

Revised Local Development Plan Members Steering Group – Briefing Paper for the meeting of the 8th December 2022

Revised Local Development Plan and Delivery Agreement

This paper has been prepared to inform the meeting of the Members Steering Group for the Revised Local Development Plan (RLDP), on 8th December.

The Members Steering Group has met on four previous occasions at the end of 2020 mid 2021 and earlier this year. This was in relation to the preparation of the RLDP for the period 2020 – 2030.

There have been a number of major changes since we last met.

Firstly, it has been determined, in accordance with a Full Council decision, to cease with the above RLDP and begin a new one for the plan period 2022 – 2037. The reasons for these changes, and the new timetable for delivering the LDP, can be seen in the Council report, item 141, of the 9th March 2022. Formal commencement of this new Revised LDP then began in April.

There were subsequent Local Government elections, that has now seen the need to appoint new Members to this Steering Group. Welcome to you all.

Accordingly, it is appropriate to give a very high level background of a Local Development Plan. It is a statutory requirement for all Local Authorities in Wales to prepare an LDP. We have a three and a half year timeframe to take it through a series of stages of preparation. This would include determining the Preferred Strategy (and associated strategic planning policies), followed by a more detail final Deposit LDP that adds more detailed policy and site allocation/protection. The LDP is then submitted to Welsh Government for an Inspector to take it through an examination in public.

The LDP sets out planning policies and site-specific allocations for many areas, including housing, employment, town centres, retail, minerals (quarries), renewable energy, waste and highways etc. It also seeks to protect ecologically important areas, open space and areas of important landscape etc.

The LDP, once adopted, will sit alongside National Planning Policy, to be the primary basis on which all planning applications up to 2037 will be determined. It will provide certainty to the communities of the County Borough on where development will be located over the plan period.

The Timetable below is taken from the formal Delivery Agreement that we have agreed with Welsh Government for the preparation of the LDP.

Key Stage	Date
Preparation of the Pre-Deposit Stage of the Revised LDP including the Preferred Strategy	From April 2022
Consultation on the Preferred Strategy	June/July 2023
Preparation of the Deposit Revised LDP	From August 2023
Consultation on the Deposit Revised LDP	July/August 2024
Submit Revised LDP to Welsh Government	November 2024
Independent Examination	April/May 2025
Adoption	October 2025

The Role of the Members Steering Group

The Members Steering Group has been established to play a formal role in the preparation of the Revised LDP (RLDP). The need for this group was identified in the formulation of the Delivery Agreement for the revision of the LDP. A Terms of Reference for this group has been prepared, and will be shared.

Although not a decision-making group, it is seen as a very necessary form of engagement. Views are sought on all stages and content of the plan to ensure there is appropriate consideration in all areas of its preparation – and this from a Members’ specific point of view.

Work Undertaken to Date.

As set out above, there is a new formal RLDP being prepared, officially not the RLDP that had previously been contributed to. However, it has been determined that the matters raised and contributions of the Members Steering Group to date remain applicable to the new Revised LDP to 2037. This would also apply to the internal Council departments contributions to date, wider Councillor engagement, the involvement of statutory stakeholders (e.g. NRW, Public Health Board etc) and the considerable feedback received from public consultation and engagement that took place during 2021.

Much of this was in relation the Visioning events undertaken – where the important issues and concerns for RCT were raised. People also identified what were appropriate aims and objectives for the LDP to overcome these issues.

However, it should be noted that we consider there is an opportunity to expand or update on these matters, both due to the new and extended RLDP plan period to 2037, and more so for those new Members to the group. New concerns and issues may well indeed have arisen in the past year that the RLDP should now be taken into account.

We will raise the matter of identifying new 'Issues' through the forthcoming meeting, however it is the intention to give Members the chance to submit them through informal written representations – this at any time from now through to the end of the year. These can be sent to LDP@RCT.GOV.UK

The issues and objectives raised to date from all the various consultation and engagement methods, are set in a section below.

General update

As a general update, it should be noted what other elements of preparation of the RLDP have taken place to date.

- 19 Background Topic Papers, including analysis of the LDP topics, up to date policy requirements for plan preparation and the identification of what further evidence is required.
- Preparation of a Settlement Assessment/Hierarchy Paper to identify what is there also scope for their development growth.
- Preparation of a draft Urban Capacity Study analysis for RCT, proactively looking at opportunities for development.
- Alongside professional consultants, preparation of the statutory Integrated Sustainability Appraisal (ISA) and Habitats Impact Assessment scoping process (including Sustainability Appraisals, Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment, Welsh Language Impact Assessment and consideration of the WCFG Act and Environment Wales Act).
- Formulation of a comprehensive Candidate Site Assessment Methodology, and two Calls for Candidate sites i.e. for the submissions of sites to be considered for development in the LDP (the second of these calls finished at the end of September). We have had over 300 such site submitted from private developers, landowners and internal Council owned sites submitted for the process. Over three quarters of these have been assessed under the first stage or sift of assessment.
- A South East Wales Regional Strategic Flood Consequences Assessment has been commissioned and has recently been completed. underway, which will be followed by a specific RCT site specific assessment.
- Professional analysis has been commissioned on a number of Housing needs areas to determine the scale of housing we need to allocate for.
- A regional approach to identify suitable criteria for the assessment and identification of Green Wedges is ongoing.
- An Employment Land Review and Economic Analysis is underway.

- Working with two other Authorities to undertake bespoke evidence gathering to inform appropriate policy on Houses in Multiple Occupation.
- Ongoing work to determine broad level development viability analysis across the County Borough i.e. costs and profits of housing development schemes.
- Continued work with other departments to seek to incorporate all ongoing strategies and priorities into LDP Strategy preparation. Working alongside them to bring things forward that can help both parties and the Council collectively.

Further analysis of the issues and objectives raised are set out below. One key ongoing piece of work is where we have taken forward all the above evidence we have collated so far, and have sought to identify a range of appropriate Strategy options for the RLDP. These are both in relation to the scale of growth the RLDP should consider, and also where it could or should be located, and why.

The next section of this briefing paper firstly sets out the issues and objectives raised. It then outlines these Strategy options which will formulate the main points of discussion at the meeting (or what may be a number of necessary meetings).

Vision, Issues and Objectives

One of the first stages of preparation of the RLDP is to identify what the plan is trying to do and what changes it can play its part in making. The first stage of this is to identify what the land use issues are in RCT that need to be addressed at present.

In order to do this during the spring and summer of 2021 we undertook a visioning engagement process. During this time we asked lots of stakeholder what they thought the issues were in RCT that needed to be addressed. These stakeholders included:

- The general public
- Elected Members
- Members Steering Group
- Statutory consultees including organisations such as NRW, Public Health Wales and South Wales Fire and Rescue.
- Internal officer steering group (including the Climate Change Working group)

Engagement was undertaken via a series of meetings with the Members Steering Group, statutory consultees, and internal colleagues. These were very constructive and generated many issues including those from experts in their field.

Alongside this public consultation was undertaken hosted on the Council's 'Lets Talk' page in the summer of 2021, seeking the views of the residents of RCT and other interested parties. Correspondence was sent to those who had expressed an interest in the process notifying them of the engagement.

The consultation page included a comments section, where individuals were able to leave comments and suggest issues. This was also complimented by an interactive map, where pins could be dropped on relevant locations across the County Borough with associated comments. An interactive poll was also available for individuals to select which topic they thought was the most important issue for the RLDP to address. Furthermore, the webpage also provided a link to the longer questionnaire for individuals to complete should they wish.

As a result of the Let's Talk page 1,600 hits were received on the page with

- 68 responses to the survey
- 69 responses to ideas
- 55 pins on the map and
- 149 responses to the quick poll

All of these issues were collated and added to those generated in the visioning event meetings.

Integrated Sustainability Appraisal (ISA)

As part of the RLDP we also have to undertake an Integrated Sustainability Appraisal which assess the impacts of the RLDP on sustainability and the legislative requirements of the Environment, Welsh language and Equality Acts and the Socio-economic duty and Health impact assessment.

As part of this assessment it was necessary for our consultants to analyse lots of data sets, studies and existing evidence base to draw out other issues that existed in RCT and provide evidence to support the findings. These issues have also been added to the list of issues generated through the engagement identified above.

Issues in RCT identified to date

Set out below are the (combined and collated) issues that were identified through the engagement work listed above

Environmental issues

Issue – Climate Change and its associated impact.

Issue – The need to protect and enhance designated and undesignated biodiversity sites and features.

Issue - The need to protect and enhance the sensitive landscape, particularly around the Brecon Beacons National Park.

Issue - Renewable energy requirements and impacts.

Issue - Many areas throughout the County Borough are at risk of surface water and/or main river flooding.

Issue - Across the County Borough there are pockets of poor air quality, in particular where numerous AQMAs have been declared

Issue – There are high levels of carbon dioxide emissions from transport, and a need to improve transport infrastructure (including EV infrastructure, Active Travel and public transport)

Issue - The need to continue recycling and tackle the problems caused by waste around the County Borough.

Issue – The need to ensure coal tip safety and appropriately manage the coal legacy across the County Borough.

Issue - The need to protect and enhance the rich built heritage and historic environment across the County Borough.

Issue - The need to protect public open and green spaces.

Issue - There are a number of waterbodies in the plan that are in poor ecological condition and some that are failing in relation to their chemical status.

Issue- The majority of WwTWs in RCT have capacity to accommodate new development. However, Cynon WwTW is noted to have very limited capacity and Hirwaun WwTW has limited capacity.

Social Issues

Issue – The mix of housing available throughout the County Borough is limited and there is a high proportion of terraced housing

Issue - There is a need for more affordable housing across the County Borough.

Issue – There is a lack of land suitable for development across the County Borough, particularly in the Rhondda.

Issue – There is a high proportion of empty properties across the County Borough.

Issue - The number of individuals across the County Borough with no formal qualifications is high, and the provision to expand school capacity is limited

Issue - The issue of crime throughout the County Borough, particularly in relation to drug related crime

Issue – The lack of healthcare facilities and health of the population across the County Borough is an issue

Issue - The impact of development on Welsh speaking communities should be carefully considered

Issue - The high number of HMOs within parts of the County Borough within Treforest and neighbouring communities.

Issue - Over-development of housing in the Tonyrefail area compared to the development of supporting facilities.

Economic Issues

Issue - There is a lack of employment opportunities across the County Borough, and there is relatively high levels of unemployment and economic inactivity compared to Wales and the rest of the UK

Issue - There has been a change in employment skills and decline in the manufacturing sector over time

Issue - Many existing employment sites require upgrades

Issue – The need for town centres to have a flexible role, and the issue of competing town centres.

Issue - There remains an issue with the viability and deliverability of development sites.

Issue- There is a growing scope for the Tourism sector to play a significant role in the economic future of RCT.

Issue – High level of out-commuting in RCT.

Objectives

These issues identified above will be refined and added to as a result of the current visioning work including your input in the Members Steering group. They will then be turned into a set of objectives for the RLDP to help address. Please note that in order for an issue to become an objective in the plan there has to be appropriate evidence. It also needs to be something that the RLDP can influence.

Growth and Spatial Options

As part of the gathering of a vast evidence base for the RLDP it is necessary to assess the appropriate level of growth for the County Borough in terms of housing and jobs using the latest available demographic evidence. We also have to think about where this growth can be located to ensure the best outcomes for RCT.

Growth options are concerned with how much RCT should grow by in terms of housing and jobs, how many new homes should we plan for? and how many jobs we should and would like to plan for? In order to do this we have commissioned Edge Analytics to look at the latest demographic evidence.

There is further analysis work required to choose the correct level of housing growth based on a variety of factors including what is best for RCT and what objectives we are trying to achieve. The report provides a variety of growth options which all result in different levels of housing and jobs required over the plan period.

These options include the Welsh Government population projections, which give you high medium and low potential options. This would equate to a required annual housing delivery of 721, 564 and 353 respectively. Another option is to base the housing requirement figure on a 5 years past trends build rate. This would equate to a required delivery of 509 dwellings. Consideration can also be given to migration patterns based on past trends analysis. This could range between 382 and 682 dwellings per annum.

Spatial options

Alongside the question of how much we should grow, is the question of where we should locate growth, this is known as the spatial strategy. As part of this process, we have looked at lots of evidence and data including things such as where we have land to grow, where National policy says we can grow, where affordable housing is required and where is viable and deliverable for us to grow. The most important question here is where can we grow which offers the most benefit to RCT and can achieve our objectives of addressing our issues.

Included below is a list of spatial options that we have formulated and the advantages and disadvantages that we feel relate to them. We would welcome your views on these options, whether we have assessed them correctly and if you can think of anymore that we should look at:

Option 1: Continuation of the current LDP

This option would see the strategy of the current LDP continued into the revised plan.

The strategy aimed to have a differing approach north and south.

The approach taken by this strategy in terms of its spatial strategy was to:

- Locate development around the principal towns and key settlements
- Allocate large Strategic Sites
- Flexible settlement boundaries in the north and fixed/ strict settlement boundaries in the south.

Aims and Objectives	Outcomes
Promotes sustainable regeneration	Approximately delivered half of the required amount of housing. However more recent Welsh Government population projections of 2014 indicated we were building more closely to need.
Halts the process of decline by stimulating growth in the housing and employment markets in the north	Less than half of the overall delivery on allocated housing and employment sites
Removing dereliction in the north through the allocation of numerous brownfield sites	Significant under delivery of Strategic Sites

Supporting services in important urban centres in the north.	Over reliance on brownfield allocated sites
Manage growth by balancing housing and commercial development with social and environmental considerations in the south.	High delivery of windfall sites particularly in the Cynon and Taf Valley
	Contained greenfield loss in the South
	Very limited development in the Rhondda Valleys

Option 2: Strategic Highway Network

This option focusses on locating growth around the strategic highway networks of the M4, A470 and A465. This happens to correlate with the three current Principal Towns of Llantrisant/Talbot Green, Pontypridd, and Aberdare respectively.

Key Elements

- Target development around the M4 corridor in order to maximise house building which offers a range of house types and affordable housing.
- Target development around the A470 and A465 corridors. These areas also align with some of the existing rail network in the area which would also benefit from the forthcoming metro.
- Supports the considerable investment in the dualling of the A465
- It would also support ongoing regeneration in these areas.
- Encourage development which supports the Principal Towns

Advantages	Disadvantages
Viable and deliverable sites available for development in most areas.	Could rely heavily on greenfield land
Proven record of delivery in these areas.	Lack of sustainability in some of the strategy area
Ability to provide affordable housing in an area with affordable housing need.	Lack of land in some areas which would be limiting in terms of allowing for a higher level growth option
Help to prevent out-migration/out-commuting to areas such as Bridgend.	Limited consideration for growth in the Rhondda Valleys and Tonyrefail.
Maximise the impact of the regeneration and investment in tourism in the Cynon Valley	Principle of a highway network based strategy
Maximise the impact of the metro	There is a significant risk that our housing need would not be met

Option 3: Town Centre First

This strategy option would see a town centre first approach to the location of development.

Key Elements:

- This option identifies development sites which are in close proximity to the Principal Towns and Key Settlements.
- Use a sequential approach to locating development
- Promote sustainable travel by locating development close to public transport
- Locate development close to services and facilities to achieve sustainable living and modal shift.

Advantages	Disadvantages
Supports the National Development Framework	Lack of land in most town centres which would be very limiting in terms of allowing for a higher level growth option
Encourages sustainability	Not all areas with town centres have transport hubs particularly in the south west of the County Borough.
Helps address climate change	Much of the land in town centres is subject to flooding
Reduces the need to travel	Potential to overlook good sites in other locations.
Supports the town centres	Costs (including public sector), related to knock down and rebuild strategy which inevitably would be required
Utilises the current settlement hierarchy and produces an efficient growth pattern	There is a significant risk that our housing need would not be met

Option 4: Southern growth strategy

This strategy involves a focus of growth in the southern strategy area of the County Borough, mainly in the Taff Ely area with a focus on the M4 corridor.

Key Elements

- Locate growth in the south of RCT with a large focus on housing.
- Development mainly on greenfield release
- Limited growth in the north which just accommodates local need.

Advantages	Disadvantages
Viable and deliverable sites available	Over development
Ability to achieve affordable housing in an area which is in need	Environmental issues
Help to halt out-commuting/ migration to Cardiff and Bridgend.	Development on greenfield and high value agricultural land

Proven delivery record and market demand.	Much of the area is car dependant and lacking in sufficient public transport.
Ability to achieve housing numbers	Lack of development and investment in the north
Would allow for a range of housing to be achieved	Competition for housing market and commercial development with NW Cardiff and Bridgend
Continued growth of successful employment areas	

Option 5: Metro and Public transport nodes

This option would see development located around metro hubs and other public transport nodes.

Key Elements

- Focus development around public transport hubs, corridors and existing stations and hubs.
- Maximise development in appropriate distances to Metro stations and hubs.
- Seek growth in those areas best served by public transport.
- Support the further improvements in public transport
- Support the increase in Electric Vehicle charging points

Advantages	Disadvantages
Would support sustainable development and climate change	There is insufficient land to meet this strategy option
Would support the modal shift to public transport	May lead to good sites being missed
Would support the growth of the South Wales Metro including proposed /new public transport corridors (NW Cardiff corridor- light rail)	Would potentially reduce improvements to the road network by focussing on public transport as car borne traffic will still be generated
Would serve the Rhondda Fawr and Cynon well	Not as many opportunities in Taff and Rhondda Fach
Would generally align well with the Town Centres on the existing rail network	Would reduce development in other areas.

Option 6- Key/Strategic Sites in the South of the County Borough

This option would see a high proportion of housing and employment growth on one large Key site.

Key Components:

- Allocation of a large Key/Strategic Site capable of delivering a mixed-use development
- Majority of the housing apportionment on one site
- Smaller allocations spread through the County Borough to address local need
- Reduce the number of allocated sites overall in the area.
- Improvements to public transport

Advantages	Disadvantages
Deliverable and viable area	Heavy reliance on one site
Highly marketable area with proven delivery	Lack of investment and growth in the rest of RCT
Co-location of housing and employment	Ecological sensitive areas
Sufficient land to achieve the strategy	Limited public transport in SW RCT
Protects the other areas of the south which are under demand pressure.	
Would help stop out commuting	

Option 7 - Urban containment

This strategy option seeks to deliver growth within the current urban area without the need to expand existing settlements. The key elements of this strategy are:

- Utilising empty properties
- No new greenfield releases
- Building on brownfield land within current settlement limits
- Tight settlement boundaries
- Windfall releases
- Current committed sites

Advantages	Disadvantages
Supports the reduction of climate change	Not necessarily what the housing developers could deliver.
Makes the best use of existing land	High risk as commitments and windfall are not guaranteed
Would further assist empty properties in being brought back into beneficial use	Reliance on intervention and public sector funding to deliver
Protects the environment and ecology	Lack of land within the urban area which would be very limiting in terms of allowing for a higher level growth option.
Removes pressure from the south of RCT	There is a significant risk that our housing need would not be met

Option 8- Local needs strategy

This option looks at concentrating on addressing development needs of each individual settlement which would result in a dispersed form of growth. This would reflect, in broad terms, proportionate development allocations were made to reflect the size and scale of associated settlement patterns along with the affordable housing need.

Advantages	Disadvantages
Dispersed pattern of development	Probable issues with viability and delivery
Limited expansion in many settlements	Lack of land in some settlements
Provides for growth where it is needed	Lack of market interest in some settlements
Impact of development reduced	Dispersed development can lead to lack of cumulative opportunities such as investment in education facilities or improvements in public transport

As is apparent in the consideration of all the above spatial options, none are in themselves wholly appropriate as stand-alone options. Nevertheless there are very positive and appropriate elements to most of the above options. It may be appropriate to seek to consider these better elements in a hybrid strategy option. This may be through the analysis of further evidence we have to hand and further evidence we need to gather. It also is dependent on the level of growth we seek to achieve in the RLDP. However, prior to making any further decision it would be really good to discuss these options at length in the Members Steering Group to gauge your views on them.

Strategic policies

Whilst the importance of homes and jobs is arguably one of the primary aims for an LDP, it is also important to remember that these are not the only considerations for it. There are many other elements of the plan that will need to be considered and which will be crucial to the plan. All the topics listed earlier on in this briefing paper which are associated with an LDP will be identified in strategic policies and included in the Preferred Strategy, these will aim to deliver the objectives of the RLDP. These policies will be formulated in due course.