’s local housing needs i.e Beddau, Church Village and Llantwit Fardre, look principally to the expanding retail/commercial area of Llantrisant/Talbot Green for their shopping/service needs. The allocation of candidate site 539 for affordable housing would ensure at least some affordable housing need is catered for locally whilst providing greater support for the regeneration of Pontypridd town centre.

The allocation of candidate site 540 for affordable housing

Preferred strategy identified Pontypridd as a principal town where development is to be focused. No reason to conclude that a redundant allotment site within the settlement boundary for Pontypridd would be a variance with the preferred strategy.

C2 Test? Does not have regard to national policy? Yes
C3 Test? Does not have regard to Wales Spatial Plan? Yes
C4 Test? Does not have regard to RCT Community Plan? Yes
### Q9 Inclusion of candidate site 540 in the LDP would satisfy one of the key objectives of the Wales Spatial Plan (Building Sustainable Communities) as follows:-

- Retain balanced communities by ensuring access to affordable housing, to buy or rent, in locations which are convenient for local work and services and by ensuring a range of housing types are available in high quality environments. (page 13)

- Inclusion of candidate site 540 would also meet the aspirations of local communities with regards to their vision of a better life through the auspices of RCT's Community Plan 2004-2014. People expressed a desire for town centres which are within easy reach. Candidate site 539 is within 400 metres of Pontypridd town centre, an ideal location for affordable housing where ownership of a private means of transport to access town centre shops and services would not be necessary. (A Better Life by Boosting Our Local Economy Feb 04)

- Inclusion of candidate site 540 would also be consistent with advice and guidance given by the Welsh Assembly in Planning Policy Wales (March 2002) where it is stated in chapter 9 Housing para 9.1.2 Local planning authorities should promote sustainable residential environments avoid large housing areas of monotonous character and make appropriate provision for affordable housing. They should promote (inter alia) development that easily accessible by public transport, cycling and walking. Candidate site 539 is a 0.6ha in area and is a sustainable development that would contribute to the revitalization of a principal town.

Draft LDP Policy AW1-New Housing advocates the allocation of land for the development of 14,850 new dwellings over the fifteen year period to be met, inter alia, by the development of unallocated land within settlement boundaries of the principal towns, key settlements and smaller settlements. The allocation of candidate site 540 in Pontypridd would be consistent with this policy.

Policy AW2-Sustainable Locations advocates the development of unallocated sites in sustainable locations ie sites that would not unacceptably conflict with surrounding uses; have good accessibility by a range of transport options; have good access to key services and facilities; are not within the Zone C floodplain and is necessary to assist in the regeneration of a principal town (Pontypridd); and supports the role and functions of the principal town. The allocation of candidate site 540 would be entirely consistent with these policy objectives.

Policy SSA 10 (para.6.148) says the housing sites allocated in the Southern Strategy Area will seek to reinforce the roles of the principal towns. Apart three sites at Cefn Lane, Gelliwion and Glanytaff Farm (150 houses) there are no grounds for concluding the remaining sixteen sites (2745 houses) in the Southern Strategy Area will provide any, other than the most minimal support for Pontypridd.

The inclusion of candidate site 540 in the LDP would accord with Policy SSA10.
### Summary

Objection is raised to the non-inclusion of candidate site 539 for affordable housing in the Rhondda Cynon Taf Local Development Plan 2006-2021.

Q3 Candidate site 539 relates to former allotment land within the settlement boundary for Pontypridd. It is an ideal site for the construction of affordable housing being within walking distance (400 metres) of shops and public transport facilities in the centre of Pontypridd. The candidate site assessment (stage one) ranked these latter attributes as 'excellent'. The delivery of 3000 affordable housing units over the fifteen year Plan period is a priority particularly in valley areas where socio-economic deprivation is high. Of this total 2396 units are to be delivered in the Southern Strategy Area and only 604 in the Northern Strategy Area. There would appear to be a mismatch between areas of greatest need and areas where demand is likely to be satisfied. Pontypridd occupies a central valley position and is ideally placed to accommodate a greater proportion of affordable housing.

There is no justification of Pontypridd’s affordable housing requirement to be met outside of the Town as stated in Draft LDP Chapter 4 Core Strategy (para. 4.13). Such a policy will have limited impact in sustaining Pontypridd as a principal town. The suggested recipient areas for Pontypridd’s local housing needs are Beddau, Church Village and Llantwit Fardre, look principally to the expanding retail/commercial area of Llantrisant/Talbot Green for their shopping/service needs. The allocation of candidate site 539 for affordable housing would ensure at least some affordable housing need is catered for locally whilst providing greater support for the regeneration of Pontypridd town centre.

### Changes sought

The allocation of candidate site 539 for affordable housing

### Representation text

See Attached Q3

Q3 Candidate site 539 relates to former allotment land within the settlement boundary for Pontypridd. It is an ideal site for the construction of affordable housing being within walking distance (400 metres) of shops and public transport facilities in the centre of Pontypridd. The candidate site assessment (stage one) ranked these latter attributes as 'excellent'. The delivery of 3000 affordable housing units over the fifteen year Plan period is a priority particularly in valley areas where socio-economic deprivation is high. Of this total 2396 units are to be delivered in the Southern Strategy Area and only 604 in the Northern Strategy Area. There would appear to be a mismatch between areas of greatest need and areas where demand is likely to be satisfied. Pontypridd occupies a central valley position and is ideally placed to accommodate a greater proportion of affordable housing.

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### Changes sought

The allocation of candidate site 539 for affordable housing

### Representation text

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See Attached Q9

Q9 Inclusion of candidate site 539 in the LDP would satisfy one of the key objectives of the Wales Spatial Plan (Building Sustainable Communities) as follows:-

Retain balanced communities by ensuring access to affordable housing, to buy or rent, in locations which are convenient for local work and services and by ensuring a range of housing types are available in high quality environments. (page 13)

Inclusion of candidate site 539 would also meet the aspirations of local communities with regards to their vision of a better life through the auspices of RCT’s Community Plan 2004-2014. People expressed a desire for town centres which are within easy reach. Candidate site 539 is within 400 metres of Pontypridd town centre, an ideal location for affordable housing where ownership of a private means of transport to access town centre shops and services would not be necessary. (A Better Life by Boosting Our Local Economy Feb 04)

Inclusion of candidate site 539 would also be consistent with advice and guidance given by the Welsh Assembly in Planning Policy Wales (March 2002) where it is stated in chapter 9 Housing para 9.1.2 Local planning authorities should promote sustainable residential environments avoid large housing areas of monotonous character and make appropriate provision for affordable housing. They should promote (inter alia) development that easily accessible by public transport, cycling and walking. Candidate site 539 is 1.32 ha in area, probably the closet (and largest) potential affordable housing site to Pontypridd town. It is a sustainable development that would contribute to the revitalization of a principal town.

Draft LDP Policy AW1-New Housing advocates the allocation of land for the development of 14,850 new dwellings over the fifteen year period to be met, inter alia, by the development of unallocated land within settlement boundaries of the principal towns, key settlements and smaller settlements. The allocation of candidate site 539 in Pontypridd would be consistent with this policy.

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### Item Question

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**Item Question** | **Representation Text**
--- | ---
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   - Objection to designation of area of land surrounding Glyncoch for extraction of minerals.
2 | Representation text
   - The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.
3 | Changes sought
   - To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.
4 | Previous Representation No
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5 | Why attend Examination?
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6 | Soundness Tests
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness' (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.

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The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
**Representation Text**

**Issue Summary**

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### Representation Detail

**Rhondda Cynon Taf County Borough Council Local Development Plan**

**Representations**

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**Document:** Deposit Draft, p.109

**Policy:** SSA 14

**Site:** 529/538 Mwyndy

**Map:** Policy: SSA 14

**Summary:**

**Issue:** Employment

**PEX Session:**

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Document: Deposit Draft, p.060, para.5.83,5.84
Policy: AW 14
Map: 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd
Delete Site
PEX Session:

Summary:

**Issue: Minerals**

**Representation Text**

**Objection to designation of area of land surrounding Glyncoch for extraction of minerals.**

**Representation text**

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

**Changes sought**

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

**Previous Representation No**

Our representation is being made during the current public consultation period (5th February - 26 March 09)

**Why attend Examination?**

There is not sufficient space within this form to do justice to our objections.

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The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
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**Document:** Deposit Draft, p.062

**Site:** 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd

**Policy:** AW 15

**Map:**

**Summary:**

**Issue:** Minerals

**PEX Session:**

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**Document:** Deposit Draft, p.108, para.6.157  
**Policy:** SSA 13  
**Site:** Settlement Boundary

**Summary:**

Objection is raised to the non inclusion of land at the end of Conway Close, Glyncoch within the settlement boundary for Glyncoch (SSA13).

**Representation Text**

The site recommended for inclusion within the settlement boundary is a small triangular shaped area of land at the southern end of Conway Close (see attached plan) Development of the site would achieve a sensible rounding off of this part of Glyncoch. It is noted the site falls within the buffer zone of Graig Yr Hesg quarry along with the southern side of Conway Close and other parts of the residential estate.

**Item Question**  
**Representation Text**

1 2 Issue Summary

Objection is raised to the non inclusion of land at the end of Conway Close, Glyncoch within the settlement boundary for Glyncoch (SSA13).

2 3 Representation text

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4 5 Changes sought

Inclusion of land at the end of Conway Close within the boundary of Policy SSA 13

9 7 Why no previous Representation  
Site was not submitted previously as a candidate site. It has only recently come into the ownership of

**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  
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**Tick box Replies**

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

- **Policy:** AW 14
- **Map:** Site: 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd
- **Summary:** Issue: Minerals
- **Representations**
  - **Representation No:** 3418.D1
  - **Date Lodged:** 09/06/2009
  - **Late?** No
  - **Source Type:** Evidence
  - **Mode Status:** Modified
  - **Petition of:** Treat
  - **Evidence SA/SEA:** No Further Evidence
  - **Repr Council Officer:**
  - **Recommendation Response:**
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The plan does not consider the Glyncoch Partnership’s proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
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**Rep’n No:** 3418.D4  
**Accssn No:** O W M  
**Date Lodged:**  
**Late?**  
**Source Type:**  
**Mode Status:**  
**Modified:**  
**Petition of:**  
**TREAT in parts:**  
**EVIDENCE:**  
**NO FRTHR EVID.:**  
**Repr Council:**  
**Officer:**  
**Recommendation:**  
**Response:**  

**Document:** Deposit Draft, p.116  
**Policy:** SSA 26  
**Map:**  
**Site:** 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd  
**Delete Site:**  
**PEX Session:**  

**Summary:**  
**Issue:** Minerals  
**Issue Summary:** Objection to designation of area of land surrounding Glyncoch for extraction of minerals.  
**Representation Text:**  
**Changes sought:** To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.  

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09/06/2009  
Page 4529 of 4851
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Changes sought
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**Summary:**

The representation is made in opposition to the designation of area of land surrounding Glyncoch for extraction of minerals. The quarry expansion would lead to further noise and disruption to residents, exacerbate air quality, and threaten the structure and integrity of the primary school. The designated area is close to nearby houses, schools, and outdoor classrooms. The existing fencing is faulty, and transportation infrastructure is inadequate. The expansion would have a negative impact on the quality of life of local residents. Alternative proposals are developed by local people to facilitate economic, social, and environmental regeneration of the community.
Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations. 'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctive ness' (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

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## Rhondda Cynon Taf County Borough Council Local Development Plan

### REPRESENTATION DETAIL

**by:** Representation No

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**Document:** Deposit Draft, p.108

**Policy:** SSA 13

**Site:** Settlement Boundary

**PEX Session:**

**Summary:**

**Issue:** Settlement Boundary

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**Previous Representation No**

Our representation is being made during the current public consultation period (5th February - 26 March 09)

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**Representation No:** 3419.D4  
**Issue:** Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

**Representation Text:**

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**Document:** Deposit Draft, p.116  
**Policy:** SSA 26  
**Map:** Site: 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd  
**Delete Site:**

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**Issue:** Minerals  
**PEX Session:** Item Question  
**Representation Text:**

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**Policy:** SSA 26  
**Site:** Graig-yr-Hesg Quarry, Pontypridd  
**Map:** Site: 705//SSA 26  
**Issue:** Minerals  
**PEX Session:** Item Question  
**Representation Text:**

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**Policy:** SSA 26  
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- Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan

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<th>Repr Council</th>
<th>Officer</th>
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**Document:** Deposit Draft, p.27, para.4.16  
**Policy:**  
**Site:**  
**Summary:**  
**Issue:** Core Strategy  
**PEX Session:**  
**Settlement Bound:**  

**Item Question**  
1 2  
Issue Summary  

Groesfam should be recognised as a small settlement within the southern region and identified accordingly on the proposals map.
SMALL SCALE HOUSING PROPOSALS AND SETTLEMENT BOUNDARIES

The approach proposed for promoting and controlling small scale residential development within the County Borough is too rigid and inconsistent.

The LDP seeks to divide the County Borough in two distinct parts:
- The northern strategy area; and
- The southern strategy area.

It is acknowledged that the area covered by the County Borough is extensive and that there is a great social, economic and environmental diversity and that there is a need to allocate strategic sites to specifically target specific issues and opportunities. However, the housing proposals should be consistent throughout the County Borough and in accordance with national regional guidance.

The approach proposed is inconsistent. In particular:

a) Not all settlements are recognised.
b) Boundaries identified on settlements are too rigid.
c) The policy approach is inconsistent between the north and the south.
d) There is no policy framework for considering small scale residential development outside of defined settlement boundaries, in the southern region (whilst there is in the northern region).
e) There is no distinction between proposals adjacent to and forming logical "rounding off" and proposals for housing in the open countryside in the southern region (whilst there is in the northern region).
f) There is no policy relating to conversion of existing properties in the southern region (whilst there is in the northern region).

These issues are discussed further below.

There is a need to provide a wide range of housing opportunities throughout the County Borough to meet the varied needs of the local population and the varied work force that the LDF is seeking to encourage.

The proposed approach is entirely prohibit all development outside of tightly defined settlement boundaries in the southern region is too prescriptive. It would prevent entirely appropriate small scale infill proposals, natural rounding of logical settlement extensions that should come forward in the longer term over the planned period. Greater opportunity should be given for small scale natural infill sites that would be in scale and in character with the existing settlement patterns.

Indeed, many existing groups of buildings and entire villages are not even recognised as settlements and fall outside of the defined boundaries that appear on the proposals map.

There are many settlements within the southern district that could make a valuable contribution to the identified housing requirement over the planned period. Some of these villages, such as Groesfaen and Brynsadler have not even been acknowledged as existing settlements.

It is not justified to state that development may be granted adjoining defined settlements in the north, but not in the south. The text at paragraph 6.157 within the northern strategy confirms that "past completion rates have demonstrated that the development of unallocated or "windfall" sites within the existing settlements can make an important contribution towards housing land supply". This statement is equally applicable to the southern area and is consistent with national guidance. The potential opportunity for infill development should be recognised for all settlements.

We acknowledge the specific requirement to provide strategic development in the south, but small scale developments providing a range of quality housing opportunities would also make a valuable contribution to the economy and the population in the southern area.

The approach proposed in the south is inconsistent with national guidance. Planning Policy Wales (2002) recognises the appropriateness of small scale "infill" and "rounding off" development. A brief summary of relevant policies is attached as Document 1.

Inspectors considering policy guidance in ales have also sought to support opportunities for small scale housing proposals. The inspector at the Vale of Glamorgan Unitary Development Plan Inquiry concurred that settlement boundaries should not be too restrictive or rigid. He concluded when considering similar issues that settlement boundaries were drawn too rigidly and that there are often...
opportunities for small scale rounding off. The Inspector indicated that "from an examination of the settlement boundaries, it is clear that they have been so tightly drawn around the built up areas within settlements as to cause an unnecessary degree of restraint. Extracts from the Vale of Glamorgan Unitary Development Plan Inspector's report are attached at Document 2.

The proposed policy framework associated with the restricted number of identified settlement boundaries within the southern area is too prescriptive and is contrary to national and regional guidance. It does not provide an appropriate framework for the consideration of small scale housing proposals.

Amendments are required throughout the local development plan to ensure that the general framework for the assessment of housing proposals in both the northern and southern regions is consistent and enables to assessment of each proposal on its individual merit.

The following amendments are required:-

1. All existing settlements should be recognised. There is no justification for totally precluding all forms of development from existing villages. In particular, settlements such as Groesfaen which are located within a Strategic Opportunity Area should, as a minimum be recognised as an existing settlement with potential for providing small scale housing proposals. In the northern region, small villages close to strategic sites have been specifically acknowledged as playing a role whilst villages such as Groesfaen which are in close proximity to a key strategic development area and fall within a key "Strategic Opportunity Area" are not even recognised as defined settlements.

2. The boundaries on existing settlements should be revised to include all existing adjacent properties and should include natural opportunities for "rounding off and infill development".

3. There should be a consistent policy framework in both the northern and the southern region for assessing proposals for small scale residential development. There should be a criteria based policy which enables the assessment of small scale residential proposals on their own merits and recognises the distinction between housing adjacent to existing dwellings and development in open countryside.

4. The policy for the assessment of property conversions in the northern region should also be applied to the southern region. Again, it is entirely inappropriate of effectively prohibit conversions of existing properties outside the defined settlement boundaries in the southern region while actively encouraging them in the north.

The identification of key strategic sites and large scale housing and employment opportunities are supported and welcomed. It is merely considered that there needs to be a consistent and appropriate framework for assessing small scale proposals which can provide a valuable contribution to a vibrant and diverse local economy and environment throughout the County Borough.

4 6 Changes sought

Groesfaen should be added to the list identified in para 4.16. A settlement boundary should also be identified on the proposals map. A plan identifying a suggested boundary is attached.

9 7 Why no previous Representation

Representations were submitted but outside the specified deadline in error and thus they were not registered.

21 11 Why attend Examination?

The representations submitted relate to a large number of paragraphs and policies within the southern region. It is considered that it would be helpful to explain the fundamental concern regarding the inconsistency of policies between the northern and southern region in person.

<table>
<thead>
<tr>
<th>Item Question</th>
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**Item Question**

Inappropriate to adopt an entirely different approach to assessing small scale residential development in the north and south.
SMALL SCALE HOUSING PROPOSALS AND SETTLEMENT BOUNDARIES

The approach proposed for promoting and controlling small scale residential development within the County Borough is too rigid and inconsistent.

The LDP seeks to divide the County Borough in two distinct parts:

- The northern strategy area;
- The southern strategy area.

It is acknowledged that the area covered by the County Borough is extensive and that there is a great social, economic and environmental diversity and that there is a need to allocate strategic sites to specifically target specific issues and opportunities. However, the housing proposals should be consistent throughout the County Borough and in accordance with national regional guidance.

The approach proposed is inconsistent. In particular:

a) Not all settlements are recognised.
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These issues are discussed further below.

There is a need to provide a wide range of housing opportunities throughout the County Borough to meet the varied needs of the local population and the varied work force that the LDF is seeking to encourage.

The proposed approach is entirely prohibit all development outside of tightly defined settlement boundaries in the southern region is too prescriptive. It would prevent entirely appropriate small scale infill proposals, natural rounding of logical settlement extensions that should come forward in the longer term over the planned period. Greater opportunity should be given for small scale natural infill sites that would be in scale and in character with the existing settlement patterns.

Indeed, many existing groups of buildings and entire villages are not even recognised as settlements and fall outside of the defined boundaries that appear on the proposals map.

There are many settlements within the southern district that could make a valuable contribution to the identified housing requirement over the planned period. Some of these villages, such as Groesfaen and Brynsadler have not even been acknowledged as existing settlements.

It is not justified to state that development may be granted adjoining defined settlements in the north, but not in the south. The text at paragraph 6.157 within the northern strategy confirms that "past completion rates have demonstrated that the development of unallocated or "windfall" sites within the existing settlements can make an important contribution towards housing land supply". This statement is equally applicable to the southern area and is consistent with national guidance. The potential opportunity for infill development should be recognised for all settlements.

We acknowledge the specific requirement to provide strategic development in the south, but small scale developments providing a range of quality housing opportunities would also make a valuable contribution to the economy and the population in the southern area.

The approach proposed in the south is inconsistent with national guidance. Planning Policy Wales (2002) recognises the appropriateness of small scale "infill" and "rounding off" development. A brief summary of relevant policies is attached as Document 1.

Inspectors considering policy guidance in ales have also sought to support opportunities for small scale housing proposals. The inspector at the Vale of Glamorgan Unitary Development Plan Inquiry concurred that settlement boundaries should not be too restrictive or rigid. He concluded when considering similar issues that settlement boundaries were drawn too rigidly and that there are often
opportunities for small scale rounding off. The Inspector indicated that "from an examination of the settlement boundaries, it is clear that they have been so tightly drawn around the built up areas within settlements as to cause an unnecessary degree of restraint. Extracts from the Vale of Glamorgan Unitary Development Plan Inspector's report are attached at Document 2.

The proposed policy framework associated with the restricted number of identified settlement boundaries within the southern area is too prescriptive and is contrary to national and regional guidance. It does not provide an appropriate framework for the consideration of small scale housing proposals.

Amendments are required throughout the local development plan to ensure that the general framework for the assessment of housing proposals in both the northern and southern regions is consistent and enables to assessment of each proposal on its individual merit.

The following amendments are required:-

1. All existing settlements should be recognised. There is no justification for totally precluding all forms of development from existing villages. In particular, settlements such as Groesfaen which are located within a Strategic Opportunity Area should, as a minimum be recognised as an existing settlement with potential for providing small scale housing proposals. In the northern region, small villages close to strategic sites have been specifically acknowledged as playing a role whilst villages such as Groesfaen which re in close proximity to a key strategic development area and fall within a key "Strategic Opportunity Area" are not even recognised as defined settlements.

2. The boundaries on existing settlements should be revised to include all existing adjacent properties and should include natural opportunities for "rounding off and infill development".

3. There should be a consistent policy framework in both the northern and the southern region for assessing proposals for small scale residential development. There should be a criteria based policy which enables the assessment of small scale residential proposals on their own merits and recognises the distinction between housing adjacent to existing dwellings and development in open countryside.

4. The policy for the assessment of property conversions in the northern region should also be applied to the southern region. Again, it is entirely inappropriate of effectively prohibit conversions of existing properties outside the defined settlement boundaries in the southern region while actively encouraging them in the north.

The identification of key strategic sites and large scale housing and employment opportunities are supported and welcomed. It is merely considered that there needs to be a consistent and appropriate framework for assessing small scale proposals which can provide a valuable contribution to a vibrant and diverse local economy and environment throughout the County Borough.

The policies for assessing small scale residential development in the south should be amended to be consistent with the approach outlined for the northern region. It should recognise the valuable contribution small windfall sites can make to provide a range of housing stock for the southern region. Para. 4.45 will need to be amended to reflect a consistent approach.

Representations were submitted but outside the specified deadline in error and thus they were not registered.

The representations submitted relate to a large number of paragraphs and policies within the southern region. It is considered that it would be helpful to explain the fundamental concern regarding the inconsistency of policies between the northern and southern region in person.

<table>
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<th>Item</th>
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Para. 4.45 should be mended to reflect a consistent approach.

**Item Question**

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**Previous Representations?** Did you make any previous representations on this issue during the Consultation?

<table>
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<th>Previous Representations?</th>
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### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representation Detail**

**Policy: AW 14**

**Map:** Policy: AW 14

**Site:** Settlement Boundary

**Issue:** Minerals

**Summary:**

1. **Issue Summary**
   - The policy and supporting text potentially inappropriately prohibits large areas of land from being developed.

2. **Representation Text**
   - The text and policy is rather confusing. It implies that no development will be allowed on areas identified as a limestone resource on the proposals map. However, strategic development sites and many villages fall within this extensive allocation (14c).
   - The policy is also inconsistent with the policy proposed within the Rhondda Cynon Taf County Borough Council Local Development Plan Sustainability Appraisal. Policy AW14 (now 14 Safeguarding Materials) instead seeks to ensure that extraction of minerals will not effect residential properties rather than prohibiting development on all identified areas.

3. **Changes sought**
   - The policy and text requires clarification. It is presumed that the authority does not wish to sterilise all land identified as a limestone resource from development. Criteria C should be amended to indicate that consideration should be given to the potential impact of any proposals within the area identified as a limestone resource.

4. **Why no previous Representation**
   - Representations were submitted but outside the specified deadline in error.

---

**Item Question**

**Representation Text**

---

**Item Question**

**Reply**

1. **Soundness Tests**
   - P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment? Yes
   - C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes
   - C2 Test? Does not have regard to national policy? Yes
   - CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes
   - CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
   - CE3 Test? No clear mechanisms for implementation and monitoring? Yes
   - CE4 Test? Not flexible to deal with changing circumstances? Yes

2. **Why changes satisfy Soundness**
   - Give details why the changes you propose will ensure that the Plan is consistent with the sustainability appraisal (AW16)

---

**Item Question**

**Reply**

3. **Seek changes? Any changes to be made to the Plan?**
   - Yes

4. **Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit?**
   - No

5. **Previous Representations? Did you make any previous representations on this issue during the Cons**
   - No

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09/06/2009
**Issue Summary**
The approach is inconsistent between the north and south.

**Representation text**
Policy NSA 12 is equally applicable to the southern region. Also it should be amended to refer to all settlements no just defined settlements. (see attached sheets).

**Changes sought**
Policy NSA 12 should be an area wide policy. The paragraph after point 4 should also be amended to state "in addition proposals for residential development outside but adjoining settlements will be permitted where it can be demonstrated…"

**Why no previous Representation**
Representations were submitted but outside the specified deadline in error.

**Why attend Examination?**
The representation is linked to a wider issue and effects a large number of policies throughout the document.

**Soundness Tests**

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<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
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**This policy approach should be consistent across the Borough and should provide a framework for assessing small scale housing proposals.**

**Tick box Replies**

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<tr>
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<td>Representation text</td>
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<td>3</td>
<td>Changes sought</td>
<td>Policy NSA 13 should be an area wide policy or a similar policy should be inserted into the southern strategy.</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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### Issue Summary
The approach is inconsistent between north and south. Policy SSA 13 is too rigid and should recognise the potential for development adjacent to existing settlements.

### Representation text
Policy SSA 13 does not provide an appropriate framework for considering small scale residential proposals in the southern region. It is too prescriptive and rigid and is also inconsistent with the approach adopted in the northern region. (see attached sheets)

### Changes sought
There should be an area wide policy for considering housing development. Policy NSA 12 provides a more appropriate criteria based approach. However, it should be amended to refer to all settlements rather than defined settlements. (see rep submitted in relation to Policy NSA 12)

### Why no previous Representation
Representations were submitted but outside the specified deadline in error.

### Why attend Examination?
The issue of inconsistency covers a number of policies and it is considered it would be helpful to appear to explain the issue.

### Soundness Tests
- **C2 Test?** Does not have regard to national policy? Yes
- **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes
- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
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### Ticket box Replies
- **Site submitted as Candidate?** If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? No
- **Previous Representations?** Did you make any previous representations on this issue during the Cons No
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<tr>
<td>1</td>
<td>Objection to designation of area of land surrounding Glyncoch for extraction of minerals.</td>
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<tr>
<td>2</td>
<td>The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.</td>
</tr>
<tr>
<td>3</td>
<td>Changes sought To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.</td>
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<tr>
<td>4</td>
<td>Previous Representation No Our representation is being made during the current public consultation period (5th February - 26 March 09)</td>
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<td>5</td>
<td>There is not sufficient space within this form to do justice to our objections.</td>
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness' (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.

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Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school’s outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.
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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 No
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

**by:** Representation No

Filtered to show: (All representations)

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**Document:** Deposit Draft, p.108  
**Site:** Settlement Boundary  
**Policy:** SSA 13  
**Map:** Map:  
**Issue:** Settlement Boundary

**Summary:**

**Item Question**  
**Representation Text**

1.  
2.  
3.  

**Objection to designation of area of land surrounding Glyncoch for extraction of minerals.**

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4.  
5.  

**Changes sought**

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

8.  
7.  

**Previous Representation No**  
Our representation is being made during the current public consultation period (5th February - 26 March 09)

21.  
11.  

**Why attend Examination?**  
There is not sufficient space within this form to do justice to our objections.

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<td>16 8</td>
<td>CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth</td>
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Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan

- 'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness’ (WAG: Wales Spatial Plan (2008) pp29 (Word version)).
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**Representation Text**

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4. **Previous Representation No**
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5. **Why attend Examination?**
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6. **Soundness Tests**
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Document: Deposit Draft, p.106

Policy: SSA 10

Map: New Site

PEX Session:

Summary:

Issue: Housing Allocation

Representation Text:

Owen Banks Planning & Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.

Changes sought:

Inclusion of site.

Why no previous Representation:

Unknown

Why attend Examination?

To participate in discussion.

Soundness Tests

Why changes satisfy Soundness:

Give details why the changes you propose will ensure that the Plan

See attached report

Tick box Replies

Seek changes? Any changes to be made to the Plan?: Yes

Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit?: No

Previous Representations? Did you make any previous representations on this issue during the Cons?: No
Rep'n No: 3422.D2

Document: Deposit Draft, p. 108
Policy: SSA 13
Map: New Site
Issue: Settlement Boundary

Summary:

Non inclusion of site.

Representation text:
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Changes sought:
Inclusion of site

Why no previous Representation:
Unknown

Why attend Examination?
To participate in discussion

Why changes satisfy Soundness:
See attached report

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

Previous Representations? Did you make any previous representations on this issue during the Consultation?
No
### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representations Detail**

**By:** Representation No

Filtered to show: (All representations)

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**Document:** Deposit Draft, p.106

**Site:** Map:

**Policy:** SSA 10

**Issue:** Housing Allocation

**Summary:**

**Item Question** | **Representation Text**
---|---

1  2  Issue Summary

   Non inclusion of site

2  3  Representation text

   Owen Banks Planning & Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.

4  5  Changes sought

   Inclusion of site

9  7  Why no previous Representation

   Unknown

21 11  Why attend Examination?

   To participate in discussion

**Item Question** | **Reply**
---|---

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

Yes

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

See attached report

**Item Question** | **Reply**
---|---

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
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| Non inclusion of site. |
| 2 3 | Representation text
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| 4 5 | Changes sought
| Inclusion of site |
| 9 7 | Why no previous Representation
| Unknown |
| 21 11 | Why attend Examination?
| To participate in discussion |
| 20 9 | Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan see attached report |

**Tick box Replies**

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**Document:** Deposit Draft, p.108  
**Policy:** SSA 13  
**Site:** Settlement Boundary

**Summary:**  
Owen Banks Planning & Development Ltd has been instructed by Pontyclun Rugby Club to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to the Deposit Draft, and seeks the inclusion of land adjacent to Pontyclun Rugby Club as a non-strategic site for recreational development.

**Item Question**  
1 2  
**Issue Summary**  
Change of settlement boundary

**Representation text**  
Owen Banks Planning & Development Ltd has been instructed by Pontyclun Rugby Club to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to the Deposit Draft, and seeks the inclusion of land adjacent to Pontyclun Rugby Club as a non-strategic site for recreational development.

**Item Question**  
4 5  
**Changes sought**  
Revision of settlement boundary

**Item Question**  
9 7  
**Why no previous Representation**  
Missed submission window

**Item Question**  
21 11  
**Why attend Examination?**  
To enable participation in discussions

**Item Question**  
20 9  
**Why changes satisfy Soundness**  
Give details why the changes you propose will ensure that the Plan The plan will provide more flexibility to enable expansion of the settlement and housing/playspace.

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

**Item Question**  
5 6  
**Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site**  
No

**Item Question**  
7 7  
**Previous Representations? Did you make any previous representations on this issue during the Cons**  
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Document: Deposit Draft, p. 109
Policy: SSA 14
Site: New Site
PEX Session: Map:
Issue: Employment

Summary:
Owen Banks Planning & Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.

### Item Question

1. Issue Summary
   - Non inclusion of site

2. Representation text
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3. Changes sought
   - Inclusion of Site

4. Why no previous Representation
   - Unknown

5. Why attend Examination?
   - To participate in discussion

### Item Question

6. CE4 Test? Not flexible to deal with changing circumstances?
   - Yes

7. Seek changes? Any changes to be made to the Plan?
   - Yes

8. Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit
   - No

9. Previous Representations? Did you make any previous representations on this issue during the Cons
   - No
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**Summary:**

**Issue Summary**

Non Inclusion of site

**Representation text**

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**Changes sought**

Inclusion of site

**Why no previous Representation**

Unknown

**Why attend Examination?**

To participate in discussion

**Soundness Tests**

Yes

**Tick box Replies**

Yes

**Previous Representations?**

No
### Representation No: 3422.D8

**Date Lodged:** 09/06/2009  

**Site:** New Site  

**Policy:** SSA 14  

**Map:** SSA/SEA  

**Issue:** Employment  

**PEX Session:**

**Document:** Deposit Draft, p.109  

**Site:**

**Summary:**

Owen Banks Planning & Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.

**Changes sought:**

Non inclusion of site

**Why no previous Representation:**

Unknown

**Why attend Examination?:**

To participate in discussion

**Soundness Tests:**

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

**Tick box Replies:**

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

Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit No

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

---

**Representation Text:**

Owen Banks Planning & Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.
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<th>Accssn No</th>
<th>Date Lodged</th>
<th>Late?</th>
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**Document:** Deposit Draft  
**Site:** New Site  
**PEX Session:** PEX Session:  
**Policy:** Map: Policy:  
**Summary:** Issue: Policy Omission  

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<th>Item Question</th>
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<tr>
<td>1 2 Issue Summary</td>
<td>Non inclusion of site</td>
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<td>2 3 Representation text</td>
<td>Owen Banks Planning &amp; Development Ltd has been instructed by Mr Williams to submit a representation towards the Deposit Draft of the Rhondda Cynon Taf County Borough Council Local Development Plan (LDP). This representation is in the form of an objection to Policies SSA 13 and SSA 10 of the Deposit Draft, and seeks the inclusion of land North of the A473 as a non-strategic site for residential development or commercial development or industrial development.</td>
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<td>9 7 Why no previous Representation</td>
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<td>21 11 Why attend Examination?</td>
<td>To participate in discussion</td>
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**Document:** Deposit Draft, p.054  
**Site:** 151/147 Heol-y-Parc North  
**Policy:** AW 8  
**Map:** Policy: AW 8  
**Site:** Site: 151/147 Heol-y-Parc North  
**Summary:** Issue: Appendix 1  

**Issue Summary**

Object to the inclusion of the site in SINC 137  
Please see supporting information

**Representation text**

Site has little ecological or special value and is of a different character and quality to the main area of land in the SINC.  
Lack of evidence base for inclusion in the SINC. Past ecological study shows the site is of limited quality.  
Please see supporting information

**Changes sought**

Remove site from the SINC 137 designation

**Candidate Site Ref No**

Smaller part of wider site, reference 147

**Soundness Tests**

17 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

20 Ecological study shows the site is of little value. The site should not be included as a SINC. Please see supporting information.

**Tick box Replies**

34 Seek changes? Any changes to be made to the Plan? Yes

56 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes
**Rep'n No**: 3423.D2  
**Accssn No**: O W M  
**Date Lodged**: 09/06/2009  
**Late?**: No  
**Source Type**: Map: Policy: SSA 10  
**Site**: 151/147 Heol-y-Parc North  
**Issue**: Housing Allocation  
**PEX Session**: Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes

### Summary:
- **Issue Summary**: Object - the site should be allocated for residential development
- **Representation Text**: Site should be allocated for residential development under Policy SSA 10. Please see supporting information.
- **Changes sought**: Site should be allocated for residential development
- **Candidate Site Ref No**: Site is part of wider site, ref 147

### Item Question
1. **Issue Summary**: Object - the site should be allocated for residential development
   - **Representation Text**: Please see supporting information
2. **Representation text**: Site should be allocated for residential development under Policy SSA 10. Please see supporting information.
4. **Changes sought**: Site should be allocated for residential development
6. **Candidate Site Ref No**: Site is part of wider site, ref 147

### Item Question
17. **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
20. **Why changes satisfy Soundness** Give details why the changes you propose will ensure that the Plan Allocation of the site for residential development will help to fill the shortfall in housing that the LDP currently contains. Please see supporting information.

### Item Question
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 Site? Yes
<table>
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**Document:** Deposit Draft, p.043  
**Policy:** AW 1  
**Site:** 151/147 Heol-y-Parc North  
**New Site**  
**PEX Session:**

**Summary:**

**Issue:** Housing Requirement

**Representation Text**

1. *Issue Summary*
   - Object - the policy will result in a shortfall of housing. Please see supporting statement.

2. *Representation text*
   - Over-reliance on windfall sites
   - No urban capacity assessment to inform small and windfall site allowance
   - Please see supporting statement.

3. *Changes sought*
   - Additional housing sites should be allocated to fill the gap in housing supply. Please see supporting information.

4. *Candidate Site Ref No*
   - Site is part of wider site 147

**Soundness Tests**

13. *C2 Test? Does not have regard to national policy?*
   - Yes

17. *CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?*
   - Yes

20. *Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan*
   - The allocation of further sites will ensure the housing requirement is met. Please see supporting information.

**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 Site?*
   - Yes
### REPRESENTATION DETAIL

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**Document:** Deposit Draft, p.113  
**Policy:** SSA 22  
**Map:** Site: 821/SSA 22.7 Efail Isaf & Llantwit Fardre  
**Delete Site**  
**PEX Session:**

**Summary:**

**Issue:** Environment  
**Screen:** SSA 22

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<td>2 3</td>
<td>Representation text</td>
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<td></td>
<td>The site should be deleted from the green wedge. Please see supporting information</td>
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<td>4 5</td>
<td>Changes sought</td>
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<td>The site should be excluded from the green wedge. Please see supporting information</td>
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<td>Site is part of wider site 147</td>
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<th>Reply</th>
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<td>CEQ Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>Yes</td>
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<td>20 9</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
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<td>The site does not contribute to the green wedge. Please see supporting information</td>
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<td>Seek changes. Any changes to be made to the Plan?</td>
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**Policy:** SSA 10  
**Map:**  
**Site:** 691/SSA 10.13 West of Llechau, Llanharry  
**Delete Site**  
**PEX Session:**  

**Summary:**  
**Issue:** Housing Allocation

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<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>1 2</td>
<td>I object to the housing allocation policy SSA 10</td>
</tr>
<tr>
<td>2 3</td>
<td>I wish to object to the allocation of Site Number 13 in Policy SSA10 (Land to the west of Llechau) for the following reasons;</td>
</tr>
<tr>
<td></td>
<td>1. The site is in the open countryside, outside the settlement boundary for Llanharry which has been approved by the Council.</td>
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<td>2. New housing would have an adverse impact on the amenity of our existing dwellings and the appearance of the local landscape.</td>
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<td>3. Trees, hedges, agricultural land and informal open space would be lost, which are important to the local community.</td>
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<tr>
<td></td>
<td>4. New residents would be a considerable distance from the shops and other services in the centre of Llanharry, which would result in an unacceptable increase in traffic generation on the main roads and to and from the new houses.</td>
</tr>
<tr>
<td></td>
<td>5. There are previous mineworkings in, on and near the site which would make it unsuitable for new housing.</td>
</tr>
<tr>
<td>4 5</td>
<td>Policy SSA 10.13 should be deleted from the new LDP.</td>
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<table>
<thead>
<tr>
<th>Item Question</th>
<th>Reply</th>
<th>Soundness Tests</th>
</tr>
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<tbody>
<tr>
<td>12 8</td>
<td>C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes</td>
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<tr>
<td>13 8</td>
<td>C2 Test? Does not have regard to national policy? Yes</td>
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<td>Why changes satisfy Soundness Test? Give details why the changes you propose will ensure that the Plan</td>
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<td>It will prevent new housing development which is not in accord with modern principles for sustainable development.</td>
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<td>Seek changes? Any changes to be made to the Plan? Yes</td>
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<td>5 6</td>
<td>Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site No</td>
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</table>
Item Question | Representation Text
---|---
1 | Issue Summary
   - I object to the housing allocation Policy SSA 10
2 | Representation Text
   - This site was part of a planning application made on behalf of Lovell Ltd in 2004. A report by Integral Geotechnique of Nov. 2004 concluded that drilling investigations are required to better assess the mining risks associated with past ironstone mining activities and that "precautions against future mining-related subsidence will be required". An ecological assessment also stated that there are a number of species that demand preservation orders including bee orchids. In 2004, over 700 residents of the area signed a petition of opposition against the scheme and were supported by Janet Davies, Assembly Member in her letters of 18 and 20 August 2004. The Llanharry Community Council also objected. Lovell's withdrew their application.
3 | Changes sought
   - Policy SSA 10.3 should be deleted from the new LDP
4 | Item Question
   - Why changes satisfy Soundness
   - Give details why the changes you propose will ensure that the Plan
   - It will prevent new housing development which is not in accord with modern principles for sustainable development.
5 | Item Question
   - Seek changes? Any changes to be made to the Plan?
   - Yes
6 | Item Question
   - Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site
   - No
**Item Question** | **Representation Text**
---|---
1. **Issue Summary**
   - Objection is raised to Policy SSA23.5 on grounds candidate site 644 should be excluded from the special landscape area for Llantrisant.

2. **Representation text**
   - SSA23.5 as presented is too restrictive. It is all encompassing. Land that has no justification for inclusion in this policy area is protected by SSA23.5 to the detriment LDP flexibility. Virtually all land outside the settlement boundary is within SSA23.5. Part of candidate site 644 is occupied by redundant pig styes and pigeon coops which are a veritable eyesore and in no way can be described as qualifying for inclusion within a special landscape area.

3. **Changes sought**
   - Exclusion of candidate site 644 from Policy SS23.5.

4. **Seek changes? Any changes to be made to the Plan?**
   - Yes
### Issue Summary

Objection is raised to Policy SSA23.5 on grounds candidate site 644 should be excluded from the special landscape area for Llantrisant.

### Representation text

SSA23.5 as presented is too restrictive. It is all encompassing. Land that has no justification for inclusion in this policy area is protected by SSA23.5 to the detriment LDP flexibility. Virtually all land outside the settlement boundary is within SSA23.5. Part of candidate site 644 is occupied by redundant pig styes and pigeon cotts which are a veritable eyesore and in no way can be described as qualifying for inclusion within a special landscape area.

### Changes sought

Exclusion of candidate site 644 from Policy SS23.5.

### Why changes satisfy Soundness

Amendments to Policy SSA23.5 would allow the identification of candidate site 644 for 'affordable housing'. This would be consistent with Welsh Assembly for Wales' Planning Policy Wales 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. Paragraph 9.2.14 identifies the need for LDP’s to make provision for ‘affordable housing’ as an essential element in contributing to community regeneration and strengthening social inclusion. Candidate site 644 is a small site, well placed to provide for the affordable housing needs of Llantrisant.
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<tr>
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<th>Late?</th>
<th>Source Type</th>
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**Document:** Deposit Draft, p.106  
**Site:** 684/SSA 10.6  
**Mill Street, Tonyrefail**  
**PEX Session:**

**Policy:** SSA 10  
**Map:**

**Summary:**

**Issue:** Housing Allocation

1. **Issue Summary**
   - ROAD DEVELOPMENT/MANAGEMENT TO EXISTING CARRIGEWAYS
   - SUSTAINABILITY TO SURROUNDING AREAS
   - CRIME PREVENTION
   - LEISURE ACTIVITIES/PLAY AREAS (YOUTH ANNOYANCE)
   - EDUCATION FACILITY UPGRADE
   - RESITING OF CLUBHOUSE

2. **Representation text**
   - I WILL ATTEND PLANNING MEETING PERSONALLY

3. **Changes sought**
   - UTILIZATION OF EXISTING WASTELAND FOR DEVELOPMENT.
   - UPGRADING OF EXISTING FACILITIES (SIC)
   - PROTECTION TO GREENFIELD SITES
   - PUBLIC FOOTPATH PRESERVATION
   - HISTORIC WALKWAY PRESERVATION

4. **Why no previous Representation**
   - I WAS NOT MADE AWARE OF IT

5. **Item Question**
   - **Proposal 1:**
     - P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc
     - C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a
   - **Proposal 2:**
     - Why changes satisfy Soundness
     - Give details why the changes you propose will ensure that the Plan
     - WE AS A COMMUNITY HAVE NOT BEEN GIVEN THE OPPORTUNITY TO DEBATE AS WE FEEL NECESSARY
     - THE PLANS SHOW HOUSING DEVELOPMENT ON AREAS NOT SUITABLE AND WOULD BE BETTER IF THEY WERE RETAIL AND EDUCATION BIASED

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

**Item Question**

**Representation Text**

09/06/2009
## Rhondda Cynon Taf County Borough Council Local Development Plan

### Representation Detail

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**Document:** Deposit Draft, p.109  
**Map:** Policy: SSA 15  
**Site:** 704//SSA 15.3 Land east of Mill Street, Tonyrefail  
**PEX Session:**

### Summary:

**Issue:** Retail

**Road Development/Management to Existing Carriageways**  
**Sustainability to Surrounding Areas**  
**Crime Prevention**  
**Leisure Activities/Play Areas (Youth Annoyance)**  
**Education Facility Upgrade**  
**Resiting of Clubhouse**

**Representation Text**

1. **Road Development/Management to Existing Carriageways**
2. **Sustainability to Surrounding Areas**
3. **Crime Prevention**
4. **Leisure Activities/Play Areas (Youth Annoyance)**
5. **Education Facility Upgrade**
6. **Resiting of Clubhouse**

**Representation Text**

1. I WILL ATTEND PLANNING MEETING PERSONALLY
2. I WAS NOT MADE AWARE OF IT

**Item Question**

- **Item Question:** Why no previous Representation  
  **Reply:**  
  **Why no previous Representation**
  **I WAS NOT MADE AWARE OF IT**

**Soundness Tests**

- **P1 Test?** Not prepared in accordance with Delivery Agreement, including Community Involvement Sc  
  **Yes**
- **C1 Test?** Does not have regard to other relevant plans, policies and strategies relating to the area or a  
  **Yes**
- **Why changes satisfy Soundness?** Give details why the changes you propose will ensure that the Plan  
  **WE AS A COMMUNITY HAVE NOT BEEN GIVEN THE OPPORTUNITY TO DEBATE AS WE FEEL NECESSARY**
  **THE PLANS SHOW HOUSING DEVELOPMENT ON AREAS NOT SUITABLE AND WOULD BE BETTER IF THEY WERE RETAIL AND EDUCATION BIASED**

**Tick box Replies**

- **Seek changes?** Any changes to be made to the Plan?  
  **Yes**
- **Site submitted as Candidate?** If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?  
  **No**
- **Previous Representations?** Did you make any previous representations on this issue during the Cons?  
  **No**
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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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</table>

**Soundness Tests**

- P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc: Yes
- C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a: Yes
- Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan: WE AS A COMMUNITY HAVE NOT BEEN GIVEN THE OPPORTUNITY TO DEBATE AS WE FEEL NECESSARY THE PLANS SHOW HOUSING DEVELOPMENT ON AREAS NOT SUITABLE AND WOULD BE BETTER IF THEY WERE RETAIL AND EDUCATION BIASED

**Tick box Replies**

- Seek changes? Any changes to be made to the Plan?: Yes
- Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit?: No
- Previous Representations? Did you make any previous representations on this issue during the Cons?: No
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**Document:** Deposit Draft, p.109

**Map:** Policy: SSA 15

**Site:**

**Summary:**

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<td>1 2</td>
<td>Issue Summary ROAD DEVELOPMENT/MANAGEMENT TO EXISTING CARRIGeways SUSTAINABILITY TO SURROUNDING AREAS CRIME PREVENTION LEISURE ACTIVITIES/PLAY AREAS(YOUTH ANNOYANCE) EDUCATION FACILITY UPGRADE RESITING OF CLUBHOUSE</td>
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<tr>
<td>2 3</td>
<td>Representation text I WILL ATTEND PLANNING MEETING PERSONALLY</td>
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<td>Changes sought UTILIZATION OF EXISTING WASTELAND FOR DEVELOPMENT. UPGRADING OF EXISTING FACILITIES (SIC) PROTECTION TO GREENFIELD SITES PUBLIC FOOTPATH PRESERVATION HISTORIC WALKWAY PRESERVATION</td>
</tr>
<tr>
<td>9 7</td>
<td>Why no previous Representation I WAS NOT MADE AWARE OF IT</td>
</tr>
<tr>
<td>10 8</td>
<td>P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc</td>
</tr>
<tr>
<td>12 8</td>
<td>C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a</td>
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<td>20 9</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan WE AS A COMMUNITY HAVE NOT BEEN GIVEN THE OPPORTUNITY TO DEBATE AS WE FEEL NECESSARY THE PLANS SHOW HOUSING DEVELOPMENT ON AREAS NOT SUITABLE AND WOULD BE BETTER IF THEY WERE RETAIL AND EDUCATION BIASED</td>
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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
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</table>
**Issue Summary**

At the rear of my house 88 Parc Nant Celyn is an open field. There is a public right of way across this field. Its is owned by Celyn Farm. Historically it has not been regarded as part of the "settlement area" for development purposes. I am not clear why it has now crept into the draft local plan.

**Representation Text**

- any development here would further erode the "village" character of Efail Isaf
- it would adversely affect provision of "open space"
- it would increase the risk of flooding in Nant Celyn as there is a narrow brook running down from Garth mountain through this field
- it would erode the public right of way across this field

It would erode the green wedge around the village, already eroded by the by-pass rather than an environmentally friendly railway

**Changes sought**

Exclude this field from the settlement area and retain it as an open rural space with right of way

**Why no previous Representation**

Because I was not aware of it.

**Soundness Tests**

- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
- CE3 Test? No clear mechanisms for implementation and monitoring? Yes
- CE4 Test? Not flexible to deal with changing circumstances? Yes

**Why changes satisfy Soundness**

The area becomes more sustainable as a country village

There is no credible evidence that the inclusion of this field has been carefully considered

There is insufficient attention to public transport from the village and RCT have not considered the re-opening of the Efail Isaf to Cardiff railway as an alternative to roads that will congest at Talbot Green and Power Station Hill anyway

**Tick box Replies**

- Seek changes? Any changes to be made to the Plan? Yes
- Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit? No
- Previous Representations? Did you make any previous representations on this issue during the Cons? No
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Document: Deposit Draft, p.073

Map: Policy: NSA 7

Site: 4/NSA 7 OSTR Robertstown/Abernant

Delete Site PEX Session:

Policy: NSA 7

Summary:

issue: Strategic Sites

Representation Text

1 2 Issue Summary

NSA7

Main hospital building to remain as this is the former Abernant House and has important historic value built in 1801 by James Birch and former resident of Richard Fothergill III Ironmaster.

The development of housing on a green field site which was former parkland to the said Abernant house to be prohibited due to its adverse negative impact on the surrounding area. School to be situated on former YTS ground in upper Abernant, and residential development to be confined to former goods yard area

The fields that make up the green space area surrounding the hospital, Abernant Rd, Moss Row and Office Houses to be undeveloped and remain an open space which it was intended for (Planning Policy Wales 2002)

Appendix A6 (Nant y Wenallt)

Land to be left undeveloped due to negative impact on environment, planning already granted to river level tips (60 units) which should be questionable due to unstable ground and lack of a full site investigation/environmental risk assessment.

4 5 Changes sought

See 21 for alternative measures, also if development is needed land at Hirwaun Common should be used to form a new settlement

9 7 Why no previous Representation

Unaware of detail or LDP

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

20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan satisfies WAG planning policies that were introduced to enhance the environment and reduce negative impacts overdevelopment has on the surrounding area especially a small village like Abernant, which I feel will be ruined if these LDP and candidate sites are taken into effect

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
### Rhondda Cynon Taf County Borough Council Local Development Plan

#### REPRESENTATION DETAIL

**Representation No**: Representation No

**Filtered to show**: (All representations)

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**Document**: Deposit Draft, p.078

**Policy**: NSA 9

**Map**: Site: 656/NSA 9.6 Nant y Wenallt, Abernant Road, Abernant

**Site**: Delete Site

**PEX Session**: Map: Policy: NSA 9

**Site**: 656//NSA 9.6 Nant y Wenallt, Abernant Road, Abernant

**City**

**Issue**: Housing Allocation

---

**Summary**

**Issue Summary**

NSA7

Main hospital building to remain as this is the former Abernant House and has important historic value built in 1801 by James Birch and former resident of Richard Fothergill III Ironmaster.

The development of housing on a green field site which was former parkland to the said Abernant house to be prohibited due to its adverse negative impact on the surrounding area. School to be situated on former YTS ground in upper Abernant, and residential development to be confined to former goods yard area.

The fields that make up the green space area surrounding the hospital, Abernant Rd, Moss Row and Office Houses to be undeveloped and remain an open space which it was intended for (Planning Policy Wales 2002)

**Appendix A6 (Nant y Wenallt)**

Land to be left undeveloped due to negative impact on environment, planning already granted to river level tips (60 units) which should be questionable due to unstable ground and lack of a full site investigation/environmental risk assessment.

---

**Changes sought**

See 21 for alternative measures, also if development is needed land at Hirwaun Common should be used to form a new settlement.

---

**Why no previous Representation**

Unaware of detail or LDP

---

**Why changes satisfy Soundness**

Give details why the changes you propose will ensure that the Plan satisfies WAG planning policies that were introduced to enhance the environment and reduce negative impacts overdevelopment has on the surrounding area especially a small village like Abernant, which I feel will be ruined if these LDP and candidate sites are taken into effect.

---

**Tick box Replies**

5 6  

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

No
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Document: Deposit Draft, p.077
Policy: NSA 9
Site: 652/NSA 9.3 South East of Llwydcoed Community Centre
Delete Site
PEX Session:

Summary:
- Issue Summary
  - objection to planning of site ref 9.3

Representation text:
- Item Question: Seek changes? Any changes to be made to the Plan?
  - Representation Text: No
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**Document:** Deposit Draft, p.106  
**Site:** 418/422 Collenna Farm  
**Policy:** SSA 10  
**Map:**  
**Issue:** Housing Allocation  

**Summary:**  
I wish to object to the proposal on the grounds of poor road access.

**Representation Text:**  
I object due to the limitations of the current road infrastructure in the locality of the proposed development. Conditions for driving through the Capel and Collena farm estates can be very hazardous with most streets reduced to single track due to the lack of off road parking, with larger vehicles (including RCT vehicles) having to mount pavements on occasions to carryout their journey. These streets are heavily populated with families with small children who play around these roads and are in constant danger even since the introduction of “Road Calming” measures. Access to the proposed development must not be considered through these already congested streets.

**Changes sought:**  
No access to the proposed development via Maes-y-Bryn or Heol Capel. Access should only be available via Llantrisant road north.

**Soundness Tests:**  
CE4 Test? Not flexible to deal with changing circumstances? Yes

**Tick box Replies:**  
Seek changes? Any changes to be made to the Plan? Yes

**Previous Representations?** Did you make any previous representations on this issue during the Cons Yes
**Issue Summary**
Proposal to build houses at Tegfan Farm

**Representation Text**
An extra 140 houses at Potters Field will increase traffic flow through the estate making the noise, pollution levels and health and safety risks to the many children on the estate. At present we have a pleasant environment with relatively safe surroundings for our children to enjoy playing outdoors - this proposal will stop this. Potters Field entrance already has several large vehicles using the area as transport to the garden centre. The one road leading in and out will not be suitable for double the traffic or constant use for large machinery lorries.

**Changes Sought**
Proposal stopped

New plans to include additional entrance into Potters Field via bypass roads to aid traffic flow and lessen risks from cars all using the same route at busy times (e.g. school runs, peak work hours).

**Why no previous Representation**
Only just heard about the proposal

**Soundness Tests**
14. C3 Test? Does not have regard to Wales Spatial Plan? Yes
17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
20. Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan to reduce (sic) traffic (sic) flow and pollution

**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 Site? No
7. Previous Representations? Did you make any previous representations on this issue during the Consultation? No
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Document: Deposit Draft, p.106
Policy: SSA 10
Site: 128/123  Talygarn House N.

Summary:
Candidate Site 123 - North of Talygarn House has not been identified as a non-strategic housing site.
Candidate Site 123 - North of Talygarn House has not been identified under Policy SSA10 as a non-strategic housing development site. The assessment of the candidate site gave 'Poor' or 'Undermining' scores to the site for a number of reasons which we assess in turn below:

The site is not located within walking distance of a range of community services: whilst the site is not within walking distance to a range of community facilities it is located within close proximity of Brynsadler which has a number of facilities used by existing Talygarn residents. It is also considered that day to day facilities could be provided in Talygarn on site 123 if mixed use development is allowed. This would improve sustainability within this area for both existing and future residents;

The site is protected by landscape ecological or cultural designations: The Local Plan (2003) does not designate the site for landscape protection. We are challenging the extent of the proposed SLA and mineral resource allocations proposed on the site under the LDP through separate representations;

Development would result in the loss of agricultural land: The site is not high quality agricultural land. The site bordered by residential development and the M4. The LDP allocates other agricultural land for development so this is not a significant reason to discount development on this site.

The site is Greenfield: We accept that the site is Greenfield but given the advantages to sustainability if a mixed use development was allowed on the site we do not consider this a justified reason for dismissing the site. The allocation of other Greenfield sites demonstrates that the Council needs to permit some development on Greenfield land to meet its development aspirations, particularly in terms of housing.

The site would have an impact on important views and vistas: It is accepted that the site is relatively open in nature and is visible on entry to Talygarn. However, the site slopes and there is existing housing to the west of the site at the lowest point. On this basis, if development was concentrated to the west part of the site, behind the existing housing this would have limited impact on views within Talygarn. Another alternative would be providing dwellings along Talygarn Mews, the view of which is largely obscured by mature planting.

Development would not provide continuity and enclosure in respect and adjacent uses: The site is bounded to the west by housing, south by Talygarn estate and to the north by the M4. We do not consider the development of the western and southern part of the site for housing/mixed use would be incongruous.

The site is unsuitable for development: We consider that the site is suitable for housing given its close proximity to existing housing. It would also provide an opportunity to accommodate future growth within Talygarn and promote stronger links between Talygarn and Brynsadler. Development of the site for mixed use purposes would increase sustainability within this area of the Borough.

The Council are concerned that Talygarn is an unsustainable settlement due to the lack of community facilities. Therefore, we consider that rather than putting a blanket policy against any new development within this area, it would be more beneficial to increase sustainability through the provision of a mixed use development to include basic community facilities. This would seem particularly important given the fact that the property numbers have effectively doubled within the area with the redevelopment of the Talygarn Manor site.

It is further noted that the majority of housing within Talygarn are large family homes and executive style housing. Therefore, opportunity exists to provide a mix of housing on this site to the benefit of the local community.

The majority of allocations identified within the plan are for larger sites, there is very little opportunity for self build development. If the larger site is not required for mixed use development at this stage, consideration should be given to the release of two discrete elements of the site that could be brought forward as quality self build schemes. These would reflect the findings of the OFT report into the house building sector which identified a lack of self build sites as a failure in the planning system. This form of development would also reflect the quality development and setting that exists in the adjacent Talygarn Estate.

In conclusion, we see great merit in re-assessing the partial development of the site to provide a mixed use development to the northern flank of Talygarn. Should development of the larger site not be required at this stage we believe that consideration should be given to the release of two discrete self contained parcels within the site. As stated we consider that a mixed use development on this site, providing basic community facilities such as a local shop, would have significant sustainability benefits for both existing and future residents of Talygarn.


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**Reason for Representation:**

- We were not commissioned to do so

**Soundness Tests**

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<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
<td>Yes</td>
</tr>
<tr>
<td>19</td>
<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
<td>Yes</td>
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**Recommendation:**

A mixed use development would promote sustainability to the south of the Borough;
Affordable housing provision in an area of the Borough deemed unaffordable consistent with Policy CS 5
Demonstrates flexibility.

**Tick box Replies**

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<td>1 2</td>
<td>Consider the extent of the designation of the Special Landscape Area ‘Talygarn Surrounds’ as defined by Policy SAA 23(SIC) and the proposals map to be excessive.</td>
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<td>It is noted that the extent of the designated Special Landscape Area within Talygarn has significantly increased in size from the original designation within the Taf Ely Local Plan (2003).</td>
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<td>The justification for the increase in size of the designation is largely due to a change in survey methods from the Countryside Commission guidance to the LANDMAP Information System of landscape assessment, developed by the Countryside Council for Wales (CCW). Using the LANDMAP system, Bronwen Thomas - Landscape Architect, produced a report on behalf of the Council recommending &quot;Enlargement of existing SLA to include Talygarn setting, and land prominent from M4&quot;.</td>
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<td>Whilst it is accepted that there appears some merit in increasing the SLA designation to the south and west of Talygarn to prevent encroachment of the existing quarry, we do not consider it necessary to include the land to the north of existing designation. This land appears to have been designated due to its location adjacent to the M4 rather than for its landscape value. We would comment that a significant area of mature trees and hedges border the M4 obscuring views to this area of Talygarn. As such, its prominence appears to have been over emphasised in the report and the subsequent designation.</td>
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<td>Brynsadler is situated on the opposite site of the M4 at this location so there is already an urbanising influence from the M4. It is inappropriate to argue that land should be protected simply because it is visible from the M4 and is currently countryside. The vista along the M4 changes significantly between urban, urban fringed and countryside. The land in this location is not of itself of particular landscape value to merit special protection. As a result we consider that the boundaries have been too widely drawn.</td>
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<td>We would request that the extent of the ‘Talygarn Surrounds’ Special Landscape Area be reassessed with a view to reinstating the designation as per the Local Plan with the addition of the area surrounding the quarry in order to protect against its encroachment.</td>
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<td>We were not commissioned to do so.</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan is sound. The proposed ‘Talygarn Surrounds’ SLA is not considered to be appropriate and is not perceived to be founded on a robust evidence base. Reducing the SLA to areas of genuine landscape value around Talygarn Manor and Country Park and the area at risk from encroachment from the quarry is considered a more appropriate approach.</td>
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</table>
Talygarn has not been designated as a settlement.

Although a relatively small settlement, Talygarn has approximately 150 predominantly large family homes when including the recent development at Talygarn Manor. It is therefore considered that Talygarn should be acknowledged as a settlement and an area which has potential to accommodate limited further growth.

Talygarn was designated as a settlement under the Taf Ely Local Plan (2003). However, the LDP proposes no such designation. Although the justification for this change could not be found within the evidence base, discussions with the Council indicate that it was due to the fact that Talygarn does not provide the appropriate facilities and amenities to qualify as a settlement.

In response to this we would emphasise the fact that the north of Talygarn is located just 75m from the settlement boundary of Brynsadler and whilst it is accepted that the M4 acts as a barrier between the two settlements, this has no bearing on the movement of pedestrians or vehicles between the two areas. Brynsadler has a number of facilities including a Post Office, butchers, pub, café, convenience store, hairdressers etc which are utilised by the residents of Talygarn. As such we would argue that the settlements are linked and it would be appropriate to extend the settlement boundary of Brynsadler/Pontyclun to include Talygarn in order to reflect this.

We would further comment that whilst we do not consider development to the south of Talygarn appropriate, development to the north i.e. within close proximity to Brynsadler could be appropriate and as such there would be merit in extending the settlement boundary to the north of Talygarn to accommodate additional growth. On the basis, it may be necessary to review a number of the candidate sites within this area of Talygarn to see if they are suitable either in whole or in part for development.

If the settlement boundary was extended to include further land we would encourage a small mixed use development to the north of Talygarn to include facilities for the local population such as an additional convenience store. This would benefit both existing and future residents and increase the sustainability of the settlement.

It is recommended that Talygarn be designated as a settlement either within its own right or as an extension to the settlement for Brynsadler/Pontyclun. It is also recommended that the boundary include potential for growth to the north of the settlement.

We were not commissioned to do so.

Item Question | Representation Text
---|---
CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? | Yes
CE4 Test? Not flexible to deal with changing circumstances? | Yes
<table>
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<tr>
<th>Rep'n No</th>
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It is considered that not allocating Talygarn as a settlement is inappropriate given its size and recent growth as a residential area.

The justification for not designating Talygarn as a settlement is inappropriate given its size and evidence base.

Designating Talygarn as a settlement will help to ensure the plan is flexible and the County is able to accommodate future growth.

Promoting a mixed use development scheme to the north of Talygarn would improve sustainability to the benefit of both future and existing residents.

### Item Question

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### Issue Summary

Policies AW14 and AW15 are conflicting.

Policy AW14 states that mineral resources shall be safeguarded from any development which would sterilise them or hinder their extraction. Whilst this is acceptable in areas where mineral extraction is occurring or is likely to occur, it is not considered that a blanket policy on any area where mineral resources are located is practical or appropriate.

Taking Limestone extraction as an example, Part c) of Policy AW14 of the LDP states that the resources of Limestone, as shown on the proposals map, will be safeguarded from development and include a 200 metre buffer zone. The areas of limestone, as plotted on the proposals map, are vast and include areas of housing, strategic development sites and the M4. As such, the majority of the area plotted on the plan, and protected under Policy AW14 is unlikely to be utilised for mineral extraction and therefore its blanket protection as a resource seems futile.

Policy AW15 states that in order to protect the amenity of residential areas, no mineral extraction or activity directly related to the extraction of minerals will be permitted within the defined settlement boundaries or other established settlements. This policy is considered to conflict with Policy AW14 which states that all areas of mineral resource will be safeguarded from any development.

In conclusion we would recommend that the areas of mineral resources should be re-assessed and streamlined to include areas of existing mineral extraction or areas deemed suitable for future mineral extraction only.

### Changes sought

- The areas of mineral resource as plotted on the proposals map should be re-assessed and rationalised to include areas of existing mineral extraction or areas deemed suitable for future mineral extraction only;
- No settlement area or areas where there are significant levels of housing should be designated as mineral resource areas including a 200 metre buffer between existing housing and existing mineral resources;
- If it is considered necessary to plot all areas where mineral resources are present, a distinction needs to be made between areas likely to be mined and those which aren’t.

### Why no previous Representation

We were not commissioned to do so

### Soundness Tests

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### Rhondda Cynon Taf County Borough Council Local Development Plan

#### REPRESENTATION DETAIL

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**Item Question**

- Policies AW14 and AW15 currently conflict which the proposed changes seek to resolve;
- Policy AW14 and the proposals map allocations are not logical in their current state;
- The proposed mineral resource allocations conflict with other LDP policies e.g. development on strategic sites.

**Tick box Replies**

- Seek changes? Any changes to be made to the Plan? Yes
- Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit? No
- Previous Representations? Did you make any previous representations on this issue during the Cons? No
## Rhondda Cynon Taf County Borough Council Local Development Plan

### REPRESENTATION DETAIL

**by:** Representation No

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.062

**Policy:** AW 15

**Site:**

**Summary:**

**Item Question** | Representation Text
--- | ---
1 | Policies AW14 and AW15 are conflicting.
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4 | Why no previous Representation
   - We were not commissioned to do so

---

**Soundness Tests**

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<tr>
<td>1 2 Issue Summary</td>
<td>I object to any more development in the Talbot Green and Llantrisant area.</td>
<td></td>
</tr>
<tr>
<td>2 3 Representation text</td>
<td>how will more ugly buildings 'respect the culture, heritage and natural environment of the area'. firstly a small part of the culture and heritage of these villages has been lost due to the amount of new development in the area already. They have moved from being small villages to small TOWNS! now the proposed plans talk about them being TOWN CENTRES! This is ridiculous (sic). Also how is it possible to respect the environment when you plan on destroying it to build on the land! and as for making a ‘positive contribution to reducing congestion’ how do you plan on doing this when you add at least another 1000 people to the area, when the traffic is already an unacceptable level as it is. I have grown up in this area and in 19 years have just seen it crumble away, these little villages aren't recognizable any more. Everything just seems to be about making money these days!</td>
<td></td>
</tr>
<tr>
<td>4 5 Changes sought</td>
<td>i would like to see the development plan for this area demolished.</td>
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</tr>
<tr>
<td>9 7 Why no previous Representation</td>
<td>did not no of the plan until a few days ago! i feel it has been kept quiet so people could not have their say.</td>
<td></td>
</tr>
<tr>
<td>10 8 Why changes satisfy Soundness</td>
<td>Give details why the changes you propose will ensure that the Plan i do not feel that the community has had any involvement. i am 19 years old, i had no idea of the plan and i know that not many youngsters in the area know either. THIS IS OUR FUTURE, and if this plan goes ahead i do not want to live in this area.</td>
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**Issue Summary**

The proposed route for the Ynysmaerdy - Talbot Green Relief Road.

**Representation Text**

I object to the part of the proposed route for this relief road which goes from the roundabout at L'Oreal, through the playing fields and past recently built housing. This proposed route would mean that recently built executive housing would lose frontage or may need to be demolished. The width of the proposed road would result in reducing the width of the river which would cause a serious risk of flooding to the houses which are near to the river. Also the proposed route would attract more traffic including heavy goods vehicles who wish to access the Valleys as well as light vehicles. There is no footpath on the proposed route which would made it very dangerous for people walking to and from the forest. Planning permission was recently approved for a housing development on the site of the playing fields in front of Lanelay Hall but did not include the relief road bisecting this ground.

**Changes sought**

I would propose that the route of the relief road is amended to avoid bisecting the playing field in front of Lanelay Hall and follows a route between the playing field and L'Oreal, along the opposite side of the Fire HQ to the proposed route which would avoid the housing development and re-join the proposed route near the railway track.

**Why no previous Representation**

Did not know about it.

---

**Soundness Tests**

12 1 C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or

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 allow for the future development of houses on the playing fields of Lanley House.

---

**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
Representations:

1. Issue Summary

We are concerned that the protection and promotion of your cultural facilities have not been included within Policies CS 1 and CS 2.

Please note that the telephone dialogue box would not allow us to enter the full number.

Please also note we are unable to use the Representation Form as it is pdf and therefore we cannot fill it in and return by email. This form also does not provide the format in which we wish to respond. Our remit cultural facilities and that is the only issue with which we are concerned but our concerns cover parts of the document rather than one policy area.

2. Representation text

Q3 You have quoted the Community Strategy on page 22 regarding the provision of a range of cultural, commercial and leisure facilities, however the Deposit Draft does not address this matter except within the accompanying text of Policy NSA 1 and the accompanying text of Policy SSA 3 although neither policy addresses the issue of protecting and promoting your cultural facilities, especially your three theatres. Item 6.116 on page 95 states that Llantrisant/Talbot Green acts as a centre for culture and the arts but your theatres (as centres for arts) in Aberdare, Treorchy and Pontrypridd (SIC) are not mentioned.

Q4 Venues that provide arts and cultural activates are essential components in the development of sustainable communities. It is important to provide, protect and promote cultural facilities for their leading role in the quality of cultural life and for their valuable contribution to the character and function of the North and South areas of Rhondda Cynon Taf. We suggest therefore that as none of the existing items within these policies refer to the value of existing leisure, recreation and cultural facilities, that a new item be inserted.

3. Changes sought

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4. Why no previous Representation

BECAUSE YOU DID NOT CONSULT US.

5. Why attend Examination?

We do not wish to attend.

Soundness Tests:

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

20. Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan The provision of a range of cultural, commercial and leisure facilities, including existing will then be addressed.

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
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**3** Changes sought

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**9** Why no previous Representation

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**21** Why attend Examination?

We do not wish to attend.

**15** C4 Test? Toes not have regard to RCT Community Plan?

Yes

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

The provision of a range of cultural, commercial and leisure facilities, including existing will then be addressed.

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

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**Why no previous Representation**

Because you did not consult us.

**Why attend Examination?**

We do not wish to attend.

**C4 Test? Toes not have regard to RCT Community Plan?**

Yes

**Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan**

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**Changes sought**

The provision of a range of cultural, commercial and leisure facilities, including existing will then be addressed.

**Why no previous Representation**

BECAUSE YOU DID NOT CONSULT US

**Why attend Examination?**

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**RHONDDA CYNON TAFCOUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN**

**REPRESENTATION DETAIL**
by: Representation No
Filtered to show: (All representations)

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<th>Late?</th>
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<th>Mode</th>
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Document: Deposit Draft, p.075
Policy: NSA 8
Summary: Issue: Strategic Sites

1. **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, open cast 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. **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.

3. **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.

4. **Soundness Tests**

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### Representation Detail

**Reasons for Representation**

- **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**
---|---
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
**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.

**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

**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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REPRESENTATION DETAIL

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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

3439.D3        O W M          09/06/2009         Yes Policy NSA 22 Map: NSA 22 Site: 754/NSA 22.2 Former railway site Hirwaun Issue: Transportation

Document: Deposit Draft, p.088

Map: NSA 22, Policy: NSA 22

Site: 754/NSA 22.2, Former railway site Hirwaun

Summary:

Issue: Transportation

PEX Session:

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.

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Add green wedge between Hirwaun and Rhigos.

Item Question Reply

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09/06/2009 Page 4607 of 4851
20 9

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

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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             |
**Item Question** | **Representation Text**
--- | ---
1 | 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 | 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.
3 | 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.
4 | 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!).
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.

**Soundness Tests**
- **P1 Test?** Not prepared in accordance with Delivery Agreement, including Community Involvement Sc
  - **Reply:** Yes
- **P2 Test?** Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment?
  - **Reply:** Yes
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  - **Reply:** Yes
- **C3 Test?** Does not have regard to Wales Spatial Plan?
  - **Reply:** Yes
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL** by: Representation No

Filtered to show: (All representations)

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**Petition of TREAT in parts**

- C4 Test? Toes not have regard to RCT Community Plan? Yes
- CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth? Yes
- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
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**Why changes satisfy Soundness Test? 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**

- Seek changes? Any changes to be made to the Plan? Yes
- Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes

**Reply**

- Yes
- Yes

**Tick box Replies**

- Yes
- Yes

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09/06/2009 Page 4610 of 4851
**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.

**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.

**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.

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### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representation Detail**

**Policy:** NSA 26  
**Map:** NSA 26  
**Site:** 778//NSA 26  
**Cynon Valley River Park**  
**PEX Session:**  

**Summary:**

**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.

**Representation Text**

1. **Changes sought**  
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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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CS 1 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.

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.

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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**Issue Summary**

CS3 Housing settlements should not be next to busy roads (i.e. housing site in Hirwaun on both sides of new A465)

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.

**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.

**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.

**Soundness Tests**

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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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**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.

**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).**

**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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**Rhondda Cynon Taf County Borough Council Local Development Plan**

**REPRESENTATION DETAIL** by: Representation No

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### Item Question

1. **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.

   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. **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.

   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 ass 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.

3. **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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**Issue: Waste Management**

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.

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1

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.

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.
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2

CS9 Waste Management

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.
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4

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.

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Add green wedge between Hirwaun and Rhigos.
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### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representation Detail**

Represented by: Representation No

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**Document:** Deposit Draft, p.040  
**Map:** Policy: CS 10  
**Site:** Site:  

**Summary:**

**Issue:** Minerals  
**PEX Session:**

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<td>We object to an open cast 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. 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, open cast 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.</td>
</tr>
<tr>
<td>2</td>
<td>P40 CS10 Minerals</td>
<td>We object to open cast coal mining. 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 open cast 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. 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 all major development in line with National strategy and strategic / suitable sites are concentrated in one small area. There is a large accumulation of development in Hirwaun and this should be revised. 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.</td>
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**Changes sought**

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**Rhondda Cynon Taf County Borough Council Local Development Plan**

**Rep’n No** | **Accssn No** | **Date Lodged** | **Late?** | **Source Type** | **Mode Status** | **Modified** | **TREAT in parts** | **EVIDENCE** | **NO FRTHR EVID.** | **Repr Council** | **Officer** | **Recommendation** | **Response** | **Item** | **Question** | **Reply** | **Tick box Replies** |
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**Item Question**

1. **C3 Test? Does not have regard to Wales Spatial Plan?**
   - Yes

2. **C4 Test? Does not have regard to RCT Community Plan?**
   - Yes

3. **CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth?**
   - Yes

4. **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**
   - Yes

5. **CE3 Test? No clear mechanisms for implementation and monitoring?**
   - Yes

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**Points**

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.

2. P1 and CE4 are related to in conjunction. With referral to the Gloucester 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 Gloucester 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**

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?**
   - Yes

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09/06/2009  Page 4626 of 4851
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.

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.

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 | Representation Text
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P2 Test? Not subjected to a Sustainability Appraisal, including Strategic Environmental Assessment? | Yes
C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a | Yes
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CE1 Test? Does not set out a coherent strategy and/or not compatibel with plans of neighbouring auth | Yes
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CE3 Test? No clear mechanisms for implementation and monitoring? | Yes

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Document: Deposit Draft, p.046

Policy: AW 4

Site: Map:

Issue: Planning Obligations

Summary:

**PEX Session:**

**Item Question**

1. **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. **Representation Text**

   **P46 AW4 Bridleways**

   Suggest convene and work together with ‘Briar’s Bridleways’ (www.briarsbridleways.co.uk) to ensure horses are catered for.

3. **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**

**Representation Text**

**Reply**

**Soundness Tests**

1. **P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement?**

   Yes

2. **C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or area?**

   Yes

3. **C2 Test? Does not have regard to national policy?**

   Yes

4. **C3 Test? Does not have regard to Wales Spatial Plan?**

   Yes

5. **C4 Test? Does not have regard to RCT Community Plan?**

   Yes

6. **CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring authorities?**

   Yes

7. **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**

   Yes

8. **CE3 Test? No clear mechanisms for implementation and monitoring?**

   Yes

**09/06/2009**

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**Document:** Deposit Draft, p.059  
**Policy:** AW 13  
**PEX Session:**  
**Site:**  
**Issue:** Renewable Energy/Wind farms  
**Summary:**  

### Item Question  

1. **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, open cast 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. **Representation text**  

AW13  
Large windfarm proposed. This will be a blight on the landscape, create minimal, short term local jobs. No community benefit.

3. **Changes sought**  

Remove Gloucesters Site, Hirwaun, from the Settlement Boundary and the status afforded it by Policy NSA12  
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Document: Deposit Draft, p.038
Policy: CS 8
Site: Map: Issue: Transportation

Summary:

Item Question

1 2 Issue Summary

These sections deal directly with transport issues. However, they only address road issues contradicting policies set down by the draft RTP mentioned in section 1.3.8.
It is Sustrans’ opinion that the proposals laid out in the Deposit Plan for RCT do not conform to the aims of the Regional Transport Plan for South East Wales. These aims are quoted in section 1.3.8 of Preserving our Heritage, Building our Future:

- Improve access to services, facilities and employment, particularly by public transport, walking and cycling;
- Provide a transport system that increases the use of sustainable modes of travel
- Reduce the demand for travel.

The Deposit Plan declares support for these aims, but it is our opinion that the content of the plan will not deliver them.

Section 3.5 of Preserving our Heritage, Building our Future also refers to the need to reduce the need to travel by car:

“Reduce the need to travel by car within Rhondda Cynon Taf by promoting residential and commercial development in the Principal Towns and Key settlements in the north and south of the County Borough where there is a choice of sustainable modes of transport.”

Sustrans sees little evidence in the rest of the deposit Plan which suggests that this aim will be realised. The reasons for this belief are discussed below.

How is transport addressed within the Deposit Plan?

Policy CS 8 and sections 4.68 to 4.75 of Preserving our Heritage, Building our Future deal directly with transport issues. These sections deal entirely however with improvements to the road network in Rhondda Cynon Taf and make no reference at all to walking and cycling. The only reference to public transport made here is in passing – ‘enhancements’ to public transport are mentioned as one of a number of measures to be included for consideration in planning gain negotiations:

“development proposals on sites capable of accommodating five dwellings or more / 1,000 m2 commercial floorspace within the A4119 / A473, A470 A4059 and A4059 / A465 Corridors will be required to fund the development of a strategic corridor management system, improvements to the highway network and key junctions, public transport enhancements and park and share provision.”

In Sustrans experience, contributions to public transport ‘enhancements’ by such schemes rarely amount to more than a new signpost to the local station.

Section 4.72 of the Deposit Draft states:

“The objective of the strategic transport management system is to ensure the provision of highway improvements necessary to deliver allocated sites and to ensure that the growth proposed by the LDP has no adverse impact on the highway network.”

Sustrans interprets this as a statement of intent by RCT Borough Council to build new roads as a means of reducing any congestion on the existing road network resulting from new development. This is in direct contradiction of the Deposit’s Draft’s stated aim of ensuring that new developments are sustainable and built in a way that reduces the need to travel. Evidence clearly shows that road expansion does not reduce congestion, but that demand simply increases to fill spare road capacity.

We consider that the omission of any reference to provision of safe walking and cycling routes, or consideration of the need to integrate new development sites into the existing public transport network, means that the proposals in the Deposit Draft fall woefully short of achieving its stated aim of delivering sustainable development.
Sections 4.68 to 4.75 must refer to the priorities of the RTP. There must be a much greater emphasis on other forms of transport and ways of reducing travel.

Similar in section 4.72 all references are made to highway improvements as a way of dealing with growth. However growth does not need to mean more traffic on the highway network.

In order to reduce the need to travel, communities need to have easy access to local facilities, shops, schools and employment opportunities within walking and cycling distance of where they live. For this reason, Sustrans believes that all developments should be mixed use, and should include retail and community facilities. Conversely, all new employment development sites should also include residential properties.

Housing density is an important factor in ensuring that new developments are well serviced by public transport. Evidence suggests that a minimum density of housing is required for instance to sustain a station, and a density no lower than 60 units per hectare (u/ha) or 200 habitable rooms per hectare (hr/ha) has been recommended for Eco-town developments.

Any new development aiming to promote sustainable transport needs to make it more attractive, convenient and easier for people to choose to walk, cycle and use public transport compared to choosing to use a car. This can be achieved by using a number of measures.

Two of the strongest measures are 'road-space reallocation' (changing existing infrastructure to prioritise space for people who choose to walk, cycle and use public transport) and 'filtered permeability' (reducing the number of places that private motorised traffic can actually get to, while providing full access for people travelling on foot or by bike, and providing nearly full access for people using public transport). These measures can be provided for both new-build developments and existing infrastructure.

Was not aware of the consultation taking place.

It will ensure the deposit plan will follow will follow the Regional Transport Plan. The RTP will be aligned to the forthcoming National Transport Plan.

Did you make any previous representations on this issue during the Cons No
Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

by: Representation No

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Document: Deposit Draft, p.075  
Policy: NSA 8  
Summary: Issue: Strategic Sites

**Item Question**  
**Representation Text**

1  
**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, open cast 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  
**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.

3  
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.

21  
**Why attend Examination?**

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

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## Item Question

**1.** 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.** The Gloucesters site in Hirwaun should not benefit from settlement boundary status, it should be outside 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.

**3.** 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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Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

## Soundness Tests

**10.** P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc

- Yes

**19.** CE4 Test? Not flexible to deal with changing circumstances?

- Yes
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Rep’n No: 3441/D3  
Document: Deposit Draft, p.088
Policy: NSA 22
Site: 754/NSA 22.2 Former railway site Hirwaun
Summary:

**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.

**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.

**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.

**Why attend Examination?**

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**Policy:** NSA 23

**Map:**

**Site:**

**Summary:**

**Issue:** Transportation

**PEX Session:**

**Item Question**

**Representation Text**

1. **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. **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 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!).

3. **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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Rhondda Cynon Taf County Borough Council Local Development Plan

REPRESENTATION DETAIL
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Filtered to show: (All representations)

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Document: Deposit Draft, p.089
Map: Policy: NSA 24
Site: PEX Session:

Summary:

Item Question

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, open cast coal mine, 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

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#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.
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Item Question

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

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Rhondda Cynon Taf County Borough Council Local Development Plan

Item Question

1. 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. Representation Text

NSA 26
River Park
Hirwaun should benefit from the Cynon Valley River Park.

3. 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.

4. Why attend Examination?

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

5. Soundness Tests

P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc

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.

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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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, open cast coal mine, 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.

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.

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.

Why attend Examination?

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

Soundness Tests

P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc

CE4 Test? Not flexible to deal with changing circumstances?

Why changes satisfy Soundness

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 Candidiate 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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**Reply:**
- Yes

**Tick box Replies:**
- Yes
### Item Question

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| 1 | CS3 Housing settlements should not be next to busy roads (i.e. housing site in Hirwaun on both sides of new A465)  
| 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 | Proposal for dwellings alongside dualling of A465 is poor planning and contradicts other policies. Housing settlements should not be next to busy roads.  
| 4 | 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. |

### Soundness Tests

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### Tick box Replies

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

Yes
Representation Detail

Filtered to show: All representations

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Document: Deposit Draft, p.033

Policy: CS 4

Map: 717//CS 4.3 Hirwaun (South)

Issue: Housing Requirement

Summary:

1. 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. 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).

3. 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.

4. P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc

Yes

5. CE4 Test? Not flexible to deal with changing circumstances?

Yes

Why attend Examination?

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

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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<td>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 ‘ectit’ 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. 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.</td>
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<td>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. 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 ass 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.</td>
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**Soundness Tests**

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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

**Issue Summary**

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.

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.

**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.
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- #Add green wedge between Hirwaun and Rhigos.

**Why attend Examination?**

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

**Soundness Tests**

- P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc:
  - Yes

09/06/2009
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## REPRESENTATION DETAIL

### Rhondda Cynon Taf County Borough Council Local Development Plan

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### Document: Deposit Draft, p.040

**Policy:** CS 10  
**Map:**  
**Site:**  
**Issue:** Minerals

**Summary:**

Issue: Minerals  
PEX Session:  

1  
2  

**Item Question**  
**Representation Text**

---

1  
2  

CS10 We object to an open cast 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. 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, open cast 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.

---

3  

**Representation Text**

P40 CS10  
Minerals  
We object to open cast coal mining. 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 open cast 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 greenhouse 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. 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 all major development in line with National strategy and strategic / 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. 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.

---

4  

**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.

---

21  

**Why attend Examination?**

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

---

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<tr>
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<td><strong>Soundness Tests</strong></td>
<td></td>
</tr>
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<td>10 8  P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc</td>
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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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### Item Question

1. **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. **Representation text**

   P46 AW4 Bridleways

   Suggest convene and work together with 'Briars Bridleways' (www.briarsbridleways.co.uk) to ensure horses are catered for.

3. **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.

4. **Why attend Examination?**

   Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

### Soundness Tests

10. **P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc**

    Yes

19. **CE4 Test? Not flexible to deal with changing circumstances?**

    Yes

### Reply

09/06/2009
## Rhondda Cynon Taf County Borough Council Local Development Plan

### REPRESENTATION DETAIL

**Filtered to show:** (All representations)

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**Document:** Deposit Draft, p.054  
**Site:**  
**Policy:** AW 8  
**Map:**  
**PEX Session:**  
**Issue:** Environment

**Summary:**

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<td>1 2</td>
<td>AW8 agree that natural environment should be protected.</td>
</tr>
<tr>
<td>3 4</td>
<td>Seek changes? Any changes to be made to the Plan? No</td>
</tr>
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</table>

**Previous Representations? Did you make any previous representations on this issue during the Consultation?** Yes

**Item Question**  
AW8 agree that natural environment should be protected.

**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 Gloucester site has been granted outline planning permission. These statements should be upheld by RCT planning officers and committee in future.

**Previous Representations? Did you make any previous representations on this issue during the Consultation?** Yes
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**Document:** Deposit Draft, p.059

**Policy:** AW 13

**Site:**

**Issue:** Renewable Energy/Wind farms

**PEX Session:**

---

**Summary:**

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 structures 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.

---

**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.

---

**Why attend Examination?**

Having seen the manner in which planning decisions have been made on Hirwaun in the near past. I wish to exercise my democratic rights.

---

**Soundness Tests**

- P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc
- CE4 Test? Not flexible to deal with changing circumstances? Yes

---

**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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---

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

- Yes

---

**Tick box Replies**

- Seek changes? Any changes to be made to the Plan? Yes

---

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<th>Soundness Tests</th>
</tr>
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<tbody>
<tr>
<td>I wish to object to the proposal within the LDP to site 30 houses of Cefn Lane, Glynccych.</td>
<td></td>
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<tr>
<td>I object on the basis that it is proposed that access to the site is gained via Cefn Close. If this is allowed for construction and new resident traffic, it will mean that traffic flow will be greatly increased which I feel will pose an unacceptable danger to children and residents in Cefn Close. I believe access should be gained to the new site by making a new access point off Ynysybwl Road. If it is agreed by the Council that Cefn Close will be the only access point to the new site, at the very least traffic calming measures should be introduced on the main road in Cefn Close (similar to those already introduced in Cefn Lane) to help reduce traffic speed and avoid incidents of car and pedestrian accidents. Any developer of the site should be made to pay the associated costs of the new traffic calming measures that will be needed in Cefn Close by the Council as a condition of being able to develop the site.</td>
<td></td>
<td>Yes</td>
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<tr>
<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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</tr>
<tr>
<td>I answered &quot;no&quot; to question 23 [Q4, any changes] but despite being told to go straight to question 32 [Q20, mode] I have been given no option but to give answers to questions 30 [Q9, tests] and 31 [Q10, how changes satisfy tests]. Otherwise the online form would not let me proceed further!</td>
<td></td>
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<tr>
<td>Seek changes? Any changes to be made to the Plan?</td>
<td>No</td>
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09/06/2009
**Representation Text**

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<tbody>
<tr>
<td>1</td>
<td>Issue Summary</td>
<td>The proposed allocation of 30 dwellings at the edge of Glyncoch and adjacent to Cefn Close is inappropriate due to 1) the suggested access into the proposed site from Cefn Close due to safety considerations, (2) the potential and substantial increase in traffic movements for the same reasons of safety and effective access, (3) the site is not a cleared site as claimed in the LDP - it is now a haven of wildlife, (4) since we moved into Cefn Close in 1996 the site has been continually used for pedestrian access to Glyncoch and additionally used as a recreation facility for the many children living in Cefn Close - the only safe area for play in the area, the alternative being the road and lastly the lack of an available and effective drainage system.</td>
</tr>
<tr>
<td>2</td>
<td>Representation text</td>
<td>The allocation of the above site in the LDP should be removed from the LDP due to the above issues. The current road serving Cefn Close (particularly at the top of the site and where access is suggested in the LDP could be gained to the new site) is already dangerous due to the visibility, topography and configuration of the road layout. This can only worsen with increased traffic movements that would be significant if the site is allocated and access is permitted from Cefn Close. The site is now an established area for wildlife and a recreation area for children which had continued since 1996 together with a well used right of way from Cefn Close across the land in question. In addition drainage is a material consideration in the planning process and whilst the Cefn Close site has drainage provision this would not be adequate to cope with the additional requirements of a new site and there is no easy ability to drain the site in an alternative and effective manner.</td>
</tr>
<tr>
<td>3</td>
<td>Changes sought</td>
<td>The proposed allocation of the Cefn Lane, Glyncoch site should be removed from the LDP.</td>
</tr>
<tr>
<td>4</td>
<td>Why no previous Representation</td>
<td>I was not aware of any consultation on the preferred strategy and furthermore the consultation on the LDP that I am responding to now was not adequately advertised and I was fortunate to be looking at the RCT website for another reason</td>
</tr>
<tr>
<td>10</td>
<td>P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc</td>
<td>Yes</td>
</tr>
<tr>
<td>13</td>
<td>C2 Test? Does not have regard to national policy?</td>
<td>Yes</td>
</tr>
<tr>
<td>17</td>
<td>CE2 Test? Not realistic and appropriate and not founded on robust and credible evidence?</td>
<td>Yes</td>
</tr>
<tr>
<td>20</td>
<td>Why changes satisfy Soundness</td>
<td>Give details why the changes you propose will ensure that the Plan is compliant with all the tests. The consultation on the LDP was not adequately advertised hence not allowing all interested parties to contribute and make representations. The national policies require consideration of safe highways and also effective drainage, both of which fail to have been adequately addressed by the proposed allocation of this site</td>
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<td>1</td>
<td>To formally object to the building of residential properties ion the site of Celyn Farm, Efail Isaf.</td>
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<tr>
<td>2</td>
<td>I object to his proposed development due to the close proximity to several houses on the Parc Nant Celyn residential estate. Concerns include: already existing poor drainage, unsuitable sewage connection, disruption during construction, loss of privacy due to overlooking of Parc Nant Celyn, loss of countryside, loss of public footpath and limited access to the proposed site.</td>
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<tr>
<td>4</td>
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</tr>
<tr>
<td>5</td>
<td>I would like the site to be removed as a housing allocation.</td>
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<tr>
<td>7</td>
<td>Why no previous Representation</td>
</tr>
<tr>
<td>9</td>
<td>We only moved to Efail Isaf in February 2008 - and this threat of further development did not show up on the legal searches conducted on purchase.</td>
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<td>C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a Yes</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan By making the change this would give the due and proper regard for the existing neighbourhood and the adjoining area.</td>
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## Rhondda Cynon Taf County Borough Council Local Development Plan

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**Document:** Deposit Draft, p.075  
**Policy:** NSA 8  
**Site:** 5/NSA 8  
**Issue:** Strategic Sites

### Map: Policy: NSA 8

Site: 5/NSA 8  
OSTR Hirwaun/Penywaun  
New Site  
PEX Session:  

### Summary:

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**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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### Seek changes? Any changes to be made to the Plan?  

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

Representation text

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.

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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.

Soundness Tests

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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### Representation Detail

**Document:** Deposit Draft, p.088  
**Site:** 754/NSA 22.2  
**Former railway site Hirwaun**

**Policy:** NSA 22  
**Map:** NSA 22 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.

**Item Question**  
**1**  
**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.

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**2**

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**4**

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Tower employment site to become tourism destination / green space.  
Add green wedge between Hirwaun and Rhigos.

**10**  
**P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc**  
Yes

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

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

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Document: Deposit Draft, p.088
Policy: NSA 23
Map: NSA 23

**Summary:**

**Issue:** Transportation

**PEX Session:**

**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**

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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.

---

**Item Question**

**Reply**

10 8

P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc | Yes

19 18

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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**Item Question**

**Reply**

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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Document:Deposit Draft, p.089  
Policy: NSA 24  
Map: NSA 24 Green wedge to prevent Rhigos and Hirwaun merging should be identified  
Issue: Environment  

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### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**  
by: Representation No

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**Map:** NSA 26  
**Site:** 778//NSA 26 – Cynon Valley River Park

**Policy:** NSA 26  
**Issue:** Environment

**Summary:**

**Item Question**  
**Representation Text**

1. **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. **Representation text**

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**Changes sought**

4. **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.

**Soundness Tests**

10. **P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc**  

   Yes

19. **CE4 Test? Not flexible to deal with changing circumstances?**  

   Yes

20. **Why changes satisfy Soundness**  

   Give details why the changes you propose will ensure that the Plan

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**Tick box Replies**

3. **Seek changes? Any changes to be made to the Plan?**  

   Yes

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

   Yes

09/06/2009
### 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.

### Representation Text

CS1 Remove Gloucesters site, Hirwaun from settlement boundary (as is currently the case in Sheet 1).

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### 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.

### Soundness Tests

**P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc**

**CE4 Test? Not flexible to deal with changing circumstances?**

### Tick box Replies

**Seek changes? Any changes to be made to the Plan?**

**Previous Representations? Did you make any previous representations on this issue during the Cons**
### Issue Summary

CS3 Housing settlements should not be next to busy roads (i.e., housing site in Hirwaun on both sides of new A465).

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### Changes sought

1. Remove Gloucesters Site, Hirwaun, from the Settlement Boundary.
2. 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.
3. Tower employment site to become tourism destination / green space.
4. Add green wedge between Hirwaun and Rhigos.

### Soundness Tests

1. **P1 Test?** Not prepared in accordance with Delivery Agreement, including Community Involvement Sc Yes
2. **CE4 Test?** Not flexible to deal with changing circumstances? Yes
3. **Why changes satisfy Soundness** Give details why the changes you propose will ensure that the Plan

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### Previous Representations

- **Seek changes?** Any changes to be made to the Plan? Yes
- **Previous Representations?** Did you make any previous representations on this issue during the Cons Yes

09/06/2009
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.

Representation text

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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.

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Previous Representations?

Yes
### Issue Summary

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.

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.

### 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.

### Soundness Tests

- P1: Not prepared in accordance with Delivery Agreement, including Community Involvement Sc
- CE4: Not flexible to deal with changing circumstances

### Item Question

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<th>Item</th>
<th>Question</th>
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<tr>
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<td>P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc</td>
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### Seek changes? Any changes to be made to the Plan?

- Yes
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Previous Representations? Did you make any previous representations on this issue during the Cons ? Yes
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL** by: Representation No

Filtered to show: (All representations)

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**Document:** Deposit Draft, p.039  
**Policy:** CS 9  
**Map:** Site:  
**Issue:** Waste Management  
**PEX Session:**

**Summary:**

1. **Issue Summary**

   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.

   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. **Representation text**

   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.

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3. **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.

4. **Item Question**

   **Soundness Tests**

   - **P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc**
     - Yes
   - **CE4 Test? Not flexible to deal with changing circumstances?**
     - Yes

5. **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.

6. **Previous Representations? Did you make any previous representations on this issue during the Cons**

   **Yes**

7. **Seek changes? Any changes to be made to the Plan?**

   **Yes**

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Rhondda Cynon Taf County Borough Council Local Development Plan

REPRESENTATION DETAIL  by:  Representation No
Filtered to show: (All representations)

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Document: Deposit Draft, p.040
Map: Policy: CS 10

Site: Issue: Minerals

Summary:

**Item Question** Representation Text

1  Issue Summary

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.

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  Representation text

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.

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.

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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.

4  Item Question  Reply

Soundness Tests

P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc  Yes

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

5  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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6  Item Question  Reply

Tick box Replies

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

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

Yes
Rhondda Cynon Taf County Borough Council Local Development Plan

REPRESENTATION DETAIL by: Representation No
Filtered to show: (All representations)

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Document: Deposit Draft, p.041
Policy: CS 11
Map: Site:
Issue: Climate Change

Summary:

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### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

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**Document:** Deposit Draft, p.046  
**Map:**  
**Policy:** AW 4  

**Summary:**  
Issue: Planning Obligations  

1  
**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  
**Representation text**  
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**Item Question**  
**Representation Text**  

3  
**Representation text**  
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Tower employment site to become tourism destination / green space.  
Add green wedge between Hirwaun and Rhigos.

**Item Question**  
**Reply**  

5  
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P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Sc  
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**Tick box Replies**  

6  
 Seek changes? Any changes to be made to the Plan?  

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

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<td>2 3 Representation text</td>
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09/06/2009
### Representation Text

**Rep’n No:** D16  
**Policy:** AW 13  
**Site:**  
**Issue:** Renewable Energy/Wind farms  

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| 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. |

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**Item Question:** Seek changes? Any changes to be made to the Plan?  
**Reply:** Yes  

**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.
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- Add green wedge between Hirwaun and Rhigos.

**Soundness Tests:**
- P1 Test? Not prepared in accordance with Delivery Agreement, including Community Involvement Scheme: Yes
- CE4 Test? Not flexible to deal with changing circumstances?: Yes

**Item Question:** 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:**
- Seek changes? Any changes to be made to the Plan? Yes
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**Document:** Deposit Draft, p.106  
**Site:**  
**PEX Session:**  
**Policy:** SSA 10  
**Issue:** Housing Allocation  

**Summary:**

I represent myself and many others who object strongly to the massive area of Tonyrefail/Gilfach that has been allocated for housing development. This in an area that must surely have some of the poorest facilities and infrastructure in the U.K.

But it would seem that our "representatives" wants to pile up the houses "and sell 'em cheap". So let this area become dormitory City to rake in the local taxes.

**Item Question**  
**Representation Text**

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<td></td>
<td>I would like to see it suspended for at least one year in order to establish what the Rate Payers want as opposed to what our Councilors (for some obscure reason) want. Perhaps also a full investigation into the reasoning/people behind these proposals.</td>
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This representation concerns LDP Candidate Site ref: 115 (Land to the west of Llechau, Llanharry). In summary, this current representation considers that an inconsistent and inaccurate approach has been adopted by the Council in their assessment of Candidate Site 115 and that its allocation as a housing site should be removed. This representation also considers that the site should be incorporated into the surrounding areas of Green Wedge/SLA within the LDP.
Site 115 has been promoted for residential allocation and as such, Rhondda Cynon Taf has undertaken a ‘Stage 1’ assessment (to consider the initial suitability of the site for development) and a ‘Stage 2’ assessment (to consider the sites allocation within the Deposit LDP). The initial ‘Stage 1’ assessment concluded that site 115 was suitable for residential development and therefore a subsequent ‘Stage 2’ assessment was undertaken. The Authority’s ‘Stage 2’ assessment considered the site to be suitable for residential development and it has been accordingly incorporated into the LDP as a ‘non strategic residential site’ under LDP Policy SSA10 (Housing Allocations).

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   · The development of the site would result in a loss of significant agricultural land.
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   · The allocation would result in an extension of the settlement of Llanharry into the character and setting of surrounding landscapes, its development would therefore have a detrimental impact on landscape setting.
   · The site is a greenfield site, which consists of an area of undeveloped agricultural land.
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The development of this site would have a significant, detrimental impact upon views/vistas. The site provides views and vistas of the surrounding green landscapes to the north, from the main built up area of Llanharry and from Llanharry Road.

The site lies on the opposite site of Llanharry Road to the significant built up areas of the settlement.

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Test CE1:

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- National policy seeks to locate development within settlement boundaries
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**Document:** Deposit Draft, p.108  
**Site:** 691//SSA 10.13 West of Llechau, Llanharry  
**Settlement Boun:** Policy: SSA 13  
**Map:** Issue: Settlement Boundary  

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Tick box Replies

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This representation concerns LDP Candidate Site ref: 115 (Land to the west of Llechau, Llanharry). In summary, this current representation considers that an inconsistent and inaccurate approach has been adopted by the Council in their assessment of Candidate Site 115 and that its allocation as a housing site should be removed. This representation also considers that the site should be incorporated into the surrounding areas of Green Wedge SLA within the LDP.
Site 115 has been promoted for residential allocation and as such, Rhondda Cynon Taf has undertaken a ‘Stage 1’ assessment (to consider the initial suitability of the site for development) and a ‘Stage 2’ assessment (to consider the sites allocation within the Deposit LDP). The initial ‘Stage 1’ assessment concluded that site 115 was suitable for residential development and therefore a subsequent ‘Stage 2’ assessment was undertaken. The Authority’s ‘Stage 2’ assessment considered the site to be suitable for residential development and it has been accordingly incorporated into the LDP as a ‘non strategic residential site’ under LDP Policy SSA10 (Housing Allocations).

It is my view that both the initial ‘Stage 1’ and subsequent ‘Stage 2’ assessment of site 115 was flawed; both within its consistency of approach and with its specific assessment of the development potential of site 115. Further to this and in terms of scope, this representation relates to the LDP proposals map, written statement and written statement appendices.

In consideration of my position, I have undertaken a separate ‘Stage 1’ and ‘Stage 2’ site assessment (please see enclosures) to challenge the Authority’s assessment of site 115. These assessments have informed and essentially form the basis of this representation.

I believe that procedurally, Rhondda Cynon Taf County Borough Council have been inconsistent and inaccurate in their assessment of the suitability of Candidate Site 115 for residential development.

Rationale behind Deposit Draft Representation

The Authority’s ‘Findings of the Candidate Site Assessment Process’ (2009) document states that site 115 is suitable for housing allocation as a result of their assessments. On this basis, the Authority has allocated the site for housing, under policy SS10 of the Deposit LDP.

I have undertaken a separate ‘Stage 1’ and ‘Stage 2’ assessment to consider the suitability of the site against the Authority’s methodology. In this respect the assessment methodology identifies five broad issues, which have been supplemented by a further 16 point assessment. Relating to each of the broad planning issues identified in the methodology and further to my enclosed ‘Stage 1’ assessment of site 115, it is considered that the site is highly unsuitable for housing allocation. In summary, the findings of my assessment in comparison to the findings of the Authority, conclude the following:

1. Economic Viability
   • No change from Authority’s position

2. Accessibility and Ease of Movement
   • Provision will need to be made to encourage pedestrian links to the limited facilities of the settlement.

3. Environmental Capital
   • The development of the site would result in a loss of significant agricultural land.
   • That the site is well related to the areas designated as SLA (LDP Policy SSA 23.1) and Green Wedge (LDP Policy SSA22) which border the site to the north, east and west.
   • The site would make a valuable addition to the SLA/Green Wedge areas as defined within the LDP.
   • The allocation would result in an extension of the settlement of Llanharry into the character and setting of surrounding landscapes, its development would therefore have a detrimental impact on landscape setting.
   • The site is a greenfield site, which consists of an area of undeveloped agricultural land.
   • The site lies beyond the adopted settlement boundary of Llanharry (ref Taf Ely Local Plan 2003, please see enclosures).
   • The site lies separate from the remainder of the built up area of Llanharry and in character is closely related to areas of surrounding undeveloped agricultural landscapes which lie to the north of the village.
   • Sites in the locality (with significant areas of brownfield) have been assessed as to have an ‘undermining’ impact (ref candidate site 410). It is illogical that site 115 (as a greenfield site) would be scored as ‘poor’: This highlights the Authority’s inconsistency of approach to this particular issue of assessment.
   • The Authority accept in their assessment that the site forms an important view/vista. Yet they do not accept that development would result in the loss of a site of visual amenity value.
   • The ‘green’ areas which surround Llanharry help to define the northern edge of the settlement (beyond Llanharry Road) and reinforce the open character of the surrounding landscape. The development on this site would result in a significant loss of landscape character and visual amenity value for the settlement.

4. Site Context and Character
The development of this site would have a significant, detrimental impact upon views/vistas. The site provides views and vistas of the surrounding green landscapes to the north, from the main built up area of Llanharry and from Llanharry Road.

The site lies on the opposite side of Llanharry Road to the significant built up areas of the settlement.

The green areas surrounding Llanharry help define the northern edge of the settlement (beyond Llanharry Road) and reinforce the open character of surrounding landscapes.

The development of the site would damage the local community in terms of the character of the settlement/surrounding landscapes and in terms of extending the built up area of Llanharry beyond Llanharry Road and into the countryside.

5. Continuity and Enclosure

- It is considered that the site is highly unsuitable for development
- The site lies outside the adopted settlement boundary of Llanharry (Taf Ely Local Plan, 2003). The site lies on an undeveloped agricultural greenfield site.
- The built up form of Llanharry predominantly lies to the south of Llanharry Road not to the north of it.
- The settlement is characterised by the open landscapes which exist in its surrounds (resulting in the Authority’s allocation of much of these areas as SLA and Green Wedge).
- The character of the site is well related to the open landscapes which exist to the north of the settlement and is unrelated to the built form, character, continuity and logical enclosure of the settlement of Llanharry.

Changes sought

On balance, my assessments conclude that, site 115 is highly unsuitable for development in relation to the five broad criteria for the stage 1 site assessment. It is considered therefore that the site should not have been considered for ‘Stage 2’ assessment and should have been rejected at ‘Stage 1’. Conversely, the Council has given no further consideration to other sites in the locality that perform better in relation to the five broad criteria of the assessment. For instance, a number of candidate sites have been rejected at ‘Stage 1’, many of which incorporate brownfield areas, lie within the settlement boundary and are not in active agricultural use.

It seems illogical that site 115 despite all of the associated constraints with its development, was able to perform well enough in the Authority’s ‘Stage 1’ assessment to warrant the undertaking of a ‘Stage 2’ and subsequent allocation within the LDP. It is therefore considered, that the Council has been inconsistent and inaccurate in their review of Candidate Site 115 and that the site should be removed as a housing allocation under Policy SSA10.

In relation to the above and considering the Authority’s ‘Stage 2’ assessment, a number of inconsistencies have been identified in relation to the suitability of the site and comparative to other candidate sites in the locality. My enclosed ‘Stage 2’ site assessment re-assesses site 115 against the Authority’s assessment criteria and the findings in their own assessment. In summary of the assessments which I have undertaken and in contrast to the Authority’s findings I consider the following to apply:

- Site 115 is a Greenfield site (constituting an area of undeveloped agricultural land).
- The site lies beyond the adopted settlement boundary of Llanharry (ref Taf Ely Local Plan 2003).
- The development of the site would result in the loss of significant landscape and visual amenity value.
- The development of the site would have a significant, detrimental impact upon views/vistas of significant importance.
- The sites development would damage the local community in terms of the character of the settlement/surrounding landscapes and in terms of extending the built up area of Llanharry beyond Llanharry Road (into the surrounding countryside).
- The open character of the site contributes the character of the settlement and of surrounding landscapes. Its development would result in a loss of this character and damage to surrounding landscapes.
- Site would represent an illogical and unsustainable extension to existing built form.
- Site has major constraints to its development requiring significant remediation.

Why no previous Representation

Was not a resident at the time of previous consultations

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<td>13</td>
<td>C2 Test? Does not have regard to national policy?</td>
<td>Yes</td>
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<td>16</td>
<td>CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth</td>
<td>Yes</td>
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In view of the above issues raised and with specific relation to the LDP tests of soundness, our representation considers the following:

Test CE1:

Test CE2: The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base. In light of the ‘Stage 1’ and ‘Stage 2’ assessment carried out by myself, it is considered that; Candidate Site 115 is highly unsuitable as a housing allocation. Development in this location lies beyond the settlement boundary, on greenfield land and would have a detrimental effect upon agriculture and the landscape and amenity value of surrounding areas. Residential development on this site would adversely impact on the individual identity of the settlement and the character of surrounding landscapes.

Test C2: It does not have regard to national policy.

- National policy seeks to locate development within settlement boundaries
- National policy seeks to protect agricultural land
- National policy seeks to direct development to previously developed (brownfield locations)
- The authority have failed to take a consistent and accurate approach to site allocations, and have failed to undertake a robust and credible assessment of the suitability of the site 115.

In conclusion and further to the detail contained within this representation and enclosed assessments, I consider that site 115 is highly unsuitable for residential development and that in order to protect the urban form of Llanharry should be deleted as a housing allocation. In addition, I conclude that the site should be allocated as ‘Green Wedge’ (under LDP Policy SSA 22.4) and as a ‘Special Landscape Area’ (under LDP Policy SSA 23.1) in order to prevent the spread of development into the countryside.

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**Issue Summary**

Support policy but seek site boundary change to incorporate land west of Cowbridge Rd, as well as the Leekes and Royal Mail Sites.

The boundary of Strategic Site 7 (Mwyndy/Talbot Green) should be extended westwards to include the Crabtree and Evelyn site (shown in red on Plan CBRE1) Leekes and the Royal Mail delivery office. We also suggest that the boundary is further extended to incorporate land to the north of the Crabtree and Evelyn site, namely the Telephone Exchange, Council land and car show room. The proposed boundary extensions are shown on Plan CBRE2.

**Representation Text**

1. The boundary of Strategic Site 7 (Mwyndy/Talbot Green) should be extended westwards to include the Crabtree and Evelyn site (shown in red on Plan CBRE1) Leekes and the Royal Mail delivery office. We also suggest that the boundary is further extended to incorporate land to the north of the Crabtree and Evelyn site, namely the Telephone Exchange, Council land and car show room. The proposed boundary extensions are shown on Plan CBRE2.

2. The boundary of Strategic Site 7 (Mwyndy/Talbot Green) is defined by Policy SSA8 and has been drawn without taking full account of the future plans and aspirations of adjacent landowners outside the boundary. It therefore misses out at least two brownfield sites (the Crabtree and Evelyn site and the Royal Mail sorting office) which could come forward for development in the plan period and these should be included within the development area. This will enable the Council to minimise the take-up of river meadows and other green field land allocated for development by policies CS3/ SSA8.

   We have undertaken a candidate site assessment for the Crabtree and Evelyn site which shows that it is suitable for redevelopment, subject to the wider strategy for development in this area, and some limits arising from flood designation (C2 - an issue which affects much of the land within SSA8).

3. The Crabtree and Evelyn site and others as shown in Plan CBRE 2 are brownfield sites that should be included within the boundary of Strategic Site 7 - Mwyndy/Talbot Green:

   The boundary of Strategic Site 7 is defined by Policy SSA8 and has been drawn without taking full account of the future plans and aspirations of adjacent landowners outside the boundary. It therefore misses out at least two brownfield sites (the Crabtree and Evelyn site and the Royal Mail sorting office) which could come forward for development in the plan period and these should be included within the development area. This will enable the Council to minimise the take-up of river meadows and other green field land allocated for development by policies CS3/ SSA8.

   We have undertaken a candidate site assessment for the Crabtree and Evelyn site which shows that it is suitable for redevelopment, subject to the wider strategy for development in this area, and some limits arising from flood designation (C2 - an issue which affects much of the land within SSA8).

4. Changes sought

   Boundary change in accordance with CBRE 2 plan:

   Extension to boundary of the CS3/SSA8 strategic development site to incorporate the Crabtree and Evelyn site (see Plan CBRE 2).

5. Candidate Site Ref No

   An assessment is included with this submission and is largely positive in terms of the site’s overall development potential.

   The site is a 2.453 ha brownfield site, which has been in industrial, and latterly distribution, use for much of the past century. Its redevelopment would be more sustainable than the development of the green field areas already allocated as part of CS3/SSA8.

   The bottom part of the site is a designated flood area, with a small section along the southern boundary within Flood Zone C1 and most of the southern part of the site is within Flood Zone C2.

   Photographs are included with this submission. It can be seen from Plan CBRE1 that the land is relatively flat, unlike the southern part of the existing SSA8 allocation which slopes away from the river valley.
**Rhondda Cynon Taf County Borough Council Local Development Plan**

**REPRESENTATION DETAIL** by: Representation No

Filtered to show: (All representations)

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Why no previous Representation

- The Crabtree and Evelyn Site has only recently come under review
- The Preferred Strategy did not specify exact boundaries of the SSA 8 strategic development area
- The Crabtree and Evelyn site has only recently come under review.
- This representation relates to a specific development boundary (SSA8) which was not detailed within the Preferred Strategy.

- Crabtree and Evelyn supports the general allocation of land in this area for significant development during the plan period. Only a change to the boundary of the strategic site is sought to encompass the Crabtree and Evelyn land.

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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan is sound.</td>
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Please see attached sheet:

**CE2:** Much of strategic site SSA8 and thus CS3, is restricted by the following policies:

- POLICY SSA23 - Special Landscape Area designation which seeks to protect the landscape;
- POLICY AW14.1E which seeks to safeguard the extensive sand and gravel deposits in the area and imposes a 100m buffer zone around them;
- POLICY AW14.3 which seeks to safeguard limestone deposits and imposes a 200m buffer around them;
- SINC Designations: There are four Sites of Importance for Nature Conservation (sites 102, 103, 147 and 151) within the SSA8 boundary, covering a significant proportion of the total land.

Given the sensitivity of much of the designated land, the addition of the Crabtree and Evelyn site to the CS3/SSA8 area via the western boundary extension proposed will provide at least one brown field option for some of the development earmarked under the CS3/SSA8 policies. Additional sites, namely the BT Exchange, Pontyclun Garage, Council Land and the Royal Mail Delivery Office would provide further opportunities for re-use of previously developed land prior to the uptake of green field land.

If the boundary extension is rejected, the result will be the effective prioritisation of sensitive green field land of regional geological and geomorphological importance with flood issues and lying outside the settlement boundary, over existing brown field land. This would be an unsustainable approach and against National Policy.

**CE4:** The CE3/SSA8 boundary is drawn too tightly within the urban area, and then is loosely drawn around generous swathes of open countryside. If the boundary were extended in line with our recommendation, it would allow for the redevelopment of several brown field sites, should they come forward in the plan period. This would ensure that only the minimum environmentally sensitive land need be lost. A wider allocation provides greater flexibility, particularly necessary given the current economic conditions where it is likely that operational sites will become obsolete during the plan period.

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<td>Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site?</td>
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09/06/2009
### Representation Details

**Issue Summary**

Please see attached sheet - the boundary of SSA 8 should be extended westwards:

The boundary of Policy SSA8 should be extended westwards to include the Crabtree and Evelyn site, as shown in red on Plan CBRE1. We also suggest that the boundary is further extended to incorporate land to the north of the Crabtree and Evelyn site, namely the Telephone Exchange, Council land and car show room. The proposed boundary extensions are shown on Plan CBRE2.

**Representation Text**

Please see attached sheet:

The boundary of Policy SSA8 has been drawn without taking full account of the future plans and aspirations of adjacent landowners outside the boundary. It therefore misses out at least two brown field sites (the Crabtree and Evelyn site and the Royal Mail sorting office) which could come forward for development in the plan period and these should be included within the development area. This will enable the Council to minimise the take-up of river meadows and other green field land allocated for development by policy SSA8. We have undertaken a candidate site assessment for the Crabtree and Evelyn site which shows that it is suitable for redevelopment, subject to the wider strategy for development in this area, and some limits arising from flood designation (C2 - an issue which affects much of the land within SSA8).

**Changes sought**

Extension of boundary to SSA 8 development area - see attached plan CBRE1

**Candidate Site Ref No**

An assessment is included with this submission and is largely positive in terms of the site’s overall development potential.

The site is a brown field site, and thus its redevelopment would be more sustainable than the development of the green filed areas already allocated as part of SSA8.

The bottom part of the site is a designated flood area, with a small section along the southern boundary within Flood Zone C1 and most of the southern part of the site is within Flood Zone C2.

- The Preferred Strategy did not specify exact boundaries of the SSA 8 strategic development area

- The Crabtree and Evelyn site has only recently come under review

### CE Test Results

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POLICY SSA23 - Special Landscape Area designation which seeks to protect the landscape;

POLICY AW14.1E which seeks to safeguard the extensive sand and gravel deposits in the area and imposes a 100m buffer zone around them;

POLICY AW14.3 which seeks to safeguard limestone deposits and imposes a 200m buffer around them;

SINC Designations: There are four Sites of Importance for Nature Conservation (sites 102, 103, 147 and 151) within the SSA8 boundary, covering a significant proportion of the total land.

Given the sensitivity of much of the designated land, the addition of the Crabtree and Evelyn site to the SSA8 area via the western boundary extension proposed will provide at least one brownfield option for some of the development earmarked under the SSA8 policy. Additional sites, namely the BT Exchange, Pontyclun Garage, Council Land and the Royal Mail Delivery Office would provide further opportunities for re-use of previously developed land prior to the uptake of greenfield land.

If the boundary extension is rejected, the result will be the effective prioritisation of sensitive greenfield land of regional geological and geomorphological importance with flood issues and lying outside the settlement boundary, over existing brownfield land. This would be an unsustainable approach and against National Policy.

CE4: The SSA8 boundary is drawn too tightly within the urban area, and then is loosely drawn around generous swathes of open countryside. If the boundary were extended in line with our recommendation, it would allow for the redevelopment of several brownfield sites, should they come forward in the plan period. This would ensure that only the minimum environmentally sensitive land need be lost. A wider allocation provides greater flexibility, particularly necessary given the current economic conditions where it is likely that operational sites will become obsolete during the plan period.
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<tr>
<td>1 2 Issue Summary</td>
<td>Policy AW 11 is overly restrictive given evidence base indicates surplus existing sites. Marketing requirement under (2) is excessive. See attached Policy AW11 should not require marketing evidence of 12 months or more in every case of proposed development on a former employment site. AW11 (2) should be removed.</td>
</tr>
<tr>
<td>3  Representation text</td>
<td>Please see attached reps: The LDP evidence base (RCT Economic Development prospects and Employment Land Implications Study 2006; RCT Employment Topic Paper 2008; Employment Land Availability Schedule 2008) indicates a surplus of employment land in the County, coupled by a take up of employment land and premises of no more than 10ha per annum. Given the economic downturn, the surplus of unoccupied and vacant sites will grow and uptake will lessen, at least in the early years of the plan period, if not for the entire plan period. Given these facts, there can be no justification for requiring evidence of no market demand over 12 months or more. Where a development opportunity arises on such sites, the onus should be upon RCT to provide reasons why it should not go ahead on employment land supply grounds. The policy is aspirational in terms of hoping that maintenance of existing employment sites will result in new employers moving in to the region. Where employment sites are obsolete (as is the case for many sites in the County) there should not be a requirement for marketing evidence if it is self-evident that no realistic requirement for the site for employment use exists. There is no need for an onerous, protectionist employment land policy when new land employment land has been identified, surplus existing employment land exists and a severe economic recession has commenced. Other factors such as adjacent uses, suitability of land, environmental and other physical constraints will provide an adequate framework for determining whether development on employment sites should be permitted</td>
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<td>4 5 Changes sought</td>
<td>Policy AW11 (2) - Criterion 2 should be deleted. See attached: Removal of criterion (2) from Policy AW11.</td>
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<td>7 Why no previous Representation</td>
<td>The Crabtree and Evelyn site was not under review at that time</td>
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<td>18 CE3 Test? No clear mechanisms for implementation and monitoring?</td>
<td>Yes</td>
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<td>19 CE4 Test? Not flexible to deal with changing circumstances?</td>
<td>Yes</td>
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Why changes satisfy Soundness
Give details why the changes you propose will ensure that the Plan

Please see attached sheet:

CE2: The LDP evidence base does not support the onerous protection of employment sites. The severe downturn in the economy means that uptake of employment sites will remain low over the plan period and the requirement for a year or more of marketing evidence will simply slow up further an already dire property development market.

In this market, where an opportunity exists for a change of use or site redevelopment it should be welcomed and assessed on the basis of physical and environmental constraints, appropriateness of the use in relation to neighbouring uses, not on an aspirational need for an extensive employment land bank for which there is no likely demand now or in the foreseeable future.

CE4: The policy needs to be flexible to ensure that where there are potential occupiers developers for a site or premises whether “employment uses” or not, they are encouraged to locate there unless other planning matters such as physical constraints or neighbouring compatibility indicate otherwise.

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

The site consists of three agricultural grazing fields situated to the rear of the recently built residential development at Gwern Heulog. The fields rise moderately steeply up behind the development, as far as the ridgeline of the hill, into open farmland beyond, although this is at a lower level than surrounding hills. The fields are bordered on most sides by hedgerows. The site and neighbouring development will form an extension to the established settlement of Coed Ely to the south of Tonyrefail. Access to the 4.63 hectare residential allocation will also be achieved from the Gwern Heulog development.

The request for planning permission on this site was already rejected after objections from the residents. This area does not have the infrastructure to support further development. This will also create another prolonged spell of building work in the area that has already suffered major inconvenience for several years. This is also some of the only green area left in this neighbourhood.
### Issue Summary

Objection to site SSA 10.3

#### Representation text

The reasons are there are a number of endangered/protected species including bats, newts and butterflies which live and breed in the sites. Heol Capel is a small dead end street with a total of 14 houses, the street is narrow and it is a struggle when all the cars are parked outside their properties to pass with one car let alone heavy traffic using the road. The access at Heol Capel would force me (13) and my neighbour (11), as we live opposite the proposed access area to break the law (statement taking from the highway code) as there would be nowhere we would be able to park as the road is too small.

"243 DO NOT stop or park opposite or within 10 metres (32 feet) of a junction".

---

### Issue Summary

Objection to site SSA 10.5

#### Representation text

The reasons are there are a number of endangered/protected species including bats, newts and butterflies which live and breed in the sites. Heol Capel is a small dead end street with a total of 14 houses, the street is narrow and it is a struggle when all the cars are parked outside their properties to pass with one car let alone heavy traffic using the road. The access at Heol Capel would force me (13) and my neighbour (11), as we live opposite the proposed access area to break the law (statement taking from the highway code) as there would be nowhere we would be able to park as the road is too small.

"243 DO NOT stop or park opposite or within 10 metres (32 feet) of a junction".
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Document: Deposit Draft, p.077
Policy: NSA 9

Site: 652/NSA 9.3  South East of Llwydcoed Community Centre  Delete Site  PEX Session:

Summary:

**Issue Summary**

We are writing to oppose the Local Development Plan which has been proposed to build houses behind Tregibbon, in Llwydcoed, Aberdare.

**Representation Text**

1  2  3  

Issue Summary: We are writing to oppose the Local Development Plan which has been proposed to build houses behind Tregibbon, in Llwydcoed, Aberdare.

**Representation text**

Our main concern is the lack of access to the proposed site.

To the front of our property, there is a single lane road without a pavement. This road is the main access road to the local primary school. Planning permission was refused for three houses recently by the highways department, due to poor access roads.

To the rear of our property is Llwydcoed Community Centre and Llwydcoed Associate Football Club ground and changing rooms. These facilities are widely used by all members of the community. The hall is used for childrens parties, bingo, Llwydcoed Brass Band practice, and they all require use of the car parking available. The football club has a very large following, and the car park is always full to capacity. The main road B4276 is the main access road from Aberdare to Prince Charles Hospital. This road was recently blocked by the sheer volume of traffic trying to access the football ground. This situation will worsen if an access road and more traffic is directed through the car park.

The Welsh Assembly Goverment are promoting healthy lifestyles and community based projects and activities in order to get the general public more active and reduce obesity. It therefore seems ludicrous that short sighted planning officers would even consider reducing the safety and accessibility of this excellent facility by putting an access road into a well used recreational area. We feel safety should always be paramount and a road through this facility would make it highly dangerous to the public. In particular to the many children that both play and watch football match's, and the people utilizing the community centre facilities.

We do appreciate the need to build more houses. However we feel that there are more appropriare sites within the Llwydcoed area, ie., the old chicken factory site, and the old brickworks and creamery.(SIC)
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<th>Acssn No</th>
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Document: Deposit Draft, p.077
Policy: NSA 9

Summary:

I am writing to oppose the Local development Plan which has been proposed to build houses behind Tregibbon, in Llwydcoed, Aberdare.

My main concern is lack of access to the proposed site.
To the front of the property, there is a single lane road without a pavement. This road is the main access road to the local primary school. Planning permission was refused for three houses recently by the highways department, due to poor access roads.
To the rear of my property is also a single lane road (Exhibition Row) without any pavement. I would appreciate if you will take our concerns into consideration, and would you please send me confirmation you have received this e-mail's.
### Issue Summary

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

### Representation Text

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

### Changes Sought

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

### Previous Representation No

Our representation is being made during the current public consultation period (5th February - 26 March 09)

### Why attend Examination?

There is not sufficient space within this form to do justice to our objections.

### Soundness Tests

<table>
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<tr>
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness' (WAG: Wales Spatial Plan (2008) pp29 (Word version).)

'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version).)

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.

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Representation Detail by: Representation No

Rhondda Cynon Taf County Borough Council Local Development Plan

Filtered to show: (All representations)

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Document: Deposit Draft, p.062
Policy: AW 15
Map: Site:
Issue: Minerals

Summary:

Issue Summary

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

Representation text

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school’s outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

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To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

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---|---
1 | Issue Summary

2 | Representation text

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11 | Why attend Examination?

21 | There is not sufficient space within this form to do justice to our objections.

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

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

16 | CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring authorities? | Yes

17 | CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? |

09/06/2009 Page 4717 of 4851
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**Why attend Examination?**

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**09/06/2009**

Page 4721 of 4851
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<td>After reading the report in regards building 15 houses at the rear of Exhibition Row Llwydcoed, I should like to make a strong objection. Housing plans have already been turned down 3 times before, on the access road into and out of Corner House Street, by the Council and Welsh Office. The report also brings in an alternative route through Llwydcoed Football ground and Llwydcoed Community Centre, this will be dangerous, owing to driving out onto the main road where local residents have their cars parked on the road so obstructing visibility up and down the road.</td>
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Document: Deposit Draft, p.116
Policy: SSA 26
Map: Site: 705//SSA 26 Graig-yr-Hesg Quarry, Pontypridd
Delete Site
PEX Session:

Summary:

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Cracks appearing on the drive. Been living on Cefn Farm Estate for 10 years, up until 6 month ago we never heard or felt the house shake, so in the last 10 years the quarry has been coming even closer.

With the quarry coming ever closer this will effect the ground and cause subsidence to my property and thus making my property un-saleable if I want to move or no one would want to be that close to the quarry.
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<td>Issue: Housing Allocation</td>
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**Summary:**

I object to the access through Cefn Close.

**Representation Text:**

I object to access for the building site being through Cefn Close.

**Changes sought:**

I would like the access to be changed from Cefn Close both for the building of the site and access when site is finished.

**Why no previous Representation:**

I was not informed of any consultation.

**Soundness Tests:**

The site of the plan is not reasonable and is not suitable for the development. Access to the site is not feasible (SIC). My concern will be addressed on removal of site access.

**Tick box Replies:**

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

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

09/06/2009
The designation of a particular area of land, as identified in the accompanying plan, as tourist and leisure or employment facilities.

We are Planning consultants acting for a client who owns land in the Treherbert area. We have been involved in pre-application discussions with several officers at the Council including Phil Ratcliffe and Judith Jones with a view to coming forward with a redevelopment project at the site. Our client's land is included within an extensive Site of Importance for Nature Conservation (SINC) and as a result there have been discussions with the Council's ecologist. The land was allocated as ENV 11.2 in the Rhondda Local Plan; i.e. designated as land that is derelict for reclamation. Our client wishes to come forward with an opportunity for development of tourism and leisure facilities including a climbing and walking centre which would be totally acceptable as a methodology of reclamation in policy terms. We more however that the land has not been allocated any specific designation in the draft Deposit Local Development Plan although there appears to be a general indication that land in the surrounding area could be subject to Policy AW 14.4 (safeguarding of mineral resources).

The site was previously the site of a coal mine and was subject to a requirement for regeneration. In our discussions with the appropriate Officers it became clear that our proposals would be encouraged due to various policies requiring an increase in recreation and land allocation for tourist associated development. Wee have been encouraged to register our concern that the land has not been allocated for tourism use. We note that land immediately to the north of our site was previously allocated for tourism and leisure and no proposals were brought forward much to the disappointment of the Planning Strategy team. It was suggested in discussion that our site be specifically recognised as appropriate for tourism and leisure facilities and we would therefore request that an amendment be made to the draft Local Development Plan to record this.

Chapter 2 of the Draft Local Development Plan sets out the key issues in Rhondda Cynon Taf and raises issues in relation to employment and the environment. The designation of this land for tourism and leisure facilities will assist in meeting these key issues. Given that the employment structure of Rhondda Cynon Taf is dominated by three sectors the diversification of employment opportunity as well as the implementation and enhancement of appropriate tourism operations will benefit the economic structure of the area. In an area experiencing high levels of deprivation, dereliction and a declining population the introduction of such a designation would bring significant growth in economic activity as well as providing access to recreational opportunity and meeting Local Development Plan briefs in relation to conservation and diversity in semi natural habitats.

We would like to see the area of land designated specifically as above.

We would suggest that the land is specifically allocated for Tourism and Leisure facilities (subject to all relevant planning controls) and that the Local Development Plan Proposals map be amended accordingly. Although Officers have all of the relevant information we include with this letter a copy of the Land Registry illustrative plan Ordnance Survey map for your information. The site in question is outlined in red and lies to the north west of Blaencwm in the Treherbert ward. We also enclose a copy of an excerpt from the previous Local Plan Proposals map which sets out the existing designations in relation to the land and have annotated the area of our client's ownership thereon by way of a red line outline.

We also note that listed on the SINC appendices to the Draft Local Development Plan at number 58 is the 'Treherbert slopes'. We should be grateful for a definition of the extent of this area and whether or not this will affect our site. We are aware that at present the site is considered to be within the SINC but clarification of the future designation would be appreciated.

Meeting with relevant officers to discuss the process we were encouraged to make representations. Unfortunately, we were not included in some of the statutory notices that would have explained the details of the process/need to submit formal representations at this earlier stage. Correspondence is with Phil Ratcliffe on the matter.
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We are Planning consultants acting for a client who owns land in the Treherbert area. We have been involved in pre-application discussions with several officers at the Council including Phil Ratcliffe and Judith Jones with a view to coming forward with a redevelopment project at the site.

Our client’s land is included within an extensive Site of Importance for Nature Conservation (SINC) and as a result there have been discussions with the Council’s ecologist. The land was allocated as ENV 11.2 in the Rhondda Local Plan; i.e. designated as land that is derelict for reclamation. Our client wishes to come forward with an opportunity for development of tourism and leisure facilities including a climbing and walking centre which would be totally acceptable as a methodology of reclamation in policy terms. We note however that the land has not been allocated any specific designation in the draft Deposit Local Development Plan although there appears to be a general indication that land in the surrounding area could be subject to Policy AW 14.4 (safeguarding of mineral resources).

The site was previously the site of a coal mine and was subject to a requirement for regeneration. In our discussions with the appropriate Officers it became clear that our proposals would be encouraged due to various policies requiring an increase in recreation and land allocation for tourist associated development. We have been encouraged to register our concern that the land has not been allocated for tourism use. We note that land immediately to the north of our site was previously allocated for tourism and leisure and no proposals were brought forward much to the disappointment of the Planning Strategy team. It was suggested in discussion that our site be specifically recognised as appropriate for tourism and leisure facilities and we would therefore request that an amendment be made to the draft Local Development Plan to record this.

Chapter 2 of the Draft Local Development Plan sets out the key issues in Rhondda Cynon Taf and raises issues in relation to employment and the environment. The designation of this land for tourism and leisure facilities will assist in meeting these key issues. Given that the employment structure of Rhondda Cynon Taf is dominated by three sectors the diversification of employment opportunity as well as the implementation and enhancement of appropriate tourism operations will benefit the economic structure of the area. In an area experiencing high levels of deprivation, dereliction and a declining population the introduction of such a designation would bring significant growth in economic activity as well as providing access to recreational opportunity and meeting Local Development Plan briefs in relation to conservation and diversity in semi natural habitats.

We would like to see the area of land designated specifically as above.

We would suggest that the land is specifically allocated for Tourism and Leisure facilities (subject to all relevant planning controls) and that the Local Development Plan Proposals map be amended accordingly. Although Officers have all of the relevant information we include with this letter a copy of the Land Registry illustrative plan Ordnance Survey map for your information. The site in question is outlined in red and lies to the north west of Blaencwm in the Treherbert ward. We also enclose a copy of an excerpt from the previous Local Plan Proposals map which sets out the existing designations in relation to the land and have annotated the area of our client's ownership theron by way of a red line outline.

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**Representation Text**

**Designation of Ynys Field, Dinas Rd, Trealaw site.**

In respect of the Ynys Field, Dinas Rd, Trealaw which under the previous plan was designated for non-food retail we would strongly object to any alteration to the previous plan. We would urge you to retain the same non-food conditions on this site, thereby making it difficult for a company such as Tesco to gain planning permission here.
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Document: Deposit Draft, p.077

Map: Policy: NSA 9

Site: 655/NSA 9.5  Tegfan Farm, Potters Field, Trecynon

PEX Session:

Summary:

Item Question

1 2 Issue Summary

Access to site NSA 9.5

2 3 Representation text

Dear Sir/Madam

I am a resident of Potters Field and have just seen the proposal for the future development surrounding Potters Field. I strongly object to the entry of our small estate being used because we already have problems with such narrow roads, cars parked on the roads, as much as 3 cars per house. We also have the care home on the entrance with cars parked from Monday to Friday there. I have no objection to entry from the bypass direction, I don’t see that’s a problem and I’m sure most people here would agree with me, I trust you will think again about this.

Yours sincerely

3463.D1

Document: Deposit Draft, p.052

Map: Policy: AW 7

Site:

PEX Session:

Summary:

Item Question

1 2 Issue Summary

Off road provision for horse riders.

2 3 Representation text

The plan does not include off road provision for horse riders, yet includes provision for walkers and cyclists. Horse riders are legally not allowed to use cycle routes/walkways yet all users are allowed to access bridleways. Cycle routes quite often have barriers which do not allow horse access.

Please could you make a provision for horse routes, through multi-user tracks with horse friendly barriers within the new plan.
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Document: Deposit Draft, p.106

Site: 681//SSA 10.3  Collena Farm, Tonyrefail

Delete Site  PEX Session:

Policy: SSA 10  Map:

Issue: Housing Allocation

Summary:

**Item Question**  **Representation Text**

1  Objection to SSA 10.3

2  I wish to put our objection to you about the opening of our street for houses being built behind for their access. We were assured last year that request for planning permission had been withdrawn for our street.

We have 2 grandchildren who stay with us regularly & young children in the street which is narrow with cars parked each side.

With lorries etc coming up the street to go to a site would be very dangerous & any mess would be walked in the house, are you going to pay for our floors & carpets.

The only way you can turn a car at the top of the street in the cul de sac.

3465.D1  M

Document:

Policy:

Site:

PEX Session:

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Document: Deposit Draft, p.106  
Map: SSA 10  
Site: 685//SSA 10.7  
Gwern Heulog, Coed Ely  
Delete Site  
PEX Session:  
Policy: SSA 10

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| 2 3           | I along with many of the local residents have grave concerns over the additional construction traffic that this would generate during the development. We have been subjected to careless driving from some of the contractors on the existing site, with a total lack of respect and regard for any children currently residing in Gwern Heulog and surrounding streets.

In addition, with only one access road there would be a considerable amount of traffic generated through the main road of the site and the potential dangers that are associated with such traffic are gravely concerning.

I have spoken with many delivery firms personally over the last 18 months to complain about the speed that their drivers travel through the site. As for residents who drive carelessly, I can only appeal to their best nature! Which is not always received with the warmth in which it is requested?

As for the impact for the local school at Cwm Lai. I would like to know what provisions have been made, if any in relation to the additional children that will subsequently reside on the proposed site, and how will this impact on an already growing and expanding school?

And finally I would like to know how the contract for the proposed site, should it be successful would be awarded. I can only assume that for such a large and potentially lucrative contract that the RCT procurement rules would preside and fair and open competition would be demonstrated, enabling interested developers to submit formal tenders for the work? |

| 3468.D1  | O M       |             |       |             |             |          |             |               |           |               |                     |                |          |

Document: Delive Agt Revision, p.106  
Map: SSA 10  
Site: 685//SSA 10.7  
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| 2 3           | To develop a further 150 dwellings would only further exasperate our previous concerns. The entry onto the original build (Gwern Heulog) gets gridlocked at the best of times, what is the impact on the local schools; the nearest public transport would be a fair distance way and a difficult walk due to the gradient of the hill. What are your views on the green issues with the destruction of yet more Greenbelt land?

My issues is the highways leading into the estate cannot take any more developments and the local school, which my son will be attending could be affected by a further 150 developments. |
### Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

### Changes sought

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

### Our representation is being made during the current public consultation period (5th February - 26 March 09)

There is not sufficient space within this form to do justice to our objections.

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**Item Question**: C2 Test? Does not have regard to national policy?
**Reply**: Yes

**Item Question**: C3 Test? Does not have regard to Wales Spatial Plan?
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> 'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness' (WAG: Wales Spatial Plan (2008) pp29 (Word version).

> 'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.

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The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.

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Document: Deposit Draft, p.116
Policy: SSA 26

Summary:
- Issue: Minerals
- Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

Representation Text

1 2  Issue Summary
Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

2 3  Representation text
The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

4 5  Changes sought
To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

8 7  Previous Representation No
Our representation is being made during the current public consultation period (5th February - 26 March 09)

21 11  Why attend Examination?
There is not sufficient space within this form to do justice to our objections.

Soundness Tests

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09/06/2009
Our proposals are much more consistent with the Wales Spatial Plan’s commitment to supporting the economic development of communities without compromising environmental and social considerations.

‘Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctive ness’ (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

‘The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future’ (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership’s proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
**Representation No:** 3475.D1

**Document:** Deposit Draft, p.077

**Policy:** NSA 9

**Map:** Site: Crichton Farm, Cwmbach

**Summary:** Proposed housing allocation, Crichton Farm, Cwmbach

**Representation Text:**

Own Banks Planning & Development Ltd has been instructed to submit a representation towards the Deposit Draft of the RCT CBC LDP. This representation is in the form of an objection to the Deposit Draft, and seeks the inclusion of land at Crichton Farm, Cwmbach, Aberdare as a non-strategic site for residential development.

**Section 1 - the Proposal**

Allocation of site for housing.

**Candidate Site Ref No:** Unknown [no record of a CS]

**Why no previous Representation:** Unknown.

**Why attend Examination?** To participate in discussion.

**Soundness Tests**

1. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
2. Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan

Please see attached report.

**Tick Box Replies**

3. Seek changes? Any changes to be made to the Plan? Yes
4. Previous Representations? Did you make any previous representations on this issue during the Cons? No
**Issue Summary**
Settlement boundary extension, Crichton Farm, Cwmbach.

**Representation text**
Please see attached report.

Section 1 - the Proposal
Own Banks Planning & Development Ltd has been instructed by to submit a representation towards the Deposit Draft of the RCT CBC LDP. This representation is in the form of an objection to the Deposit Draft, and seeks the inclusion of land at Crichton Farm, Cwmbach, Aberdare as a non-strategic site for residential development.

**Changes sought**
Movement of settlement boundary.

**Candidate Site Ref No**
Unknown [no record of a CS]

**Why no previous Representation**
Unknown.

**Why attend Examination?**
To participate in discussion.

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### Issue Summary

Comments on affordable housing policies CS 5, NSA 11 & SSA 12.

### Representation Text

- Planning Policy Wales' (as amended by Ministerial interim Planning Policy Statement 01/2006 Housing) requires local planning authorities to make appropriate provision for affordable housing (paragraph 9.1.2). Increased provision of affordable housing is a key policy goal for the Assembly Government (as expressed in section 5.1 of 'One Wales – a progressive agenda for the government of Wales', June 2007) and delivery of affordable housing is recognised in the deposit LDP as an essential element in the delivery of the core strategy (paras 4.25 & 4.27).

In accordance with national planning policy, the LDP provides an affordable housing target, thresholds for affordable housing contributions and site specific targets, however there is inadequate clarification on how these have been arrived at and how realistic they are:

- Need: Core Policy CS 5 sets a target of 3,000 affordable homes to be provided through the planning system over the plan period to 2021. The Council's Local Housing Market Assessment (LHMA) indicates that 4,350 affordable homes are needed over the period 2006-11. No information is provided for the need over the plan period (nor on the availability of Social Housing Grant for RSLs which has been identified as the means to provide the remainder of the requirement) and it is therefore difficult to assess whether the target is realistic.

- Deliverability: Para 448 (Policy CS 5) states that 604 affordable homes will be provided in the Northern Strategic Area (NSA) and the remaining 2,396 in the Southern Strategic Area (SSA), to be delivered by the application of a "tariff" to all sites over 5 units allocated by the LDP. However, it is not clear that Para 178 and 107 Policies NSA 11 and SSA 12 will deliver these targets. Both Policies rely on a combination of on-site provision (on sites of 30 or more units) and the use of commuted sums (from sites of more than 5 but less than 30 units) for the re-use / rehabilitation of existing empty properties. No information is provided either on the strategy for bringing the empty properties back into use or on the sites for 30+ units to enable an assessment to be made of the Policies' ability to deliver the affordable housing target.

In addition, it is not clear why the affordable housing quotas of 25% in the NSA and 40% in the SSA have been chosen and whether they are realistic.

### Changes sought

[Not clearly specified.]
**Issue Summary**

Comment on affordable housing policies CS5, NSA 11 & SSA 12.

**Representation Text**

'Planning Policy Wales' (as amended by Ministerial interim Planning Policy Statement 01/2006 Housing) requires local planning authorities to make appropriate provision for affordable housing (paragraph 9.1.2). Increased provision of affordable housing is a key policy goal for the Assembly Government (as expressed in section 5.1 of 'One Wales – a progressive agenda for the government of Wales', June 2007) and delivery of affordable housing is recognised in the deposit LDP as an essential element in the delivery of the core strategy (paras 4.25 & 4.27).

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**Changes sought**

[Not clearly specified.]

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### Item Question

Representations on affordable housing policies CS5, NSA 11 & SSA 12.

#### Representation Text

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#### Changes sought

[Not clearly stated.]

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### Summary:

**Policy omission - where coal operations unacceptable.**

The LDP has not met the requirements of 'Minerals Planning Policy Wales' (MPPW) paragraph 15 which says that mineral planning authorities must provide guidance in the development plan to indicate where it is likely such operations would be unacceptable. The Coal Mineral Technical Advice Note (MTAN2) sets out the process to be followed and says that the areas must be shown on the proposals map (para 27). There is room for local discretion, but the supporting evidence needs to be provided.

### Changes sought

The LDP must provide guidance to indicate where it is likely coal operations would be unacceptable. The supporting evidence needs to be provided.

### Item Question

**C2 Test? Does not have regard to national policy?**

Yes

**CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth**

Yes

**CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**

Yes

### Seek changes? Any changes to be made to the Plan?

Yes

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**Issue: Minerals**

**Policy ommission - where coal operations unacceptable.**

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The LDP must provide guidance to indicate where it is likely coal operations would be unacceptable. The supporting evidence needs to be provided.

---

**C2 Test? Does not have regard to national policy?**

Yes

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**CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth**

Yes

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**CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**

Yes

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**Why changes satisfy Soundness**

Give details why the changes you propose will ensure that the Plan

[Not stated.]
### Core Strategy & Strategic Sites: Minerals safeguarding

Minerals safeguarding for the plan period is provided for at policy AW 14 (also at core policy CS10). Minerals safeguarding (and risks from shallow coal workings) should have been included in the factors considered when determining the plan’s strategy. As examples, Fernhill Colliery, the Phurnacite plant, land at Robertstown and land south of Hirwaun are all on coal resources that should be safeguarded. It is unclear how this has influenced the selection of sites. National policy requires that if the proposed development site is in an area of primary or secondary coal resources, justification will be required to show that the resource is unlikely to have the potential for opencast extraction, or that the coal can be recovered in advance of the development, or that there are no suitable alternative locations for the development (para 39 of MTAN2: Coal, 2009).

Whilst core policy CS10(3) encourages extraction of the mineral in advance of development, it is important that the policies for Strategic Sites within an area of primary or secondary coal resources in the Northern and Southern Strategy Areas should include coal resources as a constraint, as has been done for policy NSA8 Land South of Hirwaun (para 6.41, 2nd bullet; – N.B. this should refer to coal resources rather than reserves).

### Changes sought

Minerals safeguarding (and risks from shallow coal workings) should have been included in the factors considered when determining the plan’s strategy. Justification will be required to show that the resource is unlikely to have the potential for opencast extraction, or that the coal can be recovered in advance of the development, or that there are no suitable alternative locations for the development.

The policies for Strategic Sites within an area of primary or secondary coal resources in the Northern and Southern Strategy Areas should include coal resources as a constraint.

Policy NSA8 Land South of Hirwaun: para 6.41, 2nd bullet – should refer to coal resources rather than reserves.

### 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

[Not stated.]

### Seek changes? Any changes to be made to the Plan?

3 4  Yes
### Issue Summary

Comments on minerals safeguarding.

### Representation Text

Core Strategy & Strategic Sites: Minerals safeguarding for the plan period is provided for at policy AW 14 (also at core policy CS10). Minerals safeguarding (and risks from shallow coal workings) should have been included in the factors considered when determining the plan's strategy. As examples, Fernhill Colliery, the Phurnacite plant, land at Robertstown and land south of Hirwaun are all on coal resources that should be safeguarded. It is unclear how this has influenced the selection of sites. National policy requires that if the proposed development site is in an area of primary or secondary coal resources, justification will be required to show that the resource is unlikely to have the potential for opencast extraction, or that the coal can be recovered in advance of the development, or that there are no suitable alternative locations for the development (para 39 of MTAN2: Coal, 2009).

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### Changes sought

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### Soundness Tests

13. Does not have regard to national policy?
   - Yes

16. CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth
   - Yes

18. CE3 Test? No clear mechanisms for implementation and monitoring?
   - Yes

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

   [Not stated.]

### Seek changes?

3. Any changes to be made to the Plan?
   - Yes
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<td>Comment on para 4.81.</td>
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<td>Representation text</td>
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<td>The justification for the policy combines safeguarding and extraction, and fails to be suitably clear about its intentions. It appears to balance safeguarding against the potential impacts of extraction on residential occupiers etc. These issues are matters for consideration only if proposals to extract come forwards, and not in deciding the areas for safeguarding. It also refers to safeguarding nationally important mineral resources but omits regionally and locally important minerals resources which should also be safeguarded.</td>
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<td>For clarity the paragraph should be amended, for example, to: “This policy safeguards nationally, regionally and locally important mineral resources. It will balance appropriate extraction against the potential impact of such development on …….”</td>
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### Soundness Tests

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**Document:** Deposit Draft, p.040  
**Policy:** CS 10  
**Map:**  
**Site:**  
**Issue:** Minerals  
**PEX Session:**  

**Summary:**
Policy CS10(1) seeks to maintain a 20-year landbank of aggregate reserves. We note that there is no clarification on how this is derived. This level exceeds minimum levels in national policy. (Para 49 of MTAN 1: Aggregates (2004) seeks a minimum 10-year landbank of crushed rock and a minimum 7-year landbank for sand and gravel to be maintained during the entire plan period.) Para 45 of MTAN1 says that development plans should include an assessment of the current landbank and state how many years of mineral extraction the landbank will provide; whilst there is some evidence in the LDP Minerals Topic Paper, April 2008 at pages 13-14, it has not been taken forward into the Deposit LDP. (Policy SSA 26 – Preferred Area of Known Mineral Resource should be considered in these calculations.)

**Item Question**

1. **Issue Summary**
   - Comments on CS 10.1.

2. **Representation text**
   - Policy CS10(1) seeks to maintain a 20-year landbank of aggregate reserves. We note that there is no clarification on how this is derived. This level exceeds minimum levels in national policy. (Para 49 of MTAN 1: Aggregates (2004) seeks a minimum 10-year landbank of crushed rock and a minimum 7-year landbank for sand and gravel to be maintained during the entire plan period.) Para 45 of MTAN1 says that development plans should include an assessment of the current landbank and state how many years of mineral extraction the landbank will provide; whilst there is some evidence in the LDP Minerals Topic Paper, April 2008 at pages 13-14, it has not been taken forward into the Deposit LDP. (Policy SSA 26 – Preferred Area of Known Mineral Resource should be considered in these calculations.)

**Item Question**

4. **Changes sought**
   - [Not clearly stated.]

**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

**Tick box Replies**

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

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**Document:** Deposit Draft, p.040  
**Policy:** CS 10  
**Site:** Map:  
**Issue:** Minerals

**Summary:**

**Item Question**

1 2  
Issue Summary

Comments on CS 10.2.

2 3  
Representation text

Policy CS10(2) includes considerations to be taken into account in safeguarding mineral resources (i.e. environmental, planning and transportation). No justification is provided for these considerations; they should not be taken into account in determining the safeguarding area and should be deleted; the exception being environmental considerations in relation to coal safeguarding.

4 5  
Changes sought

[Not clearly stated.]

**Item Question**

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

**Item Question**

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

09/06/2009  
Page 4753 of 4851
### Representation Text

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**Summary:**

Comments on CS 10.3.

**Representation Text**

Policy CS10(3) refers to “proven” resources. This is a higher test than national planning policy and needs to be justified; otherwise the word “proven” should be deleted.

**Changes sought**

Reference to “proven” resources needs to be justified; otherwise the word “proven” should be deleted.

**Item Question**

1. **Issue Summary**
   - Comments on CS 10.3.

2. **Representation text**
   - Policy CS10(3) refers to “proven” resources. This is a higher test than national planning policy and needs to be justified; otherwise the word “proven” should be deleted.

3. **Changes sought**
   - Reference to “proven” resources needs to be justified; otherwise the word “proven” should be deleted.

**Item Question**

13. **C2 Test? Does not have regard to national policy?**
   - Yes

20. **Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan**
   - [Not stated.]

**Item Question**

3. **Seek changes? Any changes to be made to the Plan?**
   - Yes
### Issue Summary

Comment on buffer zones for dormant minerals sites - policy omission.

### Representation Text

To accord with the requirements of 'Minerals Planning Policy Wales' paragraph 40 and MTAN1: Aggregates paragraphs 70-71, buffer zones should be defined around all mineral sites including dormant (inactive sites) and the LDP should set out a strategy for the future use of all dormant mineral sites as specified in paragraph 19 of MPPW. Paragraph 5.82 refers to dormant quarries, but it is not clear whether buffer zones have been defined.

### Changes sought

Buffer zones should be defined around all mineral sites including dormant (inactive sites).

The LDP should set out a strategy for the future use of all dormant mineral sites.

### Soundness Tests

- **C2 Test?** Does not have regard to national policy?  
  - **Yes**
- **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth  
  - **Yes**
- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?  
  - **Yes**
### Representation Text

**Issue Summary**

Comments on WSP Strategic Opportunity Areas.

**Representation text**

Although the draft deposit makes a number of references to the Wales Spatial Plan, and to the Strategic Opportunity Areas (some of which fall partly within RCT), the statements are made at a strategic, overarching policy level and do not appear to have been carried through into delivery. In particular, policies SSA 3 (page 95) and Appendix 1 D) Major Highway Schemes (page 131) do not mention improving the public transport links from the Llantrisant/Talbot Green area towards North West Cardiff, even though these two locations make up one of the Strategic Opportunity Areas (Wales Spatial Plan Update 2008, para 19.13). The context of RCT and SOAs in relation to the City Region Network is not articulated.

**Changes sought**

[Not clearly stated.]

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**Tick box Replies**

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**Policy: CS 3**

**Site:**

**Issue:** Strategic Sites

**Summary:**

**Item Question:** Comment on adaptation to climate change: development and flood risk

**Representation Text:**

Strategic sites: The rational for developing large scale sites in the floodplain needs to be robust and open to scrutiny, particularly given the acceptance of a high level of growth. It is noted that highly vulnerable development is largely avoided in the floodplain in the northern strategy area and this is supported, however, this is not the case in the south where two strategic sites (SSA7 & SSA9) are subject to risk. It is not clear what attempt has been made to justify the exception to national policy. Further, any justification would need to be supported by flood consequences assessment appropriate to enable confidence that the sites can come forward in an acceptable manner, including securing any necessary mitigation.

**Changes sought:**

[Not clearly stated.]

**Soundness Tests**

- **C2 Test?** Does not have regard to national policy? Yes
- **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring authorities? Yes
- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

**Tick box Replies**

- **Seek changes?** Any changes to be made to the Plan? Yes
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**Summary:**
Comment on climate change policy CS 11.

**Representation Text:**
Policy CS11 Climate Change – section B) Adaptation to climate change, criterion 1: This is on face-value weaker than national planning policy contained in TAN15: Development and Flood Risk, 2004. TAN15 establishes two primary tests to be applied in the floodplain at sections 6 & 7 of the TAN (i.e. that highly vulnerable development should not be permitted in C2 and that the location of development in C1 should be justified, and flood consequences should be assessed). This criterion is considered contrary to national planning policy as it is not sufficient to just require technical assessment of risk.

**Changes sought:**
[Not clearly stated.]

**Soundness Tests:**
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Document: Deposit Draft, p.045
Policy: AW 2
Site: Policy AW2 Sustainable Locations, criterion 5, uses only the first of the two primary policy tests in TAN15 and applies it to all areas of the floodplain. This is considered contrary to national planning policy.

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**Issue Summary**

Comment on employment land allocations in the floodplain.

---

**Representation text**

It would be useful to clarify the strategy for securing mitigation measures, particularly to ensure flooding does not increase elsewhere as a result of cumulative development of floodplain, and whether this can be achieved by relying on individual businesses securing their own protection.

---

**Changes sought**

Clarify the strategy for securing mitigation measures.

---

**Item Question**

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

**Reply**

Yes
| Rep'n No | Accession No | Date Lodged | Late? | Source Type | Mode Status | Modified | Petition of | Treat in parts | Evidence Add'l | No Further Evidence | Repr Council Officer | Recommendation | Response |
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| 3476.D17 | OWM          |             |       |             |             |          |             |               |                |                   |                    |                  |            |

Document: Deposit Draft, p.041
Policy: CS 11
Map: Site:
Issue: Climate Change

Summary:

**Item Question** | **Representation Text**
--- | ---
1 2 | **Comment on CS 11 climate change.**

**Item Question** | **Reply** | **Soundness Tests**
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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

**Item Question** | **Reply** | **Tick box Replies**
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Document: Deposit Draft, p.047
Policy: AW 5
Map: Site: Issue: Design

Summary:

1 2
Comment on AW 5 - new development.

2 3
Representation text

No robust and credible evidence base has been provided to justify the sustainability standards and carbon reduction targets set.

4 5
Changes sought

[Not clearly stated.]

Item Question Representation Text

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Item Question Reply

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Document: Deposit Draft 4: Core Strategy  
Map:  
Policy:  
Site:  
Issue: Core Strategy

**Summary:**

**Item Question**
Comment on Water supply and waste water infrastructure

**Representation Text**

It is not clear what evidence is available in regard to the capacity of water supply and waste water infrastructure. That discussions have taken place with service providers is noted but whether capacity exists or whether any necessary improvements are required, and consequently what the impacts of providing this will be on delivery, will need to be demonstrated.

**Item Question**

Changes sought

Whether capacity exists or whether any necessary improvements are required, and consequently what the impacts of providing this will be on delivery, will need to be demonstrated.

**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  
[Not stated.]

**Item Question**

Seek changes? Any changes to be made to the Plan? Yes
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Document: Deposit Draft, p.032  
Site:  
Policy: CS 3  
Map:  
Issue: Strategic Sites  
PEX Session:  
Summary:  

### Issue Summary

Comment on land contamination (and reclamation) constraints.

### Representation Text

There does not appear to be a robust strategy, based on an understanding of the nature of the risks, for delivery of sites subject to reclamation and land contamination constraints. Land reclamation is needed for a number of the strategic sites, whilst Abercwmboi is recognised as being contaminated and in a flood risk area (para 6.30).

### Changes Sought

[Not clearly stated.]

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### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representation Text**

**Issue:** Waste Management

**Policy:** CS 9

**Map:** [Deposit Draft, p.039](#)

**Item Question:**

1. **Issue Summary**
   - Comment on waste planning.

2. **Representation text**
   - Two areas are identified which could take regional facilities and it is assumed local facilities and this is supported. Although a large amount of employment land is available the LDP should clarify which B2 and B8 locations are appropriate for waste and whether they could accommodate a range of facility types of different sizes so as to contribute to an overall adequate network of facilities. It is noted that specific locations for a network of Civic Amenity (recycling centres) is provided for and this is supported.

3. **Changes sought**
   - The LDP should clarify which B2 and B8 locations are appropriate for waste, and whether they could accommodate a range of facility types of different sizes, so as to contribute to an overall adequate network of facilities.

**Soundness Tests**

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

16. **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes

17. **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

20. **Why changes satisfy Soundness?** Give details why the changes you propose will ensure that the Plan [Not stated.]

**Tick box Replies**

3. **Seek changes? Any changes to be made to the Plan?** Yes

**Document:** Deposit Draft, p.039

**Site:**

**PEX Session:**

**Summary:**

```plaintext
- 12 Item Question
  - Issue Summary
  - Comment on waste planning.

- 23 Representation text
  - Two areas are identified which could take regional facilities and it is assumed local facilities and this is supported. Although a large amount of employment land is available the LDP should clarify which B2 and B8 locations are appropriate for waste and whether they could accommodate a range of facility types of different sizes so as to contribute to an overall adequate network of facilities. It is noted that specific locations for a network of Civic Amenity (recycling centres) is provided for and this is supported.

- 45 Changes sought
  - The LDP should clarify which B2 and B8 locations are appropriate for waste, and whether they could accommodate a range of facility types of different sizes, so as to contribute to an overall adequate network of facilities.

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

- 16. CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes

- 17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes

- 20. Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan [Not stated.]

- 3. Seek changes? Any changes to be made to the Plan? Yes
```
### Representation Text

**Issue Summary**

Comment on AW 1 large wind farm development.

**Representation Text**

1. **Criterion 1** is overly prescriptive. The targets in TAN 8: Planning for Renewable Energy 2005 are indicative, not absolute, and therefore developers should not have to demonstrate a need to meet an indicative generating capacity.

2. **Criterion 3** is considered unnecessary. TAN 8 already considers the wind resource in the SSAs and this should also have been considered as part of the refinement exercise.

3. **Criterion 6** is considered to be too prescriptive. The development of large scale windfarms may inevitably lead to the loss of some accessibility but this needs to be considered against other factors and there may be mitigation aspects or indeed other benefits to arise from the development.

**Changes sought**

[Not clearly stated.]

---

### Soundness Tests

13. **C2 Test?** Does not have regard to national policy?  
   - **Reply:** Yes

16. **CE1 Test?** Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth  
   - **Reply:** Yes

17. **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?  
   - **Reply:** Yes

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### Seek changes? Any changes to be made to the Plan?

- **Reply:** Yes
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

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**Document:** Deposit Draft, p.058

**Policy:** AW 12

**Map:**

**Site:**

**PEX Session:**

**Summary:**

**Item Question**

1. 2 Issue Summary
   - **Comment on AW 12 renewable energy.**

2. 3 Representation text
   - Small wind turbine developments (paragraph 5.70) - The process by which the small wind turbine developments are identified needs clarification. This does not appear to have any cross reference to the definition of small scale windfarm development in TAN 8: Planning for Renewable Energy 2005 (which considers >5MW to be small scale).

4. 5 Changes sought
   - The process by which the small wind turbine developments are identified needs clarification.

**Item Question**

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
   - [Not stated.]

**Item Question**

3. 4 Seek changes? Any changes to be made to the Plan? Yes
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**Document:** Deposit Draft, p.045  
**Map:** Policy: AW 2  
**Site:**  
**Issue:** Design  

**Summary:**

**Item Question**  
**Representation Text**

1. Comment on Policy AW2 Sustainable Locations (part 8).

2. Policy AW2 Sustainable Locations (part 8) appears to imply that development will not be supported in Special Landscape Areas (SLAs). This is not consistent with national planning policy as set out in paragraph 5.3.11 of Planning Policy Wales 2002, which states that non-statutory designations such as SLAs should not unduly restrict development. Furthermore, policy AW2 does not appear to be consistent with policies NSA25 and SSA23, which imply that development is acceptable in SLAs subject to specified criteria. Policy AW2 should therefore be modified to address these issues.

3. Policy AW2 should be modified to address the issues identified [Q3].

**Item Question**  
**Reply**  
**Soundness Tests**

13. C2 Test? Does not have regard to national policy? Yes
16. CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring authority? Yes
17. CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
20. Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan [Not stated.]

**Item Question**  
**Reply**  
**Tick box Replies**

3. 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 SA/SEA | NO FRTHR EVID. | Rep Council | Officer | Recommendation | Response |
|----------|-----------|-------------|-------|-------------|-------------|----------|------------|---------------|----------------|---------------|-------------|-----------|---------|-------------|---------|
| 3476.D25 |           |             |       |             |             |          |            |               |                |               |             |           |          |            |         |

Document: Deposit Draft
Map: Policy: Site: Issue: Affordable Housing

Summary:

**Issue Summary**

Comment on policy omission - gypsies & travellers.

**Representation Text**

1 2

Whilst Policy SSA 27 Land at Beddau Caravan Park does identify one specific site allocation in accordance with MIPPS 01/2006 Housing (para 9.2.20) and WAG Circular 30/2007 (para.17), an additional criteria based policy is also needed in order to meet future or unexpected demand with criteria reflecting the guidance in the circular (para.25 of the circular) (For example, G/Ts may want to establish their own ‘private’ site; there are also transit sites and a possible issue about provision for the north of the Council area.) Para 6.190 refers to a Draft Gypsy and Travellers Study (2007), but this has not been made available as part of the evidence base; it is not clear, for example, as to what level of need there is, and how suitable the site is to meet that need.

4 5

Changes sought

A criteria-based policy is needed in order to meet future or unexpected demand for gypsy & traveller sites with criteria reflecting the guidance in the circular (para.25 of the circular).

---

**Soundness Tests**

13 16 17 20

C2 Test? Does not have regard to national policy? Yes
CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth Yes
CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan

[Not stated.]

---

**Tick box Replies**

3 4

Seek changes? Any changes to be made to the Plan? Yes
### Representation Text

**Issue Summary**

Comment on the Evidence Base and the LDP.

**Representation Text**

LDPs must be supported by an appropriate evidence base; the deposit plan does refer to various LDP Topic Papers and other documentation. At present the Topic Papers made available are generally dated April 2008 and do not support the deposit plan policies (e.g. para4.18 of the deposit LDP refers to infrastructure requirements for sites detailed in the LDP Infrastructure Topic Paper – they are not). In addition the Topic Papers aren’t sufficiently robust in providing a rigorous evidence base to support the policy choices made. (The evidence base on the web-site was not made available until well into the deposit period and the CD provided on request failed to provide the appropriate documentation.)

**Changes sought**

[Not clearly stated.]

**Soundness Tests**

- **CE2 Test?** Not realistic and appropriate and/or not founded on robust and credible evidence?
  - Yes

- **CE3 Test?** No clear mechanisms for implementation and monitoring?
  - 

- **CE4 Test?** Not flexible to deal with changing circumstances?
  - Yes

**Tick box Replies**

- **Seek changes? Any changes to be made to the Plan?**
  - Yes
Comment on flexibility of policy framework.

The deposit plan claims that the policy framework is flexible (para 4.23) but no detail is provided in support of this statement. The 8 strategic sites include very specific figures for employment and housing provision (core policy CS3, para 4.37; core policy CS4) which could prove to be overly restrictive and inflexible.

Changes sought

[Not clearly stated.]
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<th>Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>1</td>
<td>Issue Summary</td>
<td>Comment on how and when development will be realised over the plan period.</td>
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<tr>
<td>2</td>
<td>Representation text</td>
<td>The plan would benefit from a more explicit demonstration of how and when development will be realised over its lifetime; greater clarity on timing (including on priorities), on linkages to infrastructure and on funding sources, albeit at a strategic scale. This would assist clarity and certainty.</td>
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<td>4</td>
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**Soundness Tests**

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**Tick box Replies**

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<td>Seek changes? Any changes to be made to the Plan?</td>
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### Issue Summary

Comments on monitoring framework.

### Representation text

Whilst the monitoring framework (chapter 7) provides a number of targets and indicators in relation to plan objectives and core policies it should provide guidance on implementation and on triggers for review. In addition, greater clarity in relation to the individual strategic sites should be provided in the monitoring framework; some information is provided at various places in the deposit plan such as 5.17 (on infrastructure) and the individual policies for these sites, but more detail is required and incorporation into the monitoring framework would be appropriate.

### Changes sought

[Not clearly stated.]

### Soundness Tests

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<td>19</td>
<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
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**Document:** Deposit Draft 3: Vision and Objectives

**Map:**

**Policy:**

**Site:**

**Summary:**

**Item Question**

1 2 Issue Summary

Comment on LDP Vision.

2 3 Representation text

Owing to the lack of a distinct heading, it is somewhat unclear as to what the LDP Vision actually is.

4 5 Changes sought

[Not clearly stated.]

**Item Question**

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

Yes

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**Document:** Deposit Draft, p.033

**Map:**

**Policy:** CS 4

**Site:**

**Summary:**

**Item Question**

1 2 Issue Summary

Comment on Relationships to Neighbouring Areas - growth in house build rates.

2 3 Representation text

Relationships to Neighbouring Areas

- Housing Growth

14850 new dwellings in the plan period will require a 50% increase in past build rates (core policy CS4 & para 4.40); para 4.43 says that this accords with the South East Wales authorities housing apportionment. It is not clear how viable the delivery of this level of housing is and its relationship to constraints and to the Cardiff City Region

4 5 Changes sought

[Not clearly stated.]

**Item Question**

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

Yes

---

09/06/2009 Page 4774 of 4851
### Issue Summary

Comment on Relationships to Neighbouring Areas - employment land forecasts.

### Representation Text

Relationships to Neighbouring Areas
- Employment Land Forecasts

Cumulative impact: it is not clear what discussion has been had between neighbouring local planning authorities concerning the implications of emerging LDP growth strategies and the resulting over-provision of employment land. Allocations are likely to be over generous and will add to the cumulative overstatement across the WSP area.

### Changes sought

[Not clearly stated.]

### Item Question

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

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<th>Reply</th>
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<td>2 3</td>
<td>Representation text</td>
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<tr>
<td>Relationships to Neighbouring Areas  - Policy anomalies</td>
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<tr>
<td>Policy anomalies exist between emerging neighbouring LDPs and it is not clear what discussion has been had between neighboring local planning authorities and what the implications are. For example, there are inconsistent local designations e.g. Special Landscape Areas - local designations for special landscape areas are proposed in RCT whereas neighbouring Merthyr does not include any in its published deposit LDP.</td>
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<td>Changes sought</td>
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<td>Historic Built Environment</td>
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<td>Cadw considers that for clarity, the word 'historic' needs to be added to 'built heritage' / 'built environment' at the 3rd bullet of para 3.3, and in the wording of policies CS1, CS2 and AW7.</td>
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### Rhondda Cynon Taf County Borough Council Local Development Plan

**Repr'n No**: 3476.D37  
**Document**: Deposit Draft, p.052  
**Map**: Policy: AW 7  
**Site**:  
**Summary**:  
**Issue**: Design  
**PEX Session**:  

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<th>Representation Text</th>
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| 1 2 | Issue Summary  
Comment on AW 7. |
| 2 3 | Representation text  
Cadw considers that for clarity, the word 'historic' needs to be added to 'built heritage' / 'built environment' at the 3rd bullet of para 3.3, and in the wording of policies CS1, CS2 and AW7. |
| 4 5 | Changes sought  
The word 'historic' needs to be added to 'built heritage' / 'built environment' in the wording of policy AW7. |

**Seek changes? Any changes to be made to the Plan?** Yes

### Rhondda Cynon Taf County Borough Council Local Development Plan

**Repr'n No**: 3476.D38  
**Document**: Deposit Draft, p.049  
**Map**: Policy: AW 6  
**Site**:  
**Summary**:  
**Issue**: Design  
**PEX Session**:  

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| 1 2 | Issue Summary  
Comment on AW 6. |
| 2 3 | Representation text  
Design statements will become a mandatory requirement in 2009 and will therefore not require policy in the LDP unless there is distinctive local policy. |
| 4 5 | Changes sought  
[Not clearly stated.] |

**Seek changes? Any changes to be made to the Plan?** Yes
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**Document:** Deposit Draft 1: Introduction  
**Map:**  
**Policy:**  
**Site:**  
**Summary:**  
*Issue: Introduction & Context*  

**PEX Session:**

**Item Question**  
**Representation Text**

---

1. Comment on para. 1.47.

---

2. MTAN2: Coal (2009) should be added to the list of national policy and advice.

---

4. Para. 1.47. MTAN2: Coal (2009) should be added to the list of national policy and advice.

---

**Item Question**  
**Reply**

---

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

---

**Document:** Deposit Draft 1: Introduction  
**Map:**  
**Policy:**  
**Site:**  
**Summary:**  
*Issue: Introduction & Context*  

**PEX Session:**

**Item Question**  
**Representation Text**

---

1. Comment on para. 1.19.

---

2. Para 1.19 - the references to the Wales Spatial Plan are out of date, and should be revised to acknowledge the adoption of the Wales Spatial Plan Update 2008 which occurred in July 2008.

---

4. Changes sought  
   Para 1.19 - the references to the Wales Spatial Plan should be revised to acknowledge the adoption of the Wales Spatial Plan Update 2008 in July 2008.

---

**Item Question**  
**Reply**

---

3. Seek changes? Any changes to be made to the Plan?  
   Yes
### Issue Summary and Representation Text

**3476.D41**

**Item Question:** Comment on para 4.12.

**Representation Text:** Para 4.12 (page 27) the correct Wales Spatial Plan terminology is key settlements rather than hub settlements.

**Item Question:** Para 4.12 (page 27) insert 'key' delete 'hub'.

**Reply:**

**Tick box Replies**

**Seek changes? Any changes to be made to the Plan?** Yes

---

**3476.D42**

**Item Question:** Comment on para 6.106.

**Representation Text:** Para 6.106 appears to be mis-placed. It is not clear what is being safeguarded and therefore what the justification is for a buffer zone of 200m.

**Item Question:** [Not clearly stated.]

**Reply:**

**Tick box Replies**

**Seek changes? Any changes to be made to the Plan?** Yes
<table>
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Document: Deposit Draft, p. 113  
Site: 447/451 Garth Business Park  
Policy: SSA 22  
Map:  
PEX Session:  
Summary:  
Item Question | Issue Summary  
---|---  
1 | Object to the identification of land at Garth Isaf as Green Wedge.  
2 | Representation text  
   Land at Garth Isaf shown on the attached plan should be identified as being suitable for non-strategic employment, and included with policy SSA 14 Employment Allocations. A reasoned justification is included in the attached document.  
4 | Changes sought  
   Include land at Garth Isaf in policy SSA 14 Employment Allocations.  
6 | Candidate Site Ref No  
   451 [part]  
9 | Why no previous Representation  
   The site is not considered to be strategic and PS consultation did not make specific reference to non-strategic sites.  
17 | CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?  
   Yes  
20 | Why changes satisfy Soundness  
   Give details why the changes you propose will ensure that the Plan  
   The identification of land at Garth Isaf for employment purposes would be based on a recently prepared ecological report which concludes that the site could benefit from some positive mitigation, which could be achievable alongside some limited development.  
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  
   Yes  
7 | Previous Representations? Did you make any previous representations on this issue during the Cons  
   No
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Document: Deposit Draft, p.109
Policy: SSA 14
Map: Policy: SSA 14
Site: 447/451 Garth Business Park

**Summary:**

Object to the identification of land at Garth Isaf as Green Wedge.

---

**Representation Text**

Land at Garth Isaf shown on the attached plan should be identified as being suitable for non-strategic employment, and included with policy SSA 14 Employment Allocations. A reasoned justification is included in the attached document.

---

**Changes sought**

Include land at Garth Isaf in policy SSA 14 Employment Allocations.

---

**Candidate Site Ref No**

451 [part]

---

**为什么没有之前的代表**

The site is not considered to be strategic and the PS consultation did not make specific reference to non-strategic sites.

---

**Soundness Tests**

The identification of land at Garth Isaf for employment purposes would be based on a recently prepared ecological report which concludes that the site could benefit from some positive mitigation, which could be achievable alongside some limited development.

---

**Tick box Replies**

- Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Sit: Yes
- Previous Representations? Did you make any previous representations on this issue during the Cons: No
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<th>Rep'n No</th>
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**Document:** Deposit Draft, p.112  
**Site:**  
**Policy:** SSA 20  
**Map:**  
**Issue:** Transportation  

**Summary:**  
Land south of Makro, identified as being suitable for a Park and Ride / Park and Share, could conflict with the objective of developing the site for employment purposes.

**Representation Text:**  
Whilst it is recognised that the site has an extant permission for B1 use and it is located within an existing employment area, the Welsh assembly Government, Department for the Economy and Transport, consider that due to the prominence of the site's location in an Objective 1 area, the Plan should make reference to its suitability for employment use. The Plan identifies the site as being suitable for a Park and Rise / Park and Share Scheme and this could be considered to conflict with the development of the site for employment purposes.

**Changes sought:**  
Delete land south of Makro from policy SSA 20 Park and Ride / Park and Share provision.

**Why no previous Representation:**  
The site is within an existing employment area and benefits from an extant planning permission for B1 offices and it was not considered necessary to make representations on the PS.

**Soundness Tests:**  
C2 Test? Does not have regard to national policy? Yes

**Tick box Replies:**  
Seek changes? Any changes to be made to the Plan? Yes

Previous Representations? Did you make any previous representations on this issue during the Cons?
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<th>Rep'n No</th>
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Document: Deposit Draft, p.082  
Policy: NSA 14  
Site: 675/NSA 14.3  
Former Mayhew Chicken Factory, Trecynon  
PEX Session:  
Summary:  

**Issue Summary**  
Object to allocation of site solely as a non-strategic employment site.

**Representation Text**  
The Welsh Assembly Government, Department for Economy and Transport, object to the inclusion of land at the Former Mayhew Chicken Factory site, Trecynon, solely for employment purposes. The Flood Consequences Assessment previously submitted to the Council indicates that as a result of flood mitigation works, the developable area of the site renders it unviable as an employment site and it represents an opportunity for a sustainable mixed-use development to include affordable housing. The FCA indicated that 15% of the site would be suitable for residential development, with 33% of the site for less vulnerable development.

**Changes sought**  
Identify the Former Mayhew Chicken Factory site, Trecynon for mixed use development including commercial and affordable housing.

**Candidate Site Ref No**  
359

**Why no previous Representation**  
The site is not considered to be of strategic importance.

**Soundness Tests**  
The proposed changes would provide a more flexible and realistically achievable form of development on a brownfield site, that would have regard to the previously submitted FCA.

**Tick box Replies**  
Seek changes? Any changes to be made to the Plan? Yes  
Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes  
Previous Representations? Did you make any previous representations on this issue during the Cons No
**Issue:** Employment

**Representation Text:**

The potential use of the entire site for employment purposes would not ‘add value’. Demand for locating an employment use in this area is limited and the value of creating a new industrial development could be outweighed by cost. The development of the site for mixed use, to include commercial and residential, would enable the provision of a more sustainable form of development on a brownfield site.

**Changes sought:**

The Chubb Factory, Maerdy Road, Ferndale should be identified for mixed-use development, which would be informed by a masterplanning exercise.

**Why no previous Representation:**

The site is not considered to be of strategic importance.

**Item Question:**

1 2  Issue Summary

Site should be identified for mixed use development.

2 3  Representation text

The potential use of the entire site for employment purposes would not ‘add value’. Demand for locating an employment use in this area is limited and the value of creating a new industrial development could be outweighed by cost. The development of the site for mixed use, to include commercial and residential, would enable the provision of a more sustainable form of development on a brownfield site.

4 5  Changes sought

The Chubb Factory, Maerdy Road, Ferndale should be identified for mixed-use development, which would be informed by a masterplanning exercise.

9 7  Why no previous Representation

The site is not considered to be of strategic importance.

**Item Question:**

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

A mixed use development of the site would be informed by a masterplanning exercise and would represent a more realistic and deliverable form of development.

**Item Question:**

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: Strategic Sites - Mwyndy / Talbot Green

**Support identification of Mwyndy / Talbot Green as a strategic site.**

**Representation Text:**

The Welsh Assembly Government, Department for the Economy and Transport, support the identification of Mwyndy / Talbot Green as a strategic site in policy CS 3. The site has a key location in the southern part of RCT and this has the potential for a range of mixed town centre uses, to provide a focus to and be integrated with the recent expansion and transport proposals for Talbot Green / Llantrisant.

Consistency between LDPs is also crucial if the Strategic Opportunity Area (SOA) is to achieve its aim. In this respect the SOA (Llantrisant / North West Cardiff) highlights the importance of cross-boundary issues and the Deposit Draft LDP for Cardiff County Council recognises this in considering future business allocations and public transport links in North West Cardiff.

Further more detailed representations will be submitted by the Joint Venture Partners.

---

### Representation: Housing Development - Bute Quarry

**Support the inclusion of Bute Quarry within the defined residential settlement boundary.**

**Representation Text:**

The Welsh Assembly Government, Department for the Economy and Transport, support the inclusion of land at Bute Quarry within the defined settlement boundary to which policy SSA 13 - Housing Development Within the Settlement Boundary applies. The policy permits housing development within the settlement boundary subject to certain criteria being met. It is considered that the site represents a suitable site for residential development in accordance with the policy.
### Item Question | Representation Text
---|---
1 | Support the identification of the site at Coed Ely in Policy SSA 14.
2 | The Welsh Assembly Government, Department for the Economy and Transport, support the identification of the site at Coed Ely, Tonyrefail in policy SSA 14 ‘Employment Allocations’ as a non-strategic site suitable for employment purposes. Other appropriate uses may come forward following a masterplanning exercise.
4 | Include reference to any future masterplanning exercise informing the mix of uses in the site description in Appendix 1.
9 | It is a non-strategic site.

### CE2 Test? | Reply
---|---
17 | Not realistic and appropriate and/or not founded on robust and credible evidence? | Yes

### A masterplanning exercise would inform and guide the most appropriate uses for the site, based on up-to-date information.

### Seek changes? Any changes to be made to the Plan? | Reply
---|---
3 | Yes
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<th>Rep'n No</th>
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**Document:** Deposit Draft, p.035  
**Map:** Policy: CS 6  
**Site:**  
**Summary:**  
**Issue:** Employment  

**PEX Session:**  
**Item Question**  
**Representation Text**  

1  
Support recognition of significant benefits that would result from developments at Junction 33 and RAF St Athan.  

2  
The Welsh Assembly Government, Department for the Economy and Transport, support the Plan's recognition through policy CS 6 'Employment Requirements' and in para. 4.57, of the role RCT plays through its location in the Capital region of the Wales Spatial Plan, and that the development of the proposed International Business Park near Junction 33 of the M4 and the Training Centre for the Combined Armed Forces at St Athan, which although not located within the RCT administrative boundary, will have regional economic benefits.  

**PEX Session:**  
**Item Question**  
**Reply**  
**Tick box Replies**  

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

3477.D10 | S W M |             |       |              |             |          |             |               |           |               |             |         |                |          |  

**Document:** Deposit Draft, p.084  
**Map:** Policy: NSA 17  
**Site:** 677/NSA 17.1 Oxford Street, Mountain Ash  
**Summary:**  
**Issue:** Retail  

**PEX Session:**  
**Item Question**  
**Representation Text**  

1  
Support the identification of land for retail development in Mountain Ash.  

2  
The Welsh Assembly Government, Department for the Economy and Transport, support the identification of land for retail development in Mountain Ash in policy NSA 17 'Retail Allocations', which would be in line with the Welsh Assembly Government's aspirations for the regeneration of the town.  

**PEX Session:**  
**Item Question**  
**Reply**  
**Tick box Replies**  

3  
Seek changes? Any changes to be made to the Plan? No
## Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL** by: Representation No

Filtered to show: (All representations)

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**Document:** Deposit Draft, p.079  
**Site:** 468/474 Pontygwaith Industrial Estate (Unallocated)  
**PEX Session:**  
**Summary:**  
**Issue Summary**  
Support inclusion of unallocated land at Pontygwaith within the settlement boundary to which policy NSA 12 applies.

**Item Question**  
1 2  
**Representation Text**  
The Welsh Assembly Government, Department for the Economy and Transport, support the location of the site The Avenue, Pontygwaith within the settlement boundary to which policy NSA 12 applies, and consider that the site represents an opportunity for the development of affordable housing.

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

| 3477.D12|           |             |      |             |             |          |                      |          |                |             | S W M               |                |          |

**Document:** Deposit Draft, p.082  
**Site:** 674/nsa 14.2 Hirwaun Industrial Estate, Hirwaun  
**PEX Session:**  
**Summary:**  
**Issue Summary**  
Support the identification of land North of Hirwaun Industrial Estate in policy NSA 14.

**Item Question**  
1 2  
**Representation Text**  
The Welsh Assembly Government, Department for the Economy and Transport, support the identification of the site as a non-strategic employment site suitable for general industrial and storage purposes, whilst recognising that the site is close to a SAC and any development proposals would require a Habitats Regulations Assessment.

**Item Question**  
3 4  
**Seek changes? Any changes to be made to the Plan?**  
No
### Representation Text

**Issue Summary**

Land at Parc Eirin is included within the settlement boundary to which policy SSA 13 applies, however this policy only relates to housing development, whereas planning permission has been granted, subject to the signing of a S106, for B1, B2 and B8 uses and 260 dwellings.

**Representation text**

The Welsh Assembly Government, Department for the Economy and Transport, support the inclusion of Parc Eirin within the settlement boundary to which policy SSA 13 applies. While it is understood that this policy only specifically relates to development of the site for housing, planning permission has been granted, subject to the signing of a S106 agreement, for the mixed use of the site for employment and residential purposes, which represents a sustainable form of development for the site.
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**Document:** Deposit Draft, p.032  
**Site:** 3/NSA 6 OSTR Phurnacite Plant  
**Policy:** CS 3  
**Map:**  
**Issue:** Strategic Sites  
**PEX Session:**

**Summary:**
Support identification of the Phurnacite Works as a strategic site, although concern about the proposed uses being restricted to employment and informal recreation.

**Item Question**
Support identification of the Phurnacite Works as a strategic site, although concern about the proposed uses being restricted to employment and informal recreation.

**Representation Text**
The Welsh Assembly Government, Department for the Economy and Transport, support the identification of the Phurnacite Works as a strategic site. Potential uses for the site should be derived from the ongoing masterplanning exercise being carried out for the Welsh Assembly Government, which will be submitted to the local planning authority as supporting evidence. It is envisaged that besides the ecological and environmental capacity of the site, residential will form one of the potential uses.

**Changes sought**
Allow for the masterplanning exercise currently being undertaken to inform the proposed mix of uses for the Phurnacite Works.

**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 allow for a more appropriate mix of uses that would be based on an up-to-date masterplanning exercise.

**Tick box Replies**
1 2  Issue Summary
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

09/06/2009
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<th>Item Question</th>
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<td></td>
<td>Support inclusion of the land south of Hirwaun in policy CS 3.</td>
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<td>The Welsh Assembly Government, Department for the Economy and Transport, recognises that with a comprehensive programme of reclamation, the site could represent a significant redevelopment opportunity within the Heads Of The Valleys. It lies at a strategic location and is one of the largest potential areas of brownfield strategic land to be open up by the A465(T) Heads Of The Valleys [Road] dualling.</td>
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<td>Seek changes? Any changes to be made to the Plan? No</td>
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<td>Support inclusion of Pontypridd in policy CS 2 'Development In The South'.</td>
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<td>Pontypridd is one of the three main towns in Rhondda Cynon Taff. The Welsh Assembly Government, Department for the Economy and Transport, support policy CS 2 'Development In The South' which seeks to promote large-scale regeneration schemes in the principal town of Pontypridd, which is also identified in the Wales Spatial Plan as a Primary Key Settlement.</td>
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Document: Deposit Draft A3: LDP Evidence Base

Map: Policy: Site: Site:

Summary:

Issue Summary

The reliability and credibility of the evidence base with regards to environmental issues.
We do believe the Deposit Plan is founded on a robust and credible evidence base with regard to environmental issues. This in itself is an issue of soundness (Test CE2) but has consequential effects for the soundness of the Plan in relation to other tests (C1, C2) as explained below.

Appendix 3 of the Deposit Plan states the Council has collated a range of up-to-date information, and that the evidence base will contain the latest information on the environmental characteristics of Rhondda Cynon Taf. In terms of environmental data, the most significant data source listed in Appendix 3 appears to be the SA/SEA work.

Examining Appendix IV of the Sustainability Appraisal - SA/SEA Baseline Data reveals that a principle data source that has been used is the Taff Local Environment Agency Plan (LEAP), (SA/SEA Baseline Data Sources: 22, 30 & 50). We have already stated in our response to the SA/SEA Scoping Report, dated 27 April 2006 that none of our LEAPs have been reviewed since 2002 and as such, these do not represent a reliable source of up-to-date environmental data. This applies principally to data for the following SA/SEA indicators: Water Use, Industrial History, River Quality Failure, Contaminated Land, Sewerage System, Sewerage, Groundwater (quantity), Groundwater Flow Regime. Your Council was provided with access to our current data sets, and in our letter dated 27 April 2006, we advised that these data sets should be utilised. We also advised that your Council should make use of the data and information contained within the following plans: # Environment Agency Taff & Ely Catchment Abstraction Management Strategy (CAMS) # Asset Management Plan (AMP) produced by Dwr Cymru/Welsh Water (DC/WW).

In our response to the Preferred Strategy dated 21 February 2007, we noted that paragraph 3.7 of that Strategy had identified that a review had been undertaken of the environmental data available for Rhondda Cynon Taf. It was unclear what this referred to, and so we sought clarification. However, a copy of this review and analysis was not forthcoming.

The Environment Agency published for consultation the draft Severn / Western Wales River Basin Management Plans (RBMPs) in December 2008. Prior to this, information was available in the Significant Water Management Issues Reports for these river basins. It is unclear whether this information has been used to inform the Deposit Plan, as Section 5.0 of the SA Report submitted in support of the Deposit Plan states that policies relating to the water environment are generally lacking in the Plan and are required to meet the Water Framework Directive (WFD).

Section 2.7 of the Deposit Plan states that data analysis has provided a clear picture of the environmental issues which need to be addressed through the LDP process, and identifies a number of key environmental trends. Section 1.48 of the Deposit Plan states that the LDP will provide ‘...a specific policy framework for issues of a locally distinct nature.’ However, in view of the above, our concern is that the environmental data which has been used is not current or complete. The Deposit Plan policies and allocations that have been proposed may therefore be inappropriate, or there may be omissions.

In support of our position, we would make the following comments:

1. River water quality – the data appears to have been sourced from Defra (SA/SEA Baseline Data Report, Source: 19) and covers the period 1990-2003. The data included is for chemical water and biological water quality, and river water phosphate levels only. In line with the requirements of the WFD, we would expect to see data included on ‘good status’. There is a requirement within the WFD for nearly all inland and coastal waters to achieve ‘good status’ by 2015. As indicated above, the Environment Agency published for consultation the draft Severn / Western Wales RBMPs in December 2008. Prior to this, information was available in the Significant Water Management Issues Reports for these river basins. Your Council should have assessed the current status of the waterbodies within your Plan area and provided an indication of the likelihood of achieving ‘good status’. Where any risk of failing to achieve ‘good status’ was highlighted, this should be detailed as an issue for the Plan and measures / policies proposed as appropriate to address this.

2. Groundwater quality – there is no information provided. The requirements of the WFD in terms of achieving ‘good status’ are equally applicable to groundwater and this has not been considered.

3. Sewerage – decreases in water quality arising from inadequate drainage systems has been identified as a key sustainability issue for the Council in the SA/SEA work so far. In addition, the information that has been provided in the baseline data report, although dated, states the sewerage systems are old and overloaded, and that premature flows from the many combined sewers cause widespread water pollution problems and aesthetic nuisance due to sewage derived debris (p.175). It is unclear if discussions with DC/WW have been undertaken on sewerage capacity / infrastructure issues. Considering the amount of growth the Plan is proposing, if this has not been done, this would appear to be a significant omission. In particular, a recommendation is made in the Baseline Data Report that development at Hirwaun and Penderyn is restricted due to the inadequate local sewerage system. However, one of the strategic sites is intended to be located on land south of Hirwaun (Policy NSA 8) and the proposal is to include: 400 dwellings, 36 hectares of employment, a new primary school, 2000m2 retail store and a medical / community centre.

4. Water Resources – there appears to be no evidence of discussions with DC/WW on the issue of water supply. Problems with water supply in dry summers has been identified as a key sustainability issue for the Council in the SA/SEA work so far. As you may be aware, DC/WW’s draft Water Resources Management Plan, is currently out for consultation. Consultation with DC/WW is essential in
To gain their views on whether sufficient water is available for the developments proposed within the Plan. DC/WW should be able to provide information on areas which could suffer particularly from a lack of water resources. It should be noted that DC/WW's existing abstractions from the Rivers Usk and Wye are currently being reviewed under our Review of Consents required under the Habitats Regulations. This Review has the potential implication of reducing water availability, meaning that alternative sources may need to be found. Your Council should consider the potential implications of this as part of the Deposit Plan, and it should be a key part of the baseline data as it could influence the site allocations or phasing of development.

5. Flood Risk – we acknowledge the work that has been done by your Council and your consultants (Scott Wilson) in producing a Strategic Flood Consequences Assessment (SFCA) to assess the flood risk posed to the strategic sites that have been included within the Plan. However, the SFCA has not gone into sufficient detail to enable us to be satisfied that the risks and consequences of flooding, for three of the sites, can be managed to an acceptable level, in accordance with TAN15. It has therefore not proven that these sites are suitable for inclusion as allocations within the Plan. Some non-strategic allocations are also being proposed in areas known to be at risk of flooding but no justification for these allocations has been provided. Please see separate representation on sites enclosed.

6. Land contamination

Please see separate rep.

Your Authority should undertake an immediate review of your evidence base to ensure that it is robust and credible, and that the policies and allocations within the Plan are therefore realistic and appropriate. This review would also give you the opportunity to ensure that the Plan is not contrary to National planning policy and has regard to other relevant plans as we have identified above.

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<th>Item</th>
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<th>Reply</th>
<th>Soundness Tests</th>
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<tr>
<td>12</td>
<td>C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a</td>
<td>Yes</td>
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<tr>
<td>17</td>
<td>CE2 Test? Not realistic and appropiates and/or not founded on robust and credible evidence?</td>
<td>Yes</td>
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<tr>
<td>20</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
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An immediate review of the evidence base would ensure it is robust and credible, and that the policies and allocations within the Plan are therefore realistic and appropriate. This review would also ensure that the Plan is not contrary to National planning policy, and has regard to other relevant plans as we have identified above.

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<td>3</td>
<td>Seek changes? Any changes to be made to the Plan?</td>
<td>Yes</td>
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<td>Previous Representations? Did you make any previous representations on this issue during the Cons</td>
<td>Yes</td>
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**Summary:**

We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.
Why attend Examination?

Changes sought

Further work should be carried out to enable your Authority to justify both the strategic and non-strategic site allocations, in line with section 10 of TAN15. If this is not undertaken, the allocations should be deleted from the Plan.

We believe the inclusion of these sites is inappropriate, as it is not founded on a robust and credible evidence basis, and is contrary to National Policy within TAN15. It also raises issues of deliverability of the Plan, if later investigations proved the risks and consequences of flooding could not be managed appropriately, or severely constrained development options on these sites.

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We wish to attend because of the complexity and fundamental importance of the strategic and non-strategic site allocations.
## REPRESENTATION DETAIL

### Rhondda Cynon Taf County Borough Council Local Development Plan

**Filtered to show: (All representations)**

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- **13 8**: C2 Test? Does not have regard to national policy? | Yes
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Further work should enable your Authority to determine if the site allocations are founded on a robust and credible evidence base, are in line with National Policy, and can be delivered.

### 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
### Summary:

We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.
Strategic sites NSA6, NSA7 and SSA8

The Deposit Plan has identified flood risk as an issue for some of the strategic sites. We acknowledge the work that has been done by your Council and consultants (Scott Wilson) in producing a Strategic Flood Consequences Assessment (SFCA) for these sites. However, whilst the SFCA has provided some useful information, it has not gone into sufficient detail to enable us to be satisfied that the risks and consequences of flooding, for three of the sites, can be managed to an acceptable level, in accordance with TAN15. It has therefore not proven that these sites are suitable for inclusion as allocations within the Plan. The sites in question are the former Phurnacite Plant in Abercwmboi (NSA6), Robertstown in Aberdare (NSA7) and Mwyndy / Talbot Green (SSA8), all of which lie wholly / partly within zone C of the Welsh Assembly Government’s Development Advice Map. Section 10 of TAN15: Development and Flood Risk, July 2004 gives specific guidance on development plans.

Section 10.5 of TAN15 states ‘…Allocations should only be made in zone C if it can be justified that a development / use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1.’ Section 10.6 also states ‘Where the local planning authority wishes to allocate a site, and can justify such an allocation, the local planning authority will need to undertake a broad level assessment of the consequences of flooding occurring on that site…(which)…should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way…’

We were consulted on the Draft SFCA report produced by Scott Wilson in July 2008. As part of this consultation, we noted that there was a generic recommendation that where flood risk had been highlighted as an issue, site specific FCAs should be required at the planning application stage (Section 8.3 of the SFCA Report (and Section 3.3 of the addendum)). As highlighted above, this approach is contrary to the policy and guidance set out in TAN15. In our response to the Report dated 03 September 2008, we advised that if your Authority wished to pursue these sites as allocations within your LDP, additional work would be required, in order to determine whether the consequences of flooding could be managed, in line with Section 10 of TAN15. In subsequent correspondence we confirmed this advice.

The Deposit Plan makes no specific reference to the conclusions of the SFCA for these sites but merely highlights flood risk as a constraint in need of consideration. There is no evidence of any further work being carried out as we advocated. We are mindful that separate pre-application discussions and assessments are on-going in respect of the Phurnacite and Robertstown sites outside of the LDP process. However, this work has not been concluded for either site. Consequently we still do not know whether the flood risk can be acceptably managed on these sites, and whether these allocations can therefore be justified.

We believe the inclusion of these sites is inappropriate, as it is not founded on a robust and credible evidence basis, and is contrary to National Policy within TAN15. It also raises issues of deliverability of the Plan, if later investigations proved the risks and consequences of flooding could not be managed appropriately, or severely constrained development options on these sites.

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**Document:** Deposit Draft, p.100

**Map:** Policy: SSA 8  Site: 7//SSA 8  0STR Mwyndy

**Policy:** SSA 8

**Summary:**

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Document: Deposit Draft, p.106

Map: SSA 10

Site: 697/SSA 10.19 The Ridings, Tonteg \ Station Road, Church Village

PEX Session: Issue: Housing Allocation

Summary:
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Document: Deposit Draft, p.077  
Map:  
Policy: NSA 9  
Site: 668//NSA 9.18 Cemetery Road, Treorchy  
PEX Session:  
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Document: Deposit Draft, p.082  
Policy: NSA 14  
Site: 675/NSA 14.3  
Former Mayhew Chicken Factory, Trecynon  
PEX Session:  

**Summary:**  
We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.
We wish to attend because of the complexity and fundamental importance of the strategic and non-strategic site allocations.

Further work should be carried out to enable your Authority to justify both the strategic and non-strategic site allocations, in line with section 10 of TAN15. If this is not undertaken, the allocations should be deleted from the Plan.
<table>
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<tr>
<th>Item Question</th>
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<tr>
<td>13 8 C2 Test? Does not have regard to national policy?</td>
<td>Yes</td>
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<td>17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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<td>20 9 Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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<td>3 4 Seek changes? Any changes to be made to the Plan?</td>
<td>Yes</td>
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<td>7 7 Previous Representations? Did you make any previous representations on this issue during the Cons</td>
<td>Yes</td>
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### Issue Summary

We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.
Why attend Examination?

We wish to attend because of the complexity and fundamental importance of the strategic and non-strategic site allocations.
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Document: Deposit Draft, p.084
Policy: NSA 17
Map: Site: 677//NSA 17.1 Oxford Street, Mountain Ash
PEX Session:

**Summary:**

We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.

**Issue Summary**

1 2  

We object to the inclusion of strategic and non-strategic site allocations as highlighted below, where flood risk has not yet been demonstrated it can be acceptably managed, and whether these allocations can be justified.
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**Issue Summary**

We object to the inclusion of NSA8: Land South of Hirwaun as a strategic site. Although we have reservations about the out-dated nature of the baseline data (sourced from our Taff LEAP – see separate representation on baseline data), in the absence of any information to the contrary, it must be considered. The SA/SEA Baseline Data Report states the sewerage systems are old and overloaded, and that premature flows from the many combined sewers cause widespread water pollution problems and aesthetic nuisance due to sewage derived debris (p.175). In particular, a recommendation is made that development at Hirwaun and Penderyn is restricted due to the inadequate local sewerage system. The proposed allocation of the land South of Hirwaun is to include: 400 dwellings, 36 hectares of employment, a new primary school, 2000m² retail store and a medical/community centre. This is in direct conflict with this recommendation and no justification for this has been provided within the Plan. As such, we believe the inclusion of this site is inappropriate, as it is not founded on a robust and credible evidence base and therefore we question the deliverability of these proposals.

**Changes sought**

The site allocation should be deleted from the Plan unless discussions with DC/WW prove that development on the scale proposed by this allocation is achievable.

Agreement with Dwr Cymru/Welsh Water that allocation NSA8: Land South of Hirwaun is achievable would ensure the site is both realistic and appropriate by demonstrating sufficient infrastructure is in place, or will be put in place to accommodate the proposals.

**Soundness Tests**

- CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence? **Yes**
- CE3 Test? No clear mechanisms for implementation and monitoring? **Yes**

**Tick box Replies**

- Seek changes? Any changes to be made to the Plan? **Yes**
- Previous Representations? Did you make any previous representations on this issue during the Cons? **Yes**
### Issue Summary

Lack of consideration of land contamination issues.

### Representation Text

The site allocations below, taken from the Deposit Plan, would appear to be on brownfield land. Given the former use of these sites, it would indicate that the land may be subject to contamination:

**Strategic sites:**
- Former Maerdy Colliery Site, Rhondda Fach
- Former Fernhill Colliery site, Blaenrhondda
- Former Phurnacite Plant, Abercwmboi
- Land at Robertstown, Aberdare
- Land South of Hirwaun
- Former Cwm Colliery and Coking Works, Pontypridd
- Former OCC site Llanilid, Llanharan

**Non-strategic sites:**
- Land East of Dolau County Primary School, Bridgend Road, Bryncae. (historic landfill surrounds site).
- Land East of Trenant, Penywau
- Brickworks and Dairy site, Llwydcoed
- Land at Nant Y Wenallt, Abernant
- Dyffryn Row, Cwmbach
- Land near of Gwerthlyn Terrace, Tylorstown
- Site off Fenwick Street, Pontypridd
- Old hospital site and playground, Treherbert
- Site off Cemetery Road, Treorchy (historic landfill within 100m).
- Hospital Site, Llwynypia
- Land at Park Street, Clydach Vale
- Ferndale and Highfield Industrial Estate
- Cae Mawr Industrial Estate, Treorchy

Whilst in general, we support the re-use of previously developed land, we are concerned that although raised as an issue in the SA/SEA, the Deposit Plan does not properly address or consider land contamination, and the potential risks associated with the investigation and remediation of sites subject to land contamination. The only evidence presented in the SA/SEA is taken from our Taff LEAP environmental overview, dated 1998 (SA/SEA Baseline Data Report). We are therefore concerned that this does not constitute a robust and credible evidence base.

The redevelopment of contaminated sites can be a very costly and time consuming process, and until preliminary investigations are undertaken into the extent of contamination, no realistic estimates can be made for either the time or cost constraints involved in remediation. As a result of the scale of development being proposed on sites that could be affected by contamination, such considerations could be crucial in terms of the deliverability of the development proposals within the Plan. Your Council should consider this further in order that an appropriate level of flexibility can be built into the Plan to deal with any unforeseen issues that may arise. In addition, we believe that an additional policy should be added to the Plan to deal with land contamination.
As stated above, your Council should consider the potential risks associated with the investigation and remediation of sites subject to land contamination, in terms of the deliverability of the development proposals.

We also request that a policy is included within the Plan to cover land contamination matters, such as:

Where development is proposed on a site known or reasonably believed to be contaminated, a site assessment will be required to establish the nature and extent of the contamination, prior to determining the application. Development will not be permitted unless effective measures are taken to treat or control any contamination in order not to:

a) expose occupiers of the development land and neighbouring land to unacceptable risk;

b) contaminate any watercourse, waterbody or aquifer;

c) cause the contamination of adjoining land or allow the contamination to continue.

Permission for development will normally require that suitable remedial measures agreed with the authority must be completed before the development commences.'

Although this issue was not raised at the Preferred Strategy stage, we did address potential contaminated land issues with regards to the strategic sites in a letter dated 11 October 2006 to Jane Cook, Head of Development Control, Rhondda Cynon Taff.

In view of the scale of development being proposed on sites that could be affected by contamination, the addition of a specific policy to deal with land contamination matters would be an appropriate addition to the Plan.

Further consideration of land contamination issues would allow your Council to build an appropriate level of flexibility into the Plan, in terms of the deliverability of the proposals.

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<th>Item</th>
<th>Question</th>
<th>Reply</th>
<th>Soundness Tests</th>
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<td>17</td>
<td>CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
<td>Yes</td>
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<td>19</td>
<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
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<td>Why changes satisfy Soundness? Give details why the changes you propose will ensure that the Plan</td>
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Tick box Replies

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3478.D13

Document: Deposit Draft, p.041
Policy: CS 11
Site: Map:

Issue: Climate Change
PEX Session:

Item Question

1 2 Issue Summary
The wording of part B) 1 of Policy CS11.

3 Representation text
Part B) 1 of Policy CS11, which, taking into account the corrections addendum dated 11 February 2009, reads: ‘Requiring flood risk assessments on development proposals in 1:100 year floodplains’, should be deleted.
We believe this part of Policy CS11 could undermine the principles of the justification test (development within zone C / 1 in 1000 year floodplain), as contained within TAN15: Development and Flood Risk. Section 1.48 of the Deposit Plan states that the LDP will only provide a specific policy framework for issues of a locally distinct nature. As it appears that this part of CS11 is not seeking to address any locally distinct issues, there is no reason to include such a provision within this policy, as the requirement for FCAs is clear within TAN15.

4 Changes sought
Part B 1) of Policy CS11 should be deleted.

9 Why no previous Representation
This policy / wording was not included in the Preferred Strategy.

10 Soundness Tests
C2 Test? Does not have regard to national policy? Yes

20 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan
Deletion of Part B 1) of Policy CS11 would mean that development proposals would be assessed in line with National planning policy, therefore removing any potential for conflict.

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.041

**Site:** PEX Session:

**Policy:** CS 11

**Summary:**

**Issue Summary**
Omission of Core policy CS11: Climate Change from the Monitoring Framework.

**Representation Text**
Core policy CS11: Climate Change has been omitted from the 'Monitoring of Objectives and Strategic Policies: Targets and Indicators' list on pages 118 – 119 of the written statement (Deposit Plan). All other core policies (CS1 – 10) are included in the list, therefore there is currently no mechanism proposed for monitoring the effectiveness of this policy.

**Changes sought**
We wish to see the inclusion of core policy CS11: Climate Change in the 'Monitoring of Objectives and Strategic Policies' list, with appropriate targets and indicators included.

**Why no previous Representation**
Climate Change was not listed as a policy at the Preferred Strategy stage.

**Item Question**

1. Issue Summary
   - Omission of Core policy CS11: Climate Change from the Monitoring Framework.

2. Representation text
   - Core policy CS11: Climate Change has been omitted from the 'Monitoring of Objectives and Strategic Policies: Targets and Indicators' list on pages 118 – 119 of the written statement (Deposit Plan). All other core policies (CS1 – 10) are included in the list, therefore there is currently no mechanism proposed for monitoring the effectiveness of this policy.

3. Changes sought
   - We wish to see the inclusion of core policy CS11: Climate Change in the 'Monitoring of Objectives and Strategic Policies' list, with appropriate targets and indicators included.

4. Why no previous Representation
   - Climate Change was not listed as a policy at the Preferred Strategy stage.

**Soundness Tests**

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

20. Why changes satisfy Soundness Tests? Give details why the changes you propose will ensure that the Plan...
   - Including core policy CS11: Climate Change in the 'Monitoring of Objectives and Strategic Policies: Targets and Indicators' list means there will be a clear mechanism for monitoring the effectiveness of this policy.

**Tick box Replies**

3. Seek changes? Any changes to be made to the Plan?
   - Yes

7. Previous Representations? Did you make any previous representations on this issue during the Cons...
   - No
## Representation Text

### Item Question

1. **Issue Summary**
   - The site edged in red on the attached plan should be allocated for residential development under the provisions of policy NSA9.

2. **Representation text**
   - It is submitted that this site is suitable to accommodate residential development. The site relates well to existing and proposed built up limits, including allocations made under policies NSA7 and NSA 9.6, and would comprise a logical consolidation/extension of this part of Abernant. 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 the 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.

3. **Changes sought**
   - The site should be allocated for residential development under the provisions of policy NSA 9.

4. **Why no previous Representation**
   - The site owners have only recently become aware of the Local Development Plan process. However, the allocation of the site for residential development would be compatible with the Council’s strategy to identify Aberdare as a Principal Town.

5. **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

17. **CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?**
   - Yes

20. **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 Abernant is available to meet short term housing need. Further, the site comprises a logical consolidation/extension of this part of the settlement with logical physical boundaries. The site is appropriate for housing development and its allocation would make the LDP’s policies more robust.
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<th>Item Question</th>
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<td>1 2</td>
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<td>A settlement boundary should be included around the site edged in red on the attached plan under the provisions of policy SSA 12.</td>
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<td>Representation text</td>
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<td>It is submitted that a settlement boundary should be included around this part of Abernant as shown on the attached plan. Related submissions have been made that this site should be allocated for housing. The site relates well to existing and proposed development, including allocations NSA7 and NSA 9.6 with strong physical boundaries on all sides. The allocation of this site would comprise a logical consolidation/extension of Abernant.</td>
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<td>Changes sought</td>
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<td>The settlement boundary around Abernant should be amended to include the site shown edged in red on the attached plan under the provisions of policy NSA 12.</td>
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<td>Why no previous Representation</td>
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<td>The site owners have only recently become aware of the Local Development process. However the proposed development would be compatible with the Council’s strategy to identify Aberdare as a Principal Town.</td>
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<td>Why attend Examination?</td>
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<td>This submission is related to an additional representation 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 settlement boundaries.</td>
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<td>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 Aberdare. Concern is expressed regarding the deliverability of the allocated housing land supply, particularly in the earlier part of the LDP period. The site at Abernant is available to meet short term housing need. Further, the site comprises a logical consolidation/extension of this part of the settlement within strong existing and proposed physical boundaries. The inclusion of this site within the settlement boundary and its allocation for housing would make the plan's policies more robust.</td>
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### Representation Details

**Rep'n No:** 3480.D1  
**Accession No:** O W M  
**Date Lodged:** 09/06/2009  
**Type:** PEX Session: Item Question  
**Policy:** NSA 9  
**Site:** 581/590 Trecynon adj Church Row  
**New Site:** Yes  
**PEX Session:** Item Question  
**Issue:** Housing Allocation  

**Summary:**

The site in red on the attached plan should be allocated for residential development under the provisions of policy NSA 9.

1. **Issue Summary**
   - The site is suitable to accommodate residential development. The site is a natural infill site. 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. The site is potentially available in the early part of the plan period and would contribute to the range of choice of sites available.

2. **Representation Text**
   - It is submitted the site is suitable to accommodate residential development. The site is a natural infill site. 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. The site is potentially available in the early part of the plan period and would contribute to the range of choice of sites available.

3. **Changes sought**
   - The site, should be allocated for residential development under the provisions of Policy NSA9.

4. **Candidate Site Ref No**
   - 590

5. **Soundness Tests**
   - CE2 Test? No
   - Not realistic and appropriate and/or not founded on robust and credible evidence? Yes
   - 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 would help meet housing needs in the area. Concern is expressed regarding the deliverability of the allocated housing land supply particularly in the earlier part of the LDP period. The site at Trecynon is available to meet short term housing need. The allocation of the site would make the Plan's policies more robust.

6. **Tick Box Replies**
   - Seek Changes? Any changes to be made to the Plan? Yes
   - Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site? Yes
   - Previous Representations? Did you make any previous representations on this issue during the Cons? Yes
### Rhondda Cynon Taf County Borough Council Local Development Plan

**Representations Detail**

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**Document:** Deposit Draft, p.054  
**Map:** Policy: AW8  
**Site:** 403/407 Smith's Avenue/Mount Road  
**PEX Session:**

**Summary:**

**Representation Text**

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 had 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 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.  

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.

**Item Question**  
**Soundness Tests**

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<td>CE4 Test? Not flexible to deal with changing circumstances?</td>
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**Amplification of tests**

The designation of the land at Cefn Rhigos as SINC 1 has not undergone sufficient consultation and that it relies upon 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.

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Document: Deposit Draft, p.054

Policy: AW 8

Site: 405/409 New Inn Public House

Issue: Environment

PEX Session:

Summary:

Issue Summary

Objection to the designation of the land at Cefn Rhigos as part of SINC 3- Nant Fforch

Representation Text

On behalf of our client we object to the designation of the land at Cefn Rhigos 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 of environmental conservation, and whilst further 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 the seasonal requirements.

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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 the consultation has take place and that our client has had the opportunity to respond we consider the designation as premature and unsound.

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 Supplementary Planning Guidance Process.

Reply

Soundness Tests

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09/06/2009
**Item Question** | **Tick box Replies** | **Reply**
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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
7 7 | Previous Representations? Did you make any previous representations on this issue during the Cons | No
### Issue Summary

Object to the designation of land at Cefn Rhigos as part of SINC 3- Nant Fforch

### Representation Text

On behalf of our client we object to the designation of the land at Cefn Rhigos 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.

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### 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 removes 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.

### Why no previous Representation

No indication that land would be designated as a SINC.
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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.

Item Question
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
... we trust that the previously listed development site [H1.27] will be reinstated and included within the forthcoming Development Plan.

We have been provided with information connected with the Council's request for consultation and associated information relevant to the RCT LDP 2006-2021 and your requiring appropriate views and comments for future strategic environmental assessment.

At this time, our client is in the process of negotiation and consultation for the proposed development of the site, which was designated H1.27 within the former Mid Glamorgan, Rhondda Cynon Taff County Borough, Development Plan (Replacement Structure Plan) 1991-2006. (Copy of Area Plan & Information Attached).

Within the former RCT County Borough, Development Plan, the site was designated as a site with Major Planning Constraint. However, the site and land area, identified as, "Area No. 27. Land Rear of Tyntyla Road, Llwynypia, comprising 2.87 Hectares", was allocated as being suitable for the proposed development of 55 houses.

Relevant to this Council Guide-line and Policy, a draft planning submission was sent to RCT Planning & Development Office in May 2007.

Subsequent to that time, negotiations have been held in abeyance, and the development application has not been pursued as a Full Planning Application, but it is intended that development of the site will be undertaken in due course once development proposals for the Llwynypia Hospital site and development have been finalised.

Building Logistics have provided the Council with plans, details and information detailing the proposed development of the site. Compliant with RCT Planning & Development Officers' requirements, the application, in its draft form, has also been supported by Environmental Impact Assessment Reports and associated information.

Within the course of October 2008, Outline Planning Approval was granted for the demolition and development of the adjoining Llwynypia Hospital site. This was designated "Area No. 28, Site of Llwynypia Hospital, Partridge road, Llwynypia, comprising of 6.5 Hectares". The Outline Planning Approval granted for this site provides a direct precedent for the proposed development of our client's site, which directly adjoins the northern boundary of the hospital. The current development programme has not been finalised - due to the contract for the construction of the new hospital having been delayed.

There have been ongoing negotiations between Building Logistics and the various interested parties connected with the future development of the former Hospital site. There is potential to integrate and conjoin our client's site with the proposed Hospital development site. Such integrated development proposals would be beneficial to the roads and residential amenities connected with both sites. The exclusion of the development site from the forthcoming LDP 2002-2021 would be detrimental to the potential construction of additional residential units - beneficial to the locality.

Within the course of November 2008, we were in the process of entering into further discussions and negotiations with the RCT Planning & Development Office with regard to the finalisation of our client's development plans. Unfortunately, current economic circumstances have curtailed the progression of the planning application, but this factor should not delete the development site H1.27 - from the 2006-2021 RCT Development Plan.

With the submission of formal representation, we anticipate that the Development & Regeneration office will consider our views and comments which are submitted on behalf of our client.

Allocation of Rhondda Local Plan site H1.27 for residential development.
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**Candidate Site Ref No**

CS 83.

**Item Question**

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

**Reply**

Yes
### Representation

**Issue Summary**

Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

**Representation Text**

The expansion of Craig yr Hesg quarry will lead to further noise and disruption to the residents of Glyncoch, exacerbate air quality and threaten the structure and integrity of the primary school as well as nearby housing. The designated area for mineral extraction is just 138.75 meters (sic) from the nearest house, 160 meters (sic) from the local primary school and just 123 meters (sic) from the primary school's outdoor classroom. A large number of local residents have expressed health and safety concerns. The current fencing surrounding the quarry is faulty and with easy access for children, this would be of greater concern, should the quarry be expanded. There is also inadequate infrastructure for the transportation of minerals. The current quarrying levels have a negative impact on the quality of life of local residents. An expansion of the quarrying activity would be intolerable.

**Changes sought**

To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.

**Previous Representation No**

Our representation is being made during the current public consultation period (5th February - 26 March 09)

**Why attend Examination?**

There is not sufficient space within this form to do justice to our objections.

**Soundness Tests**

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<td>C2 Test? Does not have regard to national policy?</td>
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

'Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness' (WAG: Wales Spatial Plan (2008) pp29 (Word version).

'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support outdoor learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taf.
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## Item Question

### Representation Text

1. **Issue Summary**
   
   Objection to designation of area of land surrounding Glyncoch for extraction of minerals.

2. **Representation text**
   
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4. **Previous Representation No**
   
   Our representation is being made during the current public consultation period (5th February - 26 March 09)

5. **Why attend Examination?**
   
   There is not sufficient space within this form to do justice to our objections.

### Soundness Tests

- **C2 Test? Does not have regard to national policy?** Yes
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Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

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'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future' (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership's proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support out door learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
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<td>4 5 Changes sought</td>
<td>To remove the designated area for mineral extraction from the site, which is adjacent to Glyncoch, allowing the quarry to expand further. For the site to be designated instead, as a community amenity, enabling residents to access the countryside through links with the nearby designated nature reserve, as well as to develop an outdoor activities and natural environmental learning zone. Alternative proposals developed by local people will facilitate economic, social and environmental regeneration and the genuinely holistic, sustainable development of the Glyncoch community as well as RCT CBC.</td>
</tr>
<tr>
<td>8 7 Previous Representation No</td>
<td>Our representation is being made during the current public consultation period (5th February - 26 March 09)</td>
</tr>
<tr>
<td>21 11 Why attend Examination?</td>
<td>There is not sufficient space within this form to do justice to our objections.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Reply</th>
<th>Soundness Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>13 0 C2 Test? Does not have regard to national policy?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>14 8 C3 Test? Does not have regard to Wales Spatial Plan?</td>
<td>Yes</td>
<td></td>
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<tr>
<td>16 8 CE1 Test? Does not set out a coherent strategy and/or not compatible with plans of neighbouring auth</td>
<td>Yes</td>
<td></td>
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<tr>
<td>17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
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</table>
Our proposals are much more consistent with the Wales Spatial Plan's commitment to supporting the economic development of communities without compromising environmental and social considerations.

‘Our future depends on the validity of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctive ness’ (WAG: Wales Spatial Plan (2008) pp29 (Word version)).

'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future’ (WAG: Wales Spatial Plan (2008) pp38 (Word version)).

The plan does not consider the Glyncoch Partnership’s proposals which are focused upon enhancing the designated area of land for access to the Graigwen Nature reserve, as well as a host of projects to enhance the health and wellbeing of residents, support out door learning as well as community resilience to climate change.

It is also important to point out that the settlement boundary surrounding Glyncoch does not include Cefn Primary School, whereas it does include other schools in Rhondda Cynon Taff.
<table>
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<tr>
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<th>Access No</th>
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<th>Source Type</th>
<th>Mode Status</th>
<th>Modified</th>
<th>Petition of TREAT in parts</th>
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<th>Rep'r Council Officer</th>
<th>Recommendation</th>
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**Document:** Deposit Draft, p. 125, para. 5  
**Site:** 683/SSA 10.5  
**Former Hillside Club, Tonyrefail**  
**PEX Session:**

**Policy:** SSA 10  
**Map:**

**Issue:** Housing Allocation

**Summary:**

We wish to support the allocation of this land.

**Representation Text**

Support Allocation.

**Changes sought**

None

**Item Question**  
Seek changes? Any changes to be made to the Plan?  
Previous Representations? Did you make any previous representations on this issue during the Cons
<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 2</td>
<td>Support the proposed amendments to settlement boundaries to accommodate future growth.</td>
</tr>
<tr>
<td>2 3</td>
<td>In particular - we support the extension of the settlement boundary at Ivor Park Brynsadler.</td>
</tr>
</tbody>
</table>

Why attend Examination?
Not applicable.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Soundness Tests</th>
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</tr>
</thead>
<tbody>
<tr>
<td>20 9</td>
<td>Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
<td></td>
</tr>
<tr>
<td>Not applicable</td>
<td></td>
<td></td>
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<table>
<thead>
<tr>
<th>Item Question</th>
<th>Tick box Replies</th>
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<tbody>
<tr>
<td>3 4</td>
<td>Seek changes? Any changes to be made to the Plan?</td>
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</tbody>
</table>
### Rhondda Cynon Taf County Borough Council Local Development Plan

**REPRESENTATION DETAIL**

**Filtered to show:** (All representations)

<table>
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**Document:** Deposit Draft, p.112

**Site:** 801/SSA 20.2 South of Makro, Parc Nantgarw

**Policy:** SSA 20

**Map:**

**Site:** 801/SSA 20.2 South of Makro, Parc Nantgarw

**Summary:**

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<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>1 2 Issue Summary</td>
<td>Land South of Makro, Parc Nantgarw should not be identified for use for a park and ride/park and share scheme. Please refer to covering letter.</td>
</tr>
<tr>
<td>2 3 Representation text</td>
<td>The site benefits from an extant planning permission for B1 use. The landowner wishes to see the site developed for employment use. NLP's employment study found Parc Nantgarw to be the second best employment site in RCT Coleg Morgannwg propose more beneficial development at the site and are in advanced discussions about purchasing the site Please refer to cover letter.</td>
</tr>
<tr>
<td>4 5 Changes sought</td>
<td>Deletion of the park and ride/park and share scheme and re-allocation for employment use. Please refer to the cover letter.</td>
</tr>
<tr>
<td>9 7 Why no previous Representation</td>
<td>No cause to do so.</td>
</tr>
<tr>
<td>21 11 Why attend Examination?</td>
<td>Parc Nantgarw is a key employment site and the land south of Makro represents a significant opportunity for the areas future development. The future of the site is also important to future education provision in Rhondda Cynon Taff. Please see covering letter.</td>
</tr>
</tbody>
</table>

**Soundness Tests**

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<thead>
<tr>
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<td>12 8 C1 Test? Does not have regard to other relevant plans, policies and strategies relating to the area or a</td>
<td>Yes</td>
</tr>
<tr>
<td>17 8 CE2 Test? Not realistic and appropriate and/or not founded on robust and credible evidence?</td>
<td>Yes</td>
</tr>
<tr>
<td>20 9 Why changes satisfy Soundness Give details why the changes you propose will ensure that the Plan</td>
<td>The site is one of the best employment sites in RCT. Employment allocation will enable more beneficial development at the site. Removal of the park and ride allocation will allow the education provider to fulfil its education and property strategy.</td>
</tr>
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**Tick box Replies**

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<td>3 4 Seek changes? Any changes to be made to the Plan?</td>
<td>Yes</td>
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<tr>
<td>5 6 Site submitted as Candidate? If Rep'n is for inclusion of a new site, did you submit as a Candidate Site</td>
<td>No</td>
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<td>7 7 Previous Representations? Did you make any previous representations on this issue during the Cons</td>
<td>No</td>
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**Document:** Deposit Draft, p.109

**Map:** Policy: SSA 14

**Site:**

**Summary:**

**Item Question**

1 2 Issue Summary

Land south of Makro, Parc Nantgarw should be identified for use employment use.

Please refer to covering letter.

2 3 Representation text

The site benefits from an extant planning permission for B1 use.

The landowner wishes to see the site developed for employment use.

NLP's employment study found Parc Nantgarw to be the second best employment site in RCT

Coleg Morgannwg propose more beneficial development at the site and are in advanced discussions about purchasing the site

Please refer to cover letter.

4 5 Changes sought

Deletion of the park and ride/park and share scheme and re-allocation for employment use.

Please refer to the cover letter.

9 7 Why no previous Representation

No cause to do so.

21 11 Why attend Examination?

Parc Nantgarw is a key employment site and the land south of Makro represents a significant opportunity for the areas future development. The future of the site is also important to future education provision in Rhondda Cynon Taff.

Please see covering letter.

**Item Question**

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 site is one of the best employment sites in RCT.

Employment allocation will enable more beneficial development at the site.

Removal of the park and ride allocation will allow the education provider to fulfill its education and property strategy.

Please refer to covering letter.

**Item Question**

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

No