

**Rhondda Cynon Taf
Local Development Plan (2006 – 2021)**

**Preferred Strategy:
Regulation 15
Statement of Consultation**

March 2008

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1. INTRODUCTION

1.2 In January 2007 Rhondda Cynon Taf County Borough Council issued for public consultation the Local Development Plan (LDP) Preferred Strategy. The Preferred Strategy was formulated following engagement with Specific and General Consultation Bodies throughout 2006.

1.3 The Preferred Strategy was approved a meeting of Full Council on 6th December 2006. The Preferred Strategy was published for public consultation for six weeks from 11th January until 21st February 2007.

1.4 The purpose of this statement is to provide a record of the consultation undertaken and a summary of the representations received to the Preferred Strategy. Section 2 of this statement includes information on the consultation and publicity undertaken during the consultation period and a list of those individuals and organisations consulted. Section 3 sets out the number of representations received to the Preferred strategy and accompanying documents and a summary of the main issues raised by respondents.

1.5 The aim of this document is not to provide a detailed breakdown of every representation received, but to provide a summary of the main issues raised in representations.

1.6 This document has been prepared in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and the guidance

contained in section B6 of the Local Development Plan Manual (June 2006).

2. RECORD OF CONSULTATION

2.1 The consultation carried out on the Preferred Strategy and accompanying documents followed the requirements of the Council's approved Delivery Agreement.

Consultation

2.2 The package of documents published on the 11th January 2007 comprised:

- Preferred Strategy
- LDP Delivery Agreement
- Sustainability Appraisal / Strategic Environmental Assessment of the Preferred Strategy
- Appropriate Assessment Screening Opinion
- Housing Land Requirement Topic Paper
- Employment Land Availability Topic Paper
- Representation Form
- Sustainability Appraisal / Strategic Environmental Assessment Representation Form
- Consultation Letter (Appendix 1)
- List of Consultation Events (Appendix 2)
- Explanation of the Preferred Strategy and Consultation Advice

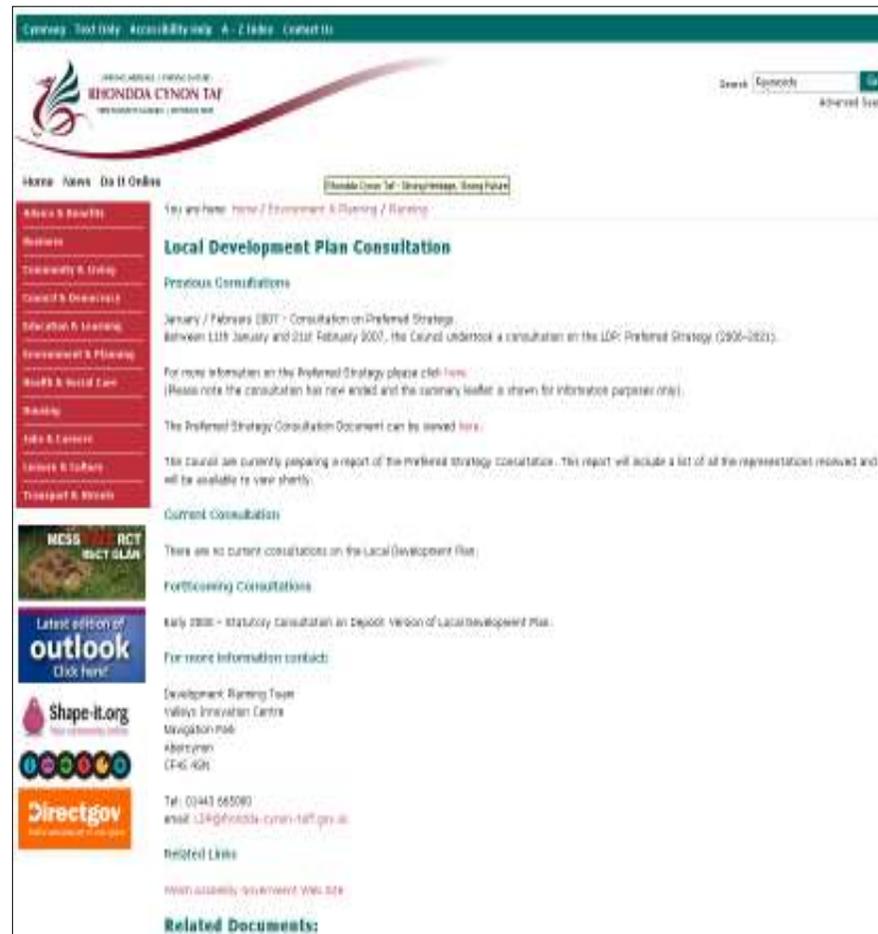
Copies of the above documents were sent to the Specific Consultation Bodies listed in Appendix 3.

2.3 Copies of the Preferred Strategy were hand-delivered to the Planning Division of the Welsh Assembly Government on 10th January 2007. This delivery also included copies of the LDP Delivery Agreement, LDP Visioning Event Record, SA/SEA Scoping Report, LDP Forum Preferred Strategy Record of Event.

2.4 Notification letters were sent to approximately 642 different contacts on the Council's LDP database. This included General, Other and Government Consultation Bodies and members of the public. The consultation list is contained in Appendix 4. Notification was also sent to Members and staff of Rhondda Cynon Taf County Borough Council.

Publicity and Participation

2.5 The Package of Preferred Strategy documents was published on the Council's website on 10th January 2007. This contained advice on where and when paper copies of the documents could be inspected and details of public exhibitions. There was a direct link from the Council's home page to the Preferred Strategy through out the consultation period.



Local Development Plan Consultation – Website page

2.6 Public notices were placed in the Western Mail, Rhondda Leader, Pontypridd Observer and Cynon Valley Leader on the 11th and 18th January 2007. A copy of the public notices is contained in Appendix 5.

2.7 Mobile Exhibitions were held in Pontypridd on the 17th and 18th January, in Aberdare on the 24th and 25th January, in Llantrisant on the 31st January and 1st February, in Tonypany on 7th February and in Tylorstown on the 8th February 2007.



Preferred Strategy mobile exhibition at Talbot Green

During the consultation period exhibitions were also held in Hirwaun, Mountain Ash, Tonyrefail and Treorchy Libraries and Llanharan Drop-in Centre. The aim was to engage with local people and raise public awareness / stimulate interest in the Preferred Strategy in the local community.



Preferred Strategy exhibition at Treorchy Library

2.8 Council officers gave presentations to a number of organisations including Pontyclun Community Council, the Over 50's Forum, the Disability Forum and the Cwmni Communities First Partnership.

2.9 A workshop was organised on 22nd January 2007 for all Community Councils in Rhondda Cynon Taf and members of the LDP Forum to consider and debate the Preferred Strategy.



Presentation to Over 50's Forum, Llantrisant Leisure Centre

2.10 Particular care was taken to ensure that the groups identified in the LDP delivery Agreement were involved in the process. Posters and leaflets were sent to Mental Health, Older Persons, Disability, Parent/Carer Groups, to Valrec and to the Gypsy and Travellers Council.

Availability

2.11 Preferred Strategy documents were placed for inspection in Council Offices in Abercynon, Clydach Vale, Pentre, Pontypridd, Williamstown and Aberdare. Copies were also available for inspection at 29 local and 2 mobile libraries.

2.12 The Preferred Strategy documents were placed on the Council's Website for inspection/downloading and were available through out the consultation process. The Website contained full details of the Preferred Strategy consultation including information on exhibitions, links to related LDP documents and advice on how to make representations. An on line representations form allowed representations to be submitted electronically. During the consultation period the web page was accessed on more than 1,000 separate occasions.

3. SUMMARY OF REPRESENTATIONS

3.1 In total 8011 representations from 556 respondents were received in respect of the Preferred Strategy and accompanying documents.

3.2 Of these 7876 referred to the Preferred Strategy Document, 19 representations were received in respect of the SA/SEA, 2 representations in respect of the Housing Land Requirement Topic Paper and 0 in respect of the Employment Land Requirement Topic Paper.

3.3 7729 of the total representations received were objections, 114 were expressing support and 168 offered comment.

Summary of Main Issues Raised by Specific and Government Consultation Bodies

British Wind Energy Association representations concerned the following main issues:

- Support policy SP14 although would recommend that the wording “no unacceptable impact” is changed to read “no unacceptable effect”
- Concern that wording of SP14 and paragraph 6.34 should be amended to avoid negative connotations.

Cardiff County Council representations concerned the following main issues:

- The preferred strategy proposes a 50% increase in the house building rate in RCT, broadly in line with the ‘agreement’ brokered by the South East Wales Strategic Planning Group in addressing the requirements of the Housing MIPPS (01/2006).
- If past trends are to be reversed and new sustainable communities are to develop in RCT this is likely to require significant new investment and infrastructure.
- The preferred strategy needs to demonstrate an integrated approach to housing, employment and transport, having regard to cross-border relationships.
- The document does not make clear the functional relationships between RCT and neighbouring authorities, particularly Cardiff.
- Significant growth is focused in the South. The precise scale of development proposed is not specified, but it is clear that it is likely to put additional pressure on M4 and key routes into Cardiff which are heavily congested at peak commuter periods (notably the A470 and A4232) and particularly if the trend for commuting from RCT to Cardiff.
- It is essential that new development includes appropriate public transport provision (in addition to walking and cycling)

to minimise the demand for travel within the SEWTA region and, particularly, to minimise commuting by car into Cardiff

Countryside Council for Wales representations concerned the following main issues:

Countryside Council welcomes and supports the Preferred Strategy. In particular support is expressed for the intention to focus new development in principal towns and key settlements throughout Rhondda Cynon Taf, and the strategic objectives of policies SP3 (Sustainable Development), SP4 (Place Making), SP8 (Town Centres and Retailing), SP9 (Transportation), SP11 (Protection of Natural Environment), SP12 (Community Infrastructure) and SP13 (Waste).

Specific Issues include:

- Concern that the emphasis of the strategy on sustainable communities has only been applied to the Northern Strategy Area and not the Southern Strategy Area.
- SP1 and SP2 Locational Strategy need to make reference to protecting the natural and built heritage in the promotion of growth in the strategy areas.
- CCW have serious concerns about the number of houses proposed during the plan period, and consider that the figure should correlate with the outcome of the Spatial Plan SEA process and not pre-empt it.

- CCW have concerns over the amount of employment land required during the plan period. It is considered that the employment allocation should correlate with the outcome of the Spatial Plan SEA process, for the South East Wales Strategy Area, and not pre-empt it.
- CCW are concerned that employment allocations should not rely on motor transport to access them but also ensure that they are incorporated into a fully integrated transport system.
- SP10 Built Heritage should make specific reference to Archaeological remains, Historic Landscapes, and Parks and Gardens of Historic Interest.
- SP14 Renewable Energy should be amended to include reference to natural heritage. The need to harness energy from renewable sources should also be carefully balanced with historic landscapes, rights of way and access facilities, built heritage features and hydrology.
- *Site 1. Former Maerdy Colliery Site, Rhondda Fach* - opportunities should be taken to integrate areas of ecological value into any proposed development.
- *Site 2. Fernhill Colliery Site, Blaenrhondda* - This is an area of significant landscape value.
- *Site 3. Former Phurnacite Plant, Abercwmboi, Cynon Valley* - There would appear to be many opportunities for the

integration of open space, important ecological features and good cycle and walking links within any proposals on his site.

- *Site 4. Robertstown/Abernant* - Development should respect the site's topography, and seek to enhance the landscape and built form of the villa development on the lower part of Abernant Road.
- *Site 5. Land South of Hirwaun/Penywaun* - CCW is aware that this area contains a number of habitats listed in the UK Biodiversity Action Plan.
- *Site 6. Former Cwm Colliery and Coking Works, Beddau* - The site has developed habitat interests on the spoil tips and detailed ecological work has been carried out in the past.
- *Site 7. Mwyndy/ Talbot Green Area* - Serious concerns are expressed relating to this proposal, its major extension into open countryside and the coalescence of a number of small settlements.
- *Site 8. Former OCG Site Llanilid, Llanharan* - Concerns are expressed over the development of this area and the likely coalescence of Llanharan, Llanilid and Llanharan.
- CCW suggest amendments / additions to the indicators contained in Appendix 1.

Department of Enterprise and Transport representations concerned the following main issues:

Department of Enterprise and Transportation (formerly Department of Enterprise, Innovation and Networks) supports the identification of strategic sites at Phurnacite Plant, Abercwmboi, Robertstown / Abernant, Aberdare and Land South of Hirwaun / Penywaun.

Specific Issues include:

- Former Maerdy Colliery Site, Rhondda Fach - This site is not included in the DEIN Property Strategy and therefore direct assistance to bring forward development here is not currently anticipated.
- Mwyndy / Talbot Green - This site is supported as a strategic site on the basis set out in the Preferred Strategy. The site's key location in the southern part of RCT and the potential that this offers for a range of mixed uses to be integrated with the recent expansion of Talbot Green/ Llantrisant needs to be explored as part of the LDP process.

Environment Agency Wales - EA(W) representations concerned the following main issues:

Preferred Strategy

- The EA(W) is concerned that the coherence and effectiveness test of soundness has not been met. That is, the strategy, policies and allocations are to be realistic and

appropriate having considered the relevant alternatives and are found on a robust and credible evidence base.

- The sewerage undertakers should be consulted with regard to the adequacy of existing infrastructure.
- A Broad Level Flood Consequences Assessment must be undertaken of the all sites prior to being allocated in the emerging LDP.

SA/SEA

- EA(W) support the following improvements of targets and indicators as defined in Table 7.1 (Biodiversity, water, climate change and waste).
- Flooding/flood risk is an identified environmental issue and is also a strategic issue. It is not clear from the information provided however, whether flood risk is an issue which significantly constrains development options (proposed strategic sites). It is not clear whether the options have been objectively assessed and supported by evidence. A strategic or broad level flood consequence assessment relevant to strategic sites should be undertaken.
- No reference appears to be made in consideration of alternative sites. No reference has been made to the precautionary framework and/or the positive steps which have been taken to promote development in zones A and B of the development advice maps, contained within technical

advice note 15 development and flood risk (July 2004). Consideration and evidence should be provided in relation to these steps, assessment, selection and decisions.

- Blaen Cynon SAC and Appropriate Assessment – EA(W) support the recommendation contained with paragraph 2.27 that further appropriate assessment is undertaken early in 2007 to ascertain what, if any effect this may have on the Blaen Cynon SAC integrity and to inform the continued development of the LDP.
- Whilst the inclusion of Policy SP8- Environmental Protection and enhancement paragraph 6.27 is welcomed. The term "inappropriate development" may be open to interpretation despite further text provided in the policy. EA (W) suggests deletion of the words "from inappropriate development".
- Please clarify whether flood risk mitigation works is part of this requirement e). If this is not the case then we request policy SP9 be amended to include flood risk mitigation works as a requirement.
- It is noted that a sustainability appraisal (SA) was undertaken of the proposed methodology of the first stage of the candidate site assessment methodology (CSAM) and that this would lead to a selection of sites that should positively progress the SA objectives
- Whilst EA(W) appreciates that the applied SA may result in the same outcome of selected strategic sites and site

allocations, the SA must be applied to these strategic sites and proposed relevant site allocations to be compliant with the test of soundness.

- The SA should be applied to the identified strategic sites within the Preferred Strategy any to any relevant candidate site allocation
- Paragraph 8.1 of the SA concludes that the SA of the Rhondda Cynon Taf LDP has found that the Preferred Strategy will make a significant contribution to the progression of sustainable development objectives for the County Borough. The EA(W) are not in a position to support this conclusion. Whether the Preferred Strategy will make a significant contribution to sustainable development will only be demonstrated through subsequent monitoring.

Llantrisant Community Council representations concerned the following main issues:

- Given the very high percentage of people who travel outside the boundaries of RCT to go to work - it is disappointing to see no reference to develop car parks which can be used for car sharing schemes, which would help to reduce the volumes of private vehicles using the main roads like the M4 /A470 etc.
- Coed Ely Industrial Site should be identified as a strategic site.

- The Community Council questions the appropriateness of the strategic site at Mwyndy / Talbot Green.

Pontyclun Community Council representations concerned the following main issues:

The Community Council supports those elements of the strategy, which seek to manage growth along the M4 corridor and promote the regeneration of the northern strategy area.

Specific Issues include:

- Further expansion of the settlement into the countryside would be unsuitable, result in loss of local identity and place unacceptable demands on local services and the highway network.
- The proposed town centre would result in the creation of an out of town retail development that would increase congestion rather than a fully functioning town centre accessible by a number of modes of transport.
- The Community Council is concerned that the proposed town centre development would result in unacceptable loss of woodland and open farmland.
- Opposition is expressed to the development of land for economic development purposes in the Mwyndy area.
- Concern that further development in the Pontyclun area

would create a barrier of congestion that would serve only to isolate the settlements of Tonyrefail and the Rhondda Valleys from growth opportunities and regeneration.

- The Community Council opposes further residential development in Llanharry, Talygarn, Brynsadler and Pontyclun.
- The Community Council supports the main theme of the Preferred Strategy that we should aim to constrain the concentration of growth along the M4 which an entirely market led approach would encourage and redirect the potential for growth in a more distributed way throughout the county borough.

Welsh Assembly Government representations concerned the following main issues:

The Welsh Assembly Government raised the following 5 key issues:

- clear links need to be demonstrated between the evidence base / contextual background studies and the robustness of the preferred strategy and the strategic sites;
- clear evidence needs to be shown of liaison with neighbouring Authorities,
- clarity needs to be provided on how other key sub-regional work is influencing the Preferred Strategy and how

settlements within RCT will relate to other settlements outside RCT;

- clarity on how key issues have affected the development of the Preferred Strategy and strategic site selection;
- clarity needs to be provided in relation to the flexibility of the emerging LDP in relation to developments outside as well as within the plan area (e.g. St Athan, M4 Junction 33 Culverhouse Cross);
- an affordable housing target (or range).

Specific Issues include:

- Tourism - It is not clear whether any consideration has been given to any tourism implications of the proximity to the Brecon Beacons National Park.
- Strategic and non-strategic sites - The local implications of issues such as flooding and the availability of infrastructure should be explored in the context of national planning policy objectives.
- Strategic and non-strategic sites - Where options involve consideration of the floodplain then a broad level assessment which provides for an understanding of flooding consequences will be necessary.

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- Climate Change - It is not clear as to what climate change specifically means for RCT and, it follows, how it is being (or how it intends to be) addressed.
 - Settlement boundaries - The flexible use of settlement boundaries in the northern strategy area is unqualified and would be inconsistent with national policy if there were not a criterion-based policy to prevent unfettered development in the countryside.
 - Community regeneration - It is not clear how the relationship between the provision and location of employment land and residential land has been addressed in order promote sustainable community regeneration.
 - At present there is no clear evidence of consideration of the Welsh language (including percentages of Welsh speakers in the County and the linguistic character of various areas) in the development of the Strategy and policy.
 - Policy SP1 & SP2 (Locational Strategy)- identify the principal towns and key settlements; however, the strategic policies should provide some elaboration of what this means in relation to any development proposals.
 - Policy SP5 (Housing requirements) is not necessarily consistent with the Assembly's policy on the reuse of brownfield land, which states that wherever possible previously developed land should be used in preference to greenfield.
 - Policy SP5 (Housing Requirements)- The Preferred Strategy needs to clarify the relationship between the Housing requirement figure and the emerging apportionment work being undertaken by South East Wales Planning Group.
 - Policy SP6 (affordable housing) does not establish an overall affordable housing target (or range) for the LDP, which is a requirement of the Housing Ministerial Interim Planning Statement 01/2006 (WAG, June 2006).
 - Policy SP8 (Retailing and Town centres)- National planning policy requires assessment of need and application of the sequential test for proposals outside existing centres; therefore the policy needs to be amended in terms of proposals 'adjacent to' centres.
 - Policy SP14 (Renewable Energy): Further consideration should be given to the implications of SSA F (Coed Morgannwg) at the local level, with any proposed detail being contained in SPG.
 - Policy SP14 (Renewable Energy): Consideration should be given to the encouragement of all forms of renewable energy and the contribution that they can make towards carbon emission reduction etc.
 - Overall there appears to be a good fit between the Preferred Strategy and the existing WSP, however the Council will need to take into account emerging thinking from the WSP SE Core Group on strategic sites.

- Coal: Consideration needs to be given to the requirement to safeguard coal reserves.

Western Power Distribution representations concerned the following main issues:

- Planning obligations should only be required where they contribute towards the mitigation of development impacts (and meet the test of necessity) and are not a more general source of local authority revenue raising.
- A support is expressed for the local needs/ growth policy and supports the identification of Church Village as a location, which will accommodate future growth. The importance of the South of Rhondda Cynon Taff to the whole borough should be reflected when detailed allocations are made.
- Support is expressed the reuse of brownfield land and reuse of existing facilities.
- Objection to the housing requirement figure. The identified residential requirement is 14,850 over the plan period, however in the Preferred Strategy this is reduced to 11,380 dwellings (2006 to 2021).
- Further concern is expressed about the Housing Requirement figure of 14,850 and suggests that this may need to be higher. In addition it is suggested that a flexibility allowance of 20% should be included to reflect the fact that

a number of the large strategic sites suffer from significant environmental and physical constraints and may not be brought forward.

- Objection is expressed to the projected requirement for 300 ha of employment land and question the methodology used to arrive at the requirement figure.
- Whilst the issues faced by RCT are noted it is considered that the employment land requirement topic paper does not effectively link the economic issues identified with the future requirement for employment land.

Summary of Main Issues Raised in Representations

The following is a summary of the main issues raised by representations made against the LDP Preferred Strategy and the accompanying SA/SEA, Appropriate Assessment, Housing Land Requirement Topic Paper and Employment Land Requirement Topic Paper. It seeks to express all discrete themes and issues raised. The following sections correspond to the relevant sections of the Preferred Strategy and accompanying documents. Where a section is not listed, no issue was raised relating to that section.

Representations on Whole Document and Omissions

- The LDP needs to give appropriate consideration to Tourism.
- Leisure and recreation must figure more strongly in the strategic thinking.

CHAPTER 1 - INTRODUCTION

- No representations received.

CHAPTER 2 - POLICY FRAMEWORK

Paragraph 2.1 –2.20

- There are contradictions between the LDP and the Community Plan

CHAPTER 3 - KEY ISSUES IN RHONDDA CYNON TAF

Paragraphs 3.1 – 3.8

- Key issues should include reference to those habitats and species identifies in the Rhondda Cynon Taf Local Biodiversity Plan
- Support for the factors identified as key environmental issues

CHAPTER 4 - VISION AND OBJECTIVES

- No representations received.

CHAPTER 5 - SPATIAL STRATEGY OPTIONS

- No representations received.

CHAPTER 6 - PREFERRED STRATEGY OPTION

Paragraph 6.1 –6.4 - Preferred Strategy Option

- Support is expressed to the Preferred Strategy option.
- The different approach to be taken in the Northern and Southern Strategy Area is welcomed.
- The Preferred Strategy needs to acknowledge Rhondda Cynon Taf's position and role in the wider Network City region.
- Concern is expressed that no Principal Towns has been identified in the Rhondda Valley.
- An approach, which focuses new development in 3 Principal Towns, will only serve to maintain the disparities between the north and south.
- Development in the Northern Strategy is over-reliant on strategic sites and should consider the need to identify

- smaller sites to ensure the development need is met.
- The suggested levels of growth in the Southern Strategy Area are not sustainable.
- The Preferred Strategy is too dependent on the delivery of the 8 strategic sites.

Paragraph 6.5 - 6.11 – Development Strategy

- Support for Aberdare, Pontypridd and Llantrisant as a Principal Town.
- Treorchy should be identified as a Principal Town.
- Support for Tonyrefail, Mountain Ash, Tonypany, as Key Settlements.
- Church Village, Beddau and Abercynon should be identified as Key Settlements.
- Talygarn, Groesfaen and Efail Isaf should be identified as settlements capable of accommodating housing growth.
- Objection to residential development in Church Village, Llantwit Fadre and Beddau to serve Pontypridd.
- Significant objection is made to new housing development in Hirwaun until the necessary road and social infrastructure is in place.

- Objection is made to new housing development in Llanharan until the Llanharan Bypass and necessary social/community infrastructure is in place.

Paragraph 6.12 - 6.16 – Residential Development

- Objection is made to the emphasis is placed on building new houses in the Preferred Strategy.
- The approach of the Council to promote growth and to take measures to ensure an appropriate supply of housing for Rhondda Cynon Taf is welcomed.
- Support is given to the approach to settlement boundaries.
- Clarification is required of the type of affordable housing required to make up the shortfall in provision.
- Provision of affordable housing must be related to need and evidenced accordingly.
- Emphasis should be placed on the development of Brownfield land.
- The Preferred Strategy must address the needs of Gypsies and Travellers.

Paragraph 6.17 - 6.21 – Employment and Economic Development

- Treforest Industrial Estate should be identified as a Simplified Planning Zone.
- Consideration should be given to locating new employment opportunities/locations within the Northern Strategy area this would greatly reduce the volume of traffic travelling south everyday.
- The LDP should consider an approach which balances encouraging major employers and small medium enterprises.

Paragraph 6.22 - 6.23 – Environmental Protection

- The LDP must provide protection for the natural environment.
- Protection must be given to the urban fringe.

Paragraph 6.24 - 6.28 - Transportation

- Transport strategy is poor. Consideration needs to be given to the problems of congestion and improvements to public transport.
- Rhondda Cynon Taf needs to take steps to ensure the development of a modern integrated transportation system

in Rhondda Cynon Taf.

- Concerns are expressed that high levels of unemployment are likely to prevail in the upper Valley communities unless transport access is improved.
- A new road is needed between Porth and Treherbert.
- The A4059 between Abercynon and Hirwaun needs to be dualled.
- Support is expressed for the Church Village Bypass.
- Consideration needs to be given to the capacity of the M4 to assimilate additional traffic.
- Road and Rail improvements are required in the northern strategy area in particular passenger rail services should be extended to Hirwaun.

Paragraph 6.29 - 6.31 – Waste Management

- No representations received.

Paragraph 6.32 - 6.33 – Minerals

- The LDP should ensure that reserves of non-energy minerals are protected.

Paragraph 6.34 - 6.35 – Energy

- Support and Objection is expressed to the approach advocated in the Preferred Strategy to renewable energy.
- The view is expressed that wind farms are inefficient, uneconomic and a blight on the landscape.
- The Preferred Strategy should provide support for onsite micro-renewable energy.
- All the new development to be constructed in Rhondda Cynon Taf over the plan period must be built to the highest energy standard possible.

Paragraph 6.36 – Community Regeneration

- No representations received.

Paragraph 6.37 – Strategic Sites

- The strategy's commitment to potential key sites for growth in the form of sustainable mixed-use development is supported.
- The need for reclamation on many of the strategic sites may hinder the implementation of the plan.

Site 1: Former Maerdy Colliery Site, Rhondda Fach

- No representations received.

Site 2: Former Fernhill Colliery Site, Bleanrhondda

- Objection is made to this site on the basis that development would result in the loss of an important natural area; result in congestion and place strain on existing services.

Site 3: Former Phurnicite Plant, Abercwmboi, Cynon Valley

- No representations received.

Site 4: Roberstown / Abernant – Aberdare

- Opposition is expressed to this site on the basis that it would result in the loss of important trees and parkland within the Hospital site.

Site 5: Land South of Hirwaun / Penywaun

- No representations received.

Site 6: Cwm Colliery and Coking Works, Beddau

- Support is expressed for the development of this site.
- The former Cwm Colliery site should only be considered for development once the Church Village Bypass is complete.

- The site has developed habitats on the spoil tips that need to be protected.

Site 7: Mwyndy / Talbot Green Area

- Support and opposition is expressed to this site.
- This strategic site is supported it will consolidate the urban form of Llantrisant and reinforce the status of the settlement as a Principal Town.
- Concern is expressed that development of this site would have an adverse effect on the natural environment, increase congestion on the A4119 and place additional pressure on schools, medical and leisure facilities.

Site 8: Former OCC Site, Llanilid, Llanharan

- No development should take place on this site until a detailed technical evaluation of land stability takes place.

CHAPTER 7 STRATEGIC POLICIES

Policy SP1 – Development in the North

- No representations received.

Policy SP2 – Development in the South

- Support is expressed for this policy.

Policy SP3 – Sustainable Development

- Support for this policy.

Policy SP4 – Place Making

- Support for this policy.
- The policy should be amended to include ‘enhancement of landscape for biodiversity’.

Policy SP5 – Housing

- Support and objection have been expressed for this policy.
- Support for the housing requirement figure of 14,850.
- Objection because housing requirement figure of 14,850 should be higher.

Policy SP6 – Affordable Housing

- Support is expressed for this policy.
- The policy should allow for flexibility and not ridged percentages.
- Amendment to the policy is sought to allow for a 25% affordable housing target to be applied to sites of over 1 hectare or where there is a minimum of 25 units being built.

Policy SP7 – Employment

- Support and objection is expressed for this policy.
- Policy SP7 seeks to allocate too much land for employment purposes, the effect may be to sterilise land which could be used for alternative uses.
- The LDP should not adopt an unduly negative stance towards non-traditional uses on employment sites.

Policy SP 8 – Retail & Town Centres

- Objection is expressed to this policy.
- The policy needs to be redrafted in accurately reflect the requirements of Planning Policy Wales.
- The LDP should allocate land for retail development in Aberdare in order to counter the magnet of Merthyr Tydfil as a retail destination.
- The LDP should provide a positive context for out of town retail centres.

Policy SP9 – Transportation

- The policy should be amended to include ‘walking for health’ as a transport objective.

Policy SP10 – Built Environment

- This policy is considered to be too restrictive and extremely difficult to quantify and explain.

Policy SP11 – Natural Environment

- Development proposals should not be permitted where it would cause unacceptable harm to local and nationally designated sites.

Policy SP12 – Community Infrastructure

- The policy should be amended to reference the requirement for section 106 contributions to be justified in terms of proven need and demand.

Policy SP13 – Waste Management

- No representations received.

Policy SP14 – Renewable Energy & Energy Efficiency

- Objection is expressed to this policy on the basis that it takes too positive an approach renewable energy.

Policy SP15 – Minerals

- The policy should be amended to take account of the balance between the supply of minerals and the desirability of development.

Appendices

- Amendments are sought to indicators.
- Non-Strategic sites - Concern is expressed that the development of many of the sites listed in this appendix.

Sustainability Appraisal

- Support is expressed for the SA / SEA.
- Objection is made to the SA/SEA because it fails to consider in sufficient depth the impact of the proposed development on Rhondda Cynon Taf.

Appropriate Assessment

- No representations received

Housing Land Requirement Topic Paper

- No representations received

Employment Land Requirement Topic Paper

- Concern is expressed that the employment land requirement topic paper fails to provide a robust methodology for the allocation of 300 hectares of new employment land.

4. CONSIDERATION OF REPRESENTATIONS

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

4.2 Consideration will however, be given to the issues raised as the Council formulates the draft LDP. The Council will ensure that through the process of formulating the LDP respondents and stakeholders are fully informed of how the comments received through the Preferred Strategy consultation have affected the policies and proposals contained in the emerging plan.

5. FURTHER ADVICE

If you require any further advice or assistance in respect this or other LDP documents or wish to be placed on the Council's consultation database please contact a member of the Local Development Plan Team at:

Development & Regeneration Unit,
Valleys Innovation Centre,
Navigation Park,
Abercynon
CF45 4SN

Email: LDP@rhondda-cynon-taf.gov.uk

Telephone: 01443 665000

Appendix 1 - Letters of Consultation

Letter to Specific Consultation Bodies

Our Ref: 12.14.16 Your Ref: Date: 8th Jan 2007
Ein cyf: Eich cyf: Dyddiad:

Dear Sirs

RHONDDA CYNON TAF LOCAL DEVELOPMENT PLAN (2006-2021) – PREFERRED STRATEGY

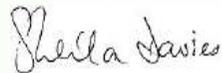
I am writing to inform you of the forthcoming consultation on the Preferred Strategy for the Local Development Plan. The Council has now prepared its Preferred Strategy and is undertaking a six-week consultation on the document between 11th January and 21st February 2007.

The Council would welcome your views. Please find enclosed a CD disk, which contains the Preferred Strategy and associated supporting documents. I also enclose a representation form. Should you wish to make any comments on the Preferred Strategy, I would be grateful if you could complete the representation form and return it to me at the above address by 5.00pm on **Wednesday 21st February 2007**.

The Preferred Strategy and associated documents are also available to view on the Council website (www.rhondda-cynon-taff.gov.uk). Further updates in respect of the preparation of the Local Development Plan will be posted on the website in due course.

If you have any questions regarding the aforementioned, or indeed any aspect of the Local Development Plan, please do not hesitate to contact the Development Planning Team on 01443 665000 or via email LDP@rhondda-cynon-taff.gov.uk.

Yours sincerely,



Sheila Davies
Director of Development and Regeneration

Letter to Specific Consultation Bodies

Our Ref: 12.14.16 Your Ref: Date: 8th Jan 2007
Ein cyf: Eich cyf: Dyddiad:

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RHONDDA CYNON TAF LOCAL DEVELOPMENT PLAN (2006-2021) – PREFERRED STRATEGY

I am writing to inform you of the forthcoming consultation on the Preferred Strategy for the Local Development Plan. The Council has now prepared its Preferred Strategy and is undertaking a six-week consultation on the document between 11th January and 21st February 2007.

The Council would welcome your views. The Preferred Strategy, associated documents and representation forms are now available to view on the Council website (www.rhondda-cynon-taff.gov.uk). Should you wish to make any comments on the Preferred Strategy, I would be grateful if you could complete a representation form and return it to me at the above address by 5.00pm on **Wednesday 21st February 2007**.

Copies of the Preferred Strategy can be made available on request. Further updates in respect of the preparation of the Local Development Plan will be posted on the website in due course.

If you have any questions regarding the aforementioned, or indeed any aspect of the Local Development Plan, please do not hesitate to contact the Development Planning Team on 01443 665000 or via email LDP@rhondda-cynon-taff.gov.uk.

Yours sincerely,



Sheila Davies
Director of Development and Regeneration

Appendix 3 - List of Specific Consultation Bodies

Sub Category	Sub Category Description	Organisation
1	Welsh Assembly Government	Welsh Assembly Government
2	Assembly Sponsored Public Bodies	Environment Agency Wales
		Countryside Council for Wales
3	Adjoining Local Authorities	Caerphilly County Borough Council
		Brecon Beacons National Park Authority
		Vale of Glamorgan County Council
		Neath and Port Talbot County Council
		Merthyr Tydfil County Borough Council
		City and County of Cardiff
		Bridgend County Borough Council
		Powys County Council
4	Community Councils	Tonyrefail Community Council
		Rhigos Community Council
		Llantwit Fardre Community Council
		Llantrisant Community Council
		Pontyclun Community Council

Sub Category	Sub Category Description	Organisation
4	Community Councils	Llanharan Community Council
		Llanharry Community Council
		Gilfach Goch Community Council
		Hirwaun Community Council
		Ynysybwl & Coed y Cwm Community Council
		Pontypridd Town Council
		Taffs Well Community Council
5	Community Councils in adjoining Local Authorities	Caerphilly Town Council
		Blaengwrach Community Council
		Glynneath Town Council
		Aber Valley Community Council
		Ogmore Valley Community Council
		Llangan Community Council
		Pendoylan Community Council
		Pencoed Town Council
		Coychurch Higher Community Council
		Welsh St.Donats Community Council
		Penllyn Community Council

Sub Category	Sub Category Description	Organisation
5	Community Councils in adjoining Local Authorities	Penyrheol, Trecenydd & Energlyn Community Council
		Peterston - Super - Ely Community Council
		Tongwynlais Community Council
		Ystradfellte Community Council
		Nelson Community Council
		Llanfrynach Community Council
		Pentyrch Community Council
6	Telecommunications	02 UK
		Vodafone Ltd
		NTL
		T-Mobile
		Three
		BT Wholesale - Network Access
		Cable and Wireless
		BT Wholesale
		National Telecommunications Ltd
		Mobile Operators Association
		Orange Personal Communications Ltd

Sub Category	Sub Category Description	Organisation
6	Telecommunications	Network Development Consultants
		British Telecom
7	Health	Pontypridd & Rhondda NHS Trust
		RCT Local Health Board
		Welsh Health Estates
		Welsh Ambulance Services NHS Trust
		Methyr & Cynon Valley Community Health Council
		Pontypridd & Rhondda Community Health Council
		North Glamorgan NHS Trust
		Bro Morgannwg NHS Trust
8	Utilities	National Grid Transco
		British Wind Energy Association
		British Gas (Transco)
		Powergen
		Welsh Water
		SWALEC
		Western Power Distribution

Sub Category	Sub Category Description	Organisation
8	Utilities	RWE npower
		Innogy plc
15	As specified in LDP Wales	Celtic Energy Ltd
		Lattice Property (formerly British Gas Property)
		Confederation of UK Coal Producers (Coalpro)
		The Coal Authority

Appendix 5 – Public Notice

<p>Planning and Compulsory Purchase Act 2004 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (Regulation 15)</p>						<p>Deddf Cynllunio a Phrynu Gorfodol 2004 Rheoliadau Aseiad Amgylcheddol o Cynlluniau a Rhaglenni (Cymru) 2004 Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol) (Cymru) 2005 (Rheoliad 15)</p>					
<p>Notice of Pre-deposit Public Consultation for a Local Development Plan</p>						<p>Hysbysiad o Ymgynghoriad Cyhoeddus Cyn Adneuo ar gyfer Cynllun Datblygu Lleol</p>					
<p>Rhondda Cynon Taf Local Development Plan (2006-2021) Rhondda Cynon Taf County Borough Council has prepared pre-deposit proposals documents for the above plan. The local development plan (LDP) will, upon adoption, replace the current Local and Structure Plans and be the basis for decisions on land use planning for Rhondda Cynon Taf, excluding land within the boundaries of the Brecon Beacons National Park.</p>						<p>Cynllun Datblygu Lleol Rhondda Cynon Taf Mae Cyngor Bwrdeistref Sirol Rhondda Cynon Taf wedi paratoi dogfennau cynigion cyn adneuo ar gyfer y cynllun uchod. Bydd y cynllun datblygu lleol (CDLI), ar ôl ei fabwysiadu, yn disodli'r cynlluniau Lleol a Strwythur presennol a bydd yn sail i benderfyniadau ar gynllunio defnydd tir ar gyfer Rhondda Cynon Taf heb gynnwys y tir sydd ym Mharc Cenedlaethol Bannau Brycheiniog.</p>					
<p>The pre-deposit proposals documents outline the Authority's vision, strategic options, preferred strategy and key policies, and include key background information and an initial sustainability appraisal report (which includes the environmental report).</p>						<p>Mae'r dogfennau cynigion cyn adneuo'n amlinellu gweledigaeth yr Awdurdod, opsiynau strategol, dewis strategaeth a pholisïau allweddol, ac yn cynnwys gwybodaeth gefndir allweddol ac adroddiad cychwynnol yr arfarniad o gynladwydd (sy'n cynnwys yr adroddiad amgylcheddol).</p>					
<p>Copies of the documents are available for public inspection free of charge at the council offices in the Valleys Innovation Centre, Navigation Park, Abercynon, Sardis House, Sardis Road, Pontypridd and The Pavilions, Clydach Vale, Tonypanddy, as well as the One for All centre at Rock Grounds, Aberdare, during office hours from the 11th January to the 21st February 2007. The documents will also be available in the following Libraries throughout Rhondda Cynon Taf, during their opening times;</p>						<p>Mae copïau o'r dogfennau ar gael i'r cyhoedd eu gweld yn rhad ac am ddim yn swyddfeydd y cyngor, sef Canolfan Menter y Cymoedd, Parc Hen Lofa'r Navigation, Abercynon, Tŷ Sardis, Sardis Road, Pontypridd, Y Fafiliynau, Cwm Clydach, Tonypanddy, a'r ganolfan I Bob Un yn Rock Grounds, Aberdâr yn ystod oriau swyddfa 11fed o Ionawr hyd yr 21fed o Chwefror 2007. Mae'n nhw hefyd ar gael yn y llyfrgelloedd canlynol ledled Rhondda Cynon Taf, yn ystod eu horiau agor;</p>					
Hirwaun	Aberdare	Cwmbach	Mountain Ash	Penrhiwceiber	Abercynon	Hirwaun	Aberdâr	Cwm-bach	Aberpennar	Penrhiw-ceibr	Abercynon
Ynysybwll	Glyncoch	Cilfynydd	Pontypridd	Rhydyfelin	Church Village	Ynys-y-bwl	Glyn-coch	Cilfynydd	Pontypridd	Rhydfelen	Pentre'r Eglwys
Taffs Well	Beddau	Llantrisant	Talbot Green	Pontyclun	Llanhari	Ffynnon Taf	Y Beddau	Llantrisant	Tonysguboriau	Pont-y-clun	Llanhari
Tonyrefail	Porth	Penygraig	Tonypanddy	Ynyshir	Ton Pentre	Tonyrefail	Y Porth	Pen-y-graig	Tonypanddy	Ynys-hir	Tonpentre
Tylorstown	Ferndale	Treorchy	Maerdy	Treherbert		Tylorstown	Glynrhedynog	Treorci	Y Maerdy	Treherbert	
<p>They are also available on the Council's website at www.rhondda-cynon-taf.gov.uk</p>						<p>Mae'r dogfennau hefyd ar gael ar wefan y Cyngor – www.rhondda-cynon-taf.gov.uk</p>					
<p>Representations (including objections) in respect of the proposals, should be sent in writing to Sheila Davies, Director of Development and Regeneration, Valleys Innovation centre, Navigation Park, Abercynon, CF45 4SN or made on-line at the above website location by the 21st February 2007. Representations (including objections) should specify the matters to which they relate. A form for making these representations is available from the above address or on-line at the above web-site location.</p>						<p>Anfonwch eich sylwadau (gan gynnwys gwrthwynebiadau) ar y cynigion, ar bapur, ar gyfer sylw Sheila Davies, Cyfarwyddwr Materion Datblygu ac Adfywio, Canolfan Menter y Cymoedd, Parc Hen Lofa'r Navigation, Abercynon CF45 4SN neu drwy gyfrwng ein gwefan ni uchod erbyn yr 21fed o Chwefror 2007. Dylai sylwadau (gan gynnwys gwrthwynebiadau) nodi'r materion y maen nhw'n ymwneud â nhw. Mae ffurflen ar gyfer cyflwyno sylwadau ar gael o'r cyfeiriad uchod neu ar-lein yn y wefan uchod.</p>					
<p>Representations may be accompanied by a request to be notified at a specified address of the next stage of the LDP, which is the publication and public consultation of the Deposit Draft of the LDP, and the subsequent stages which will be its submission to the Welsh Assembly Government for independent examination and then the adoption of the plan.</p>						<p>Croeso i chi gyflwyno sylwadau ar y cyd â chais i anfon hysbysiad i gyfeiriad penodol o gam nesaf y CDLI, sef y cyhoeddiad a'r ymgynghoriad cyhoeddus o'r Drafft Adneuo, a'r camau dilynol, sef ei gyflwyno i Lywodraeth Cynulliad Cymru ar gyfer archwiliad annibynnol cyn mabwysiadu'r cynllun.</p>					
<p>The Authority is only required to consider representations made in accordance with this notice. Representations made at the current pre-deposit stage will not be considered by the Inspector appointed to carry out the Independent Examination. There will be a further opportunity for representations to be made at the deposit stage and these representations will be considered at the examination.</p>						<p>Dim ond sylwadau a fo'n ymwneud â'r hysbysiad hwn y mae'n ofynnol i'r Awdurdod eu hystyried. Chaiff sylwadau a wneir ar y cam cyn adneuo presennol mo'u hystyried gan yr Arolygydd a benodwyd i gynnal yr Archwiliad Annibynnol. Bydd cyfle arall i gyflwyno sylwadau ar y cam adneuo ac ystyriar y sylwadau hyn yn yr archwiliad.</p>					

