



Y CABINET

DYDD IAU, 25 MEHEFIN 2020

**YN SYTH AR ÔL CYFARFOD PWYLLGOR CRAFFU POLISIŶAU AC
ADNODDAU'R CABINET**

**RHAID GOSOD POB FFÔN SYMUDOL AR Y MODD DISTAW AR
GYFER PARHAD Y CYFARFOD**

Rhan 1

1. Penodi Cadeirydd
2. Datganiadau o fuddiannau
3. Diweddaru a Monitro'r Gyllideb ar gyfer 2020-21
(*Tudalennau 5 - 32*)
4. Strategaeth Perthnasoedd Iach i greu Cymunedau Cryfach
(*Tudalennau 33 - 134*)
Ymateb ar y cyd y cyngor a'r Bwrdd Iechyd i Ddeddf Trais yn erbyn Menywod, Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015.
5. Gorchymyn Diogelu Mannau Cyhoeddus - Traeth Aberafan
(*Tudalennau 135 - 138*)
6. Cronfa Gymunedol yr Aelod - Gwerthusiad a Phrotocol ar gyfer Ail-
lansio (*Tudalennau 139 - 176*)
7. Cynllun Datblygu Lleol Castell-nedd Port Talbot 2011 - 2026

(Tudalennau 177 - 326)

Ystyried y sylwadau a dderbyniwyd yn sgîl yr ymgynghoriad ar Adroddiad Adolygu'r CDLI drafft, a'r gweithdrefnau cyhoeddi i'w rhoi ar waith.

8. Gorchmynion Traffig - Llansawel *(Tudalennau 327 - 342)*
9. Gorchmynion Traffig - Port Talbot *(Tudalennau 343 - 356)*
10. Gorchmynion Traffig - Heol Cyncoed a Heol Bertha, Margam *(Tudalennau 357 - 370)*
11. Gorchmynion Traffig - Yr heol gerllaw Heol Beechwood, Margam *(Tudalennau 371 - 384)*
12. Eitemau brys
Unrhyw eitemau brys (boed yn gyhoeddus neu wedi'u heithrio) yn ôl disgresiwn y Cadeirydd yn unol ag Adran 100b (4)(B) o Ddeddf Llywodraeth Leol 1972.
13. Mynediad i gyfarfodydd
Penderfynu gwahardd y cyhoedd ar gyfer yr eitem ganlynol yn unol â Rheoliad 4 (3) a (5) o Offeryn Statudol 2001 Rhif 2290 a'r paragraffau eithriedig perthnasol yn Rhan 4 Atodlen 12A o Ddeddf Llywodraeth Leol 1972.

Rhan 2

14. Y Ganolfan Adfer Deunyddiau ac Ynni, Twyni Crymlyn (yn eithriedig dan baragraffau 13, 14 ac 15) *(Tudalennau 385 - 420)*
15. System Meddalwedd Rheoli Perfformiad a Rheoli Risgiau (yn eithriedig dan baragraff 14) *(Tudalennau 421 - 432)*

S.Phillips
Prif Weithredwr

Canolfan Ddinesig
Port Talbot

Dydd Gwener, 19 Mehefin 2020

Aelodau'r Y Cabinet:

Y Cynghorwyr R.G.Jones, C.Clement-Williams, D.Jones,
E.V.Latham, A.R.Lockyer, P.A.Rees, P.D.Richards, A.Wingrave a/ac
L.Jones

Mae'r dudalen hon yn fwriadol wag



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

CABINET

25 JUNE 2020

REPORT OF THE DIRECTOR OF FINANCE & CORPORATE SERVICES – H.JENKINS

Matter for Decision

Wards Affected – All Wards

BUDGET UPDATE AND MONITORING REPORT 2020-21

Purpose of Report

- 1 This report prepared as at the end of May 2020 provides Members with an overview of the financial implications of COVID19 on the Council's Financial Resources and 2020/21 Budget.
- 2 From paragraph 15 onwards the report sets out for some specific service areas the amount/value that they are projected to **overspend or underspend** compared to their net budget (i.e. budgeted expenditure less income). These figures represent the projected position to the end of the financial year based on various factors and assumptions including:
 - the actual cumulative expenditure and income position to the end of May 2020 (the actual income loss for April and May 2020 is mentioned under each relevant service),
 - assumptions for cost savings or additional expenditure to the end of the financial year,
 - assumed collectible income or income loss for the rest of the year,
 - additional cost of council tax support for the remainder of the year together with council tax collection projections to 31 March 2021,

- Additional funding announcements provided by the Welsh Government.

Members will note that in some instances the “overspend” is due to or mainly due to loss of income in that particular service area, whilst for others the cause is due to additional costs. The Welsh Government has announced £78m to be made available to cover loss of income for the first quarter i.e. April to June 2020, but we are awaiting full terms and condition details of this grant reimbursement. It is unlikely that all the income loss will be recoverable but the report assumes that we will receive £2m to cover income loss for the first quarter of the financial year.

- 3 These projections and assumptions will be regularly updated and reported to Members during the year so that appropriate consideration and action can be taken to mitigate consequences on the Council’s bottom line financial position.

Authority Summary and Background

- 4 The COVID19 pandemic has had a significant impact on Council services, the costs incurred and income generated.
- 5 The projections included in the report are based on costs/income to the end of May, and include assumptions regarding the time scales within which services will resume following the COVID19 lockdown.
- 6 It is extremely difficult to accurately project the year end position given the highly volatile nature of the circumstances surrounding the pandemic. The assumptions are subject to ongoing review, in light of any further announcements regarding the easing of lockdown arrangements, associated service costs and Welsh Government funding announcements.
- 7 On an all Wales basis the Welsh Government has made available additional funding of £188.5m via a Local Authorities Hardship Fund in response to the pressures arising from the lockdown for the period to the end of June 2020. Whilst claims have been made amounting to £2.025m for additional expenditure incurred to the end of May, Welsh Government have not yet confirmed the basis on which funding allocated for loss of income (£78m) can be drawn down. The

figures included in the report do not include any funding for loss of income against individual service area but includes a general estimation that we will be able to recover circa £2m from this fund. Further detail will be provided once the terms of the grant are confirmed and the impact built into future Budget Outturn projections.

- 8 Also, Welsh Government have not yet confirmed if funding will be available to offset the reduction in Council Tax collection rates or any increased cost from new Council tax support claimants (CTRS), that have arisen as a consequence of the lockdown. The report currently provides for increased costs arising from CTRS of £338k over budget but this could increase to £1m plus during the remainder of 2020/21.
- 9 The position will be subject to ongoing review but if WG funding is not made available then it will place a further pressure on the budget of circa £5m shortfall in council tax receipts. This is a mid-range estimate where the best case scenario shows a shortfall in council tax receipts of £2.7m, increasing to £8m or more should taxpayer incomes be significantly affected by the COVID19.
- 10 As mentioned above this is currently the mid-range estimate and the council tax shortfall could reduce by some £2m or increase by £4m or more depending upon the length and impact of the pandemic on our resources and income generating capability. The Council will continue to work with the Welsh Government to deliver essential services and look for additional funding or as a minimum a capitalisation direction to help smooth the impact of the pandemic on our Budget and future year service provision.
- 11 Therefore in total the projected shortfall for 2020/21 before receipt of any recompense from the Welsh Government or Health Board for COVID19 related additional costs, loss of income is circa £30m. This report assumes that funding for some of these additional costs and loss of income / council tax receipts will reduce this to a projected net budget shortfall or overspend of £10.8m.
- 12 Members should note that these financial projections will be monitored and updated regularly during the year as changes in demand, service delivery, income received, council tax support costs and receipts and WG funding announcements are received. The next report in respect of 2020/21 will be submitted for members' scrutiny and review in late September / early October.

- 13 The Net Authority budget is currently projected to overspend by £10.8m, after receipt of various COVID19 grant reimbursements from Welsh Government. Unless the financial position and activity improve over the remainder of the year or Welsh Government provides additional funding this projected overspend will have to be funded from Reserves.
- 14 As members are aware when the 2020/21 Budget was set on the 5 March 2020 the projected General Reserve position at 31 March 2021 was £17.9m including an approved reserve use of £1.65m. Utilising the reserve to fund an estimated overspend of £10.8m will have a major impact on the Council's financial position by reducing the projected general reserve balance to £8m. Details of the general reserve position are included in Appendix 3.

Directorate Updates

- 15 The attached Directorate reports indicate the service areas where significant projected variances to the end of March 2021 against the net budget are projected.
- 16 Education Leisure and Lifelong Learning

- **Education Learning Resource Service £109k overspend**
The overspend is due to loss of income during the lock down (assuming the service is closed April to August), and a reduction in the number of schools accessing the service. The actual loss of income for April and May is £13k.
- **Primary School Meals Service £804k overspend**
The school meals budget is made up as follows:-

	£'000
Staff costs	2,396
Food	741
Other supplies & services	742
Gross Cost	3,879
Meal income	(1,280)
Other income	(474)
Net Budget	2,125

The overspend is due to a loss of meal income due to the closure of schools as a result of the pandemic. The loss of income is partly offset by savings on food purchases, whilst staff and other fixed costs continue to be incurred.

The actual loss of income for April and May is £197k. The projected overspend assumes that school meals income will resume in September at a reduced rate of 30%, rising to 70% from January 2021. It also includes a pressure to reflect the anticipated increase in entitlement to free school meals, as a consequence of the economic impact of the pandemic.

Payments of £19.50 per child per week are being made until the end of August 2020 to all children entitled to free schools meals which is being funded (net of food savings) from the WG COVID19 LA Hardship Fund. £744k has been paid out and £699 re-claimed (net of food savings) from WG for the period 6th April to end of May.

- **Home to School Transport**

Although the need for transport has reduced following the closure of schools due to COVID19, the Welsh Government has instructed that all operators are paid at least 75% of their contracted value for all service that are not operating, in order to support the bus industry and taxi operators. It is assumed that contracted routes will resume and be paid in full from 29th June, when school re-open and to the end of the summer term. However when services re-commence on 29 June 2020 it is assumed that any savings will be offset by the additional costs of implementing social distancing on school transport together with a loss of income from the purchase of spare seats – the actual loss of income for April and May is £30k.

- **Libraries £26k overspend**

The overspend is due to a reduction in income due to closure of the libraries during the lockdown. The actual loss of income for April and May is £9k. The main libraries in Neath, Port Talbot and Pontardawe are now starting to reopen for click and collect services with further service changes expected as we move out of lockdown.

Members may wish to note that the library services has led on the commissioning of additional e-books costing £100k across Wales, to provide additional resources to residents during lockdown, which has been reimbursed in full from the LA Hardship Fund.

- **Margam Park £946k overspend**

The park was initially closed and all events at the park and Orangery have been cancelled or postponed due to the COVID19 lockdown. This has resulted in a loss of income, which has been partly offset by savings in food and alcohol purchases. The actual loss of income for April and May is £370k.

The general park has recently re-opened to the public and the projected overspend is based on the assumption that the Orangery and Ivy cottage will remain closed until the end of the financial year, Charlottes Pantry will only offer a small food takeaway service (circa 10% of normal activity), and the Park will generate a small proportion of car parking income.

The projected net loss of income is made up as follows:-

Margam park – parking income	£294k
Orangery catering -	£311k
Charlottes Pantry	£137k
Park shop	£93k
Ivy cottage	£13k
Commercial - events	£98k
TOTAL	£946k

- **Pontardawe Arts Centre £182k overspend**

The overspend assumes that the centre will remain closed for the financial year, resulting in a loss of income that is only partly offset by savings on costs of food and alcohol. The actual loss of income for April and May is £16k.

- **Princess Royal Theatre £148k overspend**

The overspend assumes that the theatre will remain closed for the financial year, resulting in a loss of income which is partly offset by savings on purchases of food and alcohol. The actual loss of income for April and May is £14k.

- **External Leisure contract £1.5m overspend**

The council has committed to pay Celtic Leisure £180k for 3 months to fund the top up costs of furloughed staff. It is also anticipated that the Leisure sector will be one of the hardest hit sector by COVID19 and recovery and income levels will take some time to increase due to reduced demand following

COVID19 and additional costs incurred to implement social distancing. The overspend includes provision for additional costs of £1.3m in 2020/21.

- **Delegated Budgets for Primary, Comprehensive & Middle Schools loss of income** – it is anticipated that schools will have limited ability to generate income from lettings resulting in a loss of income of circa £158k.

A further loss of school meal income is anticipated in secondary and middle schools, net of savings on food costs, of £618k. This shortfall assumes receiving 30% of paid meals during Sept to Dec, and 70% from Jan to March 2021. The Council will be including a claim to WG for loss of income for schools covering initially the period to end of June 2020 and then for any other further periods of funding announced by WG.

There is concern that Welsh Government have not yet confirmed the value of the Regional Consortia School Improvement Grant (circa £5m allocated directly to fund schools costs) and the possibility that WG funding may be reduced in order to divert funding to cover other COVID19 pressures.

The Education Leisure and Lifelong Learning budget is currently projected to overspend by £4.541m including the additional impact on Delegated Schools Budgets (after proposed virements and reserve transfers).

17 Social Services Health & Housing

- **Children & Family – Social Work £241k underspend**
The underspend is due to savings on staff costs (£186k) and a reduction in car allowances (£64k)
- **Children & Family – Residential care £531k overspend**
The original budget is based on placements for 9 children. An overspend is projected as there are currently 12 children in placements, with a provision for 1 further new placement this year. The three new placements since the start of the year are as a direct result of COVID19, and it is estimated that these children will remain in residential care for 6 months, at a cost of £306k. Funding for the costs to the end of June are being reclaimed from the WG Hardship Fund, but thereafter will be a budget pressure.

The budget also includes an income target of £200k for contributions toward the health cost of existing placements, from Swansea University Health Board. However due to changes to placements since the budget was set, there is currently a £80k shortfall against this target. 5 further cases are currently being referred for funding, which if successful will address this shortfall.

- **Hillside - £916k overspend**

Hillside has a block contract with the Youth Custody Service (YCS) which guarantees payment for 6 beds, and the remaining 12 welfare beds are available for use by other Local Authorities.

Due to the pandemic there has been a block on placements, and as a consequence only 7 of the 12 welfare beds were occupied during April and May, resulting in a loss of income to date of £336k.

The projected loss to the end of the year is £1.082m and is based on a net increase of 1 placement from July, which is partly offset by savings on staff costs £166k.

- **Internal fostering service £194k underspend**

The underspend is due to savings on staff costs (£124k) and car allowances (£27k).

- **Community Care – Social Work £76k underspend**

The underspend is due to savings on staff costs and car allowances.

- **Business Support Services £118k underspend**

The underspend is due to savings on staff costs and general office expenses.

- **Elderly Residential Care £48k overspend** - Occupancy levels at some care homes have reduced significantly as a result of the pandemic. This is due to reduced demand for placements and as Public Health Wales has declared that care homes must be COVID19 free for 28 days before they can accept any new placements. Additional financial support (£370k to date) has been paid to those homes experiencing a significant number of voids, which is being recovered from the £40m allocation of the WG LA Hardship fund for adult social care costs.

It is anticipated that occupancy levels will increase as infections rates reduce and as lockdown restrictions are lifted. All staff working in the homes will be tested for the virus weekly, which could also impact on staffing arrangements in the homes.

- **Physical Disability £79k underspend**

The underspend is due to a delay in having new placements.

- **Trem y Mor / Respite £11k underspend**

The respite service at Trem y Mor has been closed due to the lockdown and the consequential loss of income to the end of May amounts to £24k. The projection for the year assumes that respite services will reopen in October resulting in total loss of income of £90k, which is partly offset by savings on staff overtime and cover costs.

- **Learning Disability external placements £302k underspend**

The budget for both Learning Disability (LD) and Mental Health (MH) external placements includes funding for new placements, however most of the new placements to date have arisen in the Mental Health budget.

A virement is proposed to transfer £300k from the Learning Disability budget to the Mental Health placements budget to manage the overall position. Although the demand for new placements has reduced during the lockdown, it is anticipated that demand will increase once lockdown restrictions are lifted, and infection rates reduced.

To date the council has provided PPE and paid out an additional £52k to LD and MH providers to fund additional costs incurred due to the lockdown, the cost of which is being reimbursed by WG from the LA Hardship fund.

- **Mental Health external placements £305k overspend**

The overspend is due to an increase in the number of service users being supported (budget 79, actual 83). The projection includes £100k for new placements arising throughout the remainder of the year. It is proposed that £300k is transferred from the LD placements budget to offset this pressure.

- **Housing Advice/Supported Tenancies £83k overspend**

There has been a significant increase in homelessness across the County Borough since the budget was set, and an increase in the cost of statutory bed and breakfast accommodation, for people at risk of becoming homeless, which has resulted in the projected £83k overspend.

In addition there have been further costs arising from the need to provide services to the homeless during the lockdown. The Welsh Government allocated £10m of the LA Hardship Fund to fund these pressures, and £28k (net of Housing Benefit refunds) has been recovered from this fund to fund costs incurred to the end of May. The Welsh Government has also recently announced a further £20m to be made available later this year based on a new Homeless plan due with WG by the end of June 2020.

The Social Services Budget is projected to overspend by £615k.

18 **Environment**

- **Highways Maintenance Reactive, Winter & Emergency Response £285k overspend** – The overspend is due to additional costs for remedial works required following storm Denis, and ongoing monitoring cost following the Pantteg landslip. A virement is proposed to fund this expenditure from the Corporate Contingency.
- **Highways Maintenance Work programme £52k overspend** – the overspend is due to loss of income relating to the Capital Works Programme, and assumes staff will be unable to carry out works for 3 months due to the lockdown. The actual loss of income to the end of May is £35k.
- **Transport Vehicle Maintenance £23k overspend** – the overspend is based on loss of external income for MOT's for 3 months and work from Tai Tarian, the actual loss of external income to end of May is £15k.
- **Bus Stations £10k overspend** – the overspend is based on loss of income from concessions for 3 months due to the lockdown. The actual loss of income to end of May is £6k.
- **Parking £1.062m overspend** – parking charges have been suspended for April to June, resulting in a loss of income for that period of £414k, it is assumed that there will be no event parking income for the rest of the year resulting in a further shortfall of £20k. It is anticipated that charging will be reintroduced later this year, but that income will be at a reduced rate whilst the economy recovers.
- **Refuse collection £788k overspend** – the overspend is due to the additional cost of staff transferred from Neighbourhood and Parks and Open Spaces, in order to maintain the service in light of the pandemic and to ensure compliance with social distancing regulations e.g. perspex shields fitted in the vehicles and only two people in a vehicle. The overspend on Refuse staff is offset by savings in Neighbourhood (£181k) and Parks & Open spaces (£117k).
The overspend also includes an estimated loss of income (circa £400k for 6 months) from trade and bulk waste. Some trade customers have cancelled contracts and it is unclear if they will

reinstate contracts when the lockdown ends. The actual loss of income to the end of May is £139k.

- **Refuse Disposal** – the Civic Amenity Sites were closed and the restriction on side waste was lifted as part of the lockdown, which has resulted in an increase in the amount of kerbside refuse collected (additional 820 tonnes until end of May – approx. £100k). The civic amenity sites are now operating a restricted service, with a limit on the number of people accessing the sites by appointment only.
- **Building Services £459k overspend** – Works were in the main suspended due to the lockdown, and it has therefore not been possible to generate income from external clients to fund the fixed costs (including staffing) of the service for 3 months.
- **Neath Fair £12k overspend** – a report has been prepared proposing that the September fair is cancelled, and the £12k overspend represents the loss of the net income from the event.
- **Markets £92k overspend** – the overspend is due to the loss of external rental, as Neath Market is not expected to return to normal activity until August 2020.
- **Baglan Innovation centre £30k overspend** – the overspend is due to loss of external rental income due to the lockdown.
- **Afan Forest Park** – there has been a loss of income from parking and rent to the end of May of £8k.
- **Building Control £37k overspend** – the overspend assumes a reduction in income for the first 3 months of the year, due to reduced activity during the lockdown. The actual loss of income of to the end of May is £24k
- **Industrial Workshops £400k overspend** - the overspend is based on the loss of external rental income for 3 months due to the lockdown (£205), and further reduction in income due to the difficulties recovering income from tenants due to the financial impact on businesses following the lockdown.
- **Gnoll Park £169k overspend** – the park was closed during the lockdown resulting in a loss of car parking and catering income of £60k to the end of May. The park re-opened on the 6th June but with free parking and the café remains closed. It is therefore anticipated that further loss of income will arise during the period of recovery from the lockdown.

Other

Road Safety Grant –the original budget assumed grant of £76k, but the actual amount received is £39k. The grant funds salary costs of £26k, and therefore this results in a reduced budget available for the provision of external training. However as lockdown restrictions have limited the options for training it is anticipated that expenditure can be contained within the available budget.

Enabling Natural Resources and Wellbeing Grant - £84k grant income is included in the budget which funds fixed salary and vehicle hire costs. We are still waiting confirmation of the grant and should it not be received this will result in a budget pressure.

As a result of the lockdown in March 2020 work on the following projects were not completed, and funding was therefore transferred to the Environment Equalisation Reserve in 2019/20, to fund expenditure in this financial year.

Value	Explanation
£40,000	Parks & Open Spaces – tree works Utilise funds transferred to the reserve in 19/20 to fund work delayed as a result of the lockdown in March 2020
£12,000	Coastal works
£25,000	Gnoll Park – utilise income received via a personal will to carry out works at the park
£20,000	Cemeteries

A request to transfer funding from the reserves will be included in future reports for approval by members, once the works have been completed.

The Environment budget is projected to over spend by £2.832m, after proposed virements and reserve transfers.

19 Corporate Services

- **Council Tax £75k overspend** - Council tax legislation enables the Council to recover “reasonable costs” incurred in the process

of issuing a summons and obtaining a liability order, for the non-payment of Council Tax. During 2019/20 4,468 liability orders were raised, and a provision for income of £305k is included in the 2020/21 budget.

As a result of COVID19 it is anticipated that it will only be possible to generate 75% of this income, resulting in a £75k overspend.

- **NNDR £15k overspend** – The budget includes a provision for £20k from summons and liability order receipts. As a result of COVID19 business rates relief provided to some 75% of businesses in 2020/21 it is assumed that it will only be possible to generate 25% of income resulting in a £15k shortfall.
- **Registrars £8k overspend** – The budget includes provision of £176k for income. A reduced service is operating due to COVID19, resulting in a reduction in income particularly from marriage licenses.

The Corporate Services Directorate is projected to under spend by £29k (after proposed virement).

20 Central Budgets

- **Council Tax Support £339k** – the overspend is due to the increase in claims due to financial pressures arising from COVID19 lockdown, based on actual claims made to the end of May. However it is anticipated that the overspend could further increase to circa £1m due to an increase in the number of Universal Credit claims arising due to the ongoing economic impact of the pandemic. WG have not yet confirmed if they are prepared to fund this pressure.
- **Contingency** – £822k is included in the budget for contingencies. It is proposed that £285k is transferred to fund the additional cost of remedial works arising from Storm Dennis and the landslip at Pantteg. The balance of £537k is currently being used to offset the pressures arising from COVID19.
- **Contingency for pay award** – a provision of £1.3m is included in the budget to fund any additional costs of the national pay award for staff, which has not yet been confirmed. The employers have offered 2.75% which is more than the 2% provided in the base budget, hence it is assumed that all of this provision will be needed to fund the additional cost.

- **Council Tax recovery** –a range of measures has been introduced to support residents, facing financial difficulties paying their council tax, during the lockdown. The measures include
 - deferral of payment for 2 months,
 - spreading payments over 12 rather than 10 months,
 - reduced payments in April & May payments, with balance being spread over the rest of the year.
 - providing council tax support to eligible taxpayers

As a consequence the collection of council tax income for April and May has reduced by approximately £1m and predicted to generate a shortfall of £5m in year. This is the mid-range estimate for council collection this year with the best option improving this position by some £2m whilst the worst case, which would arise if a second surge or significant loss of employment and hence personal occurs this may further increase to £8m or more by the end of the year. The Welsh Government have not yet confirmed if funding will be available to offset this shortfall.

The position will be subject to ongoing review but should council tax receipts continue to fall or additional WG funding is not made available then it will impact on the 2020/21 accounts.

- **COVID19 Safe & Well** - the service was established to support vulnerable residents who are shielding during the pandemic. Costs of £116k have been incurred from March to the end of May 2020 which are being funded from the WG LA Hardship Fund.
- **COVID19 Llandarcy Field Hospital** - The Council has undertaken the works required to convert the Llandarcy Sports Academy into a Field hospital on behalf of the Swansea Bay University Health Board. Payments of £1.649m have been made to the end of May, with the total cost of conversion works being estimated to be £2.2m, including in due course £300k for re-instatement work, all of which will be reimbursed by Swansea University Health Board.
- **COVID19 Test, Trace & Protect service** - the service commenced on 1st June, with staff re-deployed from other council services. WG has allocated £57m to fund the additional costs of the service across Wales, but the grant terms and conditions including how this funding can be drawn down, have not yet been confirmed. Redeployment

costs are not recoverable and only some IT hardware costs are expected to be funded.

Financial Summary

- 21 The Net Authority budget is projected to over spend by £10.760m after proposed virements and reserve transfers. This position will be reviewed and updated on a regular basis in year as the potential for a large variance to this projected overspend is high given the fact that we are only starting to see some relaxation of Lockdown and the economy, some businesses and services are only just starting to move into recovery mode.

Virements

- 22 The Council's constitution requires the prior approval of any virement that does not involve a significant variation in the level or nature of the delivery of service agreed by Council in the Revenue Budget as follows:-

Less than £100,000 – Corporate Directors
 More than £100,000 but less than £500,000 – Cabinet
 More than £500,000 – Council

The following virements are proposed for approval by Cabinet

<u>Value</u>	<u>Dir</u>	<u>Service</u>
-£15,000	ELLL	Children & communities
£15,000	ELLL	Management & Admin
-£300,000	SSHH	Learning Disability placements
£300,000	SSHH	Mental Health placements
-£285,140	Other	Contingency
£285,140	ENVT	Highways emergency response re Pantteg and Storm Dennis
-£46,000	ENVT	Waste Disposal & Recycling
£46,000	CORP	Health & Safety
-£16,891	ENVT	Estates
-£1,523	ENVT	Regeneration & Strategic Development

<u>Value</u>	<u>Dir</u>	<u>Service</u>
£36,895	ENVT	Management support - reallocation of vacancy management target
-£10,260	ENVT	Policy
-£1,264	ENVT	Environmental Health
-£6,957	ENVT	Food & Health & Safety

Reserve movements

23 The following Reserve movements are proposed for approval by Cabinet

Value	Reserve	Explanation
£16,000	Education Equalisation Reserve	Utilise funds transferred to reserve in 2019/20 to fund additional capacity supporting the external leisure contract
£16,200	ERVR	Transfer from reserve to fund the cost of staff who have left under the VR scheme

24 Additional grants awarded

- **COVID19 - LA Hardship fund £188.5m (All Wales)**

As part of the response to the COVID pandemic WG published their first Supplementary Budget on 27 May 2020. As part of that budget announcement they have allocated £188.5m per the following allocations to Local Authorities:-

- £40m - Adult Social Care (to end of May 2020)
- £40m - Free school meal payments (to August 2020)
- £10m - Homelessness
- £78.5m - Loss of Income to end of June)
- £20m - General support

Monthly claims have been submitted for eligible additional costs incurred (March £63k, April £814k, May £1.148m) and grant funding of £877k for March and April has been received to date.

We await details of the basis on which funding will be allocated for loss of income which will assist in offsetting some of the pressures identified above. It is estimated that it will be possible to draw down circa £2m from this fund. Future budget update reports will provide details of such receipts.

- **COVID19 - NNDR Business Support Grants**

£35.5m has been awarded by Welsh Government for the period 1st April 2020 to 31st March 2021. The grant comprises three components:-

- a. £25k grant for businesses in the retail, leisure and hospitality sectors with properties with a rateable value of between £12k and £51k
- b. £10k grant for businesses eligible for Small Business Rate Relief with a rateable value of £12k or less
- c. £10k grant to support small charities and Community Amateur Sports Clubs (CASC) within the retail and hospitality sector with a rateable value of £12k or less

To the end of May grant of £29.8m has been received from WG and as at 16 June 2,337 grants totalling £26.83m have been paid out to eligible businesses. The grant scheme is due to close to new applications on the 30 June 2020 but payments will continue to be made to those who have applied but entitlement is being verified at that date. The Council will also continue to process payments after that date to those businesses that have applied and will be granted Business Rating listing by the Valuation Office Agency (VOA) before the 20 March 2020.

- **Bus Operators Grant**

The Council has continued to pay 75% of the contract value for school and other contracted local passenger services that are not operating during the lockdown, to ensure that the industry remains viable in the short term, while longer term measures for the sustainability of services are developed.

In order to further support the industry WG have paid out the first quarter of 2020/21 grant funding provided through the Bus Services Support Grant, the My-travel Pass scheme, together with any payments made in connection with the Mandatory Concessionary

Fares scheme, in advance at pre COVID19 levels (£609k). This funding is being paid over to bus operators monthly, in recognition of the severe hardship facing the bus industry and the need to maintain the public service.

- **COVID19 Childcare Assistance Scheme**

The Childcare Offer for Wales Scheme was closed to children due to start after Easter 2020, and £30m funding across Wales has been re-purposed to provide free childcare for critical workers and vulnerable children age 0-5.

- **COVID19 Payments to Carers**

WG have announced that £33m (now expected to £40m to cover tax and national insurance) has been announced for across Wales for the payment of £500 to carers; we await clarification of terms and conditions of the payment and grant.

- **Whole school approach to emotional and mental wellbeing £57k** – the grant has been made available by WG to support and extend counselling.

- **Whole school approach to emotional and mental wellbeing additional funding £68k** – the additional sum is to target areas which support wider school programme of activity and tackling the COVID19 pandemic, in recognition of the impact on learners and school staff wellbeing.

- **Additional Learning Needs Grant £355k** – the funding is to assist providers to continue to provide high quality support for learners while preparatory work for the new ALN system is ongoing.

Integrated Impact Assessment

- 25 There is no requirement to undertake an integrated impact assessment as this report summarises the Council's financial position in relation to its net expenditure, income and grants.

Valleys Communities Impacts

- 26 All parts of the County Borough have been affected by COVID19. The Council continues to provide support to the most vulnerable as best

as we can across the Valleys, Towns and the whole of the County Borough.

Workforce Impacts

- 27 All employees have been affected by COVID19. The Council has worked with Trade Unions to develop new safe systems of working during the pandemic and will continue to work with Staff and Trade Unions as we move through the Recovery stage for service delivery. Members should note that as at the beginning of June 281 staff have been redeployed to higher priority roles within the Council including Safe and Well, Trace, Test and Protect, front line Social care, School Hubs, etc

Legal Impacts

- 28 The Council has been ensuring that it complies with new regulations and directions issued by the UK and Welsh Governments during the COVID pandemic. Service provision has been stopped, repurposed or developed to comply with the new rules. Further changes are expected as we move from lockdown through the Recovery stage to provide services.

Risk Management Impact

- 29 COVID19 has impacted significantly on the Council, its services and activities since the UK Government Lockdown announcement which commenced on 23 March 2020.
- 30 Some services have continued with some adaptations to operate with social distancing or use of PPE including residential care homes, home care, waste collection and disposal services. Some new services have been developed to safeguard vulnerable people such as those shielded i.e. safe and well, schools operating as Hubs for vulnerable and key worker children, new systems developed to work from home, pay grants to businesses and families of children entitled to Free School Meals. Some services have stopped and staff have been redeployed into such as the Track, Trace and Protect service.

- 31 Governance arrangements have also had to be updated to operate under new arrangements.
- 32 The consequences of actions and activity undertaken are reflected in this report and the Council will continue to regularly review and update its financial predictions for 2020/21 and report them to Members. The Council will also ensure that Welsh Government and our external auditor are sighted on operational and financial implications and we will continue to strive for additional funding to minimise adverse impact on taxpayers and service users in future years

Consultation

- 33 There is no requirement for external consultation on this item

Recommendation

- 34 It is recommended that:
- Members approve the proposed reserve movements and budget virements
 - Members note the operational and financial issues set out in this report
 - That the Council will continue to work with Welsh Government and in line with legislation, regulations and directions to deliver services during these challenging times.
 - Note the additional grants received
 - The Council continue to seek additional funding from Welsh Government to cover COVID19 consequences of increased expenditure, loss of income, increased cost of Council Tax Support and council tax collection shortfalls that adversely impact on Council funding and activity.

Reason for Proposed Decision

- 35 To update the Council's Budget for 2020/21 and inform Members of the financial risks arising from COVID19.

Implementation of Decision

- 36 The decision is proposed for implementation after the three day call in period.

Appendices

- Appendix 1 – Budget Summary
- Appendix 2 – Specific Reserves
- Appendix 3 – General Reserve

List of Background Papers

Budget Update Working Papers

Officer Contact

For further information on this report item, please contact:

Mr Hywel Jenkins – Director of Finance & Corporate Services
Tel no 01639 763251
Email: h.jenkins@npt.gov.uk

Appendix 1

Summary 2020/21 Projected at 31st May 2020

	Original Budget	Revised Budget	Projected Outturn	Variance 2020/21	Proposed Reserve Transfers	Virements	Variance after Virements/ Reserves
	2020/21 £	2020/21 £	2020/21 £	2020/21 £	£	£	£
Education, Leisure and Lifelong Learning - Schools	90,137,000	90,137,000	90,913,000	776,000	0	0	776,000
Education, Leisure and Lifelong Learning - Other	25,882,000	25,882,000	29,662,888	3,780,888	-16,000	0	3,764,888
Social Services Health & Housing	83,281,000	83,281,000	83,896,089	615,089	0	0	615,089
Environment	39,525,000	39,525,000	42,612,328	3,087,328	-16,200	239,100	2,832,028
Corporate Services	18,208,000	18,208,000	18,224,905	16,905	0	46,000	-29,095
Directly Controlled Expenditure	257,033,000	257,033,000	265,309,210	8,276,210	-32,200	285,100	7,958,910
Swansea Bay Port Authority	47,000	47,000	46,637	-363			-363
Fire Authority	7,890,164	7,890,164	7,890,164	0			0
Margam Crematorium	1,000	1,000	550	-450			-450
Archives	96,000	96,000	96,000	0			0
Magistrates Court	12,000	12,000	12,000	0			0
Capital Financing	19,282,000	19,282,000	19,282,000	0			0
Council Tax Support	18,748,000	18,748,000	19,086,843	338,843			338,843
Pay & Pension Provision	1,300,000	1,300,000	1,300,000	0			0
Contingency	822,453	822,453	0	-822,453		-285,100	-537,353
Management of change	500,000	500,000	500,000	0			0
WG Loss of Income Grant Reimbursement Apr - June 2020 (estimated)			-2,000,000	-2,000,000			-2,000,000
Cont. from General Reserve	-1,650,000	-1,650,000	-1,650,000	0			0
Net Budget Requirement	304,081,617	304,081,617	309,873,404	5,791,787	-32,200	0	5,759,587
RSG	-177,352,786	-177,352,786	-177,352,786	0			0
NNDR	-49,408,800	-49,408,800	-49,408,800	0			0
Discretionary rate relief	386,684	386,684	386,684	0			0
Council Tax	-77,706,715	-77,706,715	-72,706,715	5,000,000			5,000,000
Total Funding	-304,081,617	-304,081,617	-299,081,617	5,000,000	0	0	5,000,000
Projected Overspend							<u>10,759,587</u>

Tudalen26

Specific Reserves

Appendix 2

Tudalen27

Description	Reserve at 1st April 2020	Original Net Reserve Movements 2020/21	Changes already approved	Proposed changes in Period	Estimated Reserve Balance at 31 Mar 2021
	£000	£000	£000	£000	£000
EDUCATION, LEISURE & LIFELONG LEARNING					
<i>Delegated Schools Cash Reserves</i>					
ERVR Primary	Cr 8	0	0	0	Cr 8
Primary Schools Reserves	Cr 636	0	0	0	Cr 636
Secondary Schools Reserves	Cr 109	0	0	0	Cr 109
Special Schools Reserves	305	0	0	0	305
Middle Schools Reserves	1,074	0	0	0	1,074
Repairs and Maintenance Reserve	Cr 161	0	0	0	Cr 161
	465	0	0	0	465
<i>Education, Leisure and Lifelong Learning</i>					
Margam Discovery Centre - Building Maintenance Reserve	Cr 48	Cr 50	0	0	Cr 98
Equalisation Account - Education	Cr 1,373	200	0	16	Cr 1,157
Home to School Transport	Cr 111	0	0	0	Cr 111
	Cr 1,532	150	0	16	Cr 1,366
Total Education Leisure & Lifelong Learning	Cr 1,067	150	0	16	Cr 901
SOCIAL SERVICES, HEALTH & HOUSING					
Homecare ECM Equipment Reserve	Cr 73	Cr 10	0	0	Cr 83

Specific Reserves

Appendix 2

Description	Reserve at 1st April 2020	Original Net Reserve Movements 2020/21	Changes already approved	Proposed changes in Period	Estimated Reserve Balance at 31 Mar 2021
	£000	£000	£000	£000	£000
Community Care Transformation Reserve	Cr 108	102	0	0	Cr 6
Social Services Equalisation	Cr 940	321	0	0	Cr 619
Hillside General Reserve	Cr 274	0	0	0	Cr 274
Youth Offending Service - Equalisation	Cr 153	0	0	0	Cr 153
Adoption Service	Cr 100	0	0	0	Cr 100
Total Social Services Health & Housing	Cr 1,648	413	0	0	Cr 1,235
ENVIRONMENT					
Concessionary Fare - Bus Pass Replacement Reserve	Cr 152	60	0	0	Cr 92
Asset Recovery Incentive Scheme	Cr 126	0	0	0	Cr 126
Local Development Plan	Cr 181	106	0	0	Cr 75
Economic Development	0	0	0	0	0
Winter Maintenance Reserve	Cr 754	0	0	0	Cr 754
Baglan Bay Innovation Centre - Dilapidation Reserve	Cr 78	0	0	0	Cr 78
BSSG Grant Reserve	0	0	0	0	0
Renewable Energy Reserve	Cr 11	0	0	0	Cr 11
Environmental Health - Housing Equalisation	Cr 137	137	0	0	0
Workways NPT Reserve	Cr 159	0	0	0	Cr 159
Environment Equalisation Reserve	Cr 715	182	0	0	Cr 533
Sub total	Cr 2,313	485	0	0	Cr 1,828

Tudalen28

Specific Reserves

Appendix 2

Description	Reserve at 1st April 2020	Original Net Reserve Movements 2020/21	Changes already approved	Proposed changes in Period	Estimated Reserve Balance at 31 Mar 2021
	£000	£000	£000	£000	£000
Operating Accounts					
Operating Accounts Equalisation	Cr 36	0	0	0	Cr 36
Vehicle Tracking	Cr 92	47	0	0	Cr 45
Operating Accounts -Vehicle Renewals	Cr 1,906	149	0	0	Cr 1,757
	Cr 2,034	196	0	0	Cr 1,838
Total Environment	Cr 4,347	681	0	0	Cr 3,666
FINANCE AND CORPORATE SERVICES					
Elections Equalisation Fund	Cr 240	Cr 15	0	0	Cr 255
Health & Safety / Occupational Health	Cr 41	0	0	0	Cr 41
Development Fund for Modernisation	Cr 115	0	0	0	Cr 115
IT Renewals Fund	Cr 843	445	0	0	Cr 398
Corporate Equalisation Reserve	Cr 535	465	0	0	Cr 70
Building Capacity	Cr 197	75	0	0	Cr 123
Voluntary Organisation Reserve	Cr 13	0	0	0	Cr 13
Total Finance and Corporate Services	Cr 1,984	970	0	0	Cr 1,015
COUNCIL RESERVES					
Insurance Reserve	Cr 6,651	0	0	0	Cr 6,651
Swansea Bay City Deal	Cr 113	0	0	0	Cr 113
Income Generation Reserve	Cr 654	104	0	0	Cr 550
Members Community Fund	Cr 391	Cr 100	0	0	Cr 491
Community Resilience fund	Cr 2,000	0	0	0	Cr 2,000

Tudalen29

Specific Reserves

Appendix 2

Tudalen30

Description	Reserve at 1st April 2020	Original Net Reserve Movements 2020/21	Changes already approved	Proposed changes in Period	Estimated Reserve Balance at 31 Mar 2021
	£000	£000	£000	£000	£000
Housing Warranties	Cr 220	0	0	0	Cr 220
Fire Authority Reserve	0	0	0	0	0
Pantteg Landslip Reserve	Cr 500	0	0	0	Cr 500
Waste Reserve	Cr 393	0	0	0	Cr 393
LAWDC Contingency Reserve	Cr 1,012	0	0	0	Cr 1,012
Schools IT Equalisation (HWB)	Cr 250	163	0	0	Cr 87
Corporate Contingency	Cr 2,269	48	0	0	Cr 2,221
Treasury Management Equalisation Reserve	Cr 7,639	0	0	0	Cr 7,639
ERVR - Transitional Reserve	Cr 4,536	0	0	16	Cr 4,520
Accommodation Strategy	Cr 2,274	250	0	0	Cr 2,024
Total Council Reserves	Cr 28,902	465	0	16	Cr 28,421
JOINT COMMITTEES					
Workways Regional Reserve	Cr 93	0	0	0	Cr 93
Environment Legacy Reserve (SWTRA)	Cr 60	0	0	0	Cr 60
Substance Misuse Area Planning Board	Cr 41	0	0	0	Cr 41
WB Safeguarding Board Reserve	Cr 92	0	0	0	Cr 92
Intermediate Care Pooled Fund	Cr 28	0	0	0	Cr 28
	Cr 314	0	0	0	Cr 314
TOTAL ALL REVENUE RESERVES	Cr 38,261	2,679	0	32	Cr 35,550

General Reserve

Appendix 3

	Original Estimate 2020/21	Revised Estimate 2020/21	Variance 2020/21
	£'000	£'000	£'000
Opening balance 1st April	Cr 19,128	Cr 19,921	Cr 793
Council Tax increased income (as assumed at budget setting stage)	Cr 1,300	Cr 1,300	0
Capital - Phase II Accommodation financing costs	170	170	0
Doubtful Debt Provision	200	200	0
Contributions to the Economic Development Fund	200	200	0
Community Councils Grant Scheme	25	25	0
Member Community Development Fund	300	300	0
Estimated budget shortfall as at 31st May 2020	0	10,760	10,760
Contribution from General Reserve per Original Budget agreed on 5 March 2020	1,650	1,650	0
Estimated Closing balance 31st March	Cr 17,883	Cr 7,916	9,967

Tudalen31

Mae'r dudalen hon yn fwiadol wag

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Cabinet
25 June 2020

Report of the Assistant Chief Executive and Chief Digital Officer
K. Jones

Matter for Decision

Wards Affected: All Wards

Purpose of Report

To approve the 'Healthy Relationships for Stronger Communities Strategy' - the council and health board joint response to the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

Executive Summary

The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 was introduced to improve arrangements for the prevention of gender-based violence, domestic abuse and sexual violence; improve arrangements for the protection of victims of such abuse and violence; and required the appointment of a National Adviser on gender-based violence, domestic abuse and sexual violence; The Act placed a new general duty on local authorities to have regard (along with all other relevant matters) to the need to remove or minimise any factors which increases the risk of violence against women and girls or, exacerbate the impact of such violence on victims; The Act also placed a duty on local authorities and health boards to produce and publish a local strategy for the local authority area and then to take reasonable steps to achieve the objectives set out in the local strategy.

In 2017, Neath Port Talbots first 'Healthy Relationships for Stronger Communities' strategy was prepared. This was a 3 years strategy, overseen by the VAWDASV Leadership group. Significant progress has been made across all areas of VAWDASV related support and services. A draft revised strategy has been prepared for 2020-2023.

The objectives within this revised strategy mirror those in the original strategy, but the actions within them are new, to be delivered on over the next 3 years.

Attached, at Appendix 1 is the revised Strategy which has been developed and approved by a strengthened multi-agency partnership, chaired by Councillor Leanne Jones.

With the advent of the global pandemic, partners to the VAWDASV Leadership group were asked to set out current service pressures and demands, and furthermore to agree immediate priorities and these will be included in the strategy as an addendum.

Background

The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 aims to improve arrangements for the prevention of gender-based violence, domestic abuse and sexual violence; improve arrangements for the protection of victims of such abuse and violence; improve support for people affected by such abuse and violence; and requires the appointment of a National Adviser on gender-based violence, domestic abuse and sexual violence.

The Act created a number of new responsibilities for local authorities in Wales including a duty to prepare and public a strategy for the local authority's area, jointly with the relevant health board.

In order to meet the requirements of the Act, the former Domestic Abuse Strategy Group (DASG) was disbanded and replaced by a new multi-agency Leadership Group. There has been sustained senior commitment to the Group over the last three years and significant progress has been made on all aspects of the strategy. This commitment has continued with the development of the revised strategy for 2020-2023.

As with the original strategy, this revised Strategy follows the structure of the Welsh Government's National Strategy for Violence Against Women, Domestic Abuse and Sexual Violence, enabling the local partnership to demonstrate its contribution to delivering the national policy objectives established by the Welsh Government. It includes all of the areas of activity that are set out in various statutory guidance documents, but most importantly, it identifies the strengths and challenges for this area

and sets out a series of achievable actions to help us to achieve our long term vision:

“To prevent and eradicate violence against women, domestic abuse sexual violence by promoting equality, safety, respect and independence to enable everyone to live from abuse and the attitudes that perpetuate it.”

Key Objectives

There are seven objectives set out in the Strategy:

- 1. Communications & Engagement**
To Increase awareness and challenge attitudes towards violence against women, domestic abuse and sexual violence
- 2. Children & Young People**
To Increase awareness in children and young people of the importance of safe, equal and healthy relationships and that abusive behaviour is always wrong
- 3. Perpetrators**
Increased focus on holding perpetrators to account and provide opportunities to change their behaviour based on victim safety
- 4. Early Intervention & Prevention**
Make early intervention and prevention a priority
- 5. Training**
Relevant professionals are trained to provide effective, timely and appropriate response to victims
- 6. Accessible Services**
Provide victims with equal access to appropriately resourced, high quality, needs led, strength based, gender responsive services across Neath Port Talbot
- 7. Courts & Criminal Justice**
Increased focus on improving the recognition of and responses to violence against, women, domestic abuse and sexual violence in all criminal justice proceedings

Consultation

A wide range of stakeholders were consulted during the development of the Strategy. However as reported in February it was proposed to undertake further consultation and engagement to ensure that Strategy had wide support.

The consultation included an on-line survey, face to face consultation with survivors, and distribution of the draft Strategy through various partnership networks, including the Supporting People Regional Commissioning Group, Area Planning Board, Community Safety Partnership and the Public Services Board.

The consultation has been completed and the response has not required any material change in the strategy as presented, for your consideration.

Members of the Community Safety and Public Protection Scrutiny Sub-Committee have been involved at all stages of preparing the Strategy.

Immediate Priorities - Covid-19

The Strategy was due to be presented for approval in April, but was delayed because of the immediate response required to the global pandemic.

The VAWDASV Leadership group met in May 2020 to take stock of the impact of the pandemic on the work of the partners. Partners concluded that the strategy remained relevant, however, within the context of the response to the pandemic, some actions need to be given priority over others. These immediate priorities have been included as an addendum in the strategy (attached). For example as an immediate priority, the Communications & Engagement Group will launch a partnership campaign to encourage victims to come forward and seek support, and we will continue to work closely with the Police, Courts and Probation to ensure we are still able to effectively support victims whilst current restrictions are in place.

A communication plan is being developed to support the launch of the strategy.

Financial Impact

There are no new identified recurring revenue resources identified to support the new duties and responsibilities summarised in this report. Consequently, any proposed changes will require a refocusing of existing resource or acquisition of new funding streams.

Integrated Impact Assessment

The overall intention and impact is Positive, in respects of equalities, Community Cohesion/ Social Exclusion/Poverty, Biodiversity and wellbeing and future generations.

It is anticipated that the strategy will have an important contribution recognising that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender, and marital status.

Within equalities there are areas where it is recognised that further investigation is required in order to fully understand the impact of the strategy on people who share specific protected characteristics, for example LGBT

Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour. By tackling violence and abuse the strategy should have a positive impact **in respect of Community Cohesion/ Social Exclusion/Poverty.**

There will be a positive impact in respect of **Well-being of Future Generations** as the strategy has been developed in line with the five ways of working.

In respect of Welsh is anticipated that that there will be both positive and negative impacts due to the ability of and statutory requirements for partners and providers to provide services n Welsh.

While the anticipated outcome of the Strategy will be positive, some potential negative impacts have been identified and mitigating actions have been developed to address these. In addition, it is acknowledged that potential negative impacts are likely if implementation of the Strategy is not fully achieved or undertaken sensitively.

Workforce Impact

The Act & Strategy has resulted in a new workplace Domestic Abuse Policy and the recent introduction of Safe Leave, for staff who are affected by any form of VAWDASV.

The Act continues to impact on commissioning activities that fall within the scope of the Act, which in turn may have particular workforce implications e.g. the requirement to deliver training that meets the requirements set out in the National Training Framework. Other workforce impacts identified will be reported to Members when progress reports are made.

Legal Impact

The preparation and publication of a strategy will ensure the Council discharges its statutory duty as required within the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

Crime and Disorder Impact

The Council has a legal duty under Section 17 of the Crime and Disorder Act 1998 to carry out all its various functions with “due regard to the need to prevent Crime and Disorder in its area”.

The strategy will assist the Council in discharging its duty to prevent gender-based crime and disorder in its area.

Risk Management

There is a risk of non-compliance with the duties introduced by the Act if sufficient resources are not provided to local authorities to cover the costs of the associated activities. This risk has been mitigated by ensuring proposed actions within the Strategy can be delivered within existing resource, albeit there is a continued need to refocus how those resources are best used, and work closely with partners to explore the potential to draw in additional funding.

Recommendations

It is recommended that:

Cabinet formally approves the approve the ‘Healthy Relationships for Stronger Communities Strategy’ - the council and health board joint response to the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

Reason for Proposed Decision

To provide the formal approval to the strategy and ensure compliance by the Council with the duties under section 5 (1) of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

Implementation of Decision

The decision is proposed for implementation after the three day call in period.

Appendices

1. Draft Neath Port Talbot Healthy Relationships for Stronger Communities Strategy (2020-2023); implementing the Violence Against Women, Domestic Abuse & Sexual Violence (Wales) Act 2015
2. Addendum: Immediate priorities

List of Background Papers

Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

Officer Contact

Mrs Karen Jones, Assistant Chief Executive and Chief Digital Officer Tel: 01639 763283 or e-mail k.jones3@npt.gov.uk

Mrs Claire Jones, Strategic Manager Partnerships & Community Cohesion. Tel: 01639 76 01639 763193 or email s.c.jones@npt.gov.uk

Ms Elinor Wellington, Principal Officer - Community Safety
Tel: 01639 889161 or email e.wellington@npt.gov.uk

Mae'r dudalen hon yn fwriadol wag

Tudalen 41



NPT Healthy Relationships for Stronger Communities 2020-2023

Implementing the Violence Against women,
Domestic Abuse and Sexual Violence (Wales) Act 2015

Contents

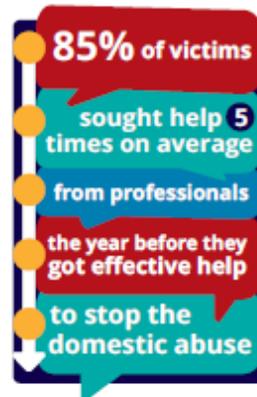
	Page
1. Introduction	3
2. Vision, Aims & Key Principles	5
3. Achievements	7
4. Context	13
5. Resources and Service Mapping	22
6. Consultation and Engagement	25
7. Overarching Framework and Strategic Objectives	30
8. Leadership and Governance	50
9. Measures	54

Tudalen42

DRAFT

1. Introduction

The human and emotional costs of Violence in domestic and public spheres cannot be underestimated.



Tudalen43

This is Neath Port Talbot County Borough Council's second 'Healthy Relationships for Stronger Communities' strategy, implementing the Violence Against Women Domestic Abuse and Sexual Violence (Wales) Act 2015. The first strategy was

published in 2017. Since this time, various changes have been made and this progress is highlighted throughout this revised strategy.

As with our original strategy, this is an overarching plan which outlines the priority areas and strategic direction around healthy relationships and the implementation of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 within Neath Port Talbot. It has been developed with the involvement of partner agencies and survivors. It aims to tackle all forms of violence in relationships, responding to the growing number of referrals being received by specialist providers; reducing harm and improving the lives of those affected.

This agenda is **'everyone's business'** and is a cross-cutting theme that requires all areas of public policy to address violence in domestic and public spheres, to shape and improve the delivery of services for those affected and to meet the requirements outlined in the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. This Act places a statutory duty on the Local Authority and Swansea Bay University Health Board to jointly prepare and publish strategies to meet local needs and to prevent all forms of Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV).

Neath Port Talbot County Borough Council (NPTCBC) and Swansea Bay University Health Board has worked with a wide range of partner agencies to develop this strategy and will continue to work with partner agencies to provide services to all victims of crime and to bring all offenders to justice. We have also worked closely with Swansea City Council, to establish areas of work which are best delivered on a regional basis and these will be highlighted throughout the strategy.

The term "Violence Against Women" which is used nationally and in this strategy refers to the range of crime types which are **predominantly, but not exclusively**, experienced by women and girls. Such gender-based violence includes domestic abuse, rape and sexual violence, stalking, female genital mutilation, forced marriage, crimes committed in the name of 'honour', trafficking, sexual exploitation, including commercially through the sex industry, and sexual harassment in the workplace and public.

Having a co-ordinated approach to addressing these issues does not mean this neglects abuse directed towards **men and boys** or other groups and individuals who experience these forms of violence, or neglects to deal with violence perpetrated by women, where this occurs. Those with the power to transform the cultures that perpetuate violence must work together. This strategy encourages partners to further work together to achieve positive outcomes for all victims of VAWDASV.

2. Our Vision, Aims & Key Principles

*“To prevent and eradicate gender based violence by promoting: equality; safety; respect; and, independence to enable **everyone** to live free from abuse and the attitudes that perpetuate it.”*

Having a co-ordinated community response ensures that all relevant organisations effectively respond to these issues, both within their own agencies and in collaboration with other partners, to prevent harm, reduce risk and increase immediate and long-term safety for people living in Neath Port Talbot.

This agenda affects all services including children and adult services, housing, the police, health, probation, civil and criminal courts, voluntary and community organisations. We maintain that it is everyone’s responsibility to address all forms of VAWDASV by identifying and supporting survivors and their children and holding perpetrators accountable, whilst offering opportunities to change their behaviour.

Our response to these issues highlights the diversity and needs of people affected and the most significant priority is to keep survivors at the centre of our work.

We recognise that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender, class and marital status.

Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour.

Tudalen45

Aims & Key Principles

In line with the requirements of the Well-Being of Future Generations (Wales) Act 2015, our aims and key principles within this strategy have been developed to meet the following 5 ways of working which will help us to work together better, avoid repeating any past mistakes and tackle some of the long term challenges we are facing

Tudalen46

Long Term

- To ensure there is a strong focus on education and work with young people with the aim of eradicating violence and abuse over the long term
- To work with communities and employers to bring about a cultural shift in attitudes towards violence and abuse so that it is no longer tolerated or considered acceptable
- To provide services that offer best value for money

Involvement

- To ensure our service delivery is person centred
- To ensure the voices of people affected by violence and abuse are heard and that more opportunity is created to develop services that are evidence based and include survivor involvement

Early Intervention & Prevention

- To refocus funding and remodel services so that victims and perpetrators can access help and support at the earliest possible time and to prevent cases reaching a point of crisis

Collaboration

- Continue to build and develop a confident, strong partnership
- To develop regional and national collaborative approaches where this is more effective than a local response
- To develop a collaborative commissioning model for all VAWDASV services in the NPT area

Integration

- To adopt a holistic approach so that the wellbeing of people affected by violence and abuse is considered in service responses
- To ensure this work is recognised as everyone's business

3. Achievements

Since the development of the first 'Healthy Relationships for Stronger Communities Strategy' in 2017, significant progress has been made. This chapter highlights some of the key areas of progress made against each of the 7 objectives of our original strategy. This revised strategy will further build on these achievements, working towards preventing VAWDASV and better supporting those who are affected.

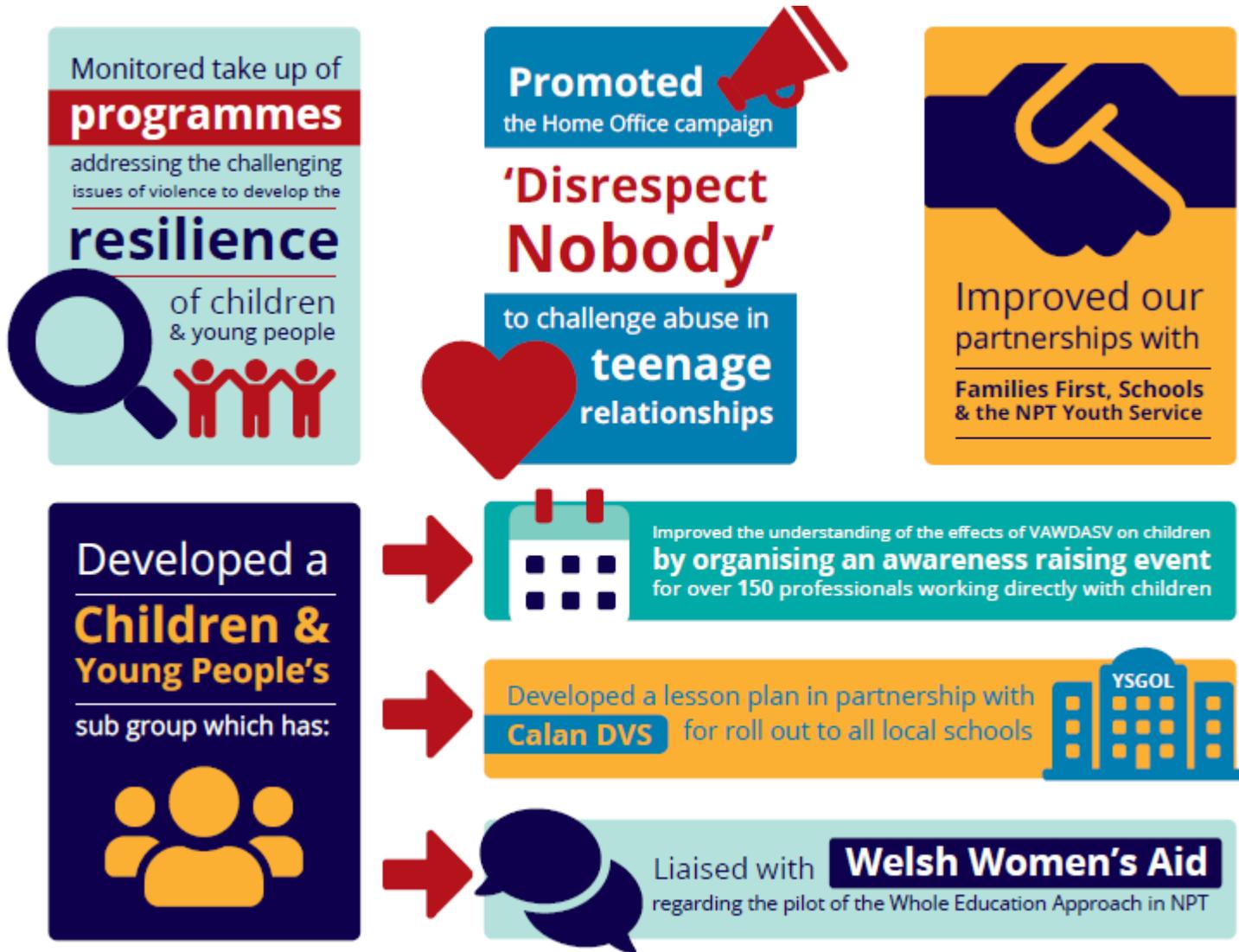
What have we achieved?

Objective 1 – Communications & Engagement

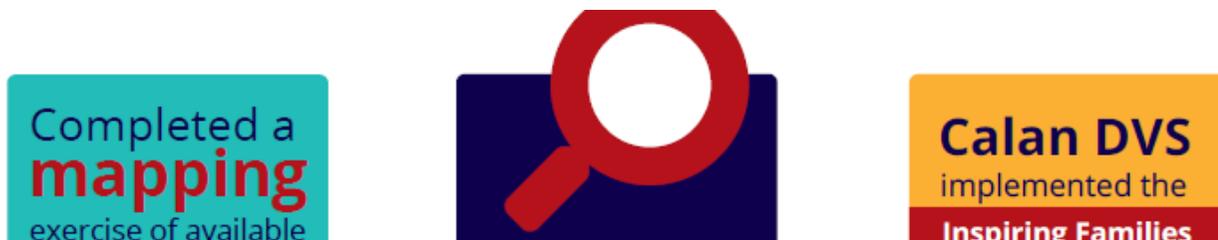


Objective 2 – Children & Young People

Tudalen 48



Objective 3 – Working With Perpetrators



Objective 4 – Early Intervention & Prevention



Objective 5 – Training and Development



Developed & implemented a

Training Programme

in compliance with the National Framework

Developed



referral



pathways



to enable an effective response to any disclosure of VAWDASV

Embedded the **White Ribbon** video into all training



70%

of NPT staff trained to
Level 1 of the National Training Framework

Delivered training to:

-  **Local Councillors**
-  **NPT Older Persons Council**
-  **30 Local Magistrates**
-  **CVS Volunteers**

Swansea Bay Uni Health Board undertook the

'Ask & Act'

pilot to increase the number of people identified by **Health workers**



Objective 6 – Accessible Services

Tudalen 51



Objective 7 – Courts & Criminal Justice

Tudalen52



Began to routinely
capture
court outcomes
and survivor feedback
to help shape
services going forward

S Developed
links with local
**Magistrates
& Youth Justice**
service
partners
to raise
awareness of
VAWDASV



Encouraged use of the
remote
evidence
facility
at the OSS for
vulnerable victims
& witnesses in VAWDASV



Improved
links with the local
**Specialist
Domestic
Violence Court
& Steering Group**

4. Context

In England and Wales, the largest element of VAWDASV cost is the physical and emotional harm suffered by the victims themselves (£47 billion). The next highest cost is for lost output relating to time taken off work and reduced productivity afterwards (£14 billion)¹. Taking the costs of sexual violence and other forms of abuse into account would significantly increase this amount.

Welsh Context

Over the last few years in Wales, significant progress has been made in improving services for those who experience Violence within their relationships, particularly since the enactment of the **Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act** in 2015.

Section 5 (1) of the Act places a duty on Local Authorities and Local Health Boards to jointly prepare and publish a Local Strategy which aims to end VAWDASV and ensure consistent consideration of preventative, protective and supportive mechanisms in the delivery of services.

This strategy has a key role to play in ensuring that Neath Port Talbot County Borough Council and Swansea Bay University Health Board are meeting the requirements of the Act.

Following the introduction of the VAWDASV Act, Welsh Government introduced the **National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence (2016-2021)**. This sets out a renewed commitment to tackling VAWDASV, building on progress to date and prioritises delivery in the areas of **prevention, protection and support**.

A suite of statutory guidance has also been issued under the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act, which sets out how relevant authorities should exercise their functions in relation to implementation. This includes;

- a whole education approach,
- National Training Framework, including 'Ask and Act',
- multi-agency working
- commissioning
- working with and responding to perpetrators

¹ <https://www.gov.uk/government/publications/the-economic-and-social-costs-of-domestic-abuse>

The National Training Framework has been established by Welsh Government to ensure an unfailing standard of public service in order to create a consistent standard of care for those who experience Violence.

This National Training Framework has two main functions:

- Consistent, proportionately disseminated training for relevant authorities to fundamentally improve the understanding of the general workforce and, therefore the response to those who experience violence.
- Alignment of existing specialist training to further professionalise the specialist sector, to improve consistency of specialist subject training provision nationally and to set core requirements of specialist service provision.

“Ask and Act” is one of the most significant practice changes, facilitated through the National Training Framework.

The ‘Ask and Act’ policy framework is a process of targeted enquiry to be practiced across the Public Service to identify people affected by VAWDASV. These two policies are integrated, in that local delivery of the National Training Framework also delivers key aspects of “Ask and Act”. Statutory Guidance is expected in 2020.

The aims of the national “Ask and Act” framework are to:

- Increase identification of those experiencing Violence Against Women, Domestic Abuse & Sexual Violence ;
- Offer referrals and interventions for those identified, which provide specialist support based on the risk and needs of the client;
- Begin to create a culture across the Public Service where addressing Violence Against Women, Domestic Abuse & Sexual Violence is an accepted area of business and where disclosure is expected, supported, accepted and facilitated;
- Improve the response to those who experience Violence Against Women, Domestic Abuse and Sexual Violence with other complex needs such as substance misuse and mental health; and to pro-actively engage with those who are vulnerable and hidden, at the earliest opportunity, rather than only reactively engaging with those who are in crisis or at imminent risk of serious harm.

There are various other pieces of legislation, guidance and research that we must have regard to in this strategy and during its implementation. These are outlined below;

Social Services and Well-being (Wales) Act 2014

The requirement to undertake a local needs assessment in relation to the duties in the Act aligns with Section 14 of the **Social Services and Well-being (Wales) Act 2014** (SSWBA), which also requires a ‘population needs assessment’ to inform the development of local strategies. The first population assessment has been published. When a local authority and Local Health Board

is exercising functions in relation to children under SSWBA, they must also have regard to Part 1 of the United Nations Convention on the Rights of the Child.

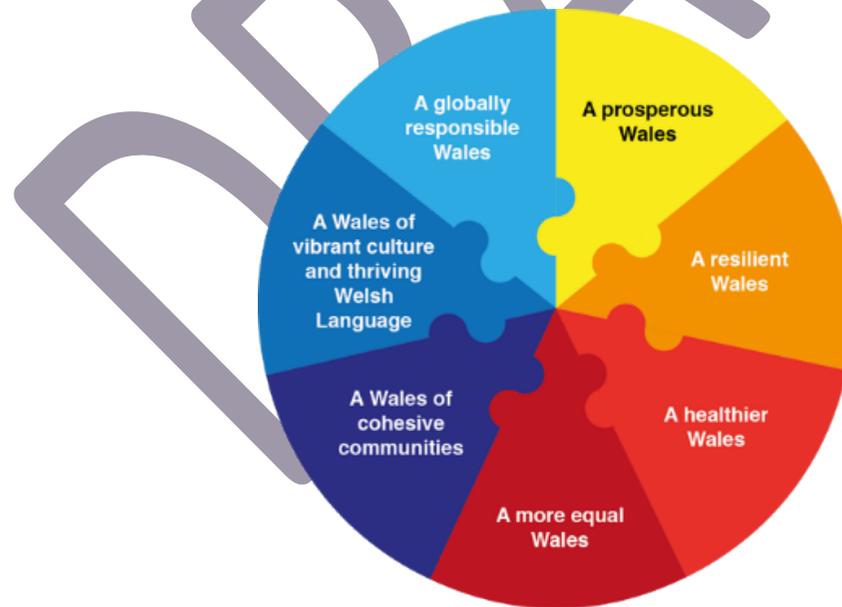
Well-Being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

The Act is unique to Wales attracting interest from countries across the world as it offers a huge opportunity to make a long-lasting, positive change to current and future generations.

To make sure we are all working towards the same purpose, the Act puts in place seven well-being goals. The Act makes it clear that public bodies must work to achieve all of the goals.

The 7 wellbeing goals are;



Neath Port Talbot Healthy Relationships For Stronger Communities Strategy

The work of the local VAWDASV partnership will contribute to Neath Port Talbot meeting the 7 wellbeing goals, in particular 'A healthier Wales' and 'A Wales of Cohesive Communities'.

The Act also sets out five ways of working needed for Public Bodies to achieve the seven well-being goals;



Tudalen56

The Well-being of Future Generations (Wales) Act also requires a Public Services Board to be set up in each local authority area in Wales.

The NPT Public Service Board identified key objectives to improve the well-being of the people who live in the Neath Port Talbot area;

Objective 1: Support children in their early years, especially children at risk of adverse childhood experiences

Objective 2: Create safe, confident and resilient communities, focusing on vulnerable people

Objective 3: Put more life into our later years - Ageing Well

The work to tackle VAWDASV in NPT contributes to achieving these objectives, specifically Objectives 1 and 2.

Housing (Wales) Act 2014

The ***Housing (Wales) Act 2014*** enshrines in legislation the role of the local authority in preventing and alleviating homelessness, this will change the way that services are delivered to survivors of violence who flee their home seeking a safe place to live. The Welsh Government guidance which supports the practical delivery of the legislation advises local authorities and their partners, as follows:

“Local authorities should be led by the wishes and feelings of the victim of domestic abuse when determining accommodation arrangements. The first option, where appropriate, should be for the perpetrator to be removed from the property to enable the victim to remain in their home. The Local Authority must also consider improving the security of the applicant’s home to enable them to continue living there safely. Alternatively, the Local Authority must assist the victim in sourcing alternative accommodation, whether on a permanent or temporary basis”²

This reinforces the need for local authorities to work in partnership to ensure that prevention of homelessness is at the forefront of thinking. This will require an alternative approach to the provision of temporary, crisis accommodation and support.

Adverse Childhood Experiences

Adverse Childhood Experiences (ACE's) is now a widely recognised term which stems from research conducted by the leading **National Public Health Institute of the United States**.

² Welsh Government 2016. Code of Guidance for local authorities on the allocation of housing and homelessness.

The research shows a correlation between childhood trauma and adult health outcomes. The research found children's developing brains and central nervous systems are so profoundly affected by ACE's that they are the root cause of many chronic diseases, most mental illness and most violence. The 10 ACE's measured in the research are:

1. Physical abuse
2. Sexual abuse
3. Verbal abuse
4. Physical neglect
5. Emotional neglect
6. A family member who is depressed or diagnosed with other mental health issues
7. A family member who is addicted to alcohol or another substance
8. A family member who is in prison
9. Witnessing Domestic Abuse
10. Losing a parent to separation, divorce or death

Many other types of trauma may also have an impact such as natural disasters and community violence.

The **Wales Adverse Childhood Experiences (ACE) study**³ suggests that a significant number of adults in Wales have experienced one or more forms of ACE.

Evidence suggests that experiencing 4 or more types of adverse childhood experiences leads to a person being 14 times more likely to be a victim of violence. It also provides evidence that preventing ACE's can significantly reduce the possibility of violence victimisation by 57%, and can further reduce the likelihood of violent perpetration by 60%. Ultimately the provision of effective support and early intervention for those impacted by ACE's will have a longer term impact on the reduced demand and costs to health and social services. The Home Office strategy suggests ACE initial enquiry should be actioned within health care settings.

NICE Domestic Abuse Guidance and Quality Standards

In 2014, the National Institute for Clinical Excellence (NICE) issued "*Domestic violence and abuse: how health services, social care and the organisations they work with can respond effectively*". The Welsh Government has an agreement in place with the National Institute for Clinical Excellence (NICE) covering the Institute's guidelines which highlights; Domestic Abuse is a complex issue that needs sensitive handling by a range of health and social care professionals. The cost, in both human and economic terms, is so

³ Public Health Wales (2015) Wales Adverse Childhood Experiences (ACE) study, PHW

significant that even marginally effective interventions are cost effective. NICE issued further Domestic Abuse Quality Standards for healthcare providers in February 2016. These standards are aimed at everyone working in health and social care whose work brings them into contact with people who experience or perpetrate Domestic Abuse. Recommendations include key issues of importance for regions to have regard to when delivering local Domestic Abuse strategies.⁴

National Review of Refuge Provision

In 2018, the First Minister announced a review of refuge provision across Wales. The review, led by the Wales Centre for Public Policy, will examine some of best international examples of services and support, and engage with people who have experience of refuge and sexual abuse services, to develop a made-in-Wales model that provides a world-leading standard of support to victims of sexual violence.

Housing First

An updated Housing First model in Wales is imminent, which could influence changes to legislation.

Housing First approaches are based on the concept that a homeless individual or household's first and primary need is to obtain stable housing, and that other issues that may affect the household can and should be addressed once housing is obtained.

South Wales Police and Crime Commissioners' Tackling Violence against Women and Girls Strategy 2019 – 2024

The strategy sets out four key priority areas for action:

- 1) Enhanced Collaboration: We will work together to deliver a whole system approach to preventing violence against women and girls in all its forms
- 2) Prevention and Early Intervention: With partners we will focus on the long-term impact of decisions and work to keep people safe, healthy and well
- 3) Safeguarding: We will build on existing safeguarding arrangements, seeking ways to protect all victims, wherever they may be
- 4) Perpetrators: We will increase our focus on the behaviour of the perpetrator (in parallel with supporting victims and survivors of violence and abuse) to better hold perpetrators to account for the consequences of their actions and offer opportunities to change their behaviour through a range of interventions

Their action plan adopts the widely-recognised “Four P’s” framework of Prepare, Prevent, Protect, and Pursue and aligns each of these against the priority areas below.

⁴ The full suite of recommendations can be found at <http://www.nice.org.uk/guidance/PH50/chapter/1-Recommendations>

Prepare: ensuring the best possible governance, collaboration and commissioning of evidence-based models and innovation, understand available resource and effectively targeting it, involving those affected to ensure the best outcomes

Prevent: intervening at the earliest opportunity to prevent violence & abuse from occurring or getting worse

Protect: safeguarding victims and potential victims from harm and providing pathways to services

Pursue: placing an active focus on the behaviour of perpetrators and consequences of that behaviour, alongside supporting victims

New Safeguarding Procedures

Wales has become the first part of the UK to introduce a single set of safeguarding guidelines for children and adults at risk when the new Wales Safeguarding Procedures launch, online and via an app, launched on 11 November 2019.

The Wales Safeguarding Procedures will standardise practice across Wales and between agencies and sectors.

The procedures will set out the essential roles and responsibilities for anyone working with children or adults who are experiencing, or at risk of, abuse, neglect or other kinds of harm. In doing so they will replace the current All Wales Child Protection Procedures as well as various local safeguarding procedures for adults and other central guidance previously issued by Welsh Government.

Wales Audit Office

On behalf of the Auditor General for Wales, the Welsh Audit Office have examined how the new duties and responsibilities of the VAWDASV Act are being rolled out and delivered. Their report was published in November 2019 and concludes that victims and survivors of domestic abuse and sexual violence are often let down by an inconsistent, complex and fragmented system.

The report sets out a series of key recommendations that are intended to help bodies who support and have responsibility to assist victims and survivors.⁵

UK and EU

Welsh Government has framed its legislation and guidance on Violence Against Women, Domestic Abuse and Sexual Violence alongside the UK and EU legislation;

- Ending Violence Against Women and Girls (2016-2020)
- European Union (EU) Directive on Victims' Rights⁶

⁵ Welsh Audit Office - Progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act

⁶ A person should be considered to be a victim regardless of whether an offender is identified, apprehended, prosecuted or convicted and regardless of the familial relationship between them. For a summary of European Commission priorities for victims of crime see http://ec.europa.eu/justice/criminal/victims/rights/index_en.htm . The full text of the Directive (2012/29/EU) is available at <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012L0029>

- The Council of Europe Convention on Preventing and Combating Violence against Women, and Domestic Violence (Istanbul Convention)
- Welfare Reform

The Spotlight Initiative

The European Union (EU) and the United Nations (UN) are embarking on a new, global, multi-year initiative focused on eliminating all forms of violence against women and girls called the Spotlight Initiative.

The Initiative is so named as it brings focused attention to this issue, moving it into the spotlight and placing it at the centre of efforts to achieve gender equality and women's empowerment, in line with the 2030 Agenda for Sustainable Development.

The Spotlight Initiative will respond to all forms of Violence Against Women and Girls, with a particular focus on domestic and family violence, sexual and gender-based violence and harmful practices, femicide, trafficking in human beings and sexual and economic exploitation. In line with the 2030 Agenda for Sustainable Development, the Initiative will fully integrate the principle of 'leaving no one behind'.

Brexit

When the outcome of Brexit is known, it is possible that we may need to review any areas of the strategy that may be impacted i.e. funding arrangements, definitions etc.

5. Resources and Service Mapping

There are a range of services in Neath Port Talbot to address VAWDASV. More detailed information can be found in Appendix 2.

Tudalen62



Resources to Address VAWDASV in NPT

The funding of services in NPT is complex. The follow funding underpins the delivery of services to survivors of VAWDASV;

Supporting People	Supporting People Programme Grant	£255,384	33 units of floating support
		£407,255	38 units of refuge and move on accommodation
Community Safety	WG funding	£84,550	Contributes to funding of the IDVA service
	Police & Crime Commissioner	£80,071.50	Contributes to funding of the IDVA service
	Crime Prevention Panel and ad hoc WG funding	£5,000	Target hardening - Security items for victims of VAWDASV
Families First	Welsh Government-Families First	£98,174	Early Intervention Prevention Services (Provided by Thrive Women's Aid) see page 19
NPTCBC	Core Funding		VAWDASV Support including; <ul style="list-style-type: none"> • Training Delivery and Roll Out • Policy Officer • MARAC Coordinator

In addition, the majority of the rental income to fund refuge accommodation and move on accommodation is funded from Housing Benefit payments⁷.

Each of the three specialist providers are charities and access funding from a range of other sources;

Recipient	Funding Provider	Amount	Purpose
Calan DVS	Awaiting	Awaiting	Awaiting
Thrive WA	Moondance	£20,000	Video Interaction Guidance
Thrive WA	Henry Smith	£112,359	Children and Young People Service
Thrive WA	Lloyds	£48,198	Crisis Intervention
Thrive WA	Children In Need	£19,742	Children and Young People Trips and Activities
Thrive WA	Comic Relief	£119,903	The EDGE Project
Thrive WA	The National Lottery Community Fund	£101,644	LIFE
Hafan Cymru	Welsh Government	Awaiting	Spectrum Project

⁷ This is not shown in the figure quoted above

Resources and Service Mapping Conclusion

Over the past 3 years, the picture has changed across NPT. This is not only due to work undertaken as part of the strategy, but due to changes in funding arrangements. Grant funded programmes are often funded on a short term basis, which makes long term sustainability difficult to achieve.

We recognise that there is a range of good quality services available in Neath Port Talbot. However, we are still in a position where some of these services need modernisation and work is still underway to achieve this.

- There is a continued need to further develop Early Intervention and Prevention and Community Based Services to prevent and reduce the number of victims requiring crisis services.
- More focus is needed on supporting victims to remain in their own homes.
- We acknowledge that there remains to be a limited insight into male victims and marginal groups and we need to explore this in more detail over the coming years.
- The focus of the work over the past 3 years has been largely based on Domestic Abuse and we need to ensure there is an increased focus on sexual violence prevention and support.
- We recognize there is a need to commission services differently, for those victims with complex needs, such as mental health and substance misuse.
- Unfortunately, there remains a paucity of support available to perpetrators, which requires further consideration and will be explored further on in this strategy
- We must ensure survivors are involved in every area of VAWDASV policy and local work.

Over the past three years there is far better coverage and focus on VAWDASV within Education and Youth settings, particularly as the approach is now more coordinated, with the amalgamation of the VAWDASV Children and Young Peoples Sub Group and local Relationship and Sexuality Education Group.

In terms of criminal justice outcomes, there is scope for further improvement and the three Domestic Homicide Reviews that have taken place in this area emphasise the importance of effective offender management, especially when perpetrators have been shown to demonstrate a pattern of escalating violence. This is also explored further on in the strategy.

6. Consultation and Engagement

During 2019, a regional review of VAWDASV services was undertaken. As part of this process, a range of means were put in place to allow partners and survivors to contribute. This has provided a rounded view of what works well, where there are gaps in provision and opportunities for improvement to be formed.

A workshop was held with members of the VAWDASV Leadership Group as an opportunity to discuss current working arrangements and priorities.

The information obtained from these exercises has been used to inform this strategy, in particular the actions we need to take in order to meet our objectives. The key themes are outlined below;

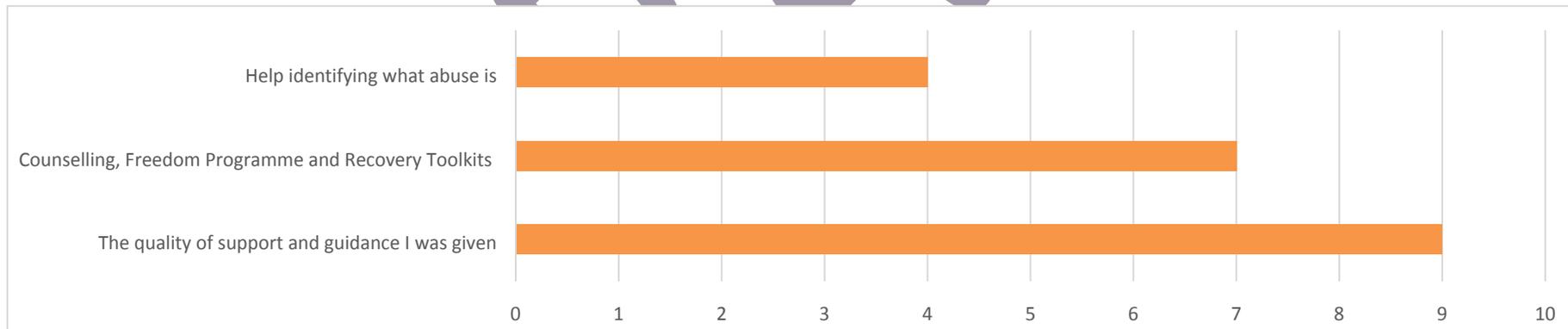
Priority Themes from Survivors – 1:1 Interviews / Group sessions	
	More education in schools and in the community about recognising abuse and unhealthy relationships.
	Independent units within a refuge with the option of a shared living space for people to meet
	Ensuring ongoing support for people after they leave refuge, even if the support is low level (e.g. a drop in facility or social activity)
	More support at weekends
	Increased volunteering opportunities to develop skill and confidence
	More awareness raising of males experiencing domestic abuse
	Organised social activities for male victims to reduce the isolation and poor mental health experienced by survivors, which could help people with their recovery.
	Lower cost housing options for people when leaving refuge
	Access to English lessons and interpreters is essential for BME survivors
	Further practical help when transitioning from refuge to independent housing, and more help with securing furniture and whitegoods
	Support for pregnant and new mothers and babies in refuge
	Waiting lists for Sexual Violence related support are too long
	Generic counselling for victims of sexual violence is not helpful- specialist counselling is needed
	Lack of confidence in the court process – Victims sometimes feel like they themselves are on trial
	Peer support for Sexual Violence survivors and group activities

Tudalen65

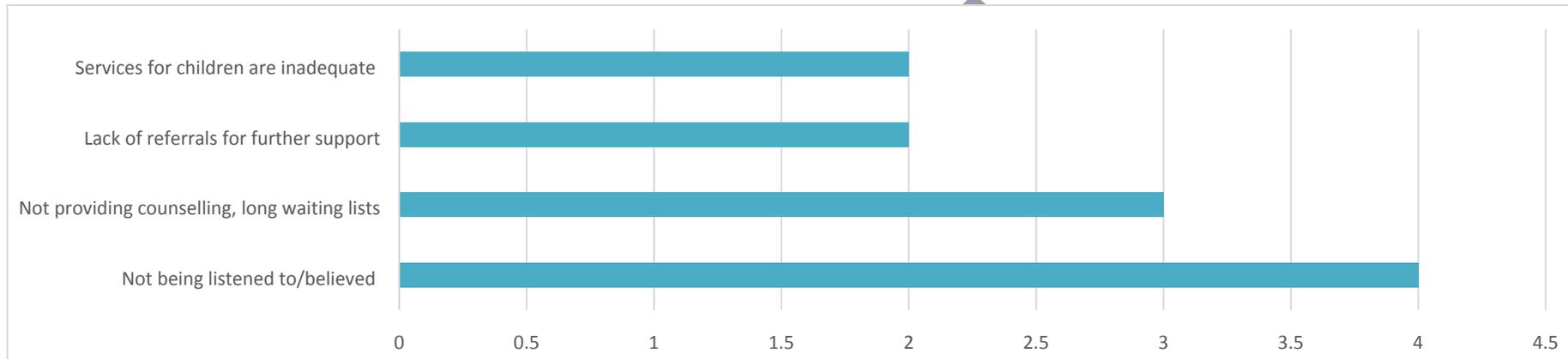
Priority themes from Specialist Services, Commissioners and Partner agencies;
Funding for the full range of needs-led evidence-based services
Build opportunities for improved communication, collaboration and integration (between agencies and between agencies and public)
Sustainable/longer term commissioning
Training/upskilling staff; improving service standards
Increased flexibility (either of funding or of ability to flex services)
Invest in coproduction of services with survivors at the centre
Fund sexual violence services
Make sure the commissioning process meets local needs
Fund more early intervention and prevention and CYP services
Improve mental health access and provision

We produced an open access survey for survivors. 47 responses were received. We asked;

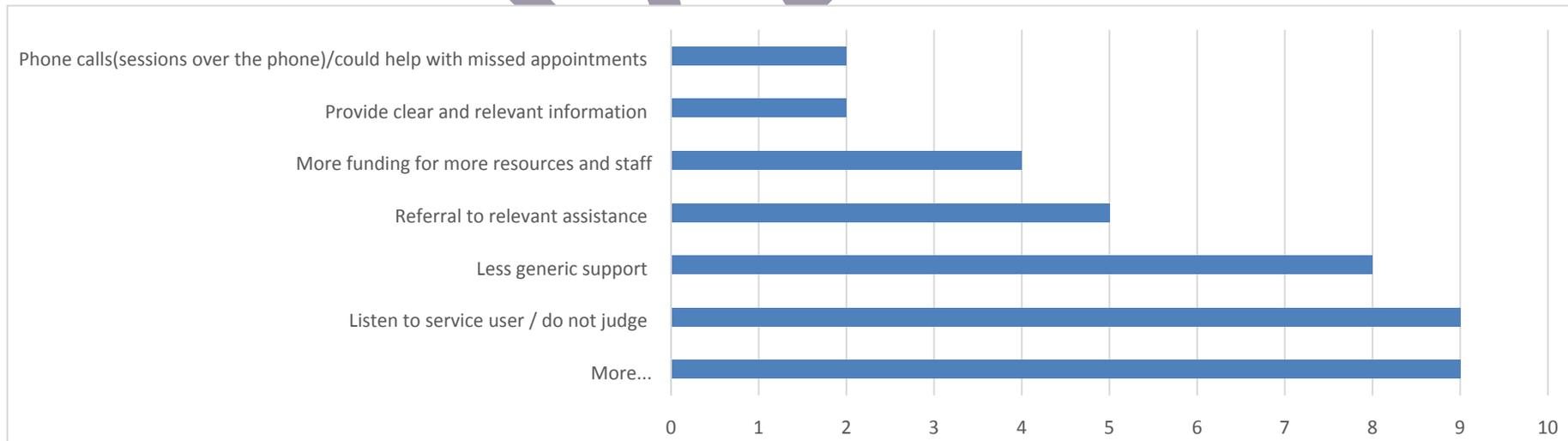
What are the good things about support and what worked well?



Where support didn't work well and why?

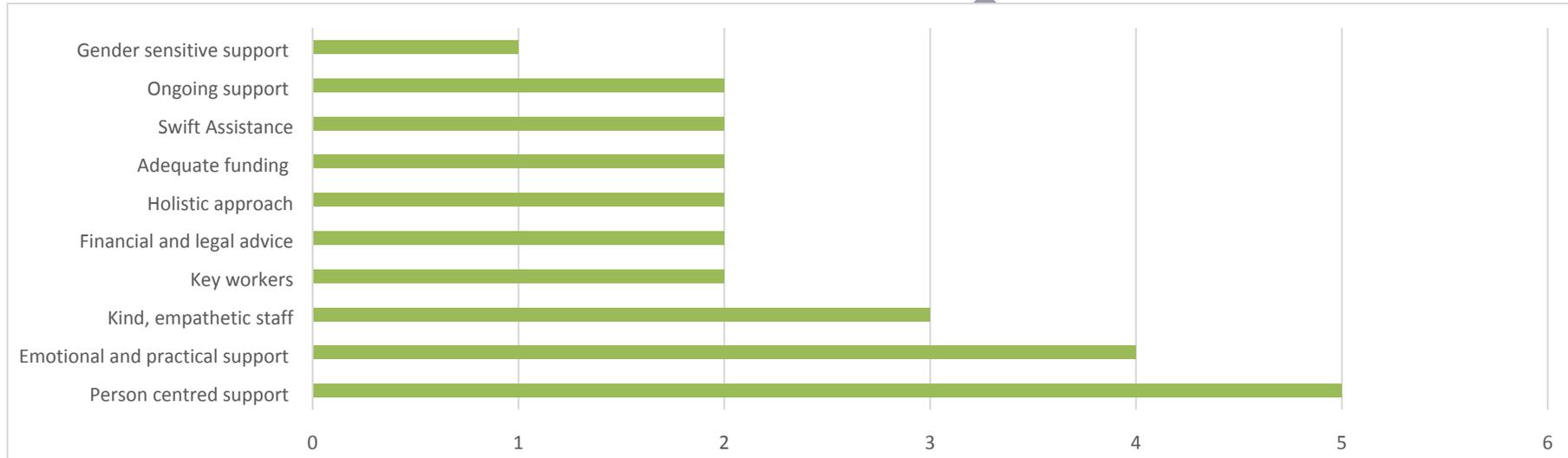


The 3 most important things service providers should do to make sure they meet people's needs:

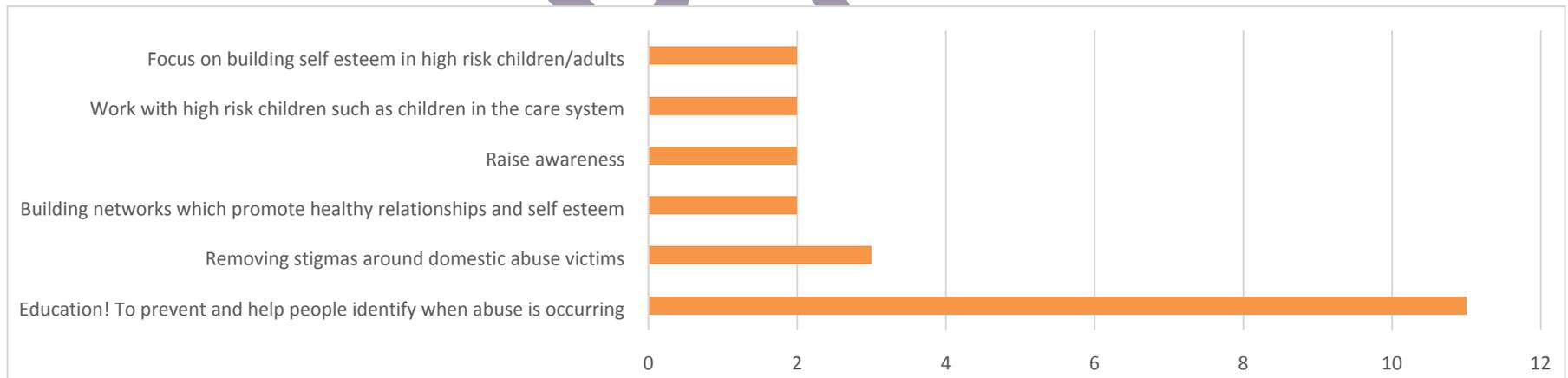


Tudalen67

What would an 'excellent service' look like?



What kind of help and support would assist in preventing and reducing VAWDASV?



Tudalen68

Neath Port Talbot Healthy Relationships For Stronger Communities Strategy

22 survivors said they had children who had witnessed or been affected by domestic abuse, and 7 of these said their children had accessed services in relation to their experiences.

Please tell us what you thought was good about the service your child/children received?	Is there anything that could have been done differently/improved on?
The doctor listens to her and did all he could when she had a few epilepsy seizures in one day	No
Nothing	Not to look like a doctor's surgery and waiting room
My child has received support from CAMHS and school. This is still ongoing	No
My son did the STAR course. The best part was that he could do it 1 to 1. He really didn't want to go in a group. His worker went to his school and did the course with him there. He got a lot out of it.	No
Helped them come to terms with what's happened and understand they not to blame and be more open about it	Pursue a bit more: found that 1 to 1 was given up on quickly because child said they were ok but some problems were still there
Support within the school..., constant check-ups, someone always there to talk to.	Not for my child. They received so much help, they're like the old child again!
It was done through play, so my children had fun and wanted to engage	The 3 rd sector provider was absolutely outstanding in supporting my kids through the aftermath of leaving a relationship and relocating via the local refuge.

Tudalen69

7. Overarching Framework & Strategic Objectives

The purpose of the Violence Against Women, Domestic Abuse & Sexual Violence (Wales) Act 2015 is to;

- improve arrangements for the **prevention** of VAWDASV;
- improve arrangements for the **protection** of victims of VAWDASV and;
- to improve **support** for people affected by VAWDASV.

Prevention

We are committed to preventing violence in relationships from happening, by challenging the attitude and behaviours which foster it and intervening early, where possible, to prevent its recurrence.

The prevention of violence is central to agendas on public health; reducing crime and the harm caused by serious violent crime; safeguarding children and adults with support needs; promoting education, learning and skills development; and promoting equality.

Prevention involves education to change attitudes and perceptions (to reduce the incidence of a problem among a population before it occurs) and can be targeted, at broad population groups, such as school-age children or members of a particular community.

Protection

We are committed to ensuring those who experience any form of violence are appropriately protected, eliminating the risk of further harm to victims and their children.

We want **anyone** experiencing these issues to be aware of the support that is available locally and we want to be confident that all professionals within our area are equipped with the knowledge to effectively respond to any disclosures.

Support

We are committed to providing high-quality support for survivors and their families, ensuring services meet their needs and prioritise their safety, to enable them to achieve independence and freedom from abuse.

It is vital that survivors receive the right support, at the right time, to enable them to take action that is right for them.

Strategic Objectives

The strategic objectives for 2020-2023 will mirror those in our original strategy. Our chosen objectives are derived from the Welsh Government National VAWDASV Strategy. Having similar Objectives within Neath Port Talbot enables us to demonstrate how we will support the Welsh Government in achieving its policy objectives regarding Violence Against Women, Domestic Abuse and Sexual Violence. However, it is important to note that Objective 7 does not form part of the Welsh Government National Strategy as this is focused on Criminal Justice. Welsh Government do not have devolved responsibility for this area, it remains the responsibility of the UK Government. In order to ensure a holistic response to VAWDASV in NPT we want to reflect the contribution that CJS partners are making locally, and how we will work to improve these arrangements.

The remainder of this chapter will provide a breakdown of each objective and the actions that we will work towards over the next three years. There are actions that can be delivered locally and others that lend themselves to a regional approach.

The actions are designed to be manageable and achievable, ensuring we are able to make a difference to local victims and their families. All actions require a continued, strong, partnership approach for maximum effectiveness and positive outcomes.

Objective 1

Increase the reports of Violence Against Women, Domestic Abuse and Sexual Violence in Neath Port Talbot, through awareness raising and challenging attitudes

Current Position

Over the past three years, a substantial amount of work has gone into the development of the VAWDASV Communications & Engagement Group. Formerly the Prevention, Education & Awareness Raising Group (PEAR), the group has now been refocused by the VAWDASV Leadership Group to provide a more co-ordinated and strategic approach to its work.

The group now has a strong, clear Terms of Reference with membership from relevant partner agencies. The group also has a Communications Plan and calendar of key events.

The group continue to be responsible for;

- the development and implementation of a programme of awareness raising of all VAWDASV services
- raising awareness of the impact of VAWDASV on victims
- organising, promoting and undertaking prevention campaigns and initiatives

The group now deliver universal awareness campaigns, to raise awareness and increase peoples understanding about VAWDASV, including the help and support that is available locally, regionally and nationally.

Going forward, there is a need for a survivor / survivors voice on the group to help shape future awareness raising campaigns, taking into account any situations where they sought help but faced adversity and felt misunderstood or not listened to. This will help us to understand where we need to focus our efforts in terms of awareness raising, not only for members of the community but also for the services and / or organisations they approached for help who were unable to provide appropriate support or advice.

There will always be a need to raise awareness within our communities and to promote the help and support that is available. Communities need to recognise all forms of VAWDASV and the harm it causes, be supportive of survivors and be able to provide information about the help that is available. This is critical since much support to victims comes from these sources, not from service providers. A positive and knowledgeable response from the immediate network surrounding victims and their children is critical to increasing the likelihood of early intervention.

For 2020-2023, on a regional basis, we will;

1. Combine the Communications and Engagement Group with the sister arrangements in Swansea, and ensure the membership of the group is extended to include;
 - a. a local survivor(s), to help shape future awareness raising campaigns and initiatives
 - b. Area Planning Board representative
 - c. Swansea Bay University Health Board representative
2. Raise awareness of the following initiatives to further encourage victims to come forward and access appropriate help and support;
 - a. Clare's Law – Clare's Law, also known as the Domestic Abuse Disclosure Scheme, allows people to find out if their partner has an abusive or violent past. It is named after Clare Wood, who was killed by her former partner in 2009.
 - b. Bright Sky – Bright Sky is a free to download, discreet mobile app providing support and information for anyone who may be in an abusive relationship or those concerned about someone they know
 - c. Ask Angela – Ask Angela is a sexual violence prevention campaign which aims to help individuals feel safe when they are on a night out. An individual can get help by asking a member of staff for Angela at the bar if they are feeling uncomfortable on a date, or in a potentially dangerous situation.
3. Actively promote the Respect Helpline for victims and perpetrators during local engagement events
4. Continue to amplify Welsh Government campaigns regarding VAWDASV, to ensure we play our part in strengthening the messages and making them recognisable across all areas of Wales.
5. Consider alternative approaches to engage with the following groups, encouraging more people to come forward if they are experiencing VAWDASV;
 - a. Young women
 - b. Older victims
 - c. Disabled victims

d. Male victims

6. Develop, launch and evaluate a local Sexual Violence Prevention campaign, using local data to ensure messages are targeted at those who may be at most risk within our communities
7. Develop a calendar of national and local events and activities for every year

DRAFT

Objective 2

Increase awareness in children and young people of the importance of safe, equal and healthy relationships and that abusive behaviour is always wrong.

An overview of available research into the effectiveness of interventions around domestic abuse⁸ found that the majority of preventative approaches involved targeting young people and adults through community or school based activities. This would include, for example, work in schools and communities with children and young people, between the ages of 5-25 years on healthy relationships.

Adopting a whole education approach to VAWDASV is a key element to increasing awareness, providing support and creating opportunities for children and young people to understand the importance of safe, equal and healthy relationships. A whole education approach that includes preventative education through all parts of school and college life, involving the community, has been identified as significant in being able to teach preventative education.

Welsh Women's Aid and the Welsh Government have published a good practice guide on a Whole Education Approach to ensure that schools and educational bodies are equipped and considered in their response to VAWDASV and the prevention, protection and support of their pupils and staff.

Under the Welsh Government Whole Education Approach Guidance, there are 9 Key Principles.

1. Children and young people learn about violence against women, domestic abuse and sexual violence.
2. Staff learn about violence against women, domestic abuse and sexual violence.
3. Parents, care-givers and family learn about violence against women, domestic abuse and sexual violence.
4. Monitoring and evaluation systems are in place to measure impact of this work.
5. Measures are in place to support people who experience forms of violence against women, domestic abuse and sexual violence.
6. Active participation of children and young people, staff and parents/care-givers to prevent violence against women, domestic abuse and sexual violence.
7. Taking action to prevent violence against women, domestic abuse and sexual violence in the wider community.

⁸ NICE (2013) Review of Interventions to Identify, Prevent, Reduce and Respond to Domestic Violence prepared by the British Columbia Centre of Excellence for Women's Health.

8. Working in partnership with relevant local experts.
9. Embedding a comprehensive prevention programme

Neath Port Talbot CBC are proud to have been approached by Welsh Women's Aid to pilot the Whole School Approach, via the Relationship & Sexuality Education Group who are responsible for the coordination and delivery of all RSE that takes place in local schools. This group is made up of representatives from NPT Youth Service, Public Health Wales, School Nursing, specialist providers, South Wales Police and others.

Current Position

Within NPT the following initiatives are delivered to children and young people;

- Spectrum
- All Wales School Liaison Core Programme
- Higher Education Awareness Raising Events
- Crucial Crew
- 'It's Your World' Wellbeing Workshops
- Relationship and Sexuality Education, including age appropriate Healthy Relationship Lessons

For 2020-2023, on a local basis we will;

1. Work with Welsh Women's Aid and the Education Directorate to participate in the Whole School Approach pilot in 4 schools across the borough
2. In partnership with the Relationship & Sexuality Education Group, ensure the Healthy Relationship lesson is rolled out to all schools across Neath Port Talbot, ensuring take up is monitored and increased over the next 3 years.
3. Using existing initiatives (such as Crucial Crew, It's Your World Wellbeing Workshops, the Healthy Relationship Lesson, Spectrum programme and the Whole School Approach) to ensure all children are aware of services or points of contact with whom they can share any concerns they may have about their own relationships or their friends, family or others in the community.

For 2020-2023, on a regional basis we will;

4. Raise awareness of the Welsh Government VAWADSV campaign targeted at CYP, to strengthen the messages and ensure they become recognisable to as many young people as possible

DRAFT

Objective 3

Increased focus on holding perpetrators to account and provide opportunities to change their behaviour based around victim safety.

We are committed to taking action to reduce the risk to victims, ensuring that perpetrators are provided with opportunities for change in a way that maximises safety.

Perpetrator Interventions and Programmes

Research shows that when perpetrators are prepared to find help, they most frequently access GPs, and are also likely to be in contact with Relate, social services, Samaritans, alcohol or drugs services, hospitals, solicitors, welfare services at work, and use websites to access help.⁹

This research also indicates that where perpetrators went to their GP, they attempted to position themselves as depressed or in need of psychological or psychiatric care, without a focus on, or acknowledgement of, their unacceptable behaviour. Alcohol, drugs, depression and 'jealousy' rather than violence were often presented as the problems requiring 'treatment'.

Male perpetrators are also more likely to seek help at some kind of 'crisis' moment, usually when the partner gives them an ultimatum or actually leaves, or where there are child contact issues. However, this is also when they are likely to be especially dangerous and/or homicidal, and safety for the women and children concerned therefore has to be a priority for any agency intervening with the men at this time.

Reducing a perpetrator's substance use may reduce levels of physical injury but has not been shown to reduce the actual occurrence of domestic violence (i.e. non-physical abuse such as psychological and sexual violence).

Couples-counselling or other therapy is also not appropriate if domestic violence is currently being perpetrated in the relationship. There can be significant dangers of colluding with abuse by reinforcing that the perpetration of abuse stems from communication problems between couples or lack of anger management. For similar reasons, restorative justice is not appropriate in cases of intimate partner domestic abuse.

⁹ Hester, M. and Westmarland, N. (2006) *Service Provision for Perpetrators of Domestic Violence*, University of Bristol; HM Government (2010) *'Call to End Violence Against Women and Girls'*, Home Office

The case for commissioning and delivering community-based perpetrator programmes has been set out by Respect¹⁰ and the largest UK research into programme effectiveness was published recently.¹¹

Accredited programmes typically have linked safety and/or support services for partners and ex-partners of programme participants and have a minimum time period required for the best possible chance of effective and sustained behaviour change.

Perpetrator programmes are far more than a behaviour change programme. As well as their services for victims (and sometimes children), they also provide a point of reference for advice for other organisations on perpetrators, and write reports for family court proceedings, children's services, CAFCASS (Children and Family Court Advisory and Support Service), criminal courts, and child protection conferences. This represents a substantial contribution to informed decision making by a wide range of agencies that are intervening in domestic abuse.

Current Position

Inspiring Families

Calan DVS provide the Inspiring Families Programme which is an innovative intervention and assessment programme that can help strengthen and stabilise families. It is a structured 10 week programme for families that are affected by domestic abuse and provides professionals with a robust framework to assess the parents' behaviour, coercive control, disguised compliance, the level of current risk and the likelihood of future risk. Inspiring Families also identifies the potential for change and reduction of risk within the family, or indeed, whether the risk is too high or the potential for change too low to make working with the family a viable option.

The intervention has been designed to be an accessible tool that will provide professionals with the evidence they need to make an assessment of the family and to identify the need and level of intervention required moving forward.

¹⁰ The Respect document, published in 2010 – 'Domestic Violence Perpetrators: Working with the cause of the problem – is available at http://www.respect.uk.net/data/files/lobbying/lobbying_tool_with_refs_30.11.10.pdf

¹¹ <https://www.dur.ac.uk/resources/criva/ProjectMirabalexecutivesummary.pdf>

The programme also supports professionals to make intelligent based decisions on what is the right intervention, for that family or individual members of that family at the right time and in the right order.

Mandatory Programmes via Probation

For those perpetrators who receive a criminal conviction or are sentenced to a term of imprisonment for Domestic Abuse related offences, they can sometimes be required to participate in a Perpetrator Programme.

However, there are many perpetrators who would like to access programmes on a voluntary basis, to help change their behavior and prevent the violence from escalating. There is a paucity of support available of this nature.

For 2020-2023, on a regional basis we will;

1. We will work in partnership with Swansea CC to explore funding opportunities and appropriate implementation plans for the regional commissioning of the Equilibrium Programme
2. Ensure we have a suitable referral pathway, to encourage referrals, use and attendance of the programme
3. Consider what measures we can take to improve the identification of perpetrators and engage them in programmes that tackle their behaviour and hold them to account
4. Work with Housing Options to monitor the number of perpetrator evictions under the Renting Homes Wales Act, which states *'perpetrators of domestic abuse can be targeted for eviction to help prevent those experiencing domestic abuse from becoming homeless; supporting the aims of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 to provide preventive, protective and supportive mechanisms in the delivery of services'*¹²
5. Continue dialogue with Welsh Government to establish who is responsible and accountable for this area of work

¹² <http://www.cih.org/resources/PDF/Wales%20Policy/Renting%20Homes%20factsheet%20-%20English%20Final.pdf>

Objective 4

Make early intervention and prevention a priority – To reduce the number of repeat victims and reduce the number of high risk cases

Preventing violence and intervening at the earliest possible stage to prevent its occurrence is the fundamental building block to an effective strategy. The need to minimise reactive interventions once a crisis has occurred is pivotal to the ambition to end violence.

We know that adults in Wales who were physically or sexually abused as children or brought up in households where there was VAWDASV, alcohol or drug abuse are more likely to adopt health-harming and anti-social behaviours in adult life. Research is identifying the long-term harm that can result from chronic stress on individuals during childhood. Such stress may arise from the abuse and neglect of children, but also from growing up in households where children are routinely exposed to issues such as VAWDASV, or individuals with alcohol and other substance use problems. It is critical therefore, for the long term health and welfare of our nation that we intervene early to reduce and prevent the incidence of violence, reducing the harm to victims and their children.

Early Identification in Health & Social Care Settings

There is evidence to show that early identification in healthcare and social care settings, leading to referral routes to specialist services, improves disclosures and referrals to support amongst survivors. In GP settings for example where indicators trigger targeted enquiry about domestic abuse, this leads to improved discussion and disclosure. There is moderate evidence that universal screening for domestic abuse in pregnancy, when supported by staff training and support, improves practices, disclosure and documentation of domestic abuse.

The IRIS programme of intervention (Identification and Referral to Improve Safety) is an evaluated service model that can be effectively jointly commissioned by health providers, to enable specialist domestic abuse support workers (advocate/educators) to be co-located in GP and other healthcare settings. These workers, located in and managed by a specialist domestic abuse service, ensure health professionals are skilled in early identification, which enables an immediate response for survivors that links them into a specialist service.

The Homicide Timeline – Dr Jane Monckton Smith

Research published and carried out by Dr Jane Monckton Smith looked at 372 cases of intimate partner homicide through interviews with bereaved families and public protection professionals. Through her study, Dr Jane Monckton Smith, Senior Lecturer in Criminology at the University of Gloucestershire, found an emerging pattern that could be broken down into eight separate stages.

A recent UN study into homicide found fifty thousand women across the world were killed by their partners in 2017. The Homicide Timeline is already being used to help form domestic abuse strategies and policy, as well as supporting police and agencies as they make risk assessments in cases of coercive control, domestic violence and stalking. Contrary to a long held belief by police, practitioners and the public, violence is no longer considered the biggest predictor of homicide. Dr Jane Monckton Smith's research found similarities in many cases in the early stages of a relationship, which may allow professionals more opportunities to intervene and save lives. The research highlights the shift in emphasis that is needed to focus motivation behind actions rather than the actions themselves. The model was designed to help practitioners and professionals engaged in risk assessments to feel confident about the decisions they are making, especially in crisis situations.¹³

'A Cry for Health'

The findings of SafeLives' research, which provides evidence from over 4,000 victims supported in hospital and community settings, show that we are missing opportunities to identify victims of domestic abuse – particularly the most vulnerable – and that locating a team of Independent Domestic Violence Advisors (IDVA's) within a hospital is a key way to address this.

SafeLives is calling for hospital-based IDVAs to be integrated as part of a whole-system approach to support which include community based specialist domestic abuse services, mental health and health services. The charity believes that this provides a way of reaching the 4 out of 5 victims who never contact the police as well as providing an opportunity to save money through earlier identification.¹⁴

Current Position

¹³ <https://www.glos.ac.uk/news/pages/the-homicide-timeline.aspx>

¹⁴ <http://www.safelives.org.uk/node/935>

A high proportion of funding in NPT continues to be focused on medium / high risk victims. More focus is needed on prevention and early intervention to avoid violence escalating and victims needing the high risk services or crisis interventions.

For 2020-2023, on a local basis we will;

1. Work with Supporting People, Area Planning Board, Community Safety and Families First commissioners to refocus funding in line with a new service model
2. In considering the findings of the Dr. Jane Monckton Smith research; work with providers to seek out further funding opportunities to support the expansion of early intervention and prevention initiatives
3. Continue to work with South Wales Police on the Early Action Together programme, incorporating ACE'S into their work and integrating services into the Social Services front door
4. Conduct research to identify unidentified need – working with local services to better understand the needs of male victims, LGBT victims, BAME victims, disabled and older people, identifying any gaps in current provision

For 2020-2023, on a regional basis we will;

1. Work with the Health Board to implement, monitor and evaluate the roll out of IRIS across the region
2. Work with the Health Board to consider establishing a hospital based IDVA provision
3. Work with Welsh Women's Aid to deliver on their Change That Lasts Model

Objective 5

Relevant professionals are trained to provide effective, timely and appropriate responses to victims and survivors

Current Position

A National Training Framework Sub Group has been developed involving representatives from Training & Development, Community Safety and Swansea Bay University Health Board. The group is responsible for the development of the training plan for roll out across the authority – identifying those who require varying levels of the training and how this will be rolled out, whilst learning from the experiences of the Swansea Bay University Health Board and sharing best practice.

With the roll out of the National Training Framework it will undoubtedly increase referrals into local services and we need to be clear of a referral pathway for all professionals to follow, for example SBUHB cite an increase in referrals to specialist VAWDASV organisations and MARAC. The VAWDASV Leadership Group will have an important role to play in how we overcome any issues that may arise as a result of this.

For 2020-2023, on a local basis we will;

1. Work with local service providers to ensure they receive appropriate training on complex needs
2. Ensure all agencies in the local VAWDASV partnership give a commitment to training plans within their own organisation over the next 3 years.
3. When delivering VAWDASV training, give consideration to the recommendations of local Domestic Homicide Reviews, to ensure everyone feels confident to signpost victims to appropriate support services or VAWDASV champions
4. Raise awareness, through our training roll out, of the newly developed 'Safe Leave' policy for NPT staff who are affected by VAWDASV

For 2020-2023, on a regional basis we will;

1. Continue roll out of Group 1 training to all NPT staff and commence roll out of 'Ask & Act' Group 2 Training across Neath Port Talbot and Swansea
2. Continue with roll out of Group 1, 2 and 3 training to SBUHB staff.
3. Work with Welsh Women's Aid to deliver Group 6 of the National Training Framework to all local members and senior leaders

DRAFT

Objective 6

Provide all victims with equal access to appropriately resourced, high quality, needs led, strength based, gender responsive services across Neath Port Talbot

Current Position

Current services within NPT are detailed in Chapter 5 of this strategy. A high proportion of funding supports high risk victims and whilst services are county borough wide, access points are principally in the two main towns of Neath and Port Talbot

As outlined earlier in the strategy, we have 3 specialist DA providers in the area, offering refuge accommodation, move on accommodation, floating support, advocacy and advice. The One Stop Shops in Neath and Port Talbot offer a walk in service, operated by the local providers.

The Council's Housing Options Service, also based in Neath, and offers a walk in service for anyone in housing difficulty, including those experiencing Domestic Abuse.

For 2020-2023, on a local basis we will;

1. Embed and incorporate the VAWDASV Commissioning Guidance into our practice so that those who commission services can ensure activity is better informed, more joined up and value for money, ensuring that specialist services in NPT meet victims' needs
2. Further develop links with local specialist providers who meet the needs of people affected by other forms of violence such as Female Genital Mutilation (FGM)
3. Work with Supporting People to complete the commissioning exercise to implement a new service model for Accommodation and Support.
4. Further develop links with local housing providers and Housing Options to ensure victims in need of alternative housing are appropriately supported

5. Conduct a further review of high risk arrangements to ensure the changes identified are embedded and having a positive impact
6. Work with Social Services to review the response to Adults at Risk, specifically in respect of domestic violence and abuse.

For 2020-2023, on a regional basis we will;

7. Work with Swansea CC to consider the demand for regionally developing the SWAN project

(The SWAN Project, delivered by Swansea Women's Aid, supports women who are sex working. They provide practical and emotional support and aim to improve the safety and wellbeing of women accessing the service)

Objective 7

Increase focus on improving the recognition of, and responses to VAWDASV in all Criminal Justice proceedings

An integral element of this strategy is justice and protection for survivors and their families according to their needs, within a criminal and civil justice framework and also within a wider social context.

Prosecution

It is well documented that many victims do not report VAWDASV related crimes to the police¹⁵ and, that a significant proportion of those who do, later withdraw their complaints¹⁶.

There needs to be greater confidence in the Criminal Justice System (CJS) in order to increase reporting and as a result, increase victims' access to safety, support and justice and reduce the risk of re-victimisation.

A number of studies have shown that in the policing context, perceptions of fairness and decent treatment were at times more important than effectiveness and outcomes in determining satisfaction and confidence. Victims want to be treated with respect and dignity. Research also highlights that the outcomes and sentence are highly influential on victims' views of the CJS¹⁷.

The majority of perpetrators are men and boys. As most cases never come to the attention of the Criminal Justice System, there are few sanctions for their behaviour. Therefore, a drive to improve criminal justice system services, ensuring a renewed focus on prosecuting and convicting perpetrators is essential to driving victim and wider public confidence.

Family Courts

For specialist service providers supporting victim the Family Court process has long been a cause for concern. Whilst improvements have been made in the criminal courts, there is an increasing need for the Family Courts to follow in their footsteps. Domestic Abuse is an issue in 70% of cases in the family courts across England and Wales. Providers have expressed concerns of victims having to participate in mediation with the perpetrator, needing to represent themselves at Court and sometimes being cross examined by the perpetrator during the process.

¹⁵ Statistical bulletin: Crime in England and Wales, Year Ending December 2012, Office for National Statistics

¹⁶ CEDAW Thematic Shadow Report on Violence Against Women in the UK, Sen and Kelly (2007)

¹⁷ Victims' views of court and sentencing (October 2011). Commissioner for Victims and Witnesses in England and Wales

For 2020-2023, on a regional basis we will;

1. Work in partnership with South Wales Police and Crime Commissioner to further improve outcomes; to reduce the number of repeat victims; and to identify how we can intervene effectively much earlier
2. Working in partnership with the Police and Courts, identify what needs to change to better support victims, including victimless prosecutions and how evidence is gathered.
3. Increase awareness with local solicitors and legal reps of the importance of recognising all forms of VAWDASV and providing appropriate responses in family court situations

DRAFT

8. Leadership & Governance

The strategic direction and oversight of the Healthy Relationships for Stronger Communities Strategy is held by the VAWDASV Leadership Group, which is accountable to the Safer Neath Port Talbot Community Safety Partnership (CSP).

The Public Services Board will provide challenge and support to the Community Safety Partnership in progressing this Strategy.

The Leadership Group will continue to establish annual priorities drawn from this Strategy that will be progressed through clearly agreed actions plans. A delivery plan will be developed to highlight which aspects of the work will be delivered locally and regionally and to allow the Leadership Group to easily monitor progress

The measures listed in this strategy will be regularly reported to the Leadership Group by the designated leads for each objective.

The diagram on page 52 illustrates the revised governance structure around this strategy for 2020-2023.

For 2020-2023 the Leadership Group will;

- Publish an annual report to highlight progress made on all areas of this strategy
- Hold a regional annual event to discuss progress made and agree the priority area's for the following year
- Extend the partnership to ensure there is further involvement from Adult Social Services, BAWSO, YJEIS

Neath Port Talbot Healthy Relationships For Stronger Communities Strategy



Sub Groups:-

Communications & Engagement Group	Raise awareness of VAWDASV and local partnership work Delivering on Objective 1 within the Healthy Relationship for Stronger Communities Strategy	Sian Morris
Relationship & Sexuality Education Group	Overseeing the continuous improvement of the RSE Lesson packs, ensuring age appropriate RSE lessons are delivered across all schools in NPT Delivering on Objective 2 within the Healthy Relationship for Stronger Communities Strategy	Corinne Fry
National Training Framework (inc Ask & Act) Group	To implement the National Training Framework, Ask & Act Model and identify / arrange other relevant training Delivering on Objective 5 within the Healthy Relationship for Stronger Communities Strategy	Rachel Dixon

**Sub Groups to feed in to Quarterly Leadership Group meetings via a Highlight Report – Agenda Items to be scheduled.*

Time Limited Task & Finish Groups:-

As Required by VAWDASV Leadership Group	Time limited Task & Finish Groups can be established by the VAWDASV Leadership Group, for any emerging issues that would not otherwise be appropriate for the Sub Groups to address or take forward
---	---

Membership of the VAWDASV Leadership Group

- NPTCBC
 - Community Safety
 - Children's Services
 - Commissioning
 - Adult Safeguarding
 - Substance Misuse
 - Education
 - Training and Development
- Swansea Bay University Health Board
- South Wales Police
- Thrive Women's Aid
- Calan DVS
- Hafan Cymru
- BAWSO
- Tai Tarian
- Police & Crime Commissioner
- Probation
- Welsh Women's Aid
- Welsh Ambulance Service
- Mid and West Wales Fire and Rescue Service
- New Pathways

Tudalen92

DRAFT

9. Measures

In order to demonstrate the progress made on each of the 7 objectives within this strategy, a set of key performance indicators will be developed.

Progress reports will be discussed at the VAWDASV Leadership Group meetings and integrated into every Annual Report.

How will we know we are making a difference?

Survivor Feedback

As outlined earlier on in this strategy, survivor engagement and feedback is vital to shaping future services and understanding whether the work we do and the services we offer are meeting the needs of our communities.

Objective 1 - Communications & Engagement

- The number of Clare's Law requests made within Neath Port Talbot and the number of those where VAWDASV related concerns were raised
- The social media reach of all VAWDASV campaigns promoted by the Communications & Engagement Group
- The number of people reporting VAWDASV and/or accessing specialist support services
- The number of calls made to the Respect Helpline from the Neath Port Talbot area and their outcomes

Objective 2 – Children and Young People

- The number of children in Neath Port Talbot schools who have received a Healthy Relationship lesson and the % of those children who retained some the key information from that lesson 6 months later

Objective 3 – Perpetrators

- Once developed, the number of referrals made to the local Perpetrator Programme, including the % of those referred who have successfully engaged with the programme

Objective 4 – Early Intervention and Prevention

- Of the referrals into SPOC, the number of these that were VAWDASV related and the % referred for statutory services or early intervention. What were the outcomes?

- The number of referrals into services from those who are affected by any form of VAWDASV, but who identify as LGBT, are older, disabled, a male victim, or a member of the BAME community.

Objective 5 – Training

- The number of staff who have been trained to the appropriate level of the National Training Framework, depending on their individual roles.
- The number of staff within partner organisations who have completed VAWDASV related training.

Objective 6 – Accessible Services

- Survivor Feedback
- Number of presentations to Housing Options as a result of VAWDASV and their outcomes
- Referrals to specialist providers, programmes offered, and outcomes
- % of cases known to Adult Services where VAWDASV is a concern

Objective 7 – Criminal Justice Proceedings

- Usage of the remote evidence facility at the One Stop Shop
- The number of high risk victims supported by the IDVA service; the % of those who engage with support and the % who are repeat victims
- The number of victims supported through a court process and the % of those that have a positive outcome

Appendix 1 - Glossary

ACE's	Adverse Childhood Experiences
APB	Area Planning Board
BAME	Black, Asian and Minority Ethnic
BAWSO	Black Association of Women Step Out
C&E	Communications & Engagement
CAFCASS	Children and Family Court Advisory Support Service
Calan DVS	Calan Domestic Violence Services
CJS	Criminal Justice System
CSP	Community Safety Partnership
CYP	Children and Young People
DHR	Domestic Homicide Review
EIP	Early Intervention & Prevention
EU	European Union
FGM	Female Genital Mutilation
GP	General Practitioner
IDVA	Independent Domestic Violence Advisor
IRIS	Identification and Referral to Improve Safety
LGBT	Lesbian, Gay, Bisexual, Transgender
MARAC	Multi Agency Risk Assessment Conference
NICE	National Institute of Clinical Excellence
NPT	Neath Port Talbot
NPTCBC	Neath Port Talbot County Borough Council
OSS	One Stop Shop
PCC	Police and Crime Commissioner
PSB	Public Services Board
RSE	Relationship & Sexuality Education
SBUHB	Swansea Bay University Health Board
SP	Supporting People
SPOC	Single Point of Contact

Tudalen95

SSWBA	Social Services & Wellbeing Act
SV	Sexual Violence
UK	United Kingdom
UN	United Nations
VAWDASV	Violence Against Women Domestic Abuse and Sexual Violence
VAWG	Violence Against Women and Girls
WA	Women's Aid
WG	Welsh Government
WWA	Welsh Women's Aid
YJEIS	Youth Justice Early Intervention Service

Tudalen96

DRAFT

Updates to the Healthy Relationships For Stronger Communities Strategy due to the Coronavirus Pandemic

The Healthy Relationships For Stronger Communities Strategy (2020-2023) was due to be launched in April 2020, following a period of public consultation.

However, given the current situation with the Coronavirus Pandemic this was delayed.

In the current climate and the concerns of Domestic Abuse increasing during and post lockdown, it is important that we continue to deliver on the strategy, prioritising the aspects we can effectively implement, whilst working towards the remaining actions in the longer term.

Outlined below are the aspects of the strategy that we will prioritise;

Objective 1 – Communications & Engagement

This objective will be prioritised and **all** actions can still be delivered on. The Communications and Engagement Group has been mobilised.

The Ask Angela Campaign will restart once licensed premises reopen.

As an immediate priority, the Communications & Engagement Group will launch a partnership campaign to encourage victims to come forward and seek support, as the current restrictions ease.

Objective 2 – Children & Young People

The Children and Young People Sub Group can be mobilised and will continue to deliver on the actions in Objective 2 of the strategy. However, the group will need to give careful consideration as to how we engage and deliver key messages in a safe but effective way.

We will work closely with the Youth Service and Education to deliver on these actions.

Crucial Crew will not be taking place this year in its usual format, but we will consider other ways to deliver key safety messages to this years primary school leavers.

Objective 5 – Training and Development

Aspects of the National Training Framework roll out will still continue via Welsh Government. The Ask and Act Steering Group has continued virtually and NPTCBC and SBU HB will continue to be represented on this group. At a local level NPTBC will continue with plans to commence Group 2 Training, but this may be delayed. SBU HB suspended all Ask and Act Group 2 & 3 training due to Covid-19, training will recommence in July as virtual training packages have been developed. IRIS (Identification and Referral to Improve Safety) was launched in February 2020 in Neath and Upper Valley clusters, implementation was suspended due to Covid-19 however, will recommence in July.

Objective 6 – Accessible Services

We will continue to work with Supporting People and our local providers to finalise plans around a new service model.

Objective 7 – Criminal Justice

We will continue to work closely with the Police, Courts and Probation to ensure we are still able to effectively support victims whilst current restrictions are in place.

Appendix 2

Resources & Service Mapping

Available services have been categorised into the following;

- 1) Accommodation
- 2) Support
- 3) High Risk
- 4) Children & Young People
- 5) Targeted Specialist Services

1) Accommodation

Refuge Provision

Calan DVS and Thrive Women's Aid provide refuge services within NPT. Both refuge providers operate a 24 hour on-call system.

- Calan DVS have 2 refuges offering a total of 13 spaces. One of Calan's 13 spaces is a crisis room which has a two week maximum stay and is restricted to women from Neath Port Talbot.
- Thrive have 1 refuge offering 6 spaces. The average length of stay in the Thrive refuge is 8 weeks. Thrive also provide short term resettlement support for women moving on from the refuge.

Fixed Term Temporary Accommodation

Fixed Term accommodation is time limited. Once the support needs of the women are met they are required to move on to other non-supported accommodation.

Thrive have five self-contained flats which are described as providing "move-on accommodation" supported by staff from within their Residential Services team. Individuals can remain in these properties for up to two years. 2018-19, 8 women were supported, 3 of whom had dependent children resident with them or as part of shared custody agreements. The average length of stay during the year was 12 months.

Hafan Cymru operate three clusters of temporary accommodation providing 14 units of housing.

Homelessness

For a proportion of survivors of VAWDASV, incidents (or repeated incidents) of abuse force them to flee from their home to places of safety.

The local authority has a duty to assist victims of domestic abuse to find alternative accommodation. However, it should be noted that many victims fleeing VAWDASV do not necessarily approach the local authority for assistance and access services in many different ways.

Neath Port Talbot Housing Options Team	2014/15	2015/16	2016/17	2017/18
Number of homeless presentations	2327	2008	2102	2158
Number of homeless presentations as a result of Domestic Abuse	130	123	171	148

2) Support

Floating Support

All three of the specialist providers provide floating support services to survivors of VAWDASV, funded by the Supporting People Programme Grant.

Thrive Women's Aid are funded to provide 10 units of floating support and employ one full-time dedicated member of staff to provide this service in addition to that provided by the Senior Family Support Officer (Community and Outreach).

Calan DVS are funded to provide 20 units of floating support and employ two dedicated full time members of staff.

Hafan are funded to provide 1 unit of floating support.

Freedom Programme

All 3 specialist providers deliver The Freedom Programme which is a **12 week group programme that** examines the roles played by attitudes and beliefs on the actions of abusive men and the responses of victims and survivors. The aim is to help women to make sense of and understand what has happened to them. The Freedom Programme also describes in detail how children are affected by being exposed to this kind of abuse and very importantly how their lives are improved when the abuse is removed.

The demand for this programme is far higher than the current capacity, demonstrated by the length of waiting lists.

All 3 specialist providers also offer further interventions, which are explained in further detail later on in the Strategy.

One Stop Shop

The OSS is based in Neath and provides a drop in service which is operated by Calan DVS. The service offers advice, information and support from specialist support workers to help **anybody** affected by violent relationships. The premises offer space for meetings, training events and counselling.

Partner agencies deliver sessional work from the OSS to deliver additional targeted services to clients.

In particular:

- A remote evidence facility for Neath and Port Talbot County Court and Family Court offering witness support
- Citizens Advice, offering welfare benefit and debt advice
- Solicitor once a week
- Probation for Females
- Victim Focus
- Counselling Services

Between April 2016 and March 2019, the remote evidence facility helped over 80 victims give evidence at court.

National Helpline

During 18/19 the number of landline calls from NPT was 937. Mobile numbers cannot be traced to a certain area.

The number of direct referrals from the Helpline to NPT refuges were;

- Calan: 17
- Thrive: 7

The above figures reflect referrals that were made directly by the helpline workers. In some instances, callers may be told of space in 3 or 4 refuges and they may contact the individual refuges themselves, which isn't reflected in the above figures.

3) High Risk

Multi Agency Risk Assessment Conference (MARAC)

The MARAC meet once every fortnight to discuss high risk victims of VAWDASV. Key statutory agencies, such as the Local Authority, the police and health work alongside relevant third sector agencies to form this partnership.

A MARAC Coordinator supports the MARAC process. This post is currently funded by the local authority.

MARAC	14 / 15	15 / 16	16 / 17	17/18	18/19
Cases discussed	306	370	446	464	506
Children in household	342	483	551	585	555
Repeat cases	22%	21%	23%	26%	34%

Independent Domestic Violence Advisor (IDVA) service

Neath Port Talbot Council have one full-time Senior IDVA, two full time IDVA's and a part time Business Support Officer, based within the Community Safety Team at Neath Police Station. The IDVA'S work with high risk VAWDASV cases. The service is funded by the Local Authority and South Wales Police and Crime Commissioner.

There is also a full time regional court IDVA funded by the Welsh Government Regional VAWDASV Grant.

IDVA Referrals	2014/15	2015/16	2016/17	2017/18	2018/19
	265	344	461	504	402

Social Services

4) Children & Young People

Social Services

The Social Services and Well Being Act (Wales) 2014 encouraged a new focus on prevention and early intervention and provided a duty to assess the needs of a child for care and support. Following a referral Children’s services carry out a statutory assessment in accordance with the level of need.

Children’s Services

The Single Point of Contact (SPOC) is designed to respond to all contacts and enquiries that come into Children and Young People Services (CYPS) and Early Intervention and Prevention services (Families First)

At the Single Point of Contact, all contacts are “screened” by a qualified, experienced Social Work Manager who will then decide on the appropriate next steps. These include:

- Signposting to support services
- Referral to early intervention and prevention services (Families First)
- Referral to statutory support services via the Intake Team
- Information and/or Advice provided and no further action required

Data for Contacts and Referrals to SPOC over last 3 years;

Year	Total Contacts	Referrals Made
2016/17	8987	984
2017/18	8970	1079
2018/19	10471	1598

Following referral an assessment is made regarding what intervention is appropriate to meet and the needs of the child and family. The outcome of this assessment will determine whether a Care and Support plan is needed to support the child and family and prevent the requirement for a child to be looked after by the Local Authority.

Children’s Services can access support services for families from partner organisations such as Thrive and Calan DVS and in addition, can refer to the Family Action Support Team (FAST), Integrated Family Support Service (IFSS) and Hidden Harm service.

FAST services include:

- Parenting advice and support
- Safety Trust and Respect (STAR) groups for children and young people and parents
- Respect programme for young people who are violent or aggressive to parents
- Freedom Programme for women who have experienced domestic abuse
- Direct work with Children and Young people
- Positive Steps Programme
- Working Together Programme – works intensively with children and families where support is required to change behaviours and improve neglectful home conditions

IFSS provides an intensive intervention for children and families where substance misuse is the primary area of concern.

The **Hidden Harm** worker provides assessment information and brief intervention for parents who misuse substances and can fast track to the community Drug and Alcohol Team as required.

Families First

Families First is a Welsh Government programme designed to improve outcomes for children, young people and families. It places an emphasis on early intervention, prevention, and providing support for whole families, rather than individuals. The programme promotes greater multi-agency working to ensure families receive joined-up support when they need it. The intention of the programme is to provide early support for families with the aim of preventing problems escalating.

The support provided through Families First spans a wide range of needs, from early intervention support through to intensive, multi-agency interventions but should stop short of supporting families in crisis, who require statutory or specialist services.

Referrals for all Families First services are made via the Single Point of Contact (SPOC). All referrals are passed to a weekly referral panel which will help make sure that families get support from the service that best meets their needs.

Some of the Families First services include;

Team Around the Family (TAF)

TAF is for families who want to make positive changes to their family life, but need support to do this.

- TAF provides a service to families who are likely to need help from two or more agencies (e.g. Schools, health services, housing).
- TAF brings everyone together with families to identify any needs, and agrees how best to help families using strengths to meet those needs.
- TAF is a way of identifying who is best placed to offer any of the additional advice and support the family may need.

Children & Families Team

The Children and Families Team provide a range of parenting support appropriate to the need of the family. The core purpose of parenting support is about working with parents to reduce risks; strengthen parenting capacity; develop and build resilience and sustain positive change in the best interests of children.

Domestic Abuse Service

This service offers a suite of specialist interventions and programmes that are family focused and offer choice for families who have either left the perpetrator or who wish to stay together. This includes targeted and age appropriate interventions for children and young people of victims, victims and perpetrators.

While the focus is on children and young people, the service protects and supports all family members, with the goal of creating and maintaining safe and healthy households that support and nurture children and young people.

Each family is allocated a key worker who assesses the families' needs and produce an action plan based on what the family would like to achieve. The support is tailored to meet the specific needs of the family and is based on a range of interventions that are age appropriate.

There have been over 1,500 referrals to EIP panel in 2018/19. Of these, 149 individuals accessed the DA service.

Flying Start

Flying Start is a Welsh Government funded programme available in targeted areas, supporting all families with children under 4 years of age to have a Flying Start in life.

The programme has 4 core elements:

1. Health Visiting
2. Childcare
3. Speech and Language
4. Parenting

In Neath Port Talbot, the programme also provides additional support through midwifery and educational psychology services.

Spectrum

Hafan Cymru operate Spectrum which is an All Wales project delivered in primary and secondary schools across all parts of Wales, including Neath Port Talbot. Spectrum uses a 'whole school' approach to tackling all forms of VAWDASV. Lessons are delivered by trained teachers working with Personal & Social Education (PSE) teachers in support of the PSE Framework in schools to teach Children and Young People about healthy relationships, abuse and its consequences and where to seek help. Classes receive this intervention on an annual basis.

The Spectrum staff also deliver sessions to teachers and support staff, youth workers, social workers, other interested professionals, and parents.

All Wales School Liaison Core Programme

The programme educates young people about some of the dangerous issues that affect our society today. The intention of the programme is to safeguard all children and young people living in Wales by providing them with information about the dangers associated with issues such as substance use and misuse, anti-social behaviour and VAWDASV. Lesson content is delivered by trained police officers working in partnership with Personal & Social Education (PSE) teachers, in support of the PSE curriculum in schools in Wales.

Crucial Crew

Crucial Crew is an annual event for year 6 pupils organised by the Neath Port Talbot's Community Safety Team.

The event is designed to raise awareness among pupils in their final year at Primary School, of the dangers they may face in everyday life. Crucial Crew is held for two weeks every year and involves many different agencies working in partnership to raise awareness of various different issues, one of which is VAWDASV and Healthy Relationships.

This event reaches 1600 pupils every year.

NPT Youth Justice and Early Intervention Service

Young persons aged 10-18 who have committed a violent offence (which could include domestic or sexual violence) automatically engage in the STAR and RESPECT programme to aid understanding about healthy relationships. This is delivered internally by suitably trained staff. The NPT YJEIS is now a local authority multi agency service having disaggregated from the Western Bay regional service in April 2019. This means that VAWDASV are able to form closer local links with the YJEIS and provide the interventions needed to support these young people in their own localities.

Data from the Core Assessments completed with young people involved with the Youth Justice and Early Intervention Services shows that 41% had witnessed violence in the family and 39% had experienced some form of abuse themselves. Young people involved in the Youth Justice Service have a significantly higher risk of experiencing ACE's (Adverse Childhood Experiences) including Domestic Abuse, Emotional Abuse and Physical abuse. Many are victims long before becoming involved with Offending or risky behaviours.

NPT Youth Service

Neath Port Talbot Youth Service works with young people aged 11-25.

They encourage and enable young people to participate in all opportunities available to them and gain the skills needed to become happy, confident and fulfilled adults and members of their communities. Staff are trained to deliver VAWDASV and Sexual Health training to the young people accessing their services.

Relationship & Sexuality Education (RSE)

The Youth Service are responsible for the development of the Relationship and Sexuality Education packs that are delivered in all local schools. Lessons include; personal hygiene, puberty, sex education and most recently a 'Healthy Relationship' lesson has been added to the pack.

The content and delivery are overseen by the RSE Group, made up representatives from the Youth Service, Health Board, Education, Community Safety and various other partners.

Higher Education

As part of the programme of awareness raising of VAWDASV and the services available, prevention campaigns and initiatives are regularly held in local colleges and universities.

5) Targeted Specialist Services

Sexual Assault Referral Centre (SARC)

The SARC is a specialist facility where victims of rape or sexual assault can receive immediate help and support. SARC services are provided in the Swansea area, managed by New Pathways.

New Pathways is a registered charitable company that provides a range of specialist counselling and advocacy services for women, men, children and young people who have been affected by rape or sexual abuse. They have many years of experience and are widely regarded throughout the UK as a leading organisation in this field.

BAWSO (Black Association of Women Step Out)

BAWSO is an All Wales Organisation that provides specialist services to the BAME community for those who are affected or at risk of Domestic Abuse and any other forms of violence, including: Female Genital Mutilation, Forced Marriage, Honor Based Violence, Modern Day Slavery and Human Trafficking.

The service provision includes; purpose built refuges that are specially adapted to meet the cultural and religious needs of service users, Information and Advice, Housing related tenancy support, Accommodation and outreach support for victims of Modern Day Slavery and Trafficking , FGM Health and a safeguarding community based project.

The Swansea project has 1 refuge and 2 safe houses with provision for 11 families. Both can accommodate either families (women and children) or single females. The project has 3 full time family support workers and one part time children and young person's worker.

At present, there is no provision for an Outreach worker in the Neath Port Talbot area but they have had the following referrals:

BAWSO Referrals for NPT	No Of Referrals
2013/14	3
2014/15	5

2015/16	4
2016/17	3
2017/18	2
2018/19	4

The specialist support providers in NPT also offer additional services;

Thrive Women's Aid

- **Video Interactive Guidance Project**

Video Interaction Guidance (VIG) is a unique intervention technique that we use to help women and their children who have been affected by domestic abuse. The method involves filming interactions between a mother and her child/children in areas that they have self-defined as wanting to improve. The footage is then edited to highlight 3 positive moments of interaction. The clips are reviewed with the client as part of a shared process where the VIG Guider can help the clients to micro-analyse the footage and empower them to move closer to their goals. VIG is a strength-based approach which helps families in need to identify the existing strengths within their relationships and then helps motivate them to build on these. VIG can help families improve how they communicate, become more aware of the principles of emotional attachment, help to increase parental sensitivity and ultimately rebuild the bonds that may have been affected by domestic abuse.

The VIG method has been clinically approved to help with infant bonding and attachment between parents and children. By focussing on the positives, and recognising what parents are doing well, it encourages those behaviours to be repeated. It engages clients actively in a process of change towards realising their own hopes for a better future in their relationships with their children.

- **LIFE (Liberty Independence Freedom and Empowerment)**

Thrive Women's Aid and NPT Mind have created a fully integrated new service provision that responds to those who have experienced domestic abuse and whose mental health has suffered as a result. The key ambition of the LIFE project is to create a sustainable, user-led, ongoing provision, that will enable often vulnerable service-users to access support beyond their period of

crisis, as and when they need it, and in a format that they want. The project brings together a range of activities that will promote

1:1 Support 3-16yrs	STAR Club 4-11 yrs Child
<p>Needs identified during initial assessment</p> <p>6/8 weeks support with a review</p> <ul style="list-style-type: none"> - 1:1 sessions within school/PTAWA office or community. - Therapeutic and sessions addressing Domestic Abuse, confidence, self-esteem, anger, safety and emotional issues. 	<p>8 Wk. programme</p> <p>Child or young person must not be residing with the perpetrator.</p> <p>Aims of the programme are:</p> <ul style="list-style-type: none"> - To improve parent/child relationship. - Help parent to understand effects of DA on their child and provide strategies to cope by enhancing parenting skills. - Help children to express and understand their feelings, and learn how to deal with them responsibly.

recovery, well-being and awareness raising, with the aim of empowering women to come together to help themselves and each other on their journey towards a positive and health future.

- **The EDGE Project (Equality Diversity enGagement and Education)**

The EDGE Project supports women who are victims of domestic abuse and further marginalised for being Roma, Gypsy and Traveler, Older or Disabled. The project seeks to increase safety and reduce the risk of harm using a multi-disciplinary approach in order to break the cycle of domestic abuse. On a one-to-one and group basis the team of two part-time Inclusion Officers support women to access the necessary local services they require and empower them to be able to replicate this process independently in the future. The project also provides education about domestic abuse, human rights, equality and diversity within the community and with professionals to raise their awareness of domestic abuse, equality and diversity by engaging with local providers and businesses to help them understand the barriers that service users may or have experienced due to their marginalization and help them to sculpt change within their organisation to address this. It provides awareness-raising sessions to individuals and teams in order to do this and encourage businesses to make 'pledges' which reflect the changes they are making.

STAR Group 7-11yrs Parent and Child	Young Person's Recovery Toolkit (7-16 years)
<p>10 Wk. programme</p> <p>Child or young person must not be residing with the perpetrator.</p> <p>Aims of the programme are:</p> <ul style="list-style-type: none"> - To improve parent/child relationship. - Help parent to understand effects of DA on their child and provide strategies to cope by enhancing parenting skills. - Help children to express and understand their feelings, and learn how to deal with them responsibly. 	<p>8-wk. programme</p> <ul style="list-style-type: none"> - The Children and Young People Recovery Toolkit is a programme for any young person that has witnessed or experienced domestic abuse and are able to take part in a group. - It is unique in its approach using a combination of trauma – informed resilience focused and specific trauma focused cognitive behaviour therapy and person-centred therapeutic principles.

- **Children and Young People**

- **Crisis Intervention**

Works with women who approach Thrive Women's Aid for support during a period of crisis and whose needs require immediacy of attention e.g. Target hardening, application for refuge, court support. The support last for approximately 2 weeks in order to address immediate needs whilst liaising with other professionals and our own community and outreach team to facilitate onward referral to the most appropriate provider for longer-term support.

Calan DVS

- **Compass Project**

The Compass Programme uses a strength based approach to promote a man's resilience and wellbeing following exposure to domestic violence and abuse. Though Domestic Abuse against men is traditionally underreported, it is known that agencies are supporting increased numbers of male victims and the Compass Programme is able to meet a growing demand. The Compass

programme provides a 'safe space' for male survivors to build positive and trusting relationships in an environment where they can talk openly about their experiences.

- **Inspiring Families**

The Inspiring Families Programme is an innovative intervention and assessment programme that can help strengthen and stabilise families. It is a structured 10 week programme for families that are affected by Domestic Abuse. It provides professionals with a robust framework to assess the parents' behaviour, coercive control, disguised compliance, the level of current risk and the likelihood of future risk. The programme identifies the potential for change and reduction of risk within the family, or indeed, whether the risk is too high or the potential for change too low to make working with the family a viable option.

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
V2	Claire Jones/Elinor Wellington	Strategic Manager Partnerships & Community Cohesion/Principal Officer Community Safety	16 June 2020

1. Details of the initiative

	Title of the Initiative: Neath Port Talbot Healthy Relationships For Stronger Communities Strategy
1a	Service Area: Partnerships & Community Cohesion
1b	Directorate: Assistant Chief Executive and Chief Digital Officer
1c	Summary of the initiative: The Strategy is an overarching plan which outlines the priority areas and strategic direction around healthy relationships and the implementation of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 within Neath Port Talbot. It has been developed with the involvement of partner agencies and survivors. It aims to tackle all forms of violence in relationships, responding to the growing number of referrals being received by specialist providers; reducing harm and improving the lives of those affected.

	<p>This therefore will be the second 'Healthy Relationships for Stronger Communities' strategy, implementing the Violence Against Women Domestic Abuse and Sexual Violence (Wales) Act 2015. Since this time, changes have been made and there has been much progress.</p> <p>Neath Port Talbot County Borough Council (NPTCBC) and Swansea Bay University Health Board has worked with a wide range of partner agencies to develop this strategy and will continue to work with partner agencies to provide services to all victims of crime and to bring all offenders to justice. We have also worked closely with Swansea City Council, to establish areas of work which are best delivered on a regional basis and these will be highlighted throughout the strategy.</p> <p>This strategy encourages partners to further work together to achieve positive outcomes for all victims of VAWDASV.</p>
1d	<p>Who will be directly affected by this initiative?</p> <p>Any person who is impacted by violence or abuse, statutory partners, service providers, courts, voluntary and community organisations. We recognise that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.</p>
1e	<p>When and how were people consulted?</p> <p>In developing this strategy we involved a range of partners from across the sector, including South Wales Police, Swansea Bay University Health Board (with whom this will be a joint strategy), specialist providers, criminal justice, the courts, etc. through the VAWDASV Leadership group and any appropriate subgroups. We will also endeavour to listen to survivors. The draft strategy will be consulted upon before being presented for formal approval.</p> <p>During 2019, a regional review of VAWDASV services was undertaken. As part of this process, a range of means were put in place to allow partners and survivors to contribute. This has provided a rounded view of what works well, where there are gaps in provision and opportunities for improvement to be formed. A workshop was held with members of the VAWDASV Leadership Group as an opportunity to discuss the current working arrangements and priorities.</p> <p>While a wide range of stakeholders were consulted during the development of the Strategy further public consultation and engagement was held during February/March 2020 to ensure that the Strategy had wide support.</p>

	The consultation included an on-line survey, face to face consultation with survivors, and distribution of the draft Strategy through various partnership networks, including the Supporting People Regional Commissioning Group, Area Planning Board, Community Safety Partnership and the Public Services Board.
1f	<p>What were the outcomes of the consultation?</p> <p>Responses to the consultation did not identify any material change</p> <p>Responses to the consultation supported the objectives contained in the strategy; expressing support for less generic support, more communication and 'education!' to assist in preventing and reducing VAWDASV.</p> <p>Respondents considered an excellent service would be holistic; providing person centred support; gender sensitive support and emotional and practical support.</p> <p>22 survivors said they had children who had witnessed or been affected by domestic abuse, and 7 of these said their children had accessed services in relation to their experiences. Experiences of the service were mainly positive with support from school and health cited as examples. The majority of respondents considered that there was little if anything that could have been done differently/improved on.</p>

2. Evidence

What evidence was used in assessing the initiative?

A range of evidence will be used, including

- Best practice
- Legislative requirements, national reviews, NICE guidelines, relevant strategies, etc.
- Case Reviews (Domestic homicide reviews); for lessons learnt
- Resource and service mapping to understand services available, how funding is utilised and demand on services
- Quantitative information e.g. number of referrals to MARAC, IDVA, Specialist providers & National hotline (key data would be collected including e.g. age – see below); numbers trained; supporting people information, service reviews, homelessness presentations, et al.
- Qualitative information e.g. consultation and engagement including events, feedback and questionnaire

Section 5 (1) of the **Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015** places a duty on Local Authorities and Local Health Boards to jointly prepare and publish a Local Strategy which aims to end VAWDASV and ensure consistent consideration of preventative, protective and supportive mechanisms in the delivery of services. This strategy has a key role to play in ensuring compliance with the Act.

A suite of statutory guidance has also been issued under the Act, which sets out how relevant authorities should exercise their functions. This includes the Whole Education approach, National Training Framework (including 'Ask and Act'), multi-agency working, commissioning and working with and responding to perpetrators.

There are also various other pieces of legislation, guidance and research that have shaped the strategy.

- The requirement to undertake a local needs assessment aligns with Section 14 of the **Social Services and Well-being (Wales) Act 2014** (SSWBA), which also requires a 'population needs assessment'
- A local authority and Local Health Board is exercising functions in relation to children under SSWBA, must also have regard to Part 1 of the United Nations Convention on the Rights of the Child.
- The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. The work of the local VAWDASV partnership contributes to meeting the 7 wellbeing goals, in particular 'A healthier Wales' and 'A Wales of Cohesive Communities', and the five ways of working.
- The **Housing (Wales) Act 2014** enshrines in legislation the role of the local authority in preventing and alleviating homelessness, this will change the way that services are delivered to survivors of violence who flee their home seeking a safe place to live.
- Adverse Childhood Experiences (ACE's) is now a widely recognised term which shows a correlation between childhood trauma and adult health outcomes. Evidence suggests that experiencing 4 or more types of adverse childhood experiences leads to a person being 14 times more likely to be a victim of violence. Ultimately the provision of effective support and early intervention for those impacted by ACE's will have a longer term impact on the reduced demand and costs to health and social services. This research is shaping the strategy and implementation.
- NICE guidelines highlights that Domestic Abuse is a complex issue that needs sensitive handling and highlights benefit of early intervention.
- **South Wales Police and Crime Commissioners' Tackling Violence against Women and Girls Strategy 2019 – 2024** sets out four key priority areas for action including working collaboratively and with perpetrators.
- New safeguarding guidelines for children and adults at risk which set out the essential roles and responsibilities for anyone working with children or adults who are experiencing, or at risk of, abuse, neglect or other kinds of harm.

- Wales Audit Office have examined how the new duties and responsibilities of the VAWDASV Act are being rolled out and delivered. Their report concludes that victims and survivors of domestic abuse and sexual violence are often let down by an inconsistent, complex and fragmented system.

Welsh Government has framed its legislation and guidance on Violence Against Women, Domestic Abuse and Sexual Violence alongside the UK and EU legislation;

- Ending Violence Against Women and Girls (2016-2020)
- European Union (EU) Directive on Victims' Rights¹
- The Council of Europe Convention on Preventing and Combating Violence against Women, and Domestic Violence (Istanbul Convention)
- Welfare Reform

Other evidence includes

- Hester, M. and Westmarland, N. (2006) *Service Provision for Perpetrators of Domestic Violence*, University of Bristol; HM Government (2010) '*Call to End Violence Against Women and Girls*', Home Office The Respect document, published in 2010 – 'Domestic Violence Perpetrators: Working with the cause of the problem – is available at http://www.respect.uk.net/data/files/lobbying/lobbying_tool_with_refs_30.11.10.pdf: **in regard to perpetrators**
- Research published and carried out by Dr Jane Monckton Smith which looked at 372 cases of intimate partner homicide through interviews with bereaved families and public protection professionals which highlights the shift in emphasis that is needed to intervene and prevent homicide
- The findings of SafeLives' research, which provides evidence from over 4,000 victims supported in hospital and community settings, show that we are missing opportunities to identify victims of domestic abuse.
- Evidence around people reporting (or not reporting incidences of violence)

3. Equalities

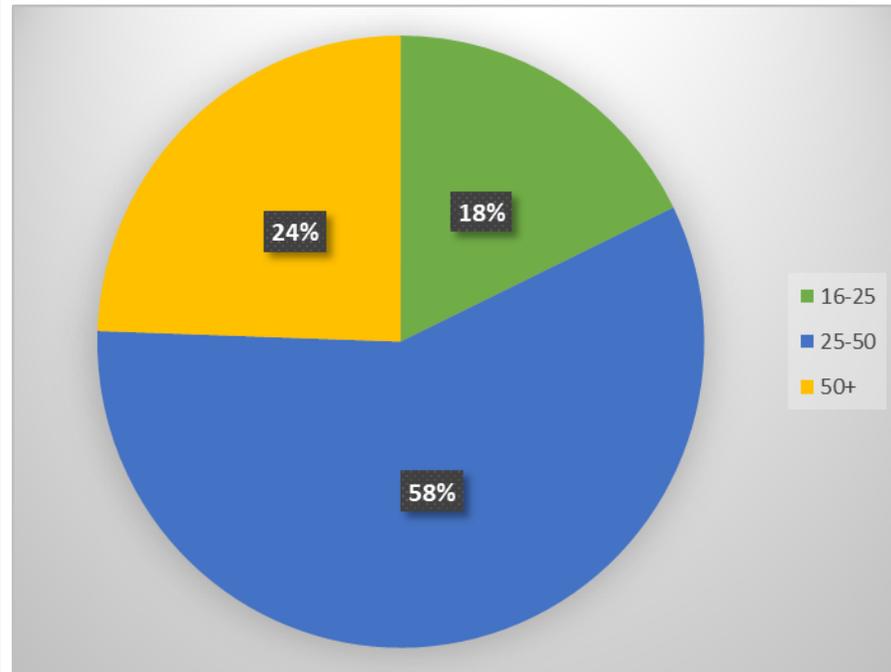
a) How does the initiative impact on people who share a **protected characteristic**?

Tudalen 118

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	✓			<p>Children and young people are likely to be a priority especially in terms of prevention and education and awareness as children are affected by domestic abuse and consequently the impact of the strategy is positive for the protected characteristic of age. Some respondents to the consultation thought services to children were inadequate, but this was not the majority view. In the same survey the majority of respondents felt a person centred approach is what an excellent service would look like.</p> <p>The over-all impact is designed to be positive in respect of those who suffer abuse (either directly or indirectly). It is anticipated that the strategy will have a positive impact on all people who experience domestic abuse regardless of age.</p> <p>Data on age is monitored.</p> <p>Calon DVS: NPT community and refuge between 01/04/2019- 31/3/2020</p> <p>14-17 - 1.2% 18-25 - 18.6% 26-35 - 31.1% 36-45 - 23.6% 46-55 - 18.6% Over 55 - 5.6% Unassigned - 1.2%</p>

Thrive highlights that the most typical age range for service users is between 25 – 34 years, followed then by ages 35 – 44.

Furthermore NPT IDVA Service - Victim Age Data. Quarter 1 – 2020/21



It is recognised that domestic abuse goes unreported, so this is not necessarily a complete picture of everyone who suffers abuse.

Having a better understanding of the ages of victims, and perpetrators, will provide an opportunity to tailor advice and support services as well as taking into account the subtleties of age, for example victims over 50.

The basis of the strategy is to enable positive outcomes for those experiencing/have been affected by domestic abuse -

			<p>Adults – specific initiatives, such as Bright Sky and Ask Angela will help provide positive outcomes in raising awareness, access to advice and support services and while the use of new technologies are being encouraged it is likely that some people may not be able to access them for example due to their age, financial circumstances, etc. Information is to the needs and the requirements of older people who have been/are victims of abuse is limited and has necessitated actions in the strategy to address this.</p> <p>Children and Young people – The development and introduction of awareness raising initiatives in schools have been identified as some of the most effective interventions around domestic abuse. With the Whole School Approach in four of our schools it is anticipated that it will raise awareness and provide support while reinforcing the importance of safe, equal and healthy relationships amongst all children/young people whether or not they are directly affected by domestic violence.</p> <p>By increasing the numbers undertaking training, we and our partners will provide a resource to identify and provide support to all who have experienced/are experiencing domestic abuse.</p> <p>Working with the police, solicitors and the courts it is anticipated that improvements in the court system will have a positive impact for victims and their families; providing better support victims and appropriate responses in family court situations.</p>
Disability	✓		<p>While it is anticipated that the Strategy will have a positive impact for anyone who experiences abuse, directly or indirectly, it is acknowledged that its implementation has the potential for the reverse in relation to people with disabilities. Accessible advice and support services will be essential to enable all those intended to benefit from the strategy to do so.</p> <p>This will be particularly important when facing court proceedings and children and young people participating in the whole school approach and other initiatives.</p>
Gender reassignment		✓	<p>While it is anticipated that the Strategy will have a positive impact for anyone who experiences abuse, directly or indirectly, it is recognised that there may be particular additional issues for those who have undergone/are undergoing gender</p>

			reassignment. This will require further investigation in order to fully understand the impact of the strategy on people who share this protected characteristic.
Marriage & civil partnership	✓		<p>The strategy recognises the role of understanding healthy relationships, and the corrosive effect on victims and families of abusive ones.</p> <p>The Strategy, nor the legislation which it is governed by, are limited to those who are married or in civil partnerships. However, there is potentially a clear distinction of the impact on those who are in an abusive relationship but live separately to those who don't.</p> <p>Initiatives to raise awareness, protect those who experience abuse and provide advice and support to both victims and perpetrators, are likely to be positive for all concerned.</p> <p>The promotion of Clare's Law provides a greater positive impact for those in the early stages of a relationship by allowing people to find out if their partner has an abusive or violent past.</p> <p>The promotion of Ask Angela (a sexual violence prevention campaign which aims to help individuals feel safe when they are on a night out) (more likely to be used by those not in a relationship) has a positive impact.</p> <p>For those not in a relationship it could be easier to access support /advice services as not under the watchful eye of a partner. However for those in relationships access to services and advice is made as safe and easy as possible e.g. advice on deleting browsing history.</p>
Pregnancy and maternity	✓		<p>It is likely that women seeking help will be pregnant or have children.</p> <p>The evidence that early identification in healthcare and social care settings, particularly with universal screening for domestic abuse in pregnancy leads to</p>

			<p>improved practices and disclosure. The implementation of the actions to ensure this takes place will have a positive impact on women who are pregnant.</p> <p>In addition the various strands of the Strategy, working with providers, early interventions by health and social care services, training programmes and education programmes all combine to provide mechanisms to support and protect.</p>
Race		✓	<p>The strategy recognises that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.</p> <p>While it is anticipated that the overall impact of the strategy will be positive there is currently limited insight into the potential impact on people from BAME communities. Therefore we will explore initially in the planned consultation exercise and in more detail over the life of the Strategy and as a result has been included as an action in the strategy</p>
Religion or belief		✓	<p>The Strategy recognises that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status.</p> <p>It is acknowledged that there is limited insight into seldom heard groups and we need to explore this in more detail over the coming years.</p> <p>While it is anticipated that the overall impact of the strategy will be positive there is currently limited insight into the potential impact on people from BAME communities. Therefore we will explore this initially in the planned consultation exercise with more detailed consideration as part of the Strategy itself.</p>
Sex	✓		<p>The Strategy uses the nationally used term “Violence Against Women” which refers to the range of crime types which are predominantly, but not exclusively, experienced by women and girls.</p>

			<p>It is important to note that the strategy is a gendered response – so it will significantly impact on women and girls, whilst also giving an assurance it will also address the needs of everyone else affected by this agenda.</p> <p>Having a co-ordinated approach to addressing these issues does not mean that the Strategy neglects to address abuse directed towards men and boys or other groups and individuals who experience these forms of violence, or neglects to deal with violence perpetrated by women.</p> <p>Therefore there is likely to be a positive impact</p> <p>By implementing the various actions to raise awareness, provide advice and support, address the lack of progress in court proceedings, etc., it is anticipated that those affected by abuse will have a positive outcome as a result.</p> <p>However, as abuse is experienced predominantly (although not exclusively) by women and girls services etc., have been established to address their particular circumstances and as a result the Strategy is likely to have a greater positive impact for them.</p> <p>This imbalance has been recognised in the Strategy with actions to raise awareness of healthy relationships in schools and well as to identify the needs of and appropriate engagement with male victims. These are likely to have positive outcomes for those affected although not to the extent of those for women.</p> <p>Programmes identified in the strategy to address the abusive nature of perpetrators are male orientated, reflecting the evidence that perpetrators are predominantly male. The successful implementation of the actions would suggest that positive impacts would be evident for male perpetrators while there is little evidence to support this in relation to women in this role</p>
Sexual orientation		✓	<p>The strategy is likely to recognise that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender, and marital status. The strategy does not neglect abuse directed towards other groups and individuals who</p>

			<p>experience these forms of violence, nor neglects to deal with the perpetrators of violence/abuse</p> <p>While it is anticipated that the Strategy will have a positive impact for anyone who experiences abuse, directly or indirectly it is recognised that this is an area that requires further investigation in order to fully understand the impact of the strategy on people who share this protected characteristic</p>
--	--	--	---

What action will be taken to improve positive or mitigate negative impacts?

A consultation exercise will be undertaken to help confirm/ identify alternative impacts
 Actions will be included in the Strategy to continue to achieve a better understand the needs and requirements of various groups within our communities. The outcomes will inform future reviews of actions and objectives.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	+			<p>Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour. We recognise that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender and marital status</p> <p>The whole ethos of the Healthy Relationships For Stronger Communities Strategy is</p>

To advance equality of opportunity between different groups	+		<p>to eradicate or prevent <i>gender based violence</i>.</p>
To foster good relations between different groups	+		<p>Underpinning the Strategy are the fundamental principles to eliminate discrimination, harassment and victimisation as well to advance equality of opportunity between different groups. Actions has been developed 'to <i>prevent and eradicate gender based violence by promoting: equality; safety; respect; and, independence to enable everyone to live free from abuse and the attitudes that perpetuate it</i>'.</p> <p>Our commitment to engagement with different organisations, groups and communities in the development of the objectives has allowed greater understanding between groups, a shared sense of purpose, and a sense of increasing confidence to tackle these issues.</p>

What action will be taken to improve positive or mitigate negative impacts?

The strategy has been developed In partnership but Consultation is required to identify any actual impact, to highlight any unintended consequences and to explore potential mitigating actions for consideration.

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
--	---	---	-----	--------------------------------------

Community Cohesion	✓		<p>Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour</p> <p>Working with our partners and survivors we will help provide support and assistance to those who experience isolation and exclusion due to their previous or current circumstances.</p>
Social Exclusion	✓		<p>The strategy will have a positive impact on social exclusion by helping address the negative experiences of victims and perpetrators, helping rebuild confidence to take a more active and positive role within family and community life</p>
Poverty	✓		<p>Over recent years we have become increasingly aware of the various aspects of poverty within our area and have identified work streams to address some of these; our work to address adverse childhood experiences is one such work stream.</p> <p>There are many forms of poverty; financial, social, emotional and the lack of opportunity. With the successful implementation of the strategy we anticipate there will be a positive impact on the various aspects of poverty particularly emotional poverty.</p>

What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language			✓	We will continue to improve the availability and quality of our services through Welsh. Where practicable providers and partners will look to improve the availability and offer of Welsh language services Opportunities for staff will continue to be promoted so that the Welsh language is treated no less favourably than the English Language.
– treating the Welsh and English languages equally			✓	We will continue to treat Welsh no less favourably than English as required by the Welsh language standards.

What action will be taken to improve positive or mitigate negative impacts?
<p>Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration</p>

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?

To maintain and enhance biodiversity			It is not expected that the strategy will have any adverse effect on biodiversity or Eco-system resilience.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			It is not expected that the strategy will have any adverse effect on biodiversity or Eco-system resilience.

What action will be taken to improve positive or mitigate negative impacts?
Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	In line with the requirements of the Well-Being of Future Generations (Wales) Act 2015, the aims and key principles of the strategy will be developed to meet the 5 ways of working which will help us to work together better, avoid repeating any past mistakes and tackle some of the long term challenges we are facing. This strategy is about cultural change as well as education and recognises some things will take time to effect and maintain change

ii. Prevention – preventing problems occurring or getting worse	Prevention and early intervention will be at the very heart of this strategy, and embedded in the actions moving forward, whether this be by education, engagement or in re-directing resources to ensure that victims and perpetrators can access help and support at the earliest possible time and to prevent cases reaching a point of crisis
iii. Collaboration – working with other services internal or external	Collaboration is integral to the development and delivery of this strategy and is embedded within the governance arrangements, including strengthening the partnerships, working regionally where it makes sense to do so, and being collaborative in the way that we commission.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	Survivors, support services, et al will be involved in the development of this strategy and will continue to be involved in its delivery. <ul style="list-style-type: none"> • To ensure our service delivery is person centred • To ensure the voices of people affected by violence and abuse are heard and that more opportunity is created to develop services that are evidence based and include survivor involvement
v. Integration – making connections to maximise contribution to:	This strategy will be developed within the well-established and strengthened VAWDASV leadership group and by the nature we will be taking a holistic approach and promoting that this is everyone’s business. No-one agency has the solutions and therefore we all need to work together to achieve the best outcomes.
Council’s well-being objectives	The objectives as developed will help meet the Council’s Wellbeing objectives and complement the anticipated priorities and steps in the revised Corporate Plan 2020-2023 Obj 1: improve well-being of children and young people - “All of our children and young people have the best start in life, so they can be the best they can be” Obj 2: To improve the well-being of all adults who live in the county borough - “Everyone participates fully in community life – socially and economically”
Other public bodies objectives	This is a shared duty with the Swansea Bay Health Board, but is an issue that requires all public bodies to play their role, including Police, Probation, Housing, Fire, etc.

	<p>The NPT Public Service Board identified key objectives to improve the well-being of the people who live in the Neath Port Talbot area with the work to tackle VAWDASV in Neath Port Talbot contributing to achieving the following objectives;</p> <p>Objective 1: Support children in their early years, especially children at risk of adverse childhood experiences</p> <p>Objective 2: Create safe, confident and resilient communities, focusing on vulnerable people</p> <p>Objective 3: Put more life into our later years - Ageing Well</p> <p>Objective 4: Promote well-being through work and in the workplace</p>
--	---

8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The strengthened partnership arrangements and planned consultation and engagement in the development of this strategy will enable people to highlight any unintended negative consequence of the strategy, which will then be considered when determining whether to continue to recommend the strategy.

The Leadership Group will continue to establish annual priorities drawn from this Strategy that will be progressed through clearly agreed actions plans. A delivery plan will be developed to highlight which aspects of the work will be delivered locally and regionally and to allow the Leadership Group to easily monitor progress

The measures listed in this strategy will be regularly reported to the Leadership Group by the designated leads for each objective.

An annual report will be published to highlight progress made on all areas of the Strategy with a regional annual event to discuss progress made and agree priority areas for the following year.

The intended impact of the Strategy will be monitored and the outcome reported in the above annual report

9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	The over-all intention is Positive, it is anticipated that the strategy will have an important contribution recognising that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender, and marital status. There are areas where it is recognised that further investigation is required in order to fully understand the impact of the strategy on people who share specific protected characteristics
Community Cohesion/ Social Exclusion/Poverty	The over-all impact is positive. The Council's Wellbeing Objectives aim to improve the wellbeing of children, young people and adults, as well as the general wellbeing of the area, by developing the local economy and environment. Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour. By tackling violence and abuse the strategy should have a positive impact.
Welsh	It is anticipated that that there will be both positive and negative impacts due to the ability of and statutory requirements for partners and providers to provide services n Welsh.
Biodiversity	The strategy will not have any adverse effect on biodiversity or Eco-system resilience

Well-being of Future Generations	There will be a positive impact as the strategy has been developed in line with the five ways of working.
---	---

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

The over-all intention and impact is Positive, in respects of equalities, Community Cohesion/ Social Exclusion/Poverty, Biodiversity and wellbeing and future generations.

It is anticipated that the strategy will have an important contribution recognising that violence and abuse affects people regardless of their age, race, religion, sexual orientation, gender, and marital status.

Within equalities there are areas where it is recognised that further investigation is required in order to fully understand the impact

of the strategy on people who share specific protected characteristics, for example LGBT

Violence in relationships may have a range of consequences including homelessness, mental health, problematic substance misuse, child protection issues, physical injury and offending behaviour. By tackling violence and abuse the strategy should have a positive impact **in respect of Community Cohesion/ Social Exclusion/Poverty**.

There will be a positive impact in respect of **Well-being of Future Generations** as the strategy has been developed in line with the five ways of working.

In respect of Welsh is anticipated that that there will be both positive and negative impacts due to the ability of and statutory requirements for partners and providers to provide services n Welsh.

While the anticipated outcome of the Strategy will be positive, some potential negative impacts have been identified and mitigating actions have been developed to address these. In addition, it is acknowledged that potential negative impacts are likely if implementation of the Strategy is not fully achieved or undertaken sensitively.

Please provide details of the overall conclusion reached in relation to the initiative

10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Undertake a public consultation exercise to test the impact of the objectives on	PO Community Safety	April 2020	Consultation responses received

those who share protected characteristics.			
Ensure the Strategy is appropriate to meet need	As above	May 2020	Strategy amended in light of responses received during the consultation
Include in the Strategy actions to continue to understand the needs and requirements of various groups within our communities.	VAWDASV Leadership Group	May 2020	Actions are developed and included in the final version of the Strategy
The outcomes of the actions to inform future reviews of actions and objectives	VAWDASV Leadership Group	June 2021	Progress and outcome of actions to be included in annual report and considered as part of future review of objectives and /or actions

11. Sign off

	Name	Position	Signature	Date
Completed by	Claire Jones	Strategic Manager Partnerships & Community Cohesion	SCJones	16 June 2020
Signed off by	Karen Jones	Asst Chief Executive and Chief Digital officer	K Jones	16 June 2020

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Cabinet
25th June 2020

Report of the Head of Streetcare
M. Roberts

Matter for Decision

Wards Affected: Sandfields East and Sandfields West

Public Space Protection Orders – Aberavon Beach

1. Purpose of Report

- 1.1. To seek approval from Cabinet to consult with external stakeholders with a view of extending the “Public Space Protection Orders 2017” at Aberavon Beach.

2. Executive Summary

Public Space Protection Orders only have a lifespan of three years. If the orders on Aberavon Beach and Promenade are to extend beyond October 2020 then a public consultation exercise needs to be completed and considered prior to October, in order to comply with legislative requirements.

3. Background.

- 3.1. For many years the Council has been committed to dealing with the detrimental environmental effects caused by uncontrolled dogs on Aberavon Beach and Promenade, particularly during the summer period.
- 3.2. Dog owners who fail to clean up after their dogs or control their animals not only cause a nuisance but potentially threaten the health and wellbeing of the public. This is particularly the case around the beach area during the summer months when there are many visitors and a significant number of children playing on the beach. To address this issue, the Council adopted the ‘Aberavon Beach Public Space Protection Orders’ in 2017, further to a change in legislation with dispensed with the former Dog Control Bylaws.

- 3.3. The PSPOs preclude dog owners from taking their dogs onto a designated part of the beach from May 1st - September 30th annually, in line with the holiday period. It also prescribes that dogs must be kept on a lead whilst on the promenade during the same period. Prior to the introduction of the orders, consideration was given to dog walkers who wished to visit the beach with their dogs, and as a consequence certain areas of the beach were omitted from the order for this purpose.
- 3.4. During the last two enforcement seasons, Waste Enforcement Officers have issued 139 Fixed Penalty Notices for a breach of the Orders. This has had a positive impact on the local environment generally, and children playing in the beach area in particular, although this number is believed to only represent a small percentage of the people who are still not complying with the requirements. Given the positive impact of the orders there is believed to be an expectation from the public that the Council will continue with controls and their policing along the Beach and Promenade during the summer periods.
- 3.5. All Public Space Protection Orders only have a lifespan of three years but can be extended at 'three year' intervals providing associated criteria is met. The expiry date for the current PSPOs in Aberavon is October 2020.
- 3.6. A PSPO can only be extended if the Local Authority concerned is satisfied on reasonable, necessary and proportionate grounds, that the following conditions have been met:
- (1) The activities occurring in the public place have, or are likely to have, a detrimental effect on the quality of life of those in the locality; and,
 - (2) The effect of the activities are, or are likely to be, of a persistent or continuing nature such as to make them unreasonable, and justifying any restrictions or requirements imposed in the PSPO.
- 3.7. To extend a PSPO, a consultation exercise has to be undertaken for a minimum of 6-8 weeks to include dialogue with:
- (1) The Chief Officer of South Wales Police;
 - (2) Any community representatives/groups that the Local Authority consider it appropriate to consult with, for example,

any particular groups that may have an interest in use of the facility such as dog walking associations, the Kennel Club or Dogs Trust; and,

- (3) The owners or occupiers of the land within the restricted area (other than land owned and occupied by the Council). In effect, members of the public who are non-dog owners who frequent the beach and any business operating at the location.

3.8. It is therefore proposed to undertake such consultation and, once completed, to report to Members detailing a summary of responses and any recommendations.

3.9. It is noted that where a Local Authority is considering extending an existing PSPO it must ratify the extension prior to the expiry date, in this case before October 2020.

4. Financial Impact

4.1. There are no financial impacts associated with this report.

5. Equality Impact Assessment

5.1. There are no equality impacts associated with this report.

6. Workforce Impact

6.1. There are no workforce impacts associated with this report other than officer time to conduct the consultation.

7. Legal Impact

7.1. The continuation of the PSPO is a discretionary power. The outcome report of the proposed public sounding exercise will be prepared in consultation with the Council's legal section.

8. Risk Management

8.1. There are no risk management issues associated with this report.

9. Consultation

9.1. The required consultation is the subject of the report.

10. Recommendations

- (1) That the Council undertakes a public consultation exercise on a proposal to extend the existing PSPOs at Aberavon Beach.
- (2) On completion of the consultation, a further report detailing a summary of responses and recommendations be presented for decision.

11. Reasons for Proposed Decision

- 11.1. To ensure that the Public Space Protection Orders currently operating seasonally at Aberavon Beach are subject to timely review so they can be extended if required.

12. Implementation of Decision

- 12.1 The decision is proposed for implementation after the three day call in period.

13. List of Background Papers

- 13.1. Nil.

14. Appendices

- 14.1. Nil.

15. Officer contact details

- 15.1 Mr Andrew Lewis, Waste and Neighbourhood Services Manager.
e-mail: a.lewis@npt.gov.uk

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Cabinet

25 June 2020

Report of the Head of Transformation - A.Thomas

Matter for Decision

Wards Affected:

All

The Members Community Fund (evaluation and protocol for relaunch).

Purpose of the Report

1. To update Cabinet on the performance of the Members Community Fund in its inaugural term and seek approval of the refinements to the Fund in readiness for its second term and relaunch.

Executive Summary

2. The Members Community Fund has, since its inception in June 2018, been invested across the 42 NPT Wards to address local needs and to support projects and initiatives that have contributed towards creating vibrant and sustainable communities.

The Project Development & Funding Unit (PDFU) within ELLL has successfully carried out the governance of the Fund, acting as the Grant Management Organisation.

Bids have been made for projects that enhance existing Council services, assist voluntary sector provision or form part of a larger initiative that is in need of additional financial support.

Eligible projects that have won through in the Members Fund have included those that have enriched the environment, promoted non - statutory education and learning, assisted Health & Well Being, and have promoted culture and/or recreation in all its forms.

This report evaluates the performance of the Fund in its first term (14.06.18 to 31.03.20) and provides detail on how refinements have been made to both the Fund criteria and the way in which project proposals are reported in the Fund's second term.

Background

3. The first term of the Members Fund concluded with the last of the Members project proposals being reported via Officer Urgency Action prior to the 1.04.20.

The Fund has proven to be a great success over the last 22 months:-

£634,147 or 99% of the £640,000 within the Fund has been invested by the 64 Councillors amidst 135 projects.

Timely intervention, commitment and support from the PDFU has brought an additional £668,542 in match funding to the scheme which represents a total investment across the 42 NPT Wards of £1,302,689. For every £1 invested from the Members Fund another £1.05 has been found from 28 separate grant aiding bodies.

The average value of a project developed under the auspices of the Members Fund is £9,650, with the largest project that has come to fruition being £222,000 and the smallest £523.

38% or £490,147 of the total investment has been used to improve, augment or add to amenities and facilities that are under the

ownership or custodianship of NPTCBC. Often this investment has helped to rescue a worsening situation that has been imposed by austerity measures.

£199,671 has been invested to refurbish 9 NPTCBC play areas.

£144,787 has been invested to improve woodland walks, drainage and the visitor experience within NPTCBC Parks, Country Parks and Open spaces.

20% of the projects developed by the Members Fund have promoted sporting outcomes. These investments have supported essential training equipment, floodlighting or adaptation of facilities.

10% of the projects developed by the Members Fund can be associated with the purchase and placement of life saving defibrillators. 20 individual units have been located at Sandfields East, Neath North, Margam, Aberafan, Pontardawe and Trebanos.

10% of the projects have assisted traffic calming, restricted car parking, road signage and pedestrian walkways.

5% of the projects have made better use of existing spaces within school settings. £36,838 has been invested in pre-school provision, conversion of underutilised classrooms for wider community use and adaptation of spaces for intergenerational work.

5% of the projects supported by the Members Fund have generated outcomes associated with Heritage and History with equipment and educational resources being funded for Margam Park Turbine House and Port Talbot Memorial Park. The Fund helped to commemorate the centenary of the end of WW1 with the acquisition of 'Tommys' (life size aluminium silhouettes of WW1 infantrymen).

Detail on all 135 projects supported by the Members Fund can be viewed on the hyperlink <Q:\Eloise Stanton\PDFO Work\EGG Stuff\PDFO Work\Hand Over Notes\Community Benefit Funds\Members Fund\Members Fund Grant Tracker.doc>

There have been some notable meritorious projects achieved within the confines of the Members Fund. Exemplar scenarios that have played out over the life time of the Members Fund in its first term include:-

Councillors contributing only 8% of the total cost of a project and realising the remaining 92% of the project cost from match funding (from Sport Wales, Welsh Rugby Union and the Football Association of Wales).

Projects being realised by using the Members Fund as leverage to arrive at a project that is multi - funded. Grant aid drawn in from the Millennium Stadium Charitable Trust, 'Awards for All Wales', Welsh Government 'All Wales Play Opportunities' Grant, Section 106 Planning Gain and the Applicants own reserves.

Environmental projects that have served multiple beneficiaries including the Prince's Trust Volunteers, Youth Engagement Team, YMCA, YGG Rhosafan, the Stroke Group and the W.I.

Six Councillors combining to each make a contribution from their Members Fund to realise the festive Port Talbot Town Centre Christmas tree and festoon lighting.

Members Fund being used to conclude and accomplish substantial capital projects that have been under preparation for some years or those that have stalled for the want of 'topping and tailing'. These include the refurbishment of Blaengwrach Welfare Park (circa £222,000), conversion of the Margam Park Turbine House to a Visitor Experience (£24,355 invested to complete the fit out and the restoration initiated by CADW), the arrival of a Bistro/sitting out area at the Gnoll Visitor Centre which could not otherwise be accomplished without Neath North Councillors contributing £9,310, and making good use of match funding from Llynfi/Afan Wind Farm to finally complete the Margaret's Terrace Play Area in Gwynfi.

Best use being made of 'in kind' contributions and 'community pay back' initiatives by way of Developers donating manpower, machinery, soil and materials to establish community gardens and junior training practice areas for Football Clubs. This has added

significantly to projects that have been core funded by the Members Fund.

Providing dedicated inclusive play equipment for profoundly physically disabled young people. Bespoke equipment for wheelchair users and apparatus that is accessible only by use of Radar keys.

Help for Self-Management Groups that have taken over the operation of the NPTCBC Bowling greens. Ground maintenance equipment has been secured by the local Councillor by contributing towards a Pen y Cymoedd Wind Farm grant and a Sport Wales 'Places for Sport' grant. This has consolidated the future of the Bowls Club as they now have the means of carrying out all green keeping activities for themselves with no financial burden on NPTCBC.

The Members Fund has been used as seed corn money to boldly develop pilot projects not previously attempted. A three year 'Community Ranger' post and rapid response ground maintenance operative has been employed to assist elderly people and to develop environmental initiatives in Onllwyn. The project costing £48,699 has the full backing of DOVE and the Community Council.

In conclusion, in the first term the Members Fund has made our communities more vibrant, greener, accessible, better equipped, more cohesive and more sustainable. Quality of life has been improved. These outcomes have prompted the relaunch of the Members Fund in its second term.

The relaunch of the Members Fund in its second term builds upon experience and the interpretation of the Fund in its first term.

A new reporting arrangement has been arrived at to foreshorten the volume of paper associated with each bid tabled at Cabinet. The generic Headings associated with a typical Cabinet report (Headings numbered 1, 2, 4 to 10 and 12 to 15) will feature only the once but individual and multiple project proposals will be assigned to concise Appendices within that report. Decision on each proposal will be

made against the information contained within each Appendix and Heading 3. 'Background or Project Specifics' and Heading 11. 'Recommendations'. (Please see Appendix A attached to this report).

The 'Guiding Principles' Paper which governs the management and stipulates the new refined eligibility criteria for the Fund are attached at Appendix B.

Notable changes to the Fund include:-

A condensed time frame to make bids and to report proposals to Cabinet (launch, post Lockdown, to receive bids up until the end of October 2021).

With the deadline for submitting and seeking approval for projects being 29.10.21, the five months remaining until the 31.03.22 (when the Fund closes) to be used to spend the grant award and to bring the project to fruition.

Highways infrastructure projects must be submitted by the 31.03.21 to allow sufficient time to advertise for approval, to explore objections and to facilitate delivery of the project by 31.03.22.

Refreshed eligibility criteria to allow more school based activity.

Opportunities in the second term for Councillors to re-invest their Members Fund money in initiatives that were piloted successfully in the first term.

More insistence on realising match funding to add value to the Fund.

More specific information on ineligibilities so as to avoid confusion.

The 'Guidance Notes for Members' (at Appendix C) follows the same vein as the 'Guiding Principles' Paper but in a more condensed format.

The Members Fund Application Form at Appendix D has been simplified and reduced in size, from the version used in the first term, without compromising on its ability to capture essential information upon the project proposal.

With these refinements the Members Fund is again deemed to be 'fit for purpose' and an appropriate vehicle to be used to promote significant inward investment.

Financial Impact

4. No implications as the Members Fund is already a budget line found from the Council's Reserve Fund.

Integrated Impact Assessment

5. A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010), the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment has indicated that a more in - depth assessment is not required as the summary concludes there are positive outcomes for the sustainable development principle, collaboration and involvement, with no impact on equalities or the Welsh language.

Valleys Communities Impacts

6. No implications

Workforce Impacts

7. There are no workforce impacts associated with this report.

Legal Impacts

8. The delivery of the Members Community Fund will come within the purview of the Local Government Act 2000 which introduced well-being powers which enable every Local Authority to have capacity to do anything which it considers likely to promote an improvement to economic, social or environmental well-being in the area. Under section 56 of the Local Government (Wales) Measure 2011 sanction

is given for both Executive and Non - Executive Members to invest within their own Ward.

The Council's Constitution should be referred to for explicit guidance on governance.

Risk Management

9. There are no risk management issues associated with this report.

Consultation

10. There is no requirement for external consultation on this item.

Recommendations

11. That the content of this report is noted and the refreshed criteria which include:-

A condensed timeframe

A submission deadline for bids being 29.10.21

Highways infrastructure bids being submitted by 31.03.21

Eligibility of school based activity

Opportunities to re- invest in initiatives that were successfully piloted

More insistence on match funding

And explicit advice on ineligibilities,

are agreed.

Reasons for Proposed Decision

12. To facilitate the governance and delivery of the Members Fund in its second term.

Implementation of Decision

13. The decision is proposed for implementation after the three day call in period.

Appendices

14. The Cabinet Template that has been used to report Members Fund project proposals in its first term, and its modification to instil brevity in reporting in the second term of the Members Fund.

The refreshed 'Guiding Principles' Paper that will be used to govern the Members Fund in its second term.

The refreshed 'Guidance Notes for Members' that accompanies the Members Fund Application Form.

The streamlined and simplified Members Fund Application Form that will be used to capture information on bids made to the Members Fund in its second term.

List of Background Papers

15. The Members Fund Tracker which records explicit detail on all 135 projects supported by the Members Fund (14.06.18 to 31.03.20) across 42 Wards and 64 Councillors can be found on the hyperlink <Q:\Eloise Stanton\PDFO Work\EGG Stuff\PDFO Work\Hand Over Notes\Community Benefit Funds\Members Fund\Members Fund Grant Tracker.doc>

Officer Contact

16. Paul Hinder, Project Development & Funding Manager, (ELLL).

Tel: 01639 763390, email: p.hinder@npt.gov.uk

Appendix A

Policy Template that has been used historically for reporting the Members Fund to Cabinet, and its refinement in the second term as a means of instilling brevity (with particular reference to Headings 3 &11).

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Cabinet

(Date as appropriate)

Report - Head of Transformation (ELLL) Andrew Thomas

Matter for Decision

Wards Affected:

Project Proposal made to the Members Community Fund

Purpose of the Report

1. To seek Cabinet approval to fund a project proposal that requests financial support under the Members Community Fund.

Executive Summary

2. The Members Community Fund is to be used to address local needs and to support projects and initiatives that will contribute towards creating vibrant and sustainable communities.

The Project Development & Funding Unit (PDFU) within ELLL is charged with the governance of the Fund and will act as the Grant Management Organisation.

Bids can be made for projects that enhance existing Council services, assist voluntary sector provision or form part of a larger initiative that is in need of additional financial support.

Eligible projects will include those that enrich the environment, promote non - statutory education and learning, assist Health & Well Being, and promote culture and / or recreation in all its forms.

Project proposals seeking funding are to be formally submitted to the PDFU. Bids are checked for completeness, accuracy and deliverability and will be deemed 'fit for purpose' and ready for determination by Cabinet.

Background

3. The 'Background' or 'Project Specifics' pertinent to each project under evaluation are, in the second term of the Members Fund, to be presented separate from the main body of a Cabinet report by way of an Appendix. The detail on the 'Project Specifics' will expand upon the Project Description, the Applicant, the need, the community benefit and how the project costs have been arrived at.

Financial Impact

4. In order to win favour in Cabinet all projects must be sustainable. Projects must have a robust exit strategy that places no additional revenue or financial burden on the Council.

Maintenance responsibilities and the ongoing revenue commitment to keep a project functioning beyond the life of the Grant will have been

rigorously investigated to determine as to whether there are any financial burdens on NPTCBC.

Integrated Impact Assessment

5. A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010), the Welsh Language Standards (No.1) Regulations 2015, the Well - being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment has indicated that a more in - depth assessment is not required as the summary concludes there are positive outcomes for the sustainable development principle, collaboration and involvement, with no impact on equalities or the Welsh language.

Valleys Communities Impacts

6. No implications

Workforce Impacts

7. There are no workforce impacts associated with the reporting.

Legal Impacts

8. The delivery of the Members Community Fund will come within the purview of the Local Government Act 2000 which introduced well-being powers which enable every Local Authority to have capacity to do anything which it considers likely to promote an improvement to economic, social or environmental well-being in the area. Under section 56 of the Local Government (Wales) Measure 2011 sanction is given for both Executive and Non - Executive Members to invest within their own Ward.

The Council's Constitution should be referred to for explicit guidance on governance.

Risk Management

9. There are no risk management issues associated with the reporting.

Consultation

10. There is no requirement for external consultation on this item.

Recommendations

11. Cabinet is asked to approve the Officer Recommendation pertinent to each project under evaluation. The recommendation will be presented separate from the main body of the Cabinet report by way of a supporting Appendix. The detail on the 'Recommendations' will expand upon the value of the project, what the investment will realise by way of essential assets and the name of the Councillor contributing.

Reasons for Proposed Decision

12. To approve the Application for funding that has been received under the Members Community Fund. Full funding Applications can be made to the Members Community Fund until the 31.10.21. The five months to the end of March 2022 will be used to spend the grant aid and bring the project proposals to fruition by the 31.3.22.

Implementation of Decision

13. The decision is proposed for implementation after the three day call in period.

14 List of Background Papers

Each project or initiative, depending upon its origins, will come equipped with a Constitution, the Applicant's Accounts, Bank details, Quotes, a current Insurance Policy and details on tenure. These documents will have been secured and will have been entered on File for reference. The first stage Impact Assessment documentation associated with a project proposal will have also been retained.

Officer Contact

15. Paul Hinder, Project Development & Funding Manager, (ELLL).

Tel: 01639 763390, email: p.hinder@npt.gov.uk

1. Background

The Members Community Infrastructure Fund is financed from Council Reserves and is to be operational again between May 2020 and March 2022.

£10,000 is set aside for each Ward Member. The £10,000 is to be invested in projects that support the delivery of the Council's policies and priorities. Money left unallocated by Members in 2020/21 will roll over to 2021/22. The Fund will receive bids until the end of October 2021 and the five months to the end of March 2022 will be used to spend the Grant aid and bring the project proposals to fruition by the 31.03.2022.

Ward Members are to identify priority projects within their own Ward and present these proposals for consideration of Cabinet.

The Project Development and Funding Unit within ELLL will act as the Grant Management Organisation (GMO) and will have strict control and governance of the Fund.

The Members Community Infrastructure Fund is for the benefit of all of the communities within the 42 Electoral Wards of Neath Port Talbot. The Fund will be encoded, one Folio Number per Member, and spend against each Folio will be monitored by NPTCBC Technical Accounts.

2. Aim of the Members Community Infrastructure Fund

The money will be used to address local needs and to fund projects and initiatives that will contribute towards creating vibrant and sustainable communities.

Applications and proposals that demonstrate how Council funding will be used to lever in additional resources in support of Council policies and priorities are particularly welcomed. It is intended that the Members Community Fund will endeavour to maximise other funding streams and draw in additional external funding which will add value to inward investment within the Ward under determination.

3. Principles

The following are Guiding Principles used to prioritise and help in the determination of bids made to the Members Community Fund.

Projects will:-

- Directly address identified issues, needs and opportunities in a particular community.
- Demonstrate added value to the local communities through clear outcomes.
- Be well thought out and have robust financial plans and delivery proposals.
- Demonstrate synergy and complementary activities with other projects and initiatives in the area.
- Demonstrate support from the local community and partner organisations.
- Meet the needs of existing and future generations.
- Recognise and respond to the diversity and uniqueness of the community.
- Be sustainable and should not ordinarily create ongoing operational/revenue costs.

4. The Members Community Infrastructure Fund

- Will be made available to Members as the 'Members Community Fund', which will be administered by the Project Development & Funding Unit (PDFU) within ELLL.
- The PDFU will act as the Grant Management Organisation (GMO).
- The Fund will be available as a means of directly funding or match funding those project proposals that come before the Grant Management Organisation (GMO).
- Projects that show merit will be reported to Cabinet for consideration and decision.

5. Grant Management and Administration

The Grant Management Organisation (GMO) will be responsible for the standard Award conditions and will promote consistency and fairness. The GMO will:

- Be the first point of contact for all Members wishing to access the Fund.

- Take enquiries about the Fund and advise upon eligibilities and ineligibilities.
- Equip the Members, who are interested in making a bid, with the appropriate Guidance Notes and Application Form.
- Provide advice upon complex bids which might require early and constructive dialogue. Information will be given upon Project Management issues such as the need for statutory undertakings, procurement, H&S, site investigations and best value as befitting the individual project requirements.
- Check bids for completeness, accuracy, deliverability, and sustainability.
- Act as a Clearing House by appraising bids to ensure that proposals are credible, realistic and practical and are ready for determination/assessment.
- Undertake consultations with partner organisations that can add to the understanding of a project submission.
- Prepare Reports for Cabinet in a timely fashion so as to facilitate early decision making and rapid response.
- Write to the Members notifying of outcome.
- Process payments, ensuring the money has been allocated appropriately and in accordance with the grant offer letter.
- Record all transactions to allow immediate reconciliation of spend against 64 Headings
- Have transparent, robust, auditable and impartial governance procedures.

6. The Process

- It will be for Members to identify projects to go forward for consideration.
- These projects may enhance existing Council services, support and augment existing voluntary sector provision or protect and refurbish capital assets that are in need of investment.
- Members can invest a minimum of £500 up to the maximum of the £10,000 allocation per Ward Member on any one or a combination of projects in 2020/21 and 2021/22. Bids to the Members Community Fund will be accepted at any time as this will be an Open Programme with no set cyclical Rounds of funding.

- Revenue projects and projects that involve the procurement of essential small items of capital equipment can be considered.
- Members may wish to augment a project that they have already supported in the earlier Round of the Members Fund, by building upon the earlier initiative with the 2020/2021 & 2021/2022 allocation (the GMO will need to be convinced that the earlier initiative has worked).
- Should a Member wish to develop a traffic calming, or a Traffic Regulation Order or a Highways Infrastructure type proposal these must be lodged with the GMO by the 31.03.21 to allow for approval to advertise, to explore objections to the proposal and to facilitate delivery by the 31.03.22.
- The Member may wish to use other locally sourced external grant aid (i.e. from Section 106 Agreements, Mineral Deposits, Renewable Energy sources, etc.) to match fund the £10,000 allocation. The PDFU can advise upon this course of action which will add value to local investment. All sources of match funding that are to be associated with the Total Project Cost must be in place and secure before a bid is made to the Members Fund and presented to Cabinet for approval.
- Certain Wards may be represented by more than one Ward Member. Where there is general agreement between Ward Members that they wish to pool their individual £10,000 allocation as a means of securing a bigger, more ambitious project, this is permissible under the Fund criteria.
- Should a Ward Member feel strongly about, and can evidence the need for, financially supporting a venture that is not within their own Electoral Ward, this is permissible under the Fund criteria. The investment outside of the indigenous Ward can be made in any Ward providing that a need can be evidenced.
- Members are to complete the Members Community Fund Application Form and then seek a meeting with the PDFU (as the GMO) to go through the submission.
- The PDFU will complete all the relevant checks.
- The Member will personally sign off the bid and declare, to the best of their knowledge, that the information contained within the Application is correct and authentic.

- Further information will be requested if the bid is in anyway incomplete or ambiguous.
- A synopsis of the Project proposals received from Members will be reported to the next available Cabinet meeting for determination/award.
- During execution of this Fund, all parties will abide by all the relevant current legislation and regulations.

7. Examples of eligible Projects (N.B. These suggestions are indicative not exhaustive)

1. **Environment** – e.g. environmental enhancements, traffic calming, street furnishings, community landscaping projects, nature trails, local interpretation, recycling initiatives, community gardens.
2. **Education** – e.g. Out of hours school clubs, ‘Forest School’, Road Safety initiatives, non – statutory support for libraries(‘Friends of’ Organisations, etc.) , non-statutory youth projects, one off materials, staging an exhibition, environmental education projects, community education activities.
3. **Health** – e.g. Food co-ops, exercise referrals, health and well-being events.
4. **Culture** – e.g. cultural events, promotional leaflets, productions, gateway features.
5. **Recreation** – e.g. Community facilities, playground refurbishments and renewals, multi-sport games areas, improvement to sporting facilities, festivals of sport and Taster Days

8. Ineligible Projects

- Statutory Activity
- Any project that has already started cannot be considered, however separate stages of a project can apply for this Fund
- Any project where contracts have been signed or orders placed before approval
- The promotion of religious faith activities (although applications from religious organisations are allowed if the proposed project benefits the wider community)

- Highways schemes that have no evidenced need or community benefit (genuine outcomes will need to form part of the proposal in order to win through in assessment).
- Projects that impact upon or adversely affect the sustainability of existing provision perhaps elsewhere in the area of benefit
- Applications from private sector organisations
- Applications to assist Organisations that receive funding from the Public purse (Police, NHS, etc.)
- Applications on behalf of other organisations or in the name of a professional fundraiser
- Funding core staff
- Feasibility studies
- Trips and visits
- Funding of recoverable VAT costs
- Running costs such as utility costs, routine hall hire, etc.
- Insurance and/or legal costs
- Proposals that are without a specific project in mind – i.e. simply gifting money to keep an Organisation operational
- Projects that conflict or adversely affect the Council's aims, policies or priorities
- Fundraising campaigns
- Party political activity or fundraising
- Purchase of land
- Duplication of other projects being delivered locally
- Individual beneficiaries

9. General Requirements

Member Applications for financial assistance may be categorised into one of three potential bid types:-

1. Enhancement to Council Services – this will require the PDFU to work with Officers in Environment, Social Services, Neighbourhood Services, Leisure, etc. to gain assurances that the proposal is workable, strategically correct, affordable and

sustainable going forward. The PDFU must be convinced of the project's worth before presenting it in a Report format to Cabinet.

2. Assistance to Voluntary sector Groups – if the Member's investment is intended to support community activity and the facilitator of that activity is within the voluntary sector (e.g. the Management Committee of a Community Centre); the PDFU will require sight of that Organisation's Constitution, Accounts, Insurances and Bank Account details so as to be convinced that they are a worthy Organisation to invest in. A Quote for the item to be purchased from the Award of grant will also be required in order to verify that the item has been economically sourced. There may be a requirement for additional information, relevant to the project e.g. evidence of ownership for capital projects. This would need to be specified on the Application Form completed by the Member.
3. Complex bids requiring a multi-faceted approach to funding – the PDFU would take a 'hands on' approach by working with the Member(s) to arrive at a total funding package that mirrors the total project cost. The PDFU would stay with such a project from inception to completion and would, according to the nature and complexity of the project, be responsible for topographical works, commissioning, supervision, grant draw down schedules, Practical Completion, post installation inspection, etc.

10. Legal Implications

Section 56 of the Local Government (Wales) Measure 2011 provides sanction for non – executive Members to be given authority to carry out both Executive and Non – Executive functions, but only within their own Ward. There is detailed statutory guidance accompanying the above provision and this must be read in conjunction with other statutory requirements e.g. that Council resources must not be used to publicise political parties. The Cabinet Executive Members will make a decision on the bids that come forward for determination under the auspices of the Members Community Fund. Both Executive and Non – Executive Members will then deliver the proposed projects that have won through in assessment.

The Local Government Act 2000 introduced well-being powers which enable every Local Authority to have capacity to do anything which it considers is likely to promote an improvement to economic, social or environmental well – being of their area. There are limits on the power to promote well – being in that the power does not enable a Local Authority to do anything which it is unable to do *“by virtue of any prohibition, restriction or limitation on their powers which is contained in any enactment, whenever passed or made”*. The Members Community Fund Scheme should remain transparent and be consistently applied in order to safeguard public confidence .The Council’s Constitution should be referred to for explicit guidance upon governance.

In keeping with all other extra voluntary contributions, the Members Community Fund will be subject to Internal Audit.

11. Conflict of Interest

Any Cabinet Member who has a financial interest (or if a family member has such an interest) in a project under discussion, should declare the nature of his/her interest and withdraw from the room and the determination of any Award.

Similarly if a Cabinet Member acts as a Trustee or forms part of a Board or Management Committee of an Organisation which hopes to be a recipient of a grant from the Fund, that Member should not be involved in decisions that directly affect the grant .The Cabinet Member should declare an interest and withdraw from the room.

Cabinet Members will declare an interest in projects that originate from their own Electoral Ward and play no further part in the determination of an Award by leaving the room.

Conflicts of interest will be a standing Agenda item and the Members will be bound by the Council’s Code of Conduct.

Non – Executive Members will be responsible for bringing project proposals to the Cabinet for decision. These Members are also bound by the above and must declare on the Members Community Fund Application Form should there be a financial or personal conflict of interest, which would otherwise create a bias or affect broader community interest.

12. Payment of the Award

Following the assessment of bids that are made to the Members Community Infrastructure Fund PDFU, acting as GMO, will notify the Applicant of the Cabinet's decision to support or to reject the bid.

The Applicant Member will be asked, as part of the Application Form to declare that if successful with an Award the grant will be used solely and specifically for the purposes described or as intended.

Should the bid succeed, the GMO will, according to section 9 'General Requirements' above:-

1. Arrange a Journal Transfer from the relevant Member Folio Code to a Project Code furnished by the Council Dept. charged with carrying out the work e.g. to Highways, Traffic and Transportation if a traffic calming initiative, etc.
2. Pay by electronic BACS proforma the Community Organisation that has been identified in the bid. This will be completed using the Bank Account and Sort Code that was gleaned from the Organisation during the initial appraisal of the proposal when first delivered to PDFU by the Member Applicant.
3. PDFU pay through Exchequer and receipted Invoice for goods and services that have been procured to arrive at some of the more capital intensive, complex projects that have been project managed 'in house'.

Second and subsequent bids made by the same Member will be accepted throughout 2020/21 and 2021/22 until such time as their allocation of £10,000 is fully utilised.

The above transactions are to be recorded against 64 Folio Headings (one for each Elected Member). Trackers and spreadsheets will be kept by Technical Accountancy to log expenditure against a working budget of £640,000.

The Member Applicant will be reminded that the GMO reserves the right to monitor a project post Award, and proof of outcomes associated with the project could be asked for.

Mae'r dudalen hon yn fwriadol wag

MEMBERS COMMUNITY INFRASTRUCTURE FUND – Appendix C

GUIDANCE NOTES FOR MEMBERS

What is the Members Community Fund?

The Fund is financed from the County Borough Council's Reserves and is available in Financial Year 2020/21, and until the end of October 2021 only. £10,000 is set aside for each Ward Member. The Fund is administered by the Project Development & Funding Unit (PDFU) within Education, Leisure and Lifelong Learning (ELLL) acting as the Grant Management Organisation (GMO). The Fund is to be governed for the benefit of priority projects within the 42 Wards of Neath Port Talbot.

Members are to identify preferred projects within their own Ward and present these proposals for consideration to the PDFU for the decision of Cabinet.

Project proposals must align strongly to the Council's Corporate Plan and Single Integrated Plan (SIP). These policies and priorities insist upon working towards creating healthier, safer, more resilient and more economically viable communities.

How to apply?

Please read through these Guidance Notes to find out more about the Community Fund and the types of project that can be funded.

It is advisable to initially contact the PDFU and take advice upon the proposal. The Unit can advise upon eligibilities, how best to procure the project, assist in its commissioning, advise upon site investigations, VAT and project management.

The Project Development & Funding Unit is based in Room 307B (2nd Floor) Civic Centre, Port Talbot, SA13 IPJ. Officers can be contacted on Tel: 01639 763390 or 01639 763552. Email – p.hinder@npt.gov.uk or e.stanton@npt.gov.uk

Members making the initial enquiry with the PDFU will be equipped with an Application Form which will capture the essential ingredients of the proposal. The PDFU will, upon receipt of the completed Application Form, check the Form for accuracy and the project for credibility, practicality and sustainability.

- Please ensure that all questions in the Application Form are answered and that all supporting documentation that has been asked for is provided. Submission of an incomplete Application will delay the processing of the bid.
- There will be no cyclical Rounds of funding as the Members Community Fund is an Open Programme receiving proposals and bids at any time. Member Applicants will be notified of the outcome of their bid following a decision made by Cabinet.

About the Grant

The primary intent of the Fund is to support projects that align strongly to the aspirations of the Council's policies and priorities. Projects should:-

- Generate a genuine long term community benefit
- Address an evidenced need
- Be well thought through and have robust financial plans and delivery proposals
- Complement , rather than duplicate existing provision
- Be sustainable.

How much can you apply for?

Members can apply for funding between £500 and £10,000 from the Community Fund by using the enclosed Application Form. The funding can be used to support any one or a combination of projects in 2020/21. Money left uncommitted within the Member's allocation in 2020/21 can be rolled over to support projects in 2021/2022.

Where a Member of a Ward feels strongly about investing the whole of their £10,000 to support a single project, this is permissible under the Fund criteria.

Members may wish to augment a project that has already received their Member's funding in an earlier Round, as a means of building upon the earlier investment. This is permissible providing that the GMO can be convinced that the earlier initiative has worked and is worthy of continued support.

Certain Wards may be represented by more than one Ward Member. Where there is general agreement between Ward Members that they wish to pool their individual £10,000 allocation as a means of securing a more ambitious project, this is permissible under the Fund criteria.

Should a Ward Member feel strongly about, and can evidence the need for, financially supporting a venture that is not within their own Electoral Ward, this is permissible under the Fund criteria. The investment outside of the indigenous Ward can be made in any Ward providing that the need can be evidenced.

Should a Member wish to develop a traffic calming, or a Traffic Regulation Order or a Highways Infrastructure type proposal, these must be lodged with the GMO by the 31.03.21 to allow for approval to advertise, to explore objections to the proposal and to facilitate delivery by the 31.03.2022.

There will be no retrospective funding.

(Please contact the PDFU for advice upon project costs and the funding arrangements – Tel: 01639 763390/763552).

The Grant Management Organisation (GMO) will refer all bids for funding to Cabinet for decision. The Member Applicant will receive the outcome of the assessment in writing. The

Applicant should await the outcome of assessment before any start is made on the project that is to be funded.

Match Funding – Added Value

Applications and proposals that demonstrate how Council funding will be used to lever in additional resources in support of Council policies and priorities are particularly welcomed. It is intended that the Members Community Fund will endeavour to maximise other funding streams and draw in additional funding which will add value and investment to the Ward that is under determination.

The PDFU can assist Members in identifying additional locally sourced external grant aid (i.e. from Section 106 Community Levy infrastructure payments, Mineral Deposits, Renewable Energy Community Benefit Funds, etc.)

All sources of match funding that are associated with the Total Project Cost must be secured and available before a bid is made to the Members Fund before a project can be presented to Cabinet for approval. The Members Fund is seen as the final piece of the funding jigsaw.

What can be funded?

Projects that have a positive impact on the community and meet the criteria of the Fund will be considered for funding. The need for the project should be evidenced. The project should not duplicate existing provision but complement what is happening in the Ward.

The Members Community Fund can support both revenue and capital projects. Work that will score well in the assessment of the bid might include new, additional or improved facilities or services. Projects that require funding for repair, replacement or renewal are also eligible.

Members that request financial support from the Fund must prove that their project is sustainable in the long term and that the project will continue beyond the life of the grant. Any project progressed should be sustainable and should not ordinarily create additional ongoing operational/revenue costs.

Examples of projects that could be supported include (these suggestions are indicative not exhaustive):-

- Environment – landscaping, traffic calming, street furnishings, interpretation, community gardens, recycling initiatives.
- Education – Out of school hours clubs, 'Forest School', Road Safety initiatives, non – statutory support for libraries (via 'Friends of' Organisations, etc.), non – statutory youth provision, one off materials, staging an exhibition, biodiversity projects.
- Health – support for Food Co – ops, exercise referrals, well-being events.
- Culture – staged productions, promotional leaflets, gateway projects, working with an artist in residence.
- Recreation – Community facilities, playground refurbishments and renewals, improvement to sports facilities, Open days and Festivals.

Bids that will not be supported in assessment might include those that require funding for:-

- Refreshments, food and drink (and fireworks).
- Trips/excursions.
- Projects that impact upon and affect the sustainability of existing provision perhaps elsewhere
- Religion and Faith groups and the advancement of any religion (unless for instance the building that is to be improved by the investment has a community benefit).
- Highways schemes that have no evidenced need or community benefit (genuine outcomes will need to form an essential part of the proposal in order to win through in assessment).
- Party political activities
- Applications to assist Organisations that receive funding from the Public purse (Police, NHS, etc.)
- Funding of recoverable VAT
- Running costs such as utilities, routine hall hire, etc.
- Insurances and legal costs
- Proposals that are without a specific project in mind – i.e. simply gifting money to keep an Organisation operational.
- Purchase of land
- Individual beneficiaries
- Projects that conflict or adversely affect the Council's aims, policies or procedures

Again, this is not an exhaustive list - please contact the Project Development & Funding Unit (PDFU) on Tel: 01639 763390/763552 for advice.

All project submissions will be assessed on merit by Cabinet. The assessment decision is final.

Second and Subsequent Applications to the Fund

Second and subsequent bids made by the same Member will be accepted throughout Financial Year 2020/21 and in 2021 until such time as the individual Member's allocation of £10,000 is fully utilised. The Members Community Infrastructure Fund will receive bids until the end of October 2021 and then the five months to the end of March 2022 will be used to spend the grant aid and bring the project proposal to fruition by the 31.03.2022.

All transactions against the Members Community Fund will be recorded against 64 Folio Headings. The Member will be kept updated as to the status of their investment profile. PDFU will advise Members upon complex projects that require a multi-faceted approach to funding and accountancy.

Declaration

The Member, as an authentic Applicant, is to sign that to the best of knowledge the information contained in the Application is correct and that they will take responsibility for the development of the project.

If the information offered in the Application changes the Member will inform the GMO immediately.

If Grant aid is awarded, it is to be used only for the purposes stipulated in the offer letter. The Council reserves the right to recover grant aid that is inappropriately used.

The Member Applicant will be reminded that the GMO reserves the right to monitor a project post Award as a means of satisfying the Council that the outcomes as depicted in the original Application have been achieved as intended.

In the making of the Application the Member must declare any financial or personal interest in the project. Similarly if the Member acts as a Trustee or forms part of a Board or Management Committee of an Organisation which hopes to be a recipient of a grant from the Fund, that Member must declare a direct conflict of interest (conflicts of interests may arise where a Member's personal or family interests and/or loyalties potentially conflict with those of the broader community and create a danger of bias). Members are bound by the Council's Code of Conduct.

Mae'r dudalen hon yn fwriadol wag



MEMBERS COMMUNITY FUND ROUND II Appendix D

APPLICATION FORM

(To be read in conjunction with the accompanying Guidance Notes)

Deadline for Applications – 31st October 2021

Applications involving Traffic Regulation Orders or Highways Infrastructure must be submitted by 31.03.21

1.1

Name of Councillor(s) submitting the proposal for funding

1.2 Is the proposal intended to (choose one option only):-

1. Enhance Existing Council Services?
2. Assist Voluntary Sector providers?

If your proposal is to assist the voluntary sector, please tell us about the organisation you wish to support:-

Name of organisation	
Contact person	
Contact email/ phone number	

3. Form part of a more complex project which would require input from the Project Development and Funding Unit (PDFU) to facilitate its delivery?

2.1 Please describe the project you wish the Members Community Fund to support.

(This may be revenue or capital investment)

2.2 How have you identified the need for the project?

(How do you know the project is really needed?)

2.3 What genuine long term community benefits do you anticipate as a result of the investment?

(What outcomes do you hope to see?)

2.4 How will the project be sustained after the Members Fund investment has ended?

(Please tell us how the project will be looked after and maintained)

Project Costs

3.1 Please provide a breakdown of the total cost of this project excluding VAT (this cost can exceed the £10,000 allotted per member if match funding has been identified as part of the funding package).

Item	£ Amount	Tick if you are applying for this item from the Members Community Fund
Total amount required for the whole project (exclusive of VAT) (A)		
Total VAT for this project (B)		
Total Project Cost (A)+(B)		

3.2

How much money are you asking the Members Community Fund for?	£
How much have you raised elsewhere for the project? Please list funders and amounts below.	
<u>Please be aware that Members Community Fund proposals cannot be reported to Cabinet for approval unless all other facets of the funding package have been secured.</u>	
	£
	£
	£

3.3 Other Information – Please outline any other information which you think would help strengthen your bid to the Fund.

--

Conflict of Interest – to be completed by the Ward Member(s)

In the making of this Application you must declare any conflict of interest which could arise from financial, personal or family involvement within the Organisation which hopes to be a recipient of a grant from the Fund.

Please declare as appropriate (leave blank if there is no perceived Conflict of interest which might otherwise create a danger of bias).

Please state nature of Interest(s) – i.e. as a Trustee, Committee Member, family member, employee, etc.	Signed

Declaration – to be completed by the Ward Member(s)

- I am authorised to make the Application.
- I certify that to the best of my knowledge the information contained in this Application is correct.
- If the information changes in any way I will inform the PDFU immediately.
- I further confirm that if successful, I agree the following conditions:
 - ✓ Use the grant only for the purpose in the offer letter
 - ✓ The invoices submitted under this Scheme not being used to claim grant aid from other sources for the same expenditure
 - ✓ Agree to monitoring visits, post Award
 - ✓ Not to use the funding for any projects that conflict or adversely affect the aim or policies of the Council.

Name (Block Capitals)		Electoral Ward (Block Capitals)	
Signed		Date	

Checklist

In its appraisal of the proposed project the PDFU must be convinced of the project's worth and its suitability to go forward to Cabinet for assessment. If the project is to 'Enhance Existing Council Services' the PDFU will work with other Council Departments to check that the project is workable in terms of affordability and deliverability. If the benefit of investment is to 'Assist a Voluntary Sector provider' it is important that the Council has confidence in that organisation.

If your application is being made on behalf of a Voluntary Sector, we will need to be in receipt of:-

(Tick box to indicate enclosed)

- A signed and dated constitution**
- Audited Accounts** If a new organisation, please provide a copy of current bank statement (showing the account name and details)
- Bank Account details in the name of the Organisation** – Name & address of Bank, Bank Account Number and Sort Code
- Two named Bank signatories and their position in the Organisation**
- A competitive, valid Quote for the services to be provided and/or a competitive, valid quote for the essential items of capital equipment that are to be procured from an Award**
- A current Insurance Policy** (Appropriate to the project, facility or activity to be developed)
- Freehold tenure or Lease Agreement** (if the project involves improvements to land or buildings)

IMPORTANT

Please ensure you have answered every question as incomplete Application Forms will take longer to process.

Please return your application marked 'Members Community Fund' to:

The Project Development & Funding Unit (Room 307B)
Education, Leisure & Lifelong Learning
2nd Floor
Civic Centre
Port Talbot
SA13 1PJ



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

CABINET
25th June 2020

Report of the Director of Environment and Regeneration
Nicola Pearce

Matter for Decision

Wards Affected: All

**Neath Port Talbot Local Development Plan (LDP) 2011-2026 –
Consideration of: the comments received following consultation on
the draft LDP Review Report; and the publication procedures to be
implemented.**

Purpose of the Report

To consider the responses to the comments received following consultation on the Draft LDP Review Report and the publication procedures to be implemented.

Executive Summary

The Neath Port Talbot LDP (2011-2026) was formally adopted by the Council on 27th January 2016. The LDP sets out the Council's vision and objectives, together with a series of policies and proposals which together sets the framework for the development and use of land up to 2026.

To ensure the LDP is kept up-to-date, the Council has an obligation to undertake a full review of the plan at intervals not longer than every four years from initial adoption – the LDP is now the subject of this four year review cycle.

The first stage of the review is to prepare and publish a 'Review Report' which identifies the key issues to be considered when taking the existing LDP forward, setting out areas where the current LDP is delivering and

performing well, in addition to those areas where changes may be required.

The Draft Review Report was subject to a formal consultation running for 6 weeks from 3rd February 2020 to 16th March 2020. This report seeks endorsement of the responses to the comments received and approval of the final LDP Review Report for publication.

Background

The Neath Port Talbot LDP (2011-2026), formally adopted by the Council on 27th January 2016, sets the policy framework for the development and use of land up to 2026.

An up-to-date LDP is an essential part of the plan-led planning system in Wales. The Council therefore has a statutory obligation to both monitor the implementation and performance of the LDP on an annual basis and to undertake a full review of the adopted Plan at intervals not longer than every four years from initial adoption.

The LDP is now the subject of the statutory four year full review cycle and as such all aspects of the Plan will need to be reassessed to consider if they remain sound and fit for purpose. It is important therefore that the Council now progresses with the statutory review of the LDP, to address in particular the policy issues that have been highlighted by the monitoring undertaken to date.

Any revision to a LDP must begin with the preparation of a 'Review Report'. The Review Report identifies the key issues to be considered when taking the existing LDP forward and sets out areas where the current LDP is delivering and performing well, in addition to those areas where changes may be required. It does not detail changes that should be made to the plan, as the detail and extent of changes will be identified through the process of the Replacement Plan (RLDP).

LDP Review Report – Consultation

Members will recall that a report was presented to Council on 29th January 2020 seeking authorisation to undertake a consultation on the *draft* LDP Review Report. The consultation was undertaken for a period of 6 weeks, from 3rd February 2020 to 16th March 2020.

The Council received a total of 57 comments from 11 different individuals or organisations. A further 2 submissions were received after the close of

the consultation (National Grid and Aggregate Industries UK Ltd), both of which have been classified as 'not duly made' and therefore do not form part of this report. Whilst neither submission raised any significant issues, the comments will nevertheless be kept on file for future reference with contact details added to the consultee database.

Of the comments received, there was overall support for undertaking a full review of the plan and the main points raised are summarised as follows:

- **Contextual Changes** – the need to consider contextual changes and new legislation that has been introduced since LDP adoption, such as the Well-being of Future Generations Act and changes to the Environment Act.
- **Development Strategy** – the existing LDP is ineffective due to the changing economic environment, albeit there is support for continuing with an employment-led growth strategy.
- **Strategic Regeneration Areas** – the existing LDP is too reliant on the two Strategic Regeneration Area which have not delivered (Coed Darcy and Harbourside).
- **Housing (Large Sites)** – the need for undelivered housing allocations to be re-assessed.
- **Housing (Small Sites)** – percentage wise, small housing sites have been more effective in delivery compared to large sites and therefore there is a need to allocate more smaller sites in the Replacement LDP.
- **Housing Density** – the housing density requirements of Policy BE1 (Design) are too rigid.
- **Infrastructure** – the need to consider the impact on existing infrastructure.
- **New Policy Areas** – the need to consider new policy areas, in particular Green Infrastructure.
- **Renewable Energy** – the need to consider specific sites for renewable energy and to also consider hydro-electric power in addition to wind and solar energy.

Responses and recommendations to all comments received are presented in Appendix 1. Members should note that there are no recommendations to make any changes to the draft LDP Review Report, as all issues raised are matters that will be fully considered in the preparation of the Replacement LDP along with the updates required to the evidence base. Section 6 of the Review Report details the evidence base studies that are required to support the review of the LDP.

Adoption and Publication Procedures

Following formal approval by Council, the Review Report will be published on the Council's website and submitted to the Welsh Government. Additionally, in accordance with the Council's Welsh Language Standards Policy the LDP Review Report will also be made available in Welsh.

The Review Report will also be available for purchase at a reasonable charge. In common with previous practice, it is suggested that the price be based on the cost of printing together with post and package at the prevailing cost. Electronic copies will be made available at no cost.

Next Steps

Once approved, the LDP Review Report will become a critical part of the review process and ultimately will be an integral part of the evidence base. Work has already commenced on the preparation of a Delivery Agreement (DA) which will, with agreement from Welsh Government, formally set out the review timetable, the Community Involvement Scheme (CIS), and the resources the Council will commit to developing the Replacement LDP.

Impacts of Covid-19

Since the preparation of the draft Review Report, the Covid-19 pandemic has resulted in the suspension of much normal activity. The impact of Covid-19 is restricting the movement of people, accessibility to public buildings and cancellation of engagement events.

The CIS is an integral part of LDP delivery, setting out who will be consulted, at what stage in the plan preparation process and by what medium. This will include highlighting the important role Members will play in the process moving forward and Members will be encouraged to continue to engage with officers to inform them of the important issues facing their communities. Ensuring conformity with the CIS is a key test of 'soundness' and failure to comply with the CIS can result in plans being unable to be found 'sound' and therefore adopted.

On 18th March 2020, the Welsh Government issued a letter to all Local Planning Authorities (LPAs) acknowledging the impact of Covid-19 on the plan preparation process, with the letter confirming that *'...those LPAs who are currently, or are about to consult on a draft Delivery Agreement, should give careful consideration to the formal start date of LDP preparation. The exceptional circumstances may mean that the commencement of plan preparation may have to be postponed for several months to enable effective engagement in the process, as set out in the CIS and DA'*.

Although it is considered reasonable to finalise and publish the contents of the LDP Review Report, for the reasons outlined above it is not considered possible to finalise and issue for consultation a draft Delivery Agreement at this time. Moving forward, this position will be kept under constant review as restrictions are lifted and whilst the formal commencement of the review process will now be delayed, important work on the LDP evidence base will continue to progress as planned.

On the wider implications of Covid-19, at present it is not feasible to predict the longer term impacts on local businesses, employment levels, retail provision and economic activity generally, or on the health and well-being of residents. The current situation is however liable to have far reaching implications on attitudes and approaches to a wide range of matters including transport and travel, recreation and leisure provision and the environment generally.

The review of the LDP will need to address all of these matters and their longer term implications for the economy and well-being of our communities. These matters will be addressed as part of the review of the LDP strategy, policies and proposals in the light of the evolving economic and social situation.

Financial Impacts

In terms of the wider costs associated with completing the LDP Review, it is estimated that such costs will amount to circa £500k. These potential costs have been highlighted for some time and a reserve has therefore been established for LDP preparation. Whilst the funds held within this reserve are currently insufficient, it has been recognised that regular payments to this reserve will be required in line with the proposed trajectory of spend to ensure delivery of the Replacement LDP.

It should also be recognised that the demands on the LDP budget will be influenced by factors outside the control of the Council, including the number and nature of objections received, the sites put forward for development consideration, the length of the Examination in Public and whether or not issues emerge that require expert advice and evidence procured from external sources.

The financial implications and resources required to prepare a Replacement LDP will be set out in more detail in a new DA which will be the subject of a separate report.

Integrated Impact Assessment

In order to comply with the relevant legislation and guidance, the preparation of the Replacement LDP will need to be subjected to a number of assessments.

Sustainability Appraisal (SA) is an assessment of the economic, environmental and social effects of a plan which is carried out from the outset of the plan-making process to ensure that decisions are made that accord with sustainable development principles. SA is therefore an iterative process that identifies and reports on the extent to which implementation of the plan will achieve sustainable development objectives and identifies opportunities for improving plan performance in relation to these.

One of the 'ways of working' that forms part of the sustainable development principle is the need to take an integrated approach. Given the nature and scope of the LDP therefore, the assessments will be amalgamated integrating SA with other statutory and non-statutory assessments including Strategic Environmental Assessment (SEA), health, equalities and the impact on the Welsh language.

The integration of these assessments will ensure that the Council discharges its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Furthermore, the approach will ensure that a collaborative approach is taken on different issues, recognising the links between topics and providing a robust and thorough mechanism for identifying issues and opportunities, assessing impacts including cumulative and indirect effects.

Valleys Communities Impacts

The preparation of the Replacement LDP will have significant spatial implications for the valley communities. Setting the framework for the development and use of land up to 2026, the current LDP seeks to reinvigorate the valley communities by identifying Pontardawe and the Upper Neath Valley as strategic growth areas and also presents a series of policies to provide a more flexible approach to development.

The current strategic approach to the valleys will be reassessed as part of the review of the LDP to determine if the approach remains sound and fit for purpose. Furthermore, the LDP will need to be updated to account for a range of contextual changes including the emergence of the Welsh Government's Valleys Task Force: Our Valleys, Our Future and more locally, the outputs of the Council's own Valleys Taskforce initiative.

Workforce Impacts

It is anticipated that the review of the LDP will be accommodated mainly by utilising the existing staff structure within the Planning Policy team. This however will need to be kept under review, subject to the nature and scope of the review process.

The staff resources required to prepare a Replacement LDP will be set out in more detail in a new Delivery Agreement which will be the subject of a separate report.

Legal Impacts

Given that it is now four years since the LDP was formerly adopted, the report addresses the legal requirement for the Council to proceed with a full review of the LDP.

Risk Management Impacts

The Council will be in breach of its legal requirement to proceed with a full review of the LDP should there be a failure to implement the proposed recommendations.

Consultation

This item has been the subject of external consultation.

Recommendations

That subject to any amendments made at Cabinet on 25th June 2020, it is resolved to commend the following to Council for approval:

1. That the responses and recommendations to the representations received as set out in Appendix 1 be agreed.
2. That the final Review Report as set out within Appendix 2 be agreed.

Reasons for Proposed Decisions

The recommendations are needed to:

1. Ensure compliance with Section 69 of the Planning and Compulsory Purchase Act 2004; The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015; and the Development Plans Manual (Edition 3) 2020.

2. That the adoption and publication procedures as set out in the report are implemented.

Implementation of Decisions

The decisions are proposed for implementation after the three day call in period.

Appendices

Appendix 1 – Responses to the Draft LDP Review Report Representations
Appendix 2 – LDP Review Report (July 2020)

List of Background Papers

Legislation and Regulations:

Planning and Compulsory Purchase Act 2004.
Well-being of Future Generations (Wales) Act 2015.
Environment (Wales) Act 2016.
The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.
The Conservation (Natural Habitats, &c.) Regulations 1994.
EC Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).

Planning Policy / Guidance:

Neath Port Talbot LDP (2011-2026) (January 2016).
Planning Policy Wales Edition 10 (2018).
Technical Advice Notes (TANs).
Minerals Technical Advice Notes (MTANs).
Development Plans Manual (Edition 3) 2020.

Officer Contact

Lana Beynon – Planning Policy Manager
Tel: 01639 686314 or e-mail: l.beynon@npt.gov.uk

APPENDIX 1 – Responses to the Draft LDP Review Report Representations

Full details of the comments received and the Council's responses are provided in the table below and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

ID	Name	Organisation	Section	Para	Representation	Council Response
1	Mr R W Ebley		LDP Review Report (Consultation Draft - January 2020)		International Standards Organisation standards need to be used to achieve the required result.	The comment is noted.
2	Ryan Norman	Dwr Cymru Welsh Water	LDP Review Report (Consultation Draft - January 2020)		Dwr Cymru offers its support to the LPA in progressing through the replacement LDP.	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WBFG Act and LDP Regulations.
16	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Yes, we would suggest that this should be reviewed in line with the principles of Sustainable Management of Natural Resources as set out in the Environment Act. We would raise the opportunities for collaboration on green infrastructure projects with neighbouring authorities as species and habitats connectivity should be considered on a landscape scale.</p> <p>We also wish to emphasise the opportunities within the review to consider priorities for habitat connectivity for key species at a landscape scale.</p>	The support is welcomed. The need for collaborative working is key and is part of the LDP Regulations.
23	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Are there any other comments in respect of the Draft Review Report?</p> <p>We welcome the opportunity to engage formally through the review process.</p>	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WBFG Act and LDP Regulations.
54	Tata Steel		LDP Review Report (Consultation Draft -		Tata Steel is supportive of a continued economic-led growth strategy for the Neath Port Talbot LDP. The approach suggested above in respect of any amendments to policies EC3, EC4 and	The Council welcomes the support. The consultation frequency and extent will be set out and agreed in the forthcoming Delivery

ID	Name	Organisation	Section	Para	Representation	Officer Response
			January 2020)		<p>EN8 will help to ensure the replacement LDP continues to support existing important employment facilities such as the Steelworks and retains the appropriate flexibility to allow the sector to flourish and diversify.</p> <p>We would welcome the opportunity to discuss any proposed policy amendments and renewable energy approaches with the Council in advance of the next round of consultation.</p>	Agreement for the Replacement Plan.
56	Mr Peter Horsley		LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Changes in legislation and government policy, together with consideration as to why housing delivery has fallen short of expected, are justification for a full review of the Plan.</p>	The comment is noted.
3	Mrs Chris Thomas		LDP Annual Monitoring Reports - Key Findings	3	<p>I wish to disagree with the comments in the report up for consultation. Namely that in paragraph 3.0.23 it states that no developments were planned in VSA areas which were outside a settlement area, but adjacent to. I believe this to be wrong on the grounds of an appeal being dismissed on application A2016 /0014, this development was planned directly alongside McDonalds drive-thru and the A465. This site is known as the Glyn Neath Business Park, and owned by Welsh Assembly, so would have had a return for the public purse.</p>	<p>Paragraph 3.0.23 refers to 'live work units' and states that there have been no applications for such units since the LDPs adoption. Policy EC6 provides the policy framework for Live-work units, which are defined as properties designed for dual use, combining residential and employment space.</p> <p>The application referred to was for a road side service area comprising petrol filling station and kiosk, drive-thru coffee shop, car parking, access, landscape and associated works which was refused planning permission and dismissed on appeal by the Planning Inspectorate.</p>
30	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports Key Findings	3	<p>Paragraph 3.0.9 HBF suggests the Council consider rewording this paragraph to make the point that all the land allocated may not actually be suitable, correctly located or viable.</p>	The comment is noted. At the time of adoption all sites were deemed to be suitable, correctly located and viable. All sites will be reassessed as part of the review process.
31	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	<p>Paragraph 3.0.12 HBF suggests the Council consider re-wording this paragraph as not all affordable housing is delivered through S106. Many affordable housing sites are delivered directly by RSL's as 100% affordable</p>	The comment is noted. Paragraph 3.0.12 relates to the findings of the Annual Monitoring Report (AMR), and the delivery of affordable housing through Policy AH1.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					and therefore not reliant on the delivery of market homes.	This policy only reports on affordable housing delivered through the planning system (via Section 106 agreements) and therefore whilst RSLs are delivering 100% affordable housing schemes, these are not recorded in this section of the AMR.
32	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	Paragraph 3.0.18 HBF suggests adding the reasons for delays more specifically than paragraph 3.0.20 and adding commentary what is likely to happen if known.	Paragraph 3.0.20 acknowledges that the large scale redevelopment of these sites is complex and has been delayed due to factors including site constraints, viability and in some cases land ownership. It is considered that this provides the broad reasons for delayed development. All Strategic Regeneration Areas (SRA) will be re-assessed and re-evaluated as part of the review process.
17	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	<p>Are there any matters that should be considered as part of the contextual review?</p> <p>The review document appears to highlight all relevant policy and legislative changes that require consideration in the context of the review. From a biodiversity perspective, the Section 6 duty introduced by the Environment Act and the well-being goals set out in the Well-being of Future Generations Act must be key considerations of the revised LDP in delivering sustainable development.</p>	The comment is noted. Delivering sustainable development is a key requirement of the LDP review. All relevant legislation including the Environment Act and Well-being of Future Generations Act will be considered.
18	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	<p>With regard specifically to paragraph 5.0.21 "The Well-Being of Future Generations Act 2015" we feel it is important to raise and emphasise that a "resilient" Wales refers to the "resilience of ecosystems". This links directly with the newly enhanced duty of public authorities to "maintain and enhance biodiversity wherever possible with the proper exercise of their functions". This enhanced duty should be a core issue as part of the review.</p> <p>Consideration should be given to the</p>	The comment is noted. The Well-being of Future Generations Act, biodiversity enhancement and the emerging NDF will all be considered as part of the Review process.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					Outcomes and Policies proposed in the National Development framework, due for release in September 2020.	
52	Tata Steel		Contextual Changes	5	<p>Question 7: Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraphs 5.0.34 and 5.0.35 of the LDP Review Report recognises the important context of the Port Talbot Waterfront Enterprise Zone as a distinct location for cutting edge and world class industries and as a catalyst for growth. Tata Steel is supportive of a Replacement LDP which is set within this context and recognises these aspirations.</p>	The support is noted.
59	Mr Peter Horsley		Contextual Changes	5	<p>Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraph 5.0.27 - This paragraph states that "the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be meeting the region for a 15 year period". Whilst MTAN states "The RAWP's provide a suitable forum for informed discussions on the provision of aggregates", the RTS is commissioned by WG and not the SWRAWP. MTAN1 requires the RTS to provide a strategy for the provision or aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development plans.</p> <p>Further, the requirement is for each individual Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years in the case of land-based sand & gravel which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
33	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.13 HBF asks for this to be re-worded as we currently consider that it suggests that the number of homes that the revised LDP plans for could be affected by "Placemaking". Placemaking is not directly linked to	The comment is noted, however, the Council believes there is a relationship between Placemaking and future housing development, with Placemaking a key

ID	Name	Organisation	Section	Para	Representation	Officer Response
					housing numbers so it should not be referred to in this paragraph which is dealing with the factors that do affect the number of new homes planned for. Placemaking should have an impact on the number of homes that the plan needs to plan for this should be about the identified need alongside the growth aspirations of the Council.	consideration in accordance with Planning Policy Wales, Edition 10.
34	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.16 Building on the comments above to paragraph 6.0.13 the HBF do not agree that placemaking should be a reason to plan for less homes as suggested by the current wording. In order for the plan to meet the Placemaking aspirations of national guidance it needs to ensure that the right sites are located in the right locations and that policies are in place to ensure the mix of development appropriate and that the infrastructure required to serve the development is in place. The HBF state again that we do not consider that placemaking is about the number of houses planned for.	The comment is noted. However, the comment is stating that the replacement plan will have a fully evidenced housing requirement, and that delivery of housing is a priority. Placemaking will be a key consideration for the plan, and ensuring that the housing requirement can be achieved by development in the right places, in the interests of well-being and sustainable development. The Council does not therefore, recommend any changes to the paragraph.
40	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 8.1.3.4 HBF notes the reference to the Draft NDF which identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. It is suggested that this same reference should be used in Section 6 of the report where the Council look at the factors affecting future population growth and demand for new housing.	Section 6 does contain a reference to the NDF and future housing growth across the Swansea Bay Region.
24	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	It was disappointing to see that very few of the objectives had been achieved however, this was due to the change in the economic environment since the creation of the plan rather than any other factors.	The comment is noted. The Replacement LDP will review the existing key issues and objectives to establish if these are still relevant. The Review process will also assess new data / information which highlights any new key issues and consider how the plan can address these.
26	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	Planning and development should begin at a local level and follow a bottom up, rather than top down approach. The Town Council is soon to create a strategic "Place Plan" in order to identify the overall direction required by the community and hopes that the County Borough would like to work	The approach taken in development plans follows National Planning Policy, Guidance (Development Plans Manual) and Regulations set by the Welsh Government. The Welsh Government has recently

ID	Name	Organisation	Section	Para	Representation	Officer Response
					together to achieve the communities plan.	<p>published a draft National Development Framework (NDF), which will be the highest tier of development plans, with LDPs coming under this.</p> <p>Whilst this could be classed as a 'top down' approach, a critical part of preparing a LDP is community involvement. The Council will in due course publish its Delivery Agreement which will include a Community Involvement Scheme (CIS), identifying how the Council will engage with the local community and organisations throughout the plan preparation process. The Council would welcome future dialogue with the Town Council and other community members.</p>
27	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	The Committee felt that the original Local Development Plan was now ineffective as the economic position had changed so radically since its creation (for example, Austerity and Brexit). They felt that the direction being followed was unlikely to be successful in this new economic environment and action should be taken now to alter the plan. They felt that there needed to be more flexibility to change direction in plans of this nature.	The comment is noted. The LDP evidence base, including the economic-led growth strategy will be reviewed and updated as part of the preparation of the Replacement Plan, to take account of any contextual changes and ensure that the strategy and policies within the plan are robust and can address the key issues identified.
28	Mr Mark Harris	HBF Wales	LDP Vision, Objectives and Strategy	7	<p>Does the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>This is for the Council to decide however the significant under delivery of private and affordable housing is of real concern, simply reducing the number of homes required as suggested by the document is not the answer and will not support the wider economic and well-being both at a national and local level.</p>	The comment is noted. A number of studies will be undertaken as part of the LDP Review, which will form the evidence base for the Replacement LDP. Future studies will determine a suitable level of future housing provision whilst considering the economy and well-being of residents.
19	Rhian Isaac	Natural Resources Wales	Key Issues, Vision and Objectives	7.1	<p>Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>We feel that nature based solutions</p>	The comments are noted. There have been a number of contextual changes since the preparation of the LDP, such as the Well-being of Future

ID	Name	Organisation	Section	Para	Representation	Officer Response
					should be embedded as a cross cutting objective within both the LDP and the local Well-Being Plan and form part of the vision for the revised plan. Appropriate mechanisms are also required to secure delivery of green infrastructure within development and consider habitat connectivity on a landscape scale. Undelivered allocated sites should be re-assessed using up to date environmental constraints e.g. revised flood map information. We can provide advice on existing constraints.	Generations Act, which has led to the development of local Well-Being plans. These will be considered within the formation of the vision for the Replacement LDP, in addition to mechanisms to support well-being, such as green infrastructure. The Review Report acknowledges that undelivered allocations will be re-assessed to determine if they are still appropriate, or if they should be deallocated.
55	Mr Peter Horsley		Key Issues, Vision and Objectives	7.1	Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan? However, changes in legislation and government policy (Well-Being and Future Generations; Environment Act; PPW (v10); etc.) must be reflected in the Key Issues, Vision and Objectives.	The comment is noted. Contextual and legislative changes, including those mentioned within the representation, will be reviewed as part of the formulation and establishment of the RLDP's Key Issues, Vision and Objectives.
20	Rhian Isaac	Natural Resources Wales	Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised plan? The current Growth and Spatial strategies need to reflect the requirements of the Draft NDF which includes "sustainable urban growth". The strategies should include biodiversity enhancement and ecosystem resilience by maximising the use of green infrastructure and nature-based solutions, and safeguarding areas which provide important ecological networks.	The comments are noted. The NDF, biodiversity enhancement and green infrastructure will all be fully considered in the preparation of the Replacement LDP.
47	Tata Steel		Growth Strategy	7.2	Question 4; Do the existing Growth and Spatial Strategies remain appropriate for the revised plan? Tata Steel is supportive of an economic-led growth strategy. It recognises the important role that the company plays in investment, growth and economic development in Neath Port Talbot. Economic growth should remain a fundamental part of any strategy moving forward NPTCBC and can also facilitate wider investment to improve housing delivery. As highlighted in paragraph 7.4.3 of the NPTCBC Review Report, Tata	The support for an economic-growth strategy is noted. As part of the preparation of the Replacement LDP, the evidence base will be updated to determine an appropriate and up to date strategy based on robust evidence. Through additional evidence-based studies, the Council will determine if an economic-led strategy is still appropriate for Neath Port Talbot and will determine a suitable level of future growth. The Council welcomes the work TATA Steel are undertaking,

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>Steel would be pleased to work with NPTCBC to establish the impact changes in the global steel market have had on local investment and the opportunities for growth which exist in the region to inform any revised growth strategy.</p> <p>Tata Steel is working internally and closely with other economic stakeholders and employers in the region to invest in, and diversify, the function and role of the steelworks. This includes significant investment in improving and modernising existing facilities with consideration to future growth and environmental responsibility.</p>	particularly in relation to investment and diversification and modernisation and recognises the importance of the steelworks to the local economy.
29	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	HBF supports the current plans growth and spatial strategies in principle but notes that this does not mean that the right sites are currently allocated. The current plan is also to be heavily reliant on one or two large strategic sites which have as accepted by the report failed to deliver.	The comment is noted, all existing allocations will be reassessed as part of the review and only sites that are deemed to be viable, deliverable and can contribute towards the overall strategy will be included within the Replacement LDP.
35	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.13 HBF do not agree that this paragraph can conclude that the demand for new housing has not therefore materialised. Economic growth is one of the factors that drives housing demand, there are others such as population growth and the number of potential homeowners living at home while saving to buy a house. This final sentence should be reworded to say "the expected level of demand from employment growth has therefore not been as strong".	The comment is noted, however, this section of the Review Report provides an analysis of the existing strategy and how this has been implemented since the base date. Whilst it is agreed that economic growth is only one factor that drives housing demand, within the economic-led strategy, the majority of housing growth was projected to support the increases in working age population, directly linked to the number of jobs. In this context, as job numbers have not reached the projected target, the subsequent housing growth has not materialised.
36	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.19 HBF do not agree that from the evidence provided in the report that the Council can simply say that the current level of growth cannot be carried forward. HBF members consider that there is demand for new housing in the area but their attempts to deliver these new homes have been	Paragraph 7.2.19 states that both the housing requirement and the existing allocations cannot be carried forward into the new plan and will need to be reconsidered. Housing delivery has fallen significantly below target and therefore the

ID	Name	Organisation	Section	Para	Representation	Officer Response
					frustrated by the allocated site not coming forward particular the large Coed Darcy strategic site on which the plan is heavily reliant. The Council in this document admit that there have been a number of reasons why sites have not come forward but then do not accept that this has affected annual delivery rates. Using the low delivery rates as a suggested justification to lower the housing requirements in the revised LDP is not the way to plan for the future, particular when the wider strategy plans for economic growth.	Council would not be able to continue with a high housing requirement that was not delivering, therefore an assessment of up to date evidence is required to determine a suitable, robust and evidenced based housing target. In addition, existing allocations will also require reassessment to determine if these sites are deliverable and viable within the plan period, or whether they should be deallocated to allow for deliverable alternatives. The Council therefore considers that a reassessment of the growth strategy and housing allocations is required as part of the review.
57	Mr Peter Horsley		Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised Plan? The evidence base should review why the economy has "stagnated" within the area and put forward remedies to address this.	The comment is noted and will be considered as part of the updated evidence base for the Replacement LDP.
60	Mr Peter Horsley		Growth Strategy	7.2	Are there any other comments in respect of the Draft Review Report? Paragraph 7.2.17 - This paragraph states that "there are a number of reasons why sites (housing) have not come forward as anticipated". The evidence base to support the plan should consider in detail why this is the case and identify remedies to address this to ensure the plan delivers on its objectives.	The comment is noted. The evidence base for the Replacement LDP will consider why housing sites have not come forward and will reassess allocations to determine if they are deliverable. The level of growth will also be reviewed to determine if this is still appropriate.
25	Mrs D Phillips	Pontardawe Town Council	Spatial Strategy	7.3	The Western Valley Strategy received a great deal of input from Pontardawe and the local community at inception however there was very little feedback provided at the time and the plan does not seem to have taken their views on board.	The LDP strategy of reinvigorating the valleys considered all relevant programmes and strategies within the area, including the Western Valley Strategy. As this Strategy has now come to an end, the replacement plan will consider any existing, relevant work within the area and consult with the community and partner organisations throughout the plan preparation process.

ID	Name	Organisation	Section	Para	Representation	Officer Response
37	Mr Mark Harris	HBF Wales	Spatial Strategy	7.3	Paragraph 7.3.11 This paragraph should include some indication of likely timescales associated with the proposed metro infrastructure. HBF's understanding is that this is unlikely to be within the near future, so its impact on the first few years of the plan is unlikely to be significant.	There is still no clarification on the timing of the Swansea Metro.
38	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.1 - 7.4.3 Identifies lots of negatives and reasons why a reduction in housing numbers and moves away from an economic led strategy should be considered. However, although the City Deal is mentioned the wording does not really identify it as a positive reason why an economic-led growth strategy could actually now be more relevant/needed. HBF requests that the role of the City Deal is better explained in the document.	This section states that given the plan has not achieved a number of its objectives, the strategy needs to be reconsidered to determine whether an economic-led strategy is still appropriate, or whether alternative strategies should be considered. In the context of the findings of the Annual Monitoring Report, the Council considers that the strategy should be reviewed, to take account of up to date evidence and therefore it is felt the wording used is appropriate.
39	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.5 The wording should be amended to make it clearer that existing H1 allocated sites which have not come forward to date and where evidence cannot be provided to show that they are deliverable and viable in the next plan period will be removed and not simply "rolled over" as a commitment which has traditionally happened with plans in Wales.	The paragraph states that existing sites will be reassessed and with a greater emphasis on viability, some sites may be deallocated and new sites included. The Council considers this to be clear that existing sites will not be 'rolled over' and will emphasise this during the call for candidate sites.
7	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the infrastructure policy and agrees with the need to provide further clarity on its definitions. We particularly welcome the need to consider other forms, such as Green Infrastructure. We would welcome inclusion in the LDP review as the Swansea Canal and its towpath should be considered as multi-functional green infrastructure.	The support for a review of the infrastructure policy and green infrastructure is welcomed. The preparation of the Replacement LDP will include an assessment of Green Infrastructure throughout the County Borough and the opportunities for its use.
10	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure We also ask that the impact of development on existing infrastructure is considered, and mitigation agreed where appropriate. New development	The preparation of the Replacement LDP will assess the impact on existing infrastructure and consider the need for mitigation.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					may require the provision of new infrastructure but consideration of its impact on existing infrastructure is important to ensure existing facilities are not degraded as a result of an increase in use following development nearby.	
11	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>Policy SP16</p> <p>The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the Environmental Protection Policy, SP 16. The proposal to separate land stability and pollution into two topic areas seems sensible. Developers should be required to properly consider the risk associated with development in areas affected by land instability or pollution and include robust mitigation measures before determination.</p> <p>We suggest that prior to allocation all sites are reviewed in relation to these issues due to the possible impact of remediation costs on viability and thus deliverability.</p>	The support for separating land stability and pollution in Policy SP16 is noted. A robust assessment of candidate sites will address the concerns raised.
12	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 18</p> <p>Glandwr Cymru note that the policy at present relates mainly to wind and solar power. Water may be used for heating and cooling new developments, or for electricity generation through hydro-electric power schemes. These sources should be included as options within studies of renewable energy potential.</p>	The comment is noted. A Renewable Energy Assessment (REA) will be undertaken as part of the evidence base for the Replacement LDP.
9	Mr Vic Price		LDP Topic Area Reviews	8	<p>The Review Document overlooks the importance, within the housing provision, of small sites for 3/5 units each for houses of distinction. These will give a variety to the availability of new housing stock in the area. They need to be in immediate proximity to existing residential areas, close to bus routes and within a reasonable time distance from the rail network, already served by adjoining adopted highway and with availability of all services; they need to be in a location capable of being extensively landscaped yet enjoying good vistas but being capable with landscaping to be almost invisible from nearby adopted highways. By way of example my client's land, part of</p>	<p>The comment is noted. Housing delivery within the LDP has been delivered on a variety of sites, from large housing developments on land allocated in Policy H1, to small sites and windfalls. It is therefore recognised that the housing supply should be made up of a variety of components to ensure that there is sufficient land to meet the needs of the area over the plan period and to allow choice for both housebuilders and homebuyers.</p> <p>As part of the preparation of</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>the land surrounding his home at "The Old Stables" Broomhill, would be ideal for this although part of the land he occupies is owned by the Council so to bring this site forward (although not strictly a planning issue) the Council's agreement as landowner will be needed to be a party to any sale.</p>	<p>the Replacement LDP, there will be the opportunity for land owners to submit sites (during the 'Call for Candidate Sites') for consideration.</p>
<p>13</p>	<p>Mrs Jane Hennell</p>	<p>Canal and River Trust</p>	<p>LDP Topic Area Reviews</p>	<p>8</p>	<p>SP 20 & 21</p> <p>The text explains that the Active Travel (Wales) Act 2013 places a legal requirement on local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities.</p> <p>Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.</p> <p>Policy BE3, which is part of SP21 relates to the safeguarding of the Swansea canal. Officers suggested that no review was necessary of the policy. Whilst this may be correct in relation to the canal itself, the opportunity should be taken to look at whether the policy should be widened to reflect other proposed changes within in the plan and whether the towpath should also be safeguarded. It is noted that other policies such as Strategic Policy 8 and 10 relating to open space and infrastructure are also relevant as well as policy SP20. Part of the towpath is National Cycle route 43, and sections of it are currently undergoing improvement as a result of Active Travel funding.</p> <p>Policy BE3 at present makes no mention of the benefits that the canal towpath can bring to the area by linking residential areas, by providing health and well-being benefits, access to both land and water-based recreation opportunities, nor does it recognise it as a sustainable transport route. Surely now that Active Travel and Green infrastructure gain more recognition in</p>	<p>The comments are noted and will be considered during the preparation of the Replacement LDP. The development of a clearer relationship between Active Travel, Green Infrastructure and the well-being gained from the use of open space / accessible natural greenspace will be a key theme in the Replacement LDP.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					the plan, Policy BE3 should be widened to be more than just a safeguarding policy? The canal & towpath are one of the best examples of multi-functional green infrastructure in the borough and already recognised in part as an active travel route. Policy BE3 should be reviewed and altered to reflect this.	
14	Mr Vic Price		LDP Topic Area Reviews	8	The Review document overlooks allocating specific sites for renewable energy. The priority given in the review report document to such use is welcome but it would be stronger with specific sites identified, especially for solar energy. The sites are best to be south facing and on marginal land in agricultural terms, of an extent of some 30 acres plus and within close proximity to the electrical connection points, and capable of being landscaped so as not to be visible from housing. My client owns a 40 site just west of Bryn which would be ideal for such use.	<p>The purpose of the Review Report is not to allocate specific sites. It is the first stage of the LDP review process. This Report reviews the existing LDP and assesses if the strategy and policies have been successful or if (due to a number of factors) a new strategy and policies will be needed for the Replacement LDP (RLDP).</p> <p>With regard to specific sites for renewable energy, there will be the opportunity for land owners to submit sites during the 'Call for Candidate Sites' which will be considered as part of the preparation of the RLDP.</p>
21	Rhian Isaac	Natural Resources Wales	LDP Topic Area Reviews	8	<p>Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>We note the summary of the proposed LDP Policy review which refers to possible amendments to policies;</p> <p>SP1 - Climate Change</p> <p>SP4 - Infrastructure - we support the inclusion of green infrastructure</p> <p>SP10 - Open Space - we support the need to allocate land for open space</p> <p>SP14 - The Countryside and Undeveloped Coast</p> <p>SP15 - Biodiversity and Geodiversity - with the main finding of the annual monitoring reports being the continuing net loss of biodiversity as a result of planning decision we strongly suggest</p>	<p>The comment is noted. National Policy context changes through the introduction of the Environment (Wales) Act (2016) and the Well-being of Future Generations (Wales) Act (2015) will be fully considered in the preparation of the Replacement LDP.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>a strengthening of this policy</p> <p>SP16 - Environmental Protection</p> <p>SP18 - Renewable and Low Carbon Energy</p> <p>SP19 - Waste Management</p> <p>We would wish to reiterate the fundamental change to maintain and enhance under Section 6 of the Environment Act which needs to be considered in the LDP Review. In addition, we wish to reiterate the focus towards ecosystem resilience which is a key goal of The Principles of Sustainability within the Well-Being of Future Generations Act 2015 which also needs to be given consideration as part of the LDP Review.</p>	
50	Tata Steel		LDP Topic Area Reviews	8	<p>Question 5; Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>Strategic Policy 11 Employment Growth</p> <p>Paragraph 8.4.1.7 of the LDP Review Report identifies the potential for combining existing policies EC3 (Employment Land Uses) and EC4 (Protection of Existing Employment Land Uses) into one policy covering both elements. The intention is for this to provide clarity and encourage more development.</p> <p>Tata Steel is supportive of opportunities to encourage economic development in the region. It does not agree that the policies should be merged. Both policies EC3 and EC4 are highly relevant for any development which takes place at the steelworks. Any policy amendments could have implications for the future of the site. Tata Steel would welcome the opportunity to be directly involved and consulted on any proposed policy amendments at the earliest opportunity.</p> <p>Any amendments or combinations of existing policies EC3 and EC4 should</p>	<p>The comments are noted. The Review Report identified some areas of the plan where further clarity may be required. During the Officer Working Group, it was suggested that the employment policies, EC3 and EC4 could be merged, or re-written to ensure there is greater clarity over their use and interpretation. Any potential amendments would fully consider their use and would not intend to deter economic development or prevent the continued operation of employment areas. The policy review, as part of the Replacement LDP will carefully consider any amendments to policy and the impacts of such amendments.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>continue to recognise;</p> <ul style="list-style-type: none"> • The ancillary facilities and services which will be appropriate at Tata Steel's site will be different to that of other general employment uses. The flexibility currently provided in supporting paragraph 5.2.22 in the adopted LDP for a range of uses on heavy industrial sites should be retained in any future policy. This will continue to support investment and diversification in the steelworks. • The protection of the steelworks and associated land as an existing and significant employment area. 	
51	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 16 - Environmental Protection</p> <p>Paragraph 8.5.4.3 of the LDP Review Report states that existing Policy EN8 may be divided into separate pollution and land stability policies. This paragraph also highlights that links between requirements for sustainable drainage systems on new development (SAB) and water quality criteria in existing policy EN8 will be taken into account.</p> <p>Tata Steel's Port Talbot Steelworks is a large, heavy industrial site with an existing private drainage system. The drainage required from different types of development at the site can vary greatly, is often bespoke and does not reflect the drainage approach seen on many "typical" types of development in Neath Port Talbot. In many instances, the highest priority levels set out in Standard S1 are not practicable or viable. Tata Steel has been working closely with NPTCBC's SAB team on a number of projects to ensure appropriate drainage and SAB approval is secured.</p> <p>Any links made between SAB and the water quality criteria of Policy EN8 should not impose impractical or</p>	<p>The comments are noted. It is recognised that the operations at TATA are unique and it would not be the intention of any policy amendments to restrict operations. That said, any future amendments to policy would need to ensure that it complies with National Policy and SAB requirements.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>unviable requirements on Neath Port Talbot's heavy industrial sites. Doing so could restrict, and have implications for, bringing further economic development in the region. This would be contrary to the aims of existing Policies EC3 and EC4. Tata Steel would be pleased to work with NPTCBC on any future policy wording.</p>	
53	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 18 - Renewable and Low Carbon Energy</p> <p>Paragraph 5.0.37 refers to the recent draft De-Carbonisation and Renewable Energy Strategy (DRES), noting that a strategy / action plan will be published shortly to set out a framework for carbon footprint reduction aspirations. The replacement LDP will be a key in facilitating the implementation of the strategy.</p> <p>Tata Steel is a core part of the South Wales Industrial Cluster leading the way on sustainable industry in the region, including the development of regional de-carbonisation projects, energy efficiency and low carbon power generation. The draft DRES recognises the work currently underway with the Council to develop sustainable forms of energy at the Port Talbot site. Tata Steel would be grateful for early involvement with the Council to discuss and assist with any amendments to the existing renewable energy policies and the action plan for the DRES.</p>	<p>The comments are noted and the work being undertaken by TATA is recognised and supported. TATA will be consulted at each stage of plan preparation in accordance with the Delivery Agreement.</p>
4	Mrs Chris Thomas		LDP Topic Area Reviews	8	<p>This review seems not to have provision for the future of the above named business park (Glynneath Business Park).</p>	<p>The Review Report refers to the performance and delivery of sites allocated within the existing LDP. As part of the Review process, a number of evidence base studies will be undertaken, including as assessment of future employment requirements and an Employment Land Review, to establish how much employment land will be required over the replacement plan period and the most appropriate locations for such development. Once such options have been established, these will be</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
						subject to future public consultations.
5	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Land Supply; It is noted that land supply has fallen below 5 years and as such it is considered that additional land is needed to provide dwellings.</p> <p>Within the LDP Small sites are to deliver 180 dwelling which is 9.4% of the overall total. Therefore, in simple terms for every 1 dwelling on a small site 10 should be built on larger sites. Since 2013 small sites have provides 14% of all housing however, in the last 2 years of the 447 dwellings completed 89 (20%) were completed on smaller sites.</p> <p>This evidence would suggest that smaller site are being delivered faster. It is also likely that they are being delivered by local developers who retain more income within the local economy. As such it is considered that in allocating additional sites greater emphasis should be given to smaller sites.</p>	<p>The comment is noted. The Review Report acknowledges that development on large sites has fallen below the targets set out in the monitoring framework. The level of growth, and how growth is distributed will be considered as part of the review process.</p> <p>The allocation of housing sites between large sites and small sites will be a key part of the LDP review process. No further action required.</p>
6	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Density BE1 (Design) Whilst it is recognised that there is a need to provide more housing it is considered that the requirement of BE1 are too rigid. The policy limits the opportunity to trade up to a larger house, provide a variety of housing and places unnecessary restraint on small sites. It is therefore consider that a review of the policy should be undertaken with a view to applying it to sites, for example, over a specific area.</p>	<p>The comment is noted. The density requirements of Policy BE1 are used to ensure that land is used efficiently, in recognition of it being a scarce resource.</p> <p>As part of the review process, the density requirements will be reviewed to determine if they are still appropriate.</p>
41	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	<p>Paragraph 8.1.4.6 The HBF objects to the suggestion that affordable housing is an infrastructure need. Unlike other infrastructure such as roads, or schools, new homes do not generate a need for affordable housing, the need already exists, requiring developers to contribute to the affordable housing supply is a policy requirement subject to consideration of the viability of the scheme.</p>	<p>Policy I1 'Infrastructure Requirements', lists the types of infrastructure new developments will need to consider. Affordable housing is included within this policy and therefore the Council considers the wording of 8.1.4.6 to be correct.</p> <p>Policy I1 is an overarching policy from which strategic policy SP8 Affordable Housing (AH) and AH topic based policies such as Policy AH1 and AH2 flow from, and set</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
						out the specific policy requirement.
42	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.2 Again the HBF consider that there is no direct link between housing requirement and placemaking, so reference to it in this section of the report should be removed.	In the context of Planning Policy Wales, Edition 10, the Council believes that there is a direct correlation between Placemaking and the amount of housing each settlement will require.
43	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.4 The HBF suggest that this is misleading as the plan review will extend the life of the plan from 2026 to 2035 so there is additional time in which to deliver the previous level of growth.	The Council is proposing a full review to the existing LDP, therefore the Replacement LDP (RLDP) will in effect be a new plan and will not simply extend the life of the existing plan. The RLDP will therefore need to establish a new level of growth for the revised plan period, based on up to date evidence.
44	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.2 Strategic Policy 8 - Affordable Housing - HBF suggests that this section should also include commentary on the recent letter from the Housing Minister regarding the use of publicly owned land to deliver affordable housing led schemes with a minimum 50% housing.	Affordable Housing will remain an important consideration for the Replacement LDP. The letter from the Housing Minister will be considered during the Replacement LDP, as will the affordable housing policies within the emerging NDF.
61	Mr Peter Horsley		LDP Topic Area Reviews	8	Paragraph 8.5.4.3 - please refer to the comments on paragraph 5.0.27 above. MTAN 1 requires the RTS to provide a strategy for the provision of aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development. Further, the requirement is for each individual Local Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years, in the case of land-based sand & gravel – which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
62	Mr Peter Horsley		LDP Topic Area Reviews	8	Paragraph 8.5.4.4 states "evidence set out in the AMR's to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations	The comment is noted – the Council will provide the necessary policy support and narrative to demonstrate how the adequate supply of aggregates will be met. The

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>will be required". Whilst this may be the case, it is important to recognise that the SWARP Annual Report confirms that Mineral Extraction ends at the two sandstone sites, Cwm Nant Lleici and Gilfach in 2026 and 2028 respectively, with mineral review (ROMP) dates of 2024 and 2027. These dates are within the replacement plan period. More importantly, these sites supply High Specification Aggregates (high PSV), which are of national importance and are not confined to local markets. The Council must therefore provide narrative and policy support in the review to demonstrate how the adequate supply of minerals, including PSV aggregates will be met on a local, regional and national scale throughout the plan period and for the requisite period beyond.</p>	<p>emerging Regional Technical Statement (RTS) 2nd Review will set out the requirements for Neath Port Talbot Council [and all other Mineral Planning Authorities (MPAs)] to demonstrate how local and regional supply of aggregates will be met. As part of the process for preparing the new RTS, seven new sub-regions have been created specifically for the purpose of facilitating strategic minerals planning and collaborative approaches. Neath Port Talbot, along with Swansea and Carmarthenshire have been grouped as the Swansea City Sub Region.</p> <p>Notably, the RTS 2nd Review introduces a new requirement for all MPAs to agree 'Statements of Sub-Regional Collaboration' (SSRC) in respect of their contributions to the future provision of land-won primary aggregates. SSRCs are required to be prepared, collaboratively, by all constituent MPAs within each sub-region (as defined by the RTS 2nd Review) as part of the evidence base needed to support each Replacement Local Development Plan (RLDP). Once agreed, an SSRC will remain in force until it becomes superseded by the requirements of future reviews of the RTS. The SSRC will confirm that all constituent MPAs within the sub-region accept the individual minimum requirements for aggregate apportionments and allocations for their individual Authority areas, as set out in the latest review of the RTS, and that (as a minimum) the RTS requirements for that sub-region as a whole will be met.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
22	Rhian Isaac	Natural Resources Wales	Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>It would be beneficial if a joint LDP was undertaken with neighbouring authorities. Many of our strategic planning interests are better considered on a cross boundary level. This will also fit in with the Area Statements.</p> <p>However, we appreciate the difficulties you may have undertaking a joint LDP.</p>	The comment is noted. Whilst presently, due to the variances in stages of preparation between authorities it is not considered possible to undertake a joint LDP, the Council will however, continue to undertake regional working and studies where possible.
58	Mr Peter Horsley		Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>The document identifies the Regional Technical Statement (RTS) as a key document under which the Plan Review will be considered to provide a strategy for the provision of aggregates in the region and within each local authority area. There are shortfalls in aggregate provision, there will be a need for local authorities within the sub-region or an adjacent sub-region to ensure minimum provisions are met and production capacity is maintained to deliver the steady and adequate supply of aggregates. This will need to be confirmed through Sub-Regional Statements of Regional Collaboration. It is expected that guidance on these SSRC's will be delivered alongside the RTS 2nd review.</p>	The comment is noted and will be considered as part of the evidence base for the Replacement LDP.
45	Mr Mark Harris	HBF Wales	Status of LDP Allocations	Appendix C:	<p>Appendix C Status of LDP Allocations</p> <p>Paragraph C.2 HBF would suggest that "sites with planning permission but not within the current five year land supply should also be re-assessed. There are many site in LDP's across Wales which have planning permission that has either been renewed several times or is extant by virtue of a start on site being made however, many of these will never be developed.</p>	The Review Report refers to all sites in the H1 portfolio being reassessed during the review, regardless of whether they are within the 5 year land supply.

APPENDIX 2

LDP Review Report (July 2020)

Blank



Neath Port Talbot Council
Local Development Plan
2011 - 2026

Local Development Plan Review Report (July 2020)



PART 1 - Introduction and Background

1	Introduction	5
2	The Review Report	7
2.1	Structure and Content	7

PART 2 - Factors Informing the Review

3	LDP Annual Monitoring Reports - Key Findings	11
4	Sustainability Appraisal Monitoring - Key Findings	15
5	Contextual Changes	17
6	Evidence Base Changes and Requirements	25

PART 3 - Detailed Review

7	LDP Vision, Objectives and Strategy	31
7.1	Key Issues, Vision and Objectives	31
7.2	Growth Strategy	32
7.3	Spatial Strategy	36
7.4	Reconsideration of the Strategy	39
8	LDP Topic Area Reviews	43
8.1	Overarching Policies	43
8.1.1	Strategic Policy 1 - Climate Change	43
8.1.2	Strategic Policy 2 - Health	43
8.1.3	Strategic Policy 3 - Sustainable Communities	44
8.1.4	Strategic Policy 4 - Infrastructure	45
8.2	Area Based Policies	46
8.2.1	Strategic Policy 5 - Development in the Coastal Corridor Strategy Area	46
8.2.2	Strategic Policy 6 - Development in the Valleys Strategy Area	47
8.3	Communities and Housing	47

Contents

8.3.1	Strategic Policy 7 - Housing Requirement	47
8.3.2	Strategic Policy 8 - Affordable Housing	48
8.3.3	Strategic Policy 9 - Gypsies and Travellers	50
8.3.4	Strategic Policy 10 - Open Space	50
8.4	The Economy	52
8.4.1	Strategic Policy 11 - Employment Growth	52
8.4.2	Strategic Policy 12 - Retail	53
8.4.3	Strategic Policy 13 - Tourism	54
8.5	Environment and Resources	54
8.5.1	Strategic Policy 14 - The Countryside and Undeveloped Coast	54
8.5.2	Strategic Policy 15 - Biodiversity and Geodiversity	56
8.5.3	Strategic Policy 16 - Environmental Protection	57
8.5.4	Strategic Policy 17 - Minerals	57
8.5.5	Strategic Policy 18 - Renewable and Low Carbon Energy	58
8.5.6	Strategic Policy 19 - Waste Management	60
8.6	Transport and Access	61
8.6.1	Strategic Policy 20 - Transport Network	61
8.7	Culture and Heritage	62
8.7.1	Strategic Policy 21 - Built Environment and Historic Heritage	62
8.7.2	Strategic Policy 22 - Welsh Language	62

PART 4 - Other Considerations

9	Reconsideration of the SA/SEA and HRA	65
9.1	Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)	65
9.2	Habitats Regulations Assessment (HRA)	65
10	Opportunities for Collaborative Working	67
10.1	Joint LDPs and Collaborative Studies	67
10.2	Strategic Development Plans	69

Appendices

A LDP Policy Review	71
B Sustainability Appraisal Monitoring - Key Findings	77
C Status of LDP Allocations	83
D General and Specific Consultation Bodies	89
E Consultation Comments and Responses	93
F Glossary	113

Contents

Local Development Plan Review Report (July 2020)

1 Introduction

1.0.1 The Council is required under the Planning and Compulsory Purchase Act 2004 (*the Act*) to prepare a Local Development Plan (LDP) for its administrative area.

1.0.2 The current Neath Port Talbot LDP⁽¹⁾ was adopted by the Council on 27th January 2016. The LDP sets out the Council's vision and objectives, together with a series of policies and proposals which together sets the framework for the development and use of land in the County Borough up to 2026.

1.0.3 The Council also has a statutory obligation to prepare an Annual Monitoring Report (AMR) to assess the extent to which the LDP strategy, policies and allocations are being delivered, the sustainability credentials of the Plan and to identify any significant contextual changes that might influence its implementation.

1.0.4 In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is also statutorily required, under Section 69 of the Act, to undertake a full review of the adopted LDP at intervals not longer than every four years from the date of adoption.

1.0.5 **As four years has now passed since the LDP was adopted, the LDP will be subject to a full review and all aspects of the Plan will need to be assessed to consider if they remain sound and fit for purpose.** This will include the key issues, vision and objectives, the strategy, policies and land use allocations / designations.

1 . Introduction

2 The Review Report

2.0.1 Any revision to a LDP must begin with the publication of a Review Report and its submission to the Welsh Government. The Review Report will form a key part of the Council's evidence base when the Replacement LDP is submitted to the Welsh Government for examination.

2.0.2 This Review Report therefore sets out areas where the current LDP is delivering and performing well, in addition to those areas where changes may be required. Importantly, **it is not the purpose of the Review Report to detail any changes that may be made to the Plan. The detail and extent of any changes will only be identified through the preparation process of the Replacement Plan.**

2.0.3 In developing this Review Report, the Council has taken the following considerations into account:

- Content of the published LDP Annual Monitoring Reports (AMRs) (2017, 2018 and 2019) including the Sustainability Appraisal (SA) monitoring findings;
- Updated evidence and surveys, including the Joint Housing Land Availability Studies that have been published post LDP adoption;
- Relevant contextual information, including changes to legislation, the national/regional policy framework and local strategies and policies; and
- Internal Officer Working Group engagement and Member discussion.

2.0.4 The Council consulted with specific and general consultation bodies (a list has been provided within Appendix D)⁽²⁾ on its findings and conclusions and the Review Report was published on the Council's website as part of a stakeholder and public consultation undertaken between 3rd February and 16th March 2020. Full details of the comments received and the Council's responses are provided in Appendix E, and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

2.0.5 It is proposed that the Replacement LDP will cover a 15 year plan period (2020-2035), with a base date of 1st April 2020.

2.1 Structure and Content

2.1.1 The Review Report is structured around the following key parts:

Part 1 - Introduction and Background (Chapters 1-2)

2.1.2 **Chapter 1** briefly summarises the legislative requirements to monitor and review the LDP and **Chapter 2** sets out the importance, scope and structure of the Review Report.

² General and Specific Bodies are defined in Regulation 2 of the Town and Country Planning Wales, Town and Country Planning LDP (Wales) Regs 2005 as amended (Town and Country Planning (Wales) Amendment Regs 2015).

2 . The Review Report

Part 2 - Factors Informing the Review (Chapters 3-6)

2.1.3 Chapter 3 highlights the key findings of the three LDP Annual Monitoring Reports (AMRs) published since Plan adoption. These reports include detailed assessments of the performance of all the Plan policy areas and constitute important evidence in assessing the success of the Plan in meeting its aims and objectives and the delivery of the strategy.

2.1.4 Chapter 4 summarises the main findings of the Sustainability Appraisal (SA) monitoring to provide an overview of the effects of the Plan in sustainability terms. The SA monitoring is also undertaken on an annual basis and is reported as part of the AMR.

2.1.5 The main contextual changes that have taken place since the adoption of the Plan at national, regional and local level are outlined in **Chapter 5**. These include changes to national policy and guidance, regional collaborative working / studies and changes to the policies and approaches of the local authority and other local bodies.

2.1.6 Chapter 6 covers potential changes to the evidence base that underpins and informs the development of the strategy and policies. Some important changes that are evident are outlined together with other anticipated changes. All evidence base information will however need to be revisited as part of the review process.

Part 3 - Detailed Review (Chapters 7-8)

2.1.7 This part of the report addresses all the detailed elements of the Plan in turn, starting with the key issues, vision and objectives including consideration of how these may require amendment as a result of the factors outlined in Part 2. Consultation and involvement with stakeholders and consultation bodies will form an important part of the review of these aspects.

2.1.8 The LDP growth and spatial strategies are addressed in **Chapter 7**. The growth strategy was underpinned by an economic-led growth model which used the projected increase in jobs and aspirations to increase the economic activity rate in order to identify the required working age population to support the projected number of jobs.

2.1.9 The projected increase in working age population was then translated into the need for new housing, ensuring that the housing and employment forecasting was aligned and that there was a direct correlation between the number of jobs, houses, labour supply and employment land. The appropriateness of this strategy will be reconsidered as part of the review in the light of the other factors outlined in Part 2.

2.1.10 The LDP spatial strategy divided the administrative area into two distinct strategy areas to identify the broad locations for meeting the growth and development needs of the growth strategy and in recognition of the unique identity, varying characteristics and the market demand of the different areas of Neath Port Talbot.

2.1.11 Within the 'Coastal Corridor Strategy Area', development was facilitated along the M4 corridor in the urban areas of Neath and Port Talbot, while the 'Valleys Strategy Area' (an area comprising Pontardawe and the five valley areas) was to be reinvigorated employing a variety of policy interventions. The outcomes of this approach are also detailed in **Chapter 7**.

2.1.12 All the LDP policies (overarching, area and topic based), are considered in **Chapter 8**, and are presented under each of the strategic policy headings. These have been considered principally in the light of the AMR findings, but also take into account amendments that may be needed as a result of contextual changes and discussion in the Officer Working Groups.

2.1.13 Reconsideration of some housing and employment allocations will be required as part of the review. An overview of the policies and findings of this section are detailed in Appendix A '*LDP Policy Review*' and Appendix C '*Status of LDP Allocations*'.

Part 4 - Other Considerations (Chapters 9-10)

2.1.14 This part of the report addresses other matters that are relevant to the approach that will be taken to the review. **Chapter 9** addresses the changes that will be needed to the SA/SEA and HRA, including baseline information, assessment frameworks and methodology.

2.1.15 **Chapter 10** considers collaborative working with other local authorities and addresses the possibility of the preparation of a Strategic Development Plan (SDP) for Mid and South West Wales (M&SWW) as detailed in the draft National Development Framework (NDF). Whilst the section concludes that collaboration is unlikely to be feasible in respect of preparing a Joint LDP with adjoining authorities based on the respective timescales for preparing Replacement Plans, significant work is however underway in the form of collaborative studies that will inform the development of the Replacement LDP.

2 . The Review Report

3 LDP Annual Monitoring Reports - Key Findings

3.0.1 In line with national guidance, the review of the LDP should along with other factors, draw on the findings of the published LDP Annual Monitoring Reports (AMRs). The LDP Monitoring Framework⁽³⁾ forms the basis of the AMR and over time enables the assessment of how the Plan's strategic policies and supporting detailed policies are performing against the identified targets and outcomes.

3.0.2 The framework contains a total of 89 indicators, comprising a small number of core indicators (prescribed by LDP Regulations), along with a range of local and contextual indicators identified by the Council. Each indicator has a specified target along with a 'trigger' which identifies the point or level at which any deviation will trigger the need for further action to be considered and/or taken.

3.0.3 Since LDP adoption, a total of three AMRs have been published. The latest AMR was published in October 2019 and covers the monitoring period 1st April 2018 to 31st March 2019. A brief summary of the outcome of the latest year's monitoring is provided below, along with an overview of the key findings of the monitoring completed to date.

Table 3.0.1 LDP Monitoring Framework (2019)

Assessment	Action	Number of Indicators Within Category
The indicators point to the successful implementation of the Policy	No further action required. Monitoring to continue	60
LDP Policies are not being implemented in the intended manner	Officer and/or Member training may be required	1
Indicators suggest the need for further guidance in addition to those identified in the Plan	Supplementary Planning Guidance may be required	2
The indicators are suggesting that the LDP strategic policy is not proving to be as effective as originally expected	Further research and investigation required	0
The indicators are suggesting that the strategic policy is not being implemented	Following confirmation, the policy will be subject to a review process	26
The indicators are suggesting that the LDP strategy is not being implemented	Following confirmation, the LDP will be subject to a review process	0

3.0.4 The third phase of monitoring has shown that in broad terms the objectives of the LDP continue to be largely achieved. The majority of indicators continue to show that the plan policies are being implemented successfully, while contextual indicators show that most are resulting in the anticipated benefits to communities across the administrative area.

3 . LDP Annual Monitoring Reports - Key Findings

3.0.5 There are however, several key policy indicator targets and monitoring outcomes relating primarily to housing delivery and employment related development that are not currently being achieved. This indicates that these policies are not always having the required effect and as a consequence provides an indication that the LDP strategy (i.e. the level and spatial distribution of growth) is not being fully implemented.

3.0.6 The more notable areas of concern are briefly summarised below and it is imperative that the Council progresses with the statutory review of the LDP in order to address these issues.

Housing Delivery (General Market and Affordable)

3.0.7 A total of 299 housing completions were recorded in Neath Port Talbot over the latest 2019 monitoring period. Although an improvement on previous annual delivery rates, this figure remains significantly lower than the year target of 686 dwellings.

3.0.8 Since the LDP base date (2011), the number of housing completions totals 2,126 dwellings. Compared against the annual cumulative target of 3,582, this shows that completions have now fallen 1,456 below target and that just 59.4% of the cumulative annual target has been delivered to date.

3.0.9 Although there is sufficient housing land allocated in the LDP to meet the identified housing requirement over the Plan period, for a variety of reasons (including those that are independent of the planning system), sites are not coming forward and progressing as anticipated.

Affordable Housing Delivery

3.0.10 Over the latest monitoring period, no affordable housing units were recorded as being delivered through the planning system (i.e. via Section 106 agreements). This is against the year target of 130 units.

3.0.11 Since the LDP base date, the number of affordable housing completions delivered totals 50 units. Compared against the annual cumulative target of 478, this shows that completions have now fallen 428 below target and that just 10.5% of the cumulative annual target has been delivered to date.

3.0.12 The delivery of affordable housing is directly linked to broader housing delivery and the position reflects the fact that LDP allocated sites are not coming through the planning system as originally anticipated.

Housing Viability

3.0.13 There has been a substantial decrease in residual values over the Plan period, which has had a negative impact on the ability of housing allocations to deliver affordable housing and other planning obligations. Since LDP adoption, there has been a significant increase in build costs, which has not been met with the required uplift in sales values, which has had a detrimental impact on viability across each of the sub-market areas of Neath Port Talbot.

Affordable Housing Exception Sites

3.0.14 There have been no applications for affordable housing exception sites over the Plan period to date. Although no applications have been received, Registered Social Landlords (RSLs) have developed a number of sites within the area, providing affordable housing on sites allocated within the H1 portfolio and windfall sites within settlement limits.

Housing Land Supply

3.0.15 The latest 2019 'Joint Housing Land Availability Study' shows that Neath Port Talbot has a housing land supply, assessed against the housing requirement of the adopted LDP, of 4.5 years.

3.0.16 In the previous three studies completed since Plan adoption, the Council had demonstrated a land supply of 5.0 years (2016), 5.3 years (2017) and 5.0 years (2018) respectively. This latest study therefore is the first occasion post-adoption where the Council's land supply figure has dropped below the required 5 years.

Strategic Regeneration Areas

3.0.17 There has been limited progress in regard to the delivery of the two allocated 'Strategic Regeneration Areas' at Coed Darcy (Neath) and Harbourside (Port Talbot) respectively.

3.0.18 At Coed Darcy Urban Village, 291 dwellings have been completed since the LDP base date. The continued low rate of housing delivery has seen the cumulative delivery of housing for the site fall 509 units below target. The slower than anticipated rate of housing and infrastructure delivery has also resulted in a delay in the progression of the employment related element of the mixed use regeneration scheme, with no new land developed for employment uses to date. Road improvements including the provision of a southern access road and additional improvements to M4 Junction 43 have also been delayed.

3.0.19 At Harbourside, 34 dwellings and 1.8 hectares of employment land have been developed since the LDP base date. This is a shortfall of 41 residential units below target with no employment development for three consecutive years. Consequently, the cumulative delivery of both elements has fallen behind targets identified for the site.

3.0.20 The redevelopment of both these former industrial areas is proving complex and challenging and over time, progress has been frustrated by a number of factors including the nature of existing site constraints, viability issues and in some cases land ownership.

Employment Sites and Economic Activity

Land Developed for Employment Purposes

3 . LDP Annual Monitoring Reports - Key Findings

3.0.21 There has been no new development on allocated employment sites over the past two years which constitutes a trigger point for Policy SP11 (Employment Growth). Further research and investigation will therefore be required in respect of this issue as part of the review process to establish the reasons and whether changes to the policy framework are required.

Workplace Employment

3.0.22 One of the fundamental elements of the LDP economic-led strategy is to create 3,850 jobs in Neath Port Talbot over the Plan period. The number of jobs has fluctuated over the initial period, increasing from 49,400 jobs in 2011 to 50,900 jobs in 2015, an increase of 1,500, which indicated that the Plan was progressing well in achieving the overall target of 3,850 jobs by 2026. Since 2015 however, the number of jobs has decreased to 49,600 jobs in 2018, which represents an increase of just 200 jobs since the base-date of the Plan.

Live-work Units

3.0.23 In order to encourage economic development in the Valleys Strategy Area (VSA), Policy EC6 allows development of live-work units outside (but immediately adjacent to) settlement limits within the VSA. To date however, there has been no such development proposed under this policy and its lack of effect on economic development and local economies will need to be taken into account in the LDP review.

Environment and Resources

Protection of the Undeveloped Coast, Green Wedges and Special Landscape Areas

3.0.24 Although in previous years all proposals within designated areas have been determined in accordance with the policy framework, during the most recent monitoring period two applications have been determined contrary to policy (one an appeal decision). This has raised questions about the effectiveness and appropriateness of these policies which will need to be addressed in detail as part of the review.

Biodiversity and Geodiversity

3.0.25 Targets of preventing net loss of biodiversity are not being achieved, partly due to adverse effects on locally designated protection areas and partly due to a lack of mitigation and/or compensation measures delivered as part of development schemes.

4 Sustainability Appraisal Monitoring - Key Findings

4.0.1 The main issues identified in the Sustainability Appraisal (SA) monitoring related to the following SA topics:

Climate Change

4.0.2 The indicators in respect of the SA climate change objectives suggest that the LDP is not fully meeting aspirations in respect of climate change adaptation or mitigation. In particular, since Plan adoption, there have been instances where proposals have been approved within flood risk and protected areas contrary to policy; the LDP density requirements are often not being met; and the number of renewable / low carbon energy schemes has been lower than expected.

Natural Resources

4.0.3 In respect of the SA natural resources objectives, there are concerns that low density development has an unnecessarily large impact per unit on natural resources generally.

Biodiversity and Geodiversity

4.0.4 Targets of preventing net loss of biodiversity are not being met, partly due to developments having adverse effects on locally designated and protected areas and partly due to a lack of biodiversity enhancement within development sites or funded through developer contributions.

Landscape, Townscape and Historic Character

4.0.5 A small number of developments have been permitted contrary to LDP policy on landscape and green wedges, giving rise to concerns about meeting the SA objective to protect and enhance the area's landscape and townscape.

Community Cohesion

4.0.6 Indicators showing the loss of community facilities, approvals for new 'town centre uses' in out-of-centre locations and shortfalls in delivery of new housing and affordable housing, open space, employment floorspace and small scale local retail suggest some mixed impacts in respect of the SA social cohesion objective.

Health and Well-being

4.0.7 Indicators showing loss of community facilities, shortfalls in open space provision and decreasing levels of workplace employment and economic activity suggest some mixed or negative impacts in respect of the SA objectives concerning health and poverty.

4 . Sustainability Appraisal Monitoring - Key Findings

The Economy

4.0.8 Indicators showing shortfalls in housing delivery, new employment floorspace and new small local retail development suggest mixed impacts in respect of the SA Economy objectives.

4.0.9 A full summary of the SA monitoring findings is contained in the table in Appendix B.

5 Contextual Changes

5.0.1 As reported in the published AMRs, since LDP adoption there has been a range of new contextual material published which sets the framework within which planning policy is developed at the local level. In addition, Welsh Government (WG) has recently consulted on and will shortly be publishing an updated **Development Plans Manual (Edition 3)** which will guide the preparation of the Replacement LDP.

5.0.2 The review of the LDP will therefore need to take account of the various new Acts, policy frameworks, updated guidance, initiatives and evidence that has emerged at the national, regional and local level. Whilst not exhaustive, the following sets out those elements that will have the most significant influence on the review of the Plan.

National Context

5.0.3 *Planning (Wales) Act 2015* - the Act sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. One of the objectives is to strengthen the plan led approach in Wales and accordingly the Act has introduced the legal basis to prepare the **National Development Framework (NDF)** and also Strategic Development Plans (*refer to Section 10.2*).

5.0.4 Replacing the 'Wales Spatial Plan'⁽⁴⁾, the NDF will set out a clear 20 year spatial direction for government policy, action and investment. The WG issued the Draft NDF for public consultation in August 2019 with the final publication of the NDF scheduled for September 2020. The Replacement LDP will ultimately need to conform with the NDF, so there will be a need for the Council to closely consider the implications of the NDF as the new national policy direction emerges.

5.0.5 *Planning Policy Wales (PPW) Edition 10 (December 2018)* - PPW has been extensively revised and restructured to reflect the Well-being of Future Generations Act. It consequently takes the seven well-being goals and the five ways of working as overarching themes and embodies a placemaking approach throughout with the aim of delivering *Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places*.

5.0.6 The document has significant implications for the planning system in Wales and identifies that the planning system is one of the main tools to create sustainable places, and that placemaking principles are a tool to achieving this through both plan making and the decision making process. The revisions to PPW will have an impact on the future development and delivery of Strategic Development Plans, Local Development Plans and Place Plans.

5.0.7 *Technical Advice Notes (TANs)* - associated with PPW and those issued/amended since LDP adoption include:

- **TAN 1: *Joint Housing Land Availability Studies (January 2015)*** - in June 2018, the WG issued notification that for the duration of a national review into the delivery

5 . Contextual Changes

of housing through the planning system, Paragraph 6.2 of TAN 1 would be temporarily dis-applied. This means that currently housing land supply figures of Council's across Wales are not being treated as a material consideration in determining housing planning applications;

- **TAN 4: Retail and Commercial Development (November 2016);**
- **TAN 12: Design (March 2016);**
- **TAN 20: Planning and the Welsh Language (October 2017);**
- **TAN 21: Waste (February 2017);**
- **TAN 24: The Historic Environment (May 2017).**

5.0.8 Welsh Government 'Prosperity for All: A Low Carbon Wales' (March 2019) - the document sets out the WG's approach to cut emissions and increase efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society. It sets out policies and proposals that are intended to reduce emissions and support the growth of the low carbon economy.

5.0.9 Of particular note in relation to planning are the targets and policies introduced in the following sectors: power; buildings; transport; industry; land use, land use change and forestry; agriculture; and waste management. The implications of the Plan will be considered through the LDP review process.

5.0.10 Implementation of Schedule 3 to the Flood and Water Management Act 2010: the Mandatory Use of Sustainable Drainage Systems (SuDS) - as of 7th January 2019, all new developments of more than 1 dwelling house or where the construction area is 100 square metres or more will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards (published by the Welsh Ministers) and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins.

5.0.11 Welsh Government Circular (005/2018): Planning for Gypsy, Traveller and Showpeople Sites (June 2018) - the circular provides updated guidance on the planning aspects of identifying sustainable sites for Gypsies and Travellers and outlines how planning authorities and Gypsies and Travellers can work together to achieve this aim. The circular outlines the duty to provide sites, the necessity of involving Gypsies and Travellers proactively in the process and the steps required to assess the need for sites, identify suitable sites, and include policies in development plans.

5.0.12 Noise and Soundscape Action Plan (2018-2023) - the plan outlines the Welsh public sector's strategic policy direction in relation to noise and soundscape management for the next five years. It has a broader focus than just reducing noise levels alone, recognising also the need to create appropriate soundscapes, meaning the right acoustic environment in the right time and place.

5.0.13 Welsh Government 'Prosperity for All': the National Strategy' (2017) - takes the commitments of their 5 year programme for Government, 'Taking Wales Forward: 2016-2021', and places them in a long-term context, setting out how they will be delivered

by bringing together the efforts of the whole Welsh public sector. The four key Themes of the strategy are: 'Prosperous & Secure'; 'Healthy & Active'; 'Ambitious & Learning'; and 'United & Connected'.

5.0.14 *National Natural Resources Policy (NNRP) (2017)* - focusing on the sustainable management of Wales' natural resources, the NNRP sets out three national priorities: delivering nature based solutions; increasing renewable energy and resource efficiency; and taking a place-based approach. The NNRP sets the context for Natural Resources Wales (NRW) to produce 'Area Statements' to ensure that the national priorities inform the approach at the local level. The implications of the NNRP and relevant Area Statement will be considered as part of the LDP review.

5.0.15 *Welsh Government Valleys Task Force: Our Valleys, Our Future (July 2017)* - this Ministerial Taskforce for the South Wales Valleys published a high level action plan outlining priorities for the future of the Valleys. The key themes/priorities in the Plan include good quality jobs and the skills to do them; better public services; and my local community. Associated Delivery Plans subsequently outline a range of actions linked to each priority and include the creation of new, fair, secure and sustainable jobs and exploring the development of a Valleys Landscape Park.

5.0.16 Notably, Neath has been identified as one of seven strategic hubs where public money is to be focused to provide opportunities for the private sector to invest and create new jobs. The focus of each hub reflects the opportunities and demand in the particular area along with the aspirations for the future - the Neath hub will focus on industrial, residential, digital and energy related development.

5.0.17 *Welsh Government Future Trends Report (2017)* - this report identifies key future social, economic, environmental and cultural future trends for Wales under six themes. Whilst identifying future trends, it is hoped it will help change the way authorities think about decision making and long term planning. The report is an attempt to take a wider and longer view, bringing trends together and examining the interactions and inter dependencies between them.

5.0.18 *Environment (Wales) Act 2016* - the Act establishes the legislative framework needed to plan and manage the natural resources of Wales in a more proactive, sustainable and joined-up way. The Act requires that NRW report on the state of Wales' natural resources and detail their ability to respond to pressures and adapt to climate change, and also requires the WG to produce a 'Natural Resources Policy' that sets out the priorities, risks and opportunities for sustainably managing Wales' natural resources.

5.0.19 *Historic Environment (Wales) Act 2016* - the Act makes important improvements to existing systems for the protection of the historic environment by giving more effective protection to listed buildings and scheduled monuments; enhancing existing mechanisms for the sustainable management of the historic environment; and introduces greater transparency and accountability into decisions taken on the historic environment.

5 . Contextual Changes

5.0.20 *Energy Efficiency in Wales – A Strategy for the Next Ten Years (2016 – 2026)* - the strategy considers the role of authorities in driving this agenda as well as the role of other organisations, businesses and householders. It also highlights the vision to ensure that Wales can realise its full energy efficiency potential and become a major exporter of energy efficiency technology and know-how.

5.0.21 *Well-being of Future Generations Act (2015)* - the Act strengthens existing governance arrangements for improving the well-being of Wales by ensuring that 'sustainable development' is at the heart of decision making across Government and all public bodies and identifies seven well-being goals: a prosperous, resilient, healthier, more equal and globally responsible Wales, and a Wales of cohesive communities, vibrant culture and thriving Welsh language. The Act has also provided the legislative framework for the preparation of 'Local Well-being Plans'.

5.0.22 The Act defines 'sustainable development' as the process of improving the economic, social, environmental and cultural well-being of Wales and sets out five governance principles (or five ways of working) to aid in the consideration of this work (i.e. long term, integration, collaboration, prevention and involvement).

5.0.23 The Replacement LDP will need to be underpinned by sustainable development principles and accordingly the review will need to be informed by an 'Integrated Sustainability Appraisal / Strategic Environmental Assessment' (ISA/SEA). Clear linkages and associations will also need to be made between the aims and objectives of the Local Well-being Plan and the emerging Replacement LDP.

Regional Context

5.0.24 *Swansea Bay City Region and City Deal* - although the City Region was formally launched in 2013, the key change at the regional level since the adoption of the LDP has been the signing of the 'City Deal' on 20th March 2017. The City Deal comprises the local authorities of Neath Port Talbot, Swansea, Carmarthenshire and Pembrokeshire, together with Abertawe Bro Morgannwg and Hywel Dda University Health Boards, Swansea University, the University of Wales Trinity St David and private sector companies.

5.0.25 The City Deal Investment Programme is intended to transform the regional economy, establish and maintain an effective and aligned skills base, create, prove and commercialise new technologies and ideas, and be a recognised regional centre of excellence in the application of digital technologies, life science and well-being, energy and advanced manufacturing. This Council is the lead authority on the following three City Deal projects:

1. Homes as Power Stations;
2. Swansea Bay Technology Centre; and
3. Centre of Excellence for Next Generation Services (CENGS) - located within the Swansea Bay Technology Centre.

5.0.26 The preparation of the Replacement LDP will need to be set firmly in the context of the City Region/City Deal aspirations.

5.0.27 Regional Technical Statement (RTS) 2nd Review (2020) - under the provisions of Mineral Technical Advice Note 1 (MTAN1): Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be met in the region for a 15 year period.

5.0.28 The RTS assesses the demand and supply of aggregates within the South Wales region and considers the environmental capacity of each Mineral Planning Authority (MPA) to make a contribution to meeting the regional demand. The SWRAWP has recently consulted on and will shortly be publishing an updated RTS 2nd Review and the implications of the statement will be considered as part of the LDP review.

Local Context

5.0.29 Neath Port Talbot Public Services Board (PSB) Well-being Plan (2018-2023) 'The Neath Port Talbot We Want' - replacing the Single Integrated Plan (SIP), the Well-being Plan published in May 2018 sets out the PSB's long term vision for Neath Port Talbot. The Plan sets out the following six objectives to improve the well-being of people in Neath Port Talbot and identifies priorities for action:

- Support children in their early years, especially children at risk of adverse childhood experiences;
- Create safe, confident and resilient communities, focusing on vulnerable people;
- Put more life into our later years - ageing well;
- Promote well-being through work and in the workplace;
- Value our green infrastructure and the contribution it makes to our well-being (*cross-cutting*); and
- Tackle digital exclusion (*cross-cutting*).

5.0.30 Neath Port Talbot Corporate Plan (2019-2022) 'Shaping NPT' - the Plan sets out an overarching vision along with three well-being objectives: to improve the well-being of children and young people; to improve the well-being of all adults who live in the County Borough; and to develop the local economy and environment so that the well-being of people can be improved.

5.0.31 The Replacement LDP will need to give a spatial expression of the land use implications of the Neath Port Talbot Well-being Plan and Corporate Plan, and the LDP vision in particular will need to complement those within the published documents.

5.0.32 Neath Port Talbot Biodiversity Duty Plan (2017) - the plan demonstrates how the Council will fulfil the biodiversity duty set out under the Environment (Wales) Act 2016 and will act as a driver for conservation activities throughout Neath Port Talbot. Through meeting the Biodiversity Duty, the Council is delivering against well-being objectives and the ways of working under the Well-Being of Future Generations Act 2015 and contributing towards the delivery of the Nature Recovery Action Plan for Wales. The Replacement LDP will need to complement the Biodiversity Duty Plan and set an appropriate framework to deliver ecosystems resilience and the protection and enhancement of biodiversity.

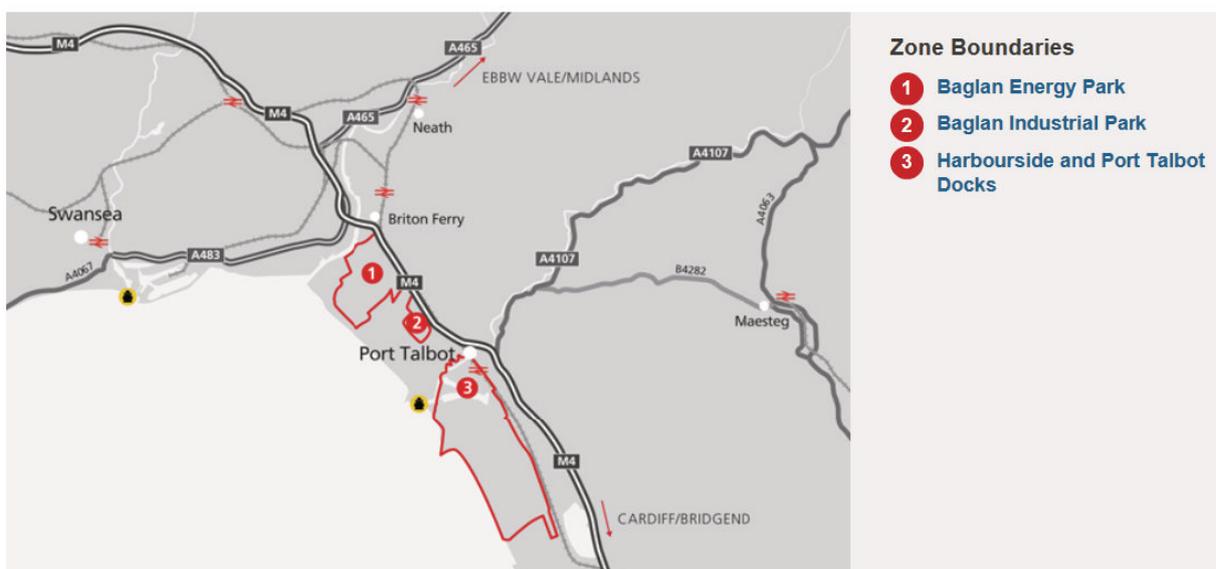
5 . Contextual Changes

5.0.33 Neath Port Talbot Local Biodiversity Action Plan (LBAP) - the Plan is currently under review by the Neath Port Talbot Nature Partnership and will be replaced by a new 'Neath Port Talbot Nature Plan'; this will set out the state of nature, highlight priorities for conservation action in the future and ensure nature recovery in NPT. An action plan will also be produced to set out key projects and activities that will contribute to nature recovery and feed in to the implementation of the Welsh Nature Recovery Action Plan. The NPT Nature Plan is intended to be published in 2020 and will feed in and inform the review of the LDP.

5.0.34 Port Talbot Waterfront Enterprise Zone (2016) - in March 2016, the WG confirmed that Port Talbot Waterfront would receive Enterprise Zone status. Its unique combination of factors in terms of location, infrastructure and its connectivity to the knowledge economy has attracted some of the UK's top manufacturers, including TATA Steel, BOC, SPECIFIC, TWI and ThyssenKrupp.

5.0.35 The area covered by the designation includes: Harbourside, Port Talbot Docks, Baglan Energy Park and Baglan Industrial Estate. There is now a firm focus on continuing to develop cutting edge, world class industries in sectors such as Advanced Materials and Manufacturing, Construction and Green Energy. Businesses moving to the area will profit from the inherent strengths and the existing growth potential of the region, and the momentum of the Economic Regeneration Strategy of Swansea Bay City Region which is a catalyst to improving the prospects of communities, businesses and the economy. The preparation of the Replacement LDP will need to be set firmly in the context of these aspirations.

Figure 5.1 Port Talbot Waterfront Enterprise Zone



Source: Business Wales - Enterprise Zones in Wales

5.0.36 Neath Port Talbot Active Travel 'Existing Route Map' (ERM) and 'Integrated Network Map' (INM) - WG Ministers approved the Council's revised ERM and INM in February 2018. The ERM identifies the existing routes in Neath Port Talbot that the Council considers suitable for active travel. The INM sets out the Council's aspirations for the

next 15 years, identifying either improvements that could be made to existing routes or where new routes could be developed and added to the active travel network. The Replacement LDP will need to provide an appropriate policy framework to enable the aspirations of the INM to be met.

5.0.37 Neath Port Talbot Decarbonisation and Renewable Energy Strategy - in light of the recent declaration by the WG of a 'climate emergency', the Council has recently consulted on and will shortly be publishing a strategy / action plan that will set the framework to achieve the Council's carbon footprint reduction aspirations. The strategy is developed around three key themes: transportation; buildings and spaces; and influencing behaviour. The Replacement LDP will therefore have a key role in facilitating the implementation of this overarching corporate strategy.

5 . Contextual Changes

6 Evidence Base Changes and Requirements

6.0.1 To inform the review of the LDP and in addition to accounting for the contextual changes set out above, there will be a need to update various elements of the evidence base that informed the current LDP.

6.0.2 The table below provides a list of studies (*albeit not exhaustive*), that will be required to inform the Replacement LDP. As this data is not yet available however, the following section focuses on the WG Population and Household Projections that have been released and the changes that have occurred since the current LDP was formulated.

Table 6.0.1 Replacement LDP - Evidence Base Studies

Topic Areas	Evidence Base Studies
Overarching Policies	Strategic Flood Consequences Assessment (SFCA) Settlement Hierarchy and Boundary Review
Communities and Housing	Annual Joint Housing Land Availability Studies Audit of Communities Facilities Affordable Housing Viability Assessment Urban Capacity Study Open Space Assessment Population & Household Projections Local Housing Market Assessment (LHMA) Gypsy and Traveller Accommodation Needs Assessment
The Economy	Economic Assessment and Employment Land Provision Study Employment Land Review Retail Study Annual Retail Survey
Environment and Resources	Green Infrastructure Assessment Energy Needs Assessment, Renewable Energy Assessment and District Heat Network Assessment
Transport and Access	Strategic Transport Assessment

6 . Evidence Base Changes and Requirements

Population and Household Projections

Adopted LDP - Current Position

6.0.3 Based on the projected economic-led growth scenario of 3,850 jobs for the area, the current LDP makes provision for an additional 7,800 new residential units. Delivering this level of housing need over the Plan period will lead to an increase of approximately 7,500 people and a total population of 147,400 by 2026.

6.0.4 Initially, at the time of preparing the Deposit Plan, the 2008 based WG Household Projections were used as a starting point and were incorporated into an aspirational economic-led scenario which aimed to maximise job growth within the local economy. The method enabled the Authority to forecast how economic changes over the Plan period equated to the requirements for employment land and the number of new homes needed to accommodate the projected total population and required labour supply. Prior to the Examination in Public, the 2011 based projections were published and the level of growth was then reassessed using these updated projections.

6.0.5 Over time, there has been a slight change in emphasis by WG on how the household projections should be used. During the preparation of the LDP, PPW stated that the WG's latest household projections should form the starting point for assessing the level of growth and housing requirement in LDPs. The latest version of PPW (2018) however now states that these projections will form a fundamental part of the evidence base and will therefore remain a key consideration in the LDP Review.

6.0.6 The purpose of the following section is to analyse the projections published since the LDP was adopted and the implications of the most recent projections on the formulation of housing need for the extended Plan period.

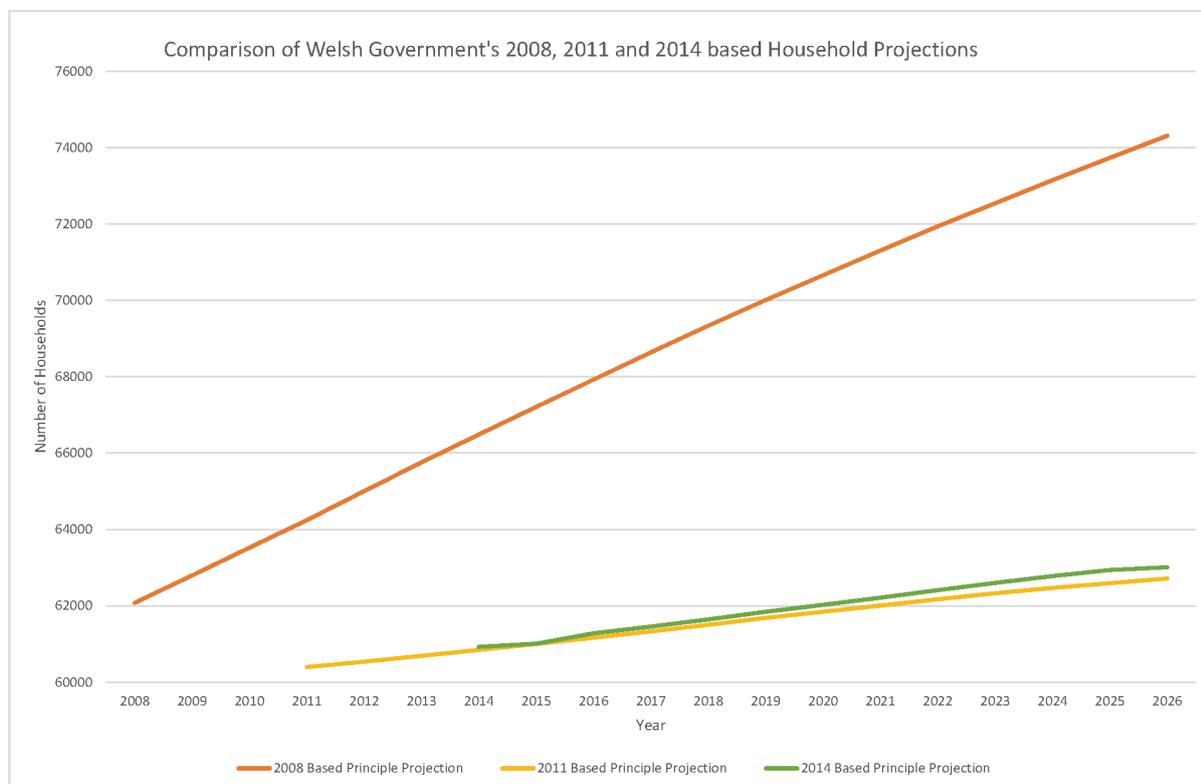
Revised Household Projections

6.0.7 The WG release population and household projections every three years (broken down by Local Authority). The most recent projections released since the adoption of the LDP are the 2014 based projections. The following table illustrates the comparisons between the 2008, 2011 and 2014 based principle projections.

6.0.8 As illustrated in Figure 6.1 below, there is a large variation between the 2008 projections and the 2011 and 2014, with the number of households at 2026 estimated to be 74,307 under the 2008 projections, 62,715 under the 2011 based projections and 63,009 under the 2014 projections. The 2008 projections indicate a high level of growth, whereas the 2011 and 2014 projections follow a similar pattern with marginal variance between the two sets of projections.

6 . Evidence Base Changes and Requirements

Figure 6.1 Comparison of Welsh Government's 2008, 2011 and 2014 Based Household Projections



6.0.9 As projections are trend based, the assumptions underlying the 2011 based projections were founded on a period of economic decline following the global economic crisis, which resulted in a significantly lower projected level of growth than the 2008 projections. Using the principle projection, it was estimated that 10,066 new homes would be required using the 2008 projections, with the projections under the 2011 significantly lower at 2,319 new homes by 2026.

6.0.10 As the 2011 principle projections were founded on a period of low economic growth, and as they do not make any allowance for the effects of government policy, the WG re-emphasised the expectation of using the projections as a starting point, whilst considering all sources of evidence available. For this reason, the 2011 based 10 year migration variant was used, which covered a period of both high and low economic growth, which increased the number of households at 2026 from 2,319 under the principle variant to 4,331. This variant was then considered in the context of the aspirational economic growth scenario to form the growth strategy in the adopted LDP.

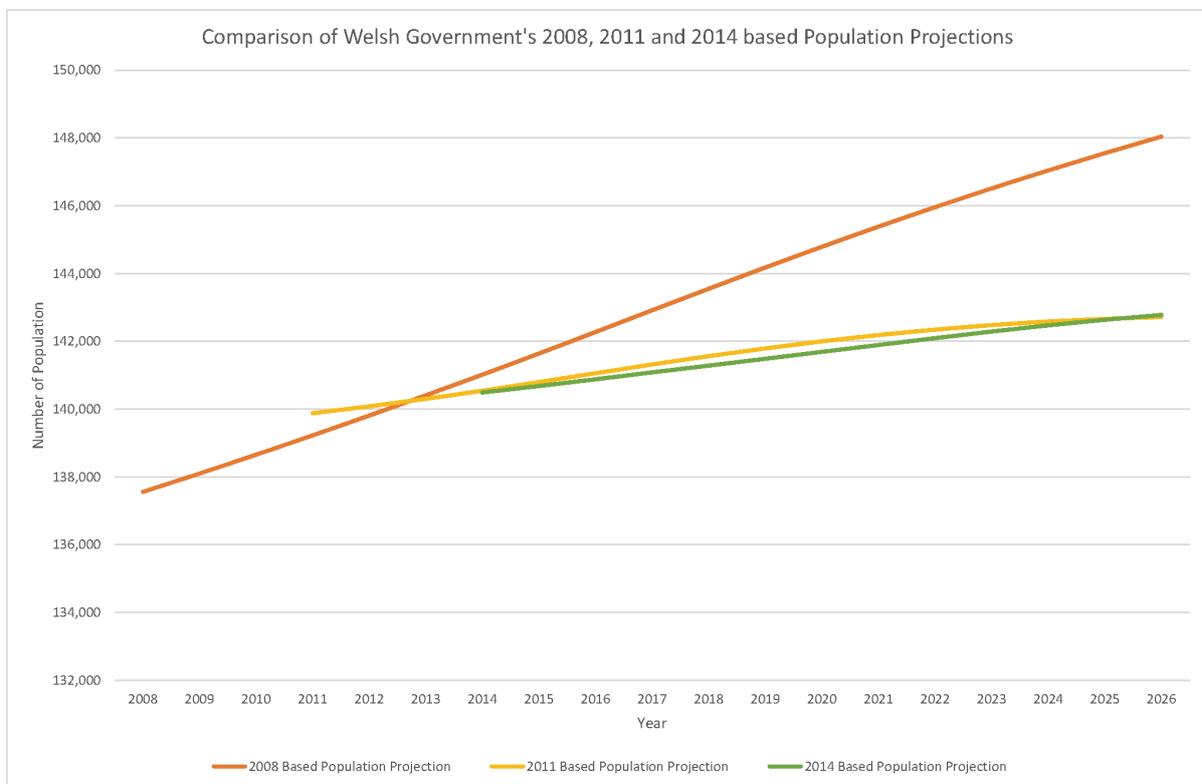
6.0.11 More recently, the WG have made the decision not to publish the 2017 based projections and it is anticipated that the 2018 based projections will be published in 2020. Whilst the projections by authority are yet to be released, the national 2018 based projections have been published, which estimates that housing need will gradually decrease over the next 15 years, and by mid 2030s (which would be the end date of the Replacement LDP), 6,500 new homes will be required annually in Wales.

6 . Evidence Base Changes and Requirements

Revised Populations Projections

6.0.12 The 2008 based population projections estimated the total population at 2026 to be 148,038, slightly higher than the LDP's economic-led growth scenario (which estimated the population to be 147,400). Based on the 2011 Census, 2011 based projections were published prior to the LDP adoption and estimated that the population at 2026 would be 142,716, which was 5,322 less than the 2008 based projection. By comparison, the 2014 based projections indicate a population of 142,779 at 2026, which is just 63 people lower than the 2011 based. Figure 6.2 below illustrates the comparisons between the projections.

Figure 6.2 Comparison of Welsh Government's 2008, 2011 and 2014 Based Population Projections



6.0.13 The housing requirement within the Replacement LDP will therefore need to be reconsidered in the context of: the 2018 based WG population and household projections; the City Deal; the provisions of corporate strategies, viability and constraints (such as flooding and topography); the key issues that the plan will seek to achieve; links between homes and jobs; the need for affordable housing; and achieving the holistic objective of the planning system: 'Placemaking'.

Placemaking

6.0.14 PPW continues to stress the importance of clearly identifying the housing requirement in the development plan, and states : *'These requirements must be based on evidence and clearly express the number of market and affordable homes the planning authority considers will be required in their area over the plan period'*.

6 . Evidence Base Changes and Requirements

6.0.15 However, there is a now also an emphasis on *Placemaking* and the creation of sustainable places: *'Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plan policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being'*.

6.0.16 The LDP will therefore need to continue to ensure that a fully evidenced housing requirement is identified and that the delivery of housing remains a priority, but this should not be at the expense of the need for effective placemaking and the creation of sustainable places.

Regional Planning - Assessing Housing Need at the Regional Level

6.0.17 Planning and coordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. The *Draft* NDF (August 2019) uses the 2014 projections and under the WG's central estimates, identifies that 114,000 homes are needed across Wales by 2038 with almost a quarter (23,400) in Mid and South West Wales (M&SWW).

6.0.18 The Cross Border Local Housing Market Assessment (LHMA) (2019) undertaken by ORS on behalf of the M&SWW region ⁽⁵⁾ was based on the 2014 projections. Accommodating each of the Local Planning Authorities (LPAs) preferred population projections and covering a 15 year period (2018-2033) is nearing completion and will be published early in the new year (2020).

6.0.19 Previously, Neath Port Talbot worked jointly with the City & County of Swansea and commissioned Peter Brett Associates (PBA) to project the number of homes needed over each of the respective Plan periods based on an employment-led strategy which aligned job numbers with homes.

6.0.20 As part of the review, the Council will need to consider whether to undertake a similar exercise, either with Swansea or on a larger geographical scale which could encompass LPAs further west to align with the forthcoming SDP.

5 Based on ORS' methodology and applied consistently across all of the Local Planning Authorities within the M&SWW region.

6 . Evidence Base Changes and Requirements

7 LDP Vision, Objectives and Strategy

7.1 Key Issues, Vision and Objectives

Key Issues

7.1.1 The LDP Key Issues were identified following a significant amount of evidence gathering and an extensive programme of community involvement including a number of stakeholder events held across the County Borough. A total of 18 key issues were identified, covering a wide range of topic areas including climate change, the need for affordable housing, erosion of the Welsh language and air quality.

7.1.2 The key issues then fed into the development of the LDP objectives which were grouped according to the themes set out in the Wales Spatial Plan.

7.1.3 All the key issues will need to be reconsidered in the light of updated evidence and changes in national legislation and guidance, including in particular the requirements of the Well-being of Future Generations (Wales) Act (2015) relating to the five 'ways of working' and the seven 'well-being goals', together with the vision and objectives set out in the Neath Port Talbot PSB Local Well-being Plan and Corporate Plan respectively.

7.1.4 To accord with the ways of working, the close involvement of the community (*public and stakeholders*) will be necessary in order to assess the continued relevance of the existing key issues or whether changes or additions are required. This process will need to be informed by up-to-date information on all aspects of life in Neath Port Talbot in order to identify areas where issues have now been addressed as well as those where issues remain an ongoing concern.

Vision

7.1.5 The LDP vision was developed from public participation and evidence gathering and was prepared to seek to address the key issues that had been identified. The vision consisted of several iterations as the development of the Plan progressed, from initial consultation and stakeholder engagement sessions to its development through the Preferred Strategy and then finalised at Deposit stage.

7.1.6 As with the key issues, the vision will need to be reconsidered in the light of updated background evidence, the new legislation and national policy that has emerged, along with the new corporate priorities and objectives that have been developed.

Objectives

7.1.7 The LDP vision is supported by 25 objectives, cross referenced to the relevant key issues. Of the 25 objectives, there are four overarching, two area-based and the remaining are grouped under the Wales Spatial Plan themes.

7.1.8 Again, the objectives will need to be reconsidered as part of the LDP Review in the light of any changes to the key issues and vision, and to account for new evidence from updated information and revised legislation and guidance. Given that the Wales

7 . LDP Vision, Objectives and Strategy

Spatial Plan will be superseded upon adoption of the NDF, it is anticipated that the new set of objectives will be grouped to align with the NDF and/or the themes as set out in the new updated PPW.

7.2 Growth Strategy

7.2.1 The current LDP Strategy aims to:

Facilitate growth within Neath Port Talbot, with a focus on the coastal corridor whilst reinvigorating the valley communities.

This means:

- Focusing development along the coastal corridor and in the urban areas of Neath and Port Talbot, in recognition of the important role these settlements play within the wider context;
- Maximising the benefit of market interest along the coastal corridor and stimulating growth through the delivery of strategic employment sites and strategic regeneration areas;
- Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the valleys which will create a mechanism to co-ordinate investment and ensure the benefits of growth and regeneration are shared more widely throughout the valley communities; and
- Providing a flexible approach to development within the valley communities.

Economic-led Growth Strategy - *Aligning jobs, houses, labour supply and employment land*

7.2.2 The LDP strategy is underpinned by an economic-led growth model that uses the projected increase in jobs and an aspiration to increase the economic activity rate to identify the required working age population to support the projected number of jobs. The projected increase in working age population is then translated into the need for new housing, which ensures that the housing and employment forecasting is aligned and that there is a direct correlation between the number of jobs, houses, labour supply and employment land within Neath Port Talbot.

7.2.3 Prior to the LDP base date economic growth in Neath Port Talbot had stagnated, which provided an opportunity for the Plan to try and address a number of fundamental issues within the area, maximising the opportunities likely to be created through key regeneration and infrastructure projects. The economic-led scenario is aspirational in its approach, aiming to maximise job creation within the local economy, seeking to increase economic activity rates and reduce unemployment levels in line with the Welsh average, thereby addressing some of the key issues identified within the LDP.

7.2.4 The economic growth model projected that 3,850 jobs would be created over the Plan period, increasing the number of jobs in Neath Port Talbot to 53,250 jobs by 2026, with the population growth for the area derived from the ratio of working age population

7 . LDP Vision, Objectives and Strategy

to total population. The number of jobs created over the Plan period is therefore one of the major indicators that can monitor how the LDP strategy is being implemented and to determine how successful the Plan has been in addressing some of the main issues in Neath Port Talbot.

7.2.5 Data releases for jobs numbers are subject to revision and can sometimes have fluctuations and variances year on year. There can also be time delays before the release of the current year's data, which can make the monitoring of workplace employment more difficult than other economic indicators. The original economic growth model projected that there would be an increase in jobs from 48,200 in 2011 to 52,050 in 2026, representing the 3,850 increase. However, by the time of the Examination in Public (2015), the latest data release showed that there had actually been a decrease in the number of jobs from 48,200 in 2011 to 46,300 in 2013 and as a consequence, for the Plan to achieve 52,050 jobs by 2026, the annual target for job creation would need to increase in order to make up for the reduction in jobs between 2011 and 2013.

7.2.6 The next statistical release revised the figures further, actually indicating that the number of jobs at the base position (2011), was actually higher than the previous data release had suggested, and the number of jobs in 2011 was 49,400 (as opposed to the original release figure of 48,200), and whilst there had been a reduction of jobs in 2013 (47,100), by 2014 the number of jobs had increased to 50,500, which provided a positive reflection on the local economy and potentially illustrating a more resilient economy.

7.2.7 A further increase in jobs was then seen over the next 12 month period, increasing to 50,900 jobs by 2015. Since 2015, there has been a reduction in the number of jobs, with a dramatic decrease to 46,600 jobs in 2017, which was 2,800 fewer jobs than at the LDP base date. The latest release (2018) shows a vast improvement, increasing by 3,000 jobs to 49,600. Whilst this is positive, the overall increase between the base date, 2011 and 2018 is just 200 jobs, against a 3,850 jobs target over the Plan period. The following table illustrates the annual fluctuations in workplace employment in Neath Port Talbot.

Table 7.2.1 Workplace Employment in Neath Port Talbot

Year	2011	2012	2013	2014	2015	2016	2017	2018
Workplace Employment	49,400	50,200	47,100	50,500	50,900	49,800	46,600	49,600

Source: Annual Population Survey, Office for National Statistics

7.2.8 Whilst the level of workplace employment has fallen significantly below the Plan's aspirations, other LDP objectives, such as increasing the economic activity rate to align with the Welsh average and reducing the unemployment rate have been more positive.

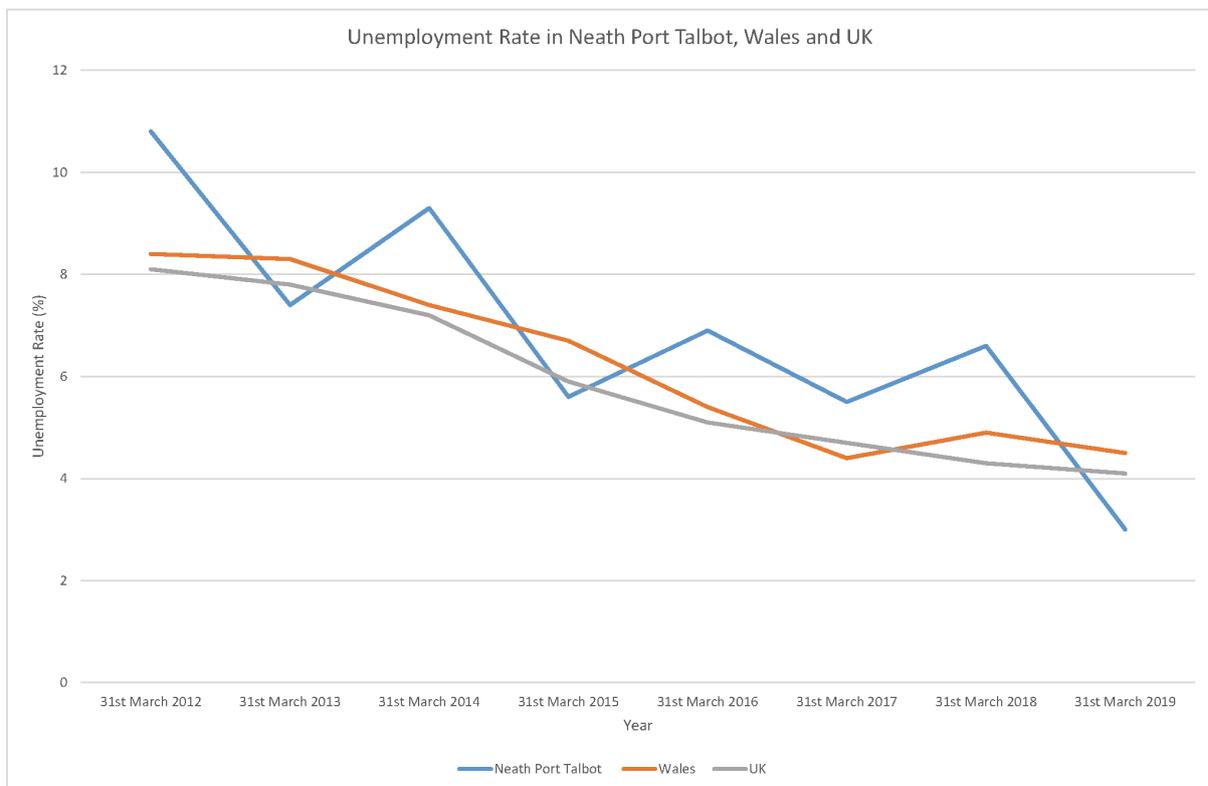
7.2.9 One of the Plan's objectives is to increase the economic activity rate to 76% by 2026, to align with the Welsh average. There has been an increase in the rate of economic activity in Neath Port Talbot, increasing from 69.7% in 2011 to 74% in 2019, with the gap

7 . LDP Vision, Objectives and Strategy

between Neath Port Talbot and Wales reducing slightly from being 3% behind the Welsh average in 2011 to 2.7% behind in 2019. The gap between Neath Port Talbot and the UK average has also reduced from 6.3% to 4.5% over the same period.

7.2.10 A further objective is to reduce the unemployment rate in line with the long term Welsh average of 6.9%. The graph below illustrates the rate of unemployment for Neath Port Talbot, Wales and the UK. Wales and the UK follow a similar pattern, with a steady decline over the period. By contrast, Neath Port Talbot has seen more fluctuation over the period, with a significant decline of 6.9% between the base date and 2019 and is now 3%, which is lower than the Welsh (4.5%) and UK average (4.1%).

Figure 7.1 Unemployment Rate in Neath Port Talbot, Wales and UK



7.2.11 The increase in economic activity and the reduction in unemployment provides a positive outlook for the area and shows a more resilient economic base. However, one of the fundamental elements of the LDP strategy is to maximise job growth within the local economy, in order to address a number of key issues the areas experiences, with wealth creation through job growth required to meet the Plan's overall vision. Whilst economic activity has increased, the jobs do not appear to have been created within the area, and could possibly mean there are more people commuting outside of the area for employment purposes.

7.2.12 Integral to increasing the number of jobs in the area, the Plan allocated sufficient employment land to deliver an adequate supply, mix and range of high quality employment sites at Baglan Bay, J38 of the M4, Coed Darcy and Harbourside. A total of 96 hectares

Tudalen242

7 . LDP Vision, Objectives and Strategy

of land was allocated for employment, comprising of 32 hectares for conventional B Class uses and space to accommodate the needs of the growing energy sector. To date, only 5.1 hectares has been developed across these four strategic employment allocations.

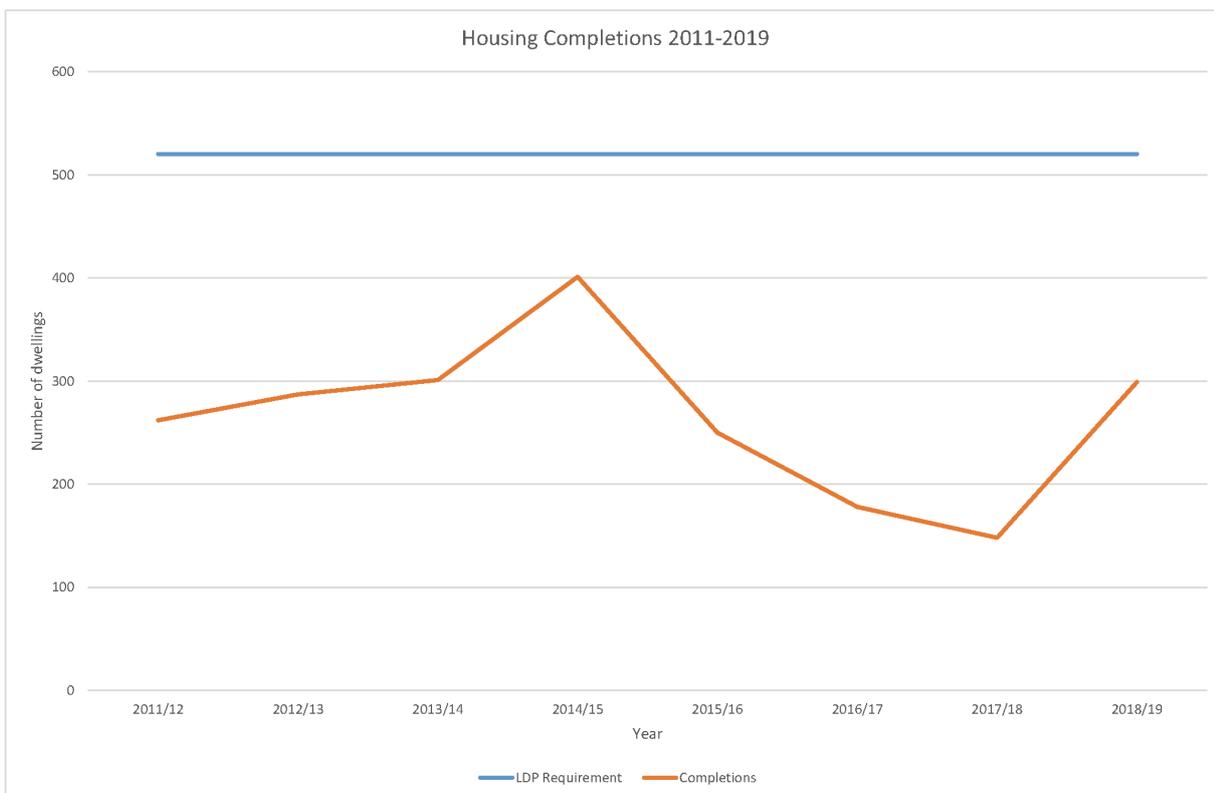
7.2.13 As the LDP housing requirement was based on housing to support a projected increase in the working age population to support new job creation and as jobs are not being created, the demand for new housing has not therefore materialised.

Housing

7.2.14 The LDP makes provision to deliver 7,800 new dwellings over the Plan period. Over the period 1st April 2011 to 31st March 2019, a total of 2,126 new housing units have been developed, against the target of 3,582 equating to 59% of the target for the period.

7.2.15 The table below illustrates the annual requirement of the LDP compared to the delivery of housing against the target, showing that housing completions have been below the LDP dwelling requirement every year since the base date. Housing completions were at their lowest in 2016/17 and 2017/18 where total completions were just 178 and 148 units respectively, significantly below the annual target of 520 units.

Housing Completions in Neath Port Talbot (2011-2019)



7.2.16 As a consequence of low housing delivery over the initial years of the Plan, to meet the LDP housing target of 7,800 new dwellings, an annual build rate of 810 new homes will now be needed from 2019 to 2026. This level of house building has never been

7 . LDP Vision, Objectives and Strategy

achieved in Neath Port Talbot, with average build rate since the base date at a level of 265 units per year. It is therefore considered that the level of housing need is unrealistic and not deliverable over the remainder of the Plan period.

7.2.17 Up to 31st March 2019, a total of 2,126 units have been delivered, which equates to 27.3% of the overall housing need over the first 8 years of the LDP. There are a number of reasons why sites have not come forward as anticipated, some of which are independent of the planning system, with other reasons such as viability having an influence on whether sites will come forward in the remaining Plan period.

7.2.18 The LDP has sufficient land allocated to meet the identified housing requirement and until recently, the Authority was able to evidence a 5 year land supply based on the anticipated level of future delivery, given early discussions with landowners and progress made on a number of sites. However more recently, housing delivery has been slower than anticipated and a number of the LDP allocations have not progressed to the planning application / development stage for a number of reasons. This has resulted in the available land supply falling below the required 5 years.

Table 7.2.2 Land Supply in Neath Port Talbot

Year	Land Supply
2011/12	6 years
2012/13	2.6 years
2013/14	2.5 years
2014/15	5.5 years
2015/16	5.0 years
2016/17	5.3 years
2017/18	5.0 years
2018/19	4.5 years

7.2.19 In light of delivery to date, it is evident that the current level of growth and the housing allocations contained within the current LDP cannot be carried forward and the growth strategy will need to be reconsidered during the review.

7.3 Spatial Strategy

7.3.1 The LDP spatial strategy divided the administrative area into two distinct strategy areas to identify the broad locations for meeting the growth and development needs of the growth strategy and in recognition of the unique identity, varying characteristics and market demand the different areas of Neath Port Talbot possess.

7.3.2 The spatial strategy facilitates development along the M4 'coastal corridor' in the urban areas of Neath and Port Talbot, whilst reinvigorating the 'valleys', an area comprising of Pontardawe and the five valley areas.

Coastal Corridor

7.3.3 The coastal corridor contains the areas of the strongest market demand and where the greatest proportion of house building and economic investment is concentrated. To deliver the growth strategy and deliver development in the most sustainable locations, major new developments are focused along the corridor to maximise the potential of the area, capitalising on strategic transport networks to achieve the Plan's vision.

7.3.4 To achieve more sustainable patterns of development, the re-use of brownfield land is utilised where possible, and spatially, large scale regeneration is focused on brownfield land at Coed Darcy and Harbourside through identification of Strategic Regeneration Areas (SRAs).

7.3.5 The Coed Darcy development aims to create a sustainable urban village comprising of residential, education and employment, whilst the Harbourside allocation provides an opportunity for major regeneration and mixed use development of retail, education, residential and employment.

7.3.6 In addition to these areas, strategic employment allocations at Junction 38 (M4) and Baglan Bay are identified due to the market demand and their ability to accommodate a range of employment, including the requirements of the growing energy sector and to accommodate spin off developments from the new Swansea Bay University Campus (Bay Campus), to encourage a shift from traditional manufacturing towards a knowledge based economy.

7.3.7 Whilst the development of the Bay Campus has been successfully implemented and there have been some expansions of employment uses into Baglan Bay, overall development at the strategic employment sites and strategic regeneration areas has been limited over the Plan period, falling below the anticipated levels of development.

7.3.8 By the 31st March 2019, the LDP housing trajectory anticipated Coed Darcy to have delivered in the region of some 800 dwellings and 2 hectares (ha) of employment floorspace. To date, there has been no development for employment uses and only 36% (291 units) of the anticipated level of housing delivered. Similarly, at Harbourside delivery has also fallen significantly below the Plan's trajectory, with 34 out of the projected 75 housing units delivered and 1.8ha of employment floorspace developed against a target of 4.92ha.

7.3.9 In terms of infrastructure to deliver the strategy, a number of key improvements are identified to support the growth strategy and to address issues such as congestion and encourage a modal shift to more sustainable forms of transport. The redevelopment of Port Talbot Parkway Station, Integrated Transport Hub, Baglan Energy Park Link Road, Harbour Way and Ffordd Amazon have all been successfully implemented over the Plan period. Therefore, whilst development has been limited, key infrastructure has been put in place that could facilitate future development and address the key issues in Neath Port Talbot.

7 . LDP Vision, Objectives and Strategy

7.3.10 Based on the low levels of delivery to date, the review will need to reconsider whether these regeneration initiatives will deliver growth within the coastal corridor, or whether focused development in alternative locations will be more effective in delivering the LDP Strategy, considering new initiatives such as the allocation of the Port Talbot Waterfront Enterprise Zone in 2016.

7.3.11 The emerging NDF identifies opportunities for enhancement and a different focus on planning for future infrastructure. The potential for a new 'Swansea Bay Metro' will improve connectivity across the region and maximise the opportunities for inward investment and growth. The Metro would be one of the largest infrastructure developments seen across the region and could bring considerable economic benefit, whilst improving accessibility. Due to the scale of the proposals, the strategy will need to reflect the potential opportunities associated with the development and consider how the Metro will complement the NDF identification of the Swansea Bay and Llanelli National Growth Area (NGA). Other forms of new infrastructure will also need to be considered in the context of the strategy, key elements will include electric vehicle charging infrastructure, mobile communications infrastructure and green infrastructure.

Valleys

7.3.12 The valley areas have a strong cultural heritage and distinct identity and are steep in natural resources. Communities have however faced a decline in traditional industries, poor health and out-migration, which has resulted in a cycle of deprivation in some areas. The strategy to reinvigorate the Valleys recognises the challenges and key issues within these areas and aims to diversify away from traditional industries, maximising on regeneration initiatives and providing a more flexible approach to new development.

7.3.13 The areas of Pontardawe and the Upper Neath Valley were identified as 'Strategic Growth Areas' for the valleys in recognition of their status as key and supporting settlements in the Wales Spatial Plan and as they were the most sustainable settlements within the valleys area to focus development. The benefits of managed growth and regeneration in these areas has the ability to promote wider benefits to ripple throughout other valley communities.

7.3.14 Pontardawe is the largest settlement within the Valleys Strategy Area (VSA), functioning as a town centre with close links to the M4 and as a gateway to some of the valley areas. With the ability and demand to accommodate a significant amount of new housing development, a total of 11 housing sites are allocated, with a capacity of 664 units. Of these allocations, 240 units have been developed (up to 30th March 2019), with delivery of housing expected to increase based on the current progress being made on a number of sites.

7.3.15 The growth point in the Upper Neath Valley primarily centres around Glynneath, which is situated adjacent to the A465, a key transport corridor linking to Neath, Swansea, Cardiff and the Midlands. The retail district centre of Glynneath acts as a hub with a broad range of services, and during the formation of the strategy had recently benefitted from the Glynneath Town Centre Regeneration Scheme. To complement this and support the town centre, a retail-led regeneration scheme at Park Avenue was allocated, which comprises a mixed residential and commercial development.

7 . LDP Vision, Objectives and Strategy

7.3.16 A tourism-led mixed use regeneration development at Rheola is also allocated to provide holiday accommodation and ancillary facilities to promote growth within the tourism sector, due to the increasing status of the areas as a tourism destination. The developments at Park Avenue and Rheola have not commenced during the initial years of the Plan and the revised strategy will need to explore how growth across the valley communities can be promoted and delivered.

7.3.17 The Strategy also seeks to encourage a more flexible approach to development in the valleys in order to build sustainable, resilient communities with an aim to halt the process of depopulation and decline. Live-work units are encouraged outside of, but immediately adjacent to settlement limits and retail proposals up to 200m² of gross floorspace being acceptable outside of designated town, district and local centres to support new and existing employment, create jobs and revitalise the area.

7.3.18 There have however been no live-work developments within the VSA to date. There were three relevant applications for small retail developments of less than 200m² in the VSA in 2018, but none in 2017 or 2019. These policies and the effectiveness of the reinvigoration approach taken for the VSA will need to be reassessed as part of the review.

7.3.19 The emerging NDF identifies areas of the VSA as priority areas for renewable energy. The growing energy sector and the potential for the valleys to accommodate a number of wind and solar energy proposals will need to be considered during the review. The potential for growth in other industries, such as tourism will also need to be considered.

7.4 Reconsideration of the Strategy

7.4.1 Although the economic-led growth strategy has seen some positive improvements in the rate of economic activity and a reduction in unemployment, given the limited growth in job numbers and the inability to meet the housing requirement, will mean that the strategy will need to be reconsidered as part of the review.

7.4.2 A critical element of the LDP strategy is the job creation within the local economy, which in turn feeds into the requirement for new housing, with the creation of new jobs an integral element in achieving the overall vision. Given the Plan has fallen considerably short in achieving job growth and employment development, the review will need to consider whether an economic-led approach is still appropriate for Neath Port Talbot. Whilst the existing strategy has addressed some of the Plan's objectives, such as reducing the unemployment rate, some of the key issues identified still remain to be addressed.

7.4.3 Further analysis is required to determine why job growth has decreased since 2015, and whether the uncertainty around the future of TATA Steel or Brexit have had any impact on attracting new investment to the area. New economic forecasting will be required to establish where the potential growth sectors will be over the period of the Replacement Plan and how contextual changes such as the Swansea Bay City Deal, Enterprise Zone at Port Talbot, potential for the Swansea Bay Metro and the emerging NDF will have on future economic development.

7 . LDP Vision, Objectives and Strategy

7.4.4 The level of development across both strategy areas (i.e. 'Coastal Corridor' and 'Valleys') has fallen below the anticipated levels of growth set out within the adopted Plan (as illustrated below). The review process will need to determine a revised level of housing growth over the extended Plan period, taking account of the latest Welsh Government projections and consider whether the spatial strategy remains the appropriate mechanism for the distribution of growth.

Table 7.4.1 Housing Allocations & Completions by Strategy Area

	LDP Policy H1	Proportion Allocated	Housing Completions H1 Allocations (up to 31 st March 2019)	Completions Against Target (up to 31 st March 2019)
Coastal Corridor Strategy Area	5,690	82%	1,189	21%
Valleys Strategy Area	1,275	18%	457	36%
Total	6,695	100%	1,646	-

7.4.5 The H1 portfolio of housing allocations will be reappraised and any undelivered housing allocations will be reassessed to ensure that sites are deliverable and viable within the extended Plan period. Notably, the new edition of PPW requires site viability to be demonstrated prior to a site's allocation within the Plan, so there is now a greater emphasis on viability which could potentially lead to the de-allocation of some sites and the inclusion of new sites to meet the overall housing requirement.

7.4.6 The spatial distribution of the updated level of growth will also need to be considered in the context of the draft NDF, with the emerging document suggesting there will be a different focus for areas within the area. Draft proposals indicate that the coastal corridor will feature within the designated Swansea Bay and Llanelli NGA, which will be the main focus for larger scale growth and investment across the M&SWW region in recognition of its status as the location of the main centres for population, employment, services and connectivity.

7.4.7 The emerging national policy to focus strategic growth, essential services and facilities, transport and digital infrastructure to the main centres, will need to be reflected within the strategy of the Replacement LDP. Furthermore, the draft NDF recognises the potential for the region to play a key role in supporting decarbonisation and the exploitation of renewable energy sources such as wind, tidal and solar. A significant proportion of the existing Valleys Strategy Area is identified within a priority area for wind and solar energy development. These areas also have the potential to expand and diversify the tourism industry.

7.4.8 In parallel, the revised PPW also sets out a number of planning principles that will need to be a key focus for the Replacement Plan, in order to ensure that placemaking is at the heart of new developments, and that the Plan creates places that promote prosperity

7 . LDP Vision, Objectives and Strategy

for all, promoting healthier, active, social and accessible places for people to live and work. All of these elements will need to be considered when assessing the current position, and cumulatively could result in a number of changes to the overall strategy.

7 . LDP Vision, Objectives and Strategy

8 LDP Topic Area Reviews

8.1 Overarching Policies

8.1.1 Strategic Policy 1 - Climate Change

8.1.1.1 Policy SP1 Climate Change is an overarching policy that is intended to be implemented throughout all the themes and topic policies of the LDP. In the years since the adoption of the LDP, all the indications are that climate change is becoming an ever more pressing issue with effects and implications that are becoming more evident as time passes. Following the Welsh Government's declaration of a climate emergency⁽⁶⁾, it is considered appropriate that this policy is retained as an overarching consideration that will have overriding influence throughout the Plan.

8.1.1.2 Due to the overarching nature of the policy, a number of evidence base documents are relevant to climate change, in terms of both causes and consequences, for example the Environment Topic Paper, Strategic Flood Consequences Assessment and the Renewable and Low Carbon Energy Topic Paper. The evidence base generally relating to climate change in the context of Neath Port Talbot will need updating.

8.1.1.3 The draft NDF re-affirms the importance of climate change, stating that both the NDF and PPW aim to ensure that the planning system focusses on delivering a decarbonised and resilient Wales through '*...the places we create, the energy we generate and use, circular economy, the houses we live in and the way we travel*'. This is taken forward through the placemaking theme embodied in PPW.

8.1.1.4 At the Officer Working Group, no specific issues were identified in respect of the terms of the policy or its overarching role in the Plan. The main issue identified in the AMRs relates to a shortfall in the density of developments within the coastal corridor, which is an issue dealt with under Policy BE1 (Design).

8.1.1.5 At present the policy is split into measures to deal with the causes of climate change (mitigation measures) and measures relating to the consequences of climate change (adaptation measures). It is proposed to retain this basic structure but to review the specific policy criteria to ensure that the latest information and approaches are incorporated.

8.1.2 Strategic Policy 2 - Health

8.1.2.1 Similarly, Policy SP2 Health is an overarching policy that is intended to be implemented throughout all the themes and topic policies of the LDP:

- *Sustainable Settlements* - well designed, adequately resourced and well-connected neighbourhoods can provide positive health benefits;
- *Housing Allocations* - siting sensitive developments such as housing away from sources of noise, air pollution and flood risk and building to strict environmental standards to increase energy efficiency;

8 . LDP Topic Area Reviews

- *Protection of Community Facilities* - seeking the retention of a range of accessible leisure, recreational, health, social, cultural and community facilities encourages healthier, more active and safer lifestyles;
- *Provision and Protection of Open Space* - ensure that all residents have access to adequate open space to improve physical and mental health;
- *Accessibility* - improve accessibility between communities and encourage active travel wherever possible;
- *Employment* - provide new employment opportunities to reduce unemployment and economic inactivity rates; and
- *Environment* - the quality of the natural and built environment can influence the health and well-being of the population.

8.1.2.2 Health is the principle element embedded within the Well-being of Future Generations Act which places an emphasis on taking a holistic, long term and collaborative approach to achieving well-being through placemaking. One of the seven goals is to achieve a healthier Wales. The new theme of placemaking and sustainable places in PPW are relevant to this topic area and improved health is one of the objectives of the Draft NDF. Health and well-being is therefore presented as a key objective in WG policy.

8.1.2.3 It is considered appropriate therefore that a health and well-being policy is retained as an overarching consideration that will have overriding influence throughout the Plan. The review however will need to consider whether it should remain as a stand alone overarching policy or whether it should be amalgamated under a new overarching theme of sustainable placemaking.

8.1.3 Strategic Policy 3 - Sustainable Communities

8.1.3.1 Policy SP3 Sustainable Communities is intended to facilitate the delivery of a network of sustainable, healthy and cohesive communities through the identification and implementation of a settlement hierarchy, defined settlement limits and protection of community facilities.

8.1.3.2 The evidence base informing the development of these policies includes the Settlement Hierarchy (Table 3.1 of the LDP) and the Settlement Topic Paper, with information in other topic papers and documents also relevant. An audit of community facilities and an urban capacity study will need to be undertaken to establish the current baseline information on which to assess the capacity of settlements and the opportunities that exist for them to grow.

8.1.3.3 In broad terms, the Settlement Hierarchy is unlikely to have changed to any significant degree, but it will need updating to reflect any notable changes that have taken place. Furthermore, the identified settlement limits will need amendment to reflect any minor changes that have arisen since the Plan was adopted. Consideration will also need to be given as to whether a revised, more flexible approach could be applied to the identification of settlement limits within the valley areas in order to encourage more smaller scale developments and to further facilitate reinvigoration.

8.1.3.4 The new placemaking theme embedded within PPW sets an even greater emphasis on the creation of sustainable, healthy places, while the draft NDF identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. These aspects will need to be reflected in the reviewed policies.

8.1.3.5 At the Officer Working Group, issues were also raised in respect of the detailed wording of the criteria set out in Policy SC1 (Settlement Limits) that define the circumstances under which development outside settlement limits would be acceptable. The policy will need to be reviewed and amendments made to address these issues. In respect of Policy SC2 (Protection of Existing Community Facilities), officers noted there was some confusion concerning the definition of what constitutes a *community facility*. It was also noted that there is currently no policy that relates specifically to the development of *new* community facilities. Again, these issues will need to be considered as part of the review.

8.1.4 Strategic Policy 4 - Infrastructure

8.1.4.1 Policy SP4 Infrastructure, Policy I1 (Infrastructure Requirements) and the Planning Obligations Supplementary Planning Guidance (SPG) seek to ensure that new development proposals make efficient use of existing infrastructure and provide the necessary planning obligations (as set out in Section 106 (S106) of the Town and Country Planning Act 1990) to mitigate the impacts of the development. At the time of adoption of the LDP, a Community Infrastructure Levy (CIL) was not progressed as funding had been identified through other mechanisms to deliver the LDP strategy.

8.1.4.2 The evidence base which informed the formulation of these policies will be reviewed as part of the process. The Infrastructure Delivery Plan (IDP) (2014) established the scale of infrastructure that currently exists but also identified the level of infrastructure that will be provided and required in future years, the organisations responsible for providing the infrastructure, the means (financial and otherwise) by which this infrastructure will be provided and when it is anticipated the provision will be made.

8.1.4.3 As part of the review, an assessment of infrastructure provision and needs will be undertaken to identify the capacity and availability of existing and planned infrastructure. There will be a need to work closely with utility providers to have regard to their most recent plans for improvement and the availability of funding so that infrastructure and development are aligned. The strategy will need to reflect the availability of existing and planned infrastructure.

8.1.4.4 Infrastructure directly relates to a number of placemaking principles identified in the revised PPW. Both PPW and the draft NDF now place more of a focus on new types of infrastructure, such as electric vehicle charging infrastructure, digital infrastructure, mobile telecommunications and green infrastructure, all of which will need to be considered during the review.

8.1.4.5 During the review of the infrastructure policies, the Officer Working Group expressed some concern that the policy, in its current form, lacked clarity which could impact on its implementation. The use of the term 'infrastructure' can cover a range of planning considerations and can generally be interpreted as physical infrastructure, such

8 . LDP Topic Area Reviews

as roads and utilities rather than planning obligations. During the review, the policy will need to be amended to ensure there is sufficient clarity in the terminology used that will allow the effective interpretation of the policy.

8.1.4.6 The AMR indicators have shown that a considerable number of applications have not met their infrastructure needs (mainly relating to affordable housing and open space provision). Due to issues with viability, the amount of S106 contributions being secured has been significantly below the thresholds set within the LDP.

8.1.4.7 As viability has become a major issue in the determination of planning applications, the review will need to consider the most appropriate and effective method of securing planning obligations and ensuring that there is sufficient infrastructure in place to deliver the strategy. PPW states that the financial viability of development sites must be demonstrated prior to their inclusion within the Plan to ensure sites are deliverable and can comply with other policies to deliver infrastructure and plan requirements.

8.1.4.8 Updated high level viability testing is required to consider whether the targets within the Plan should be amended and whether CIL should be considered. A Regional Viability Model for the M&SWW Region is currently being developed to create a consistent methodological approach when setting affordable housing targets and undertaking site specific viability assessments.

8.1.4.9 Alternative means of securing planning obligations and essential infrastructure will also be explored, such as site specific targets and masterplanning of strategic sites.

8.2 Area Based Policies

8.2.1 Strategic Policy 5 - Development in the Coastal Corridor Strategy Area

8.2.1.1 Policy SP5 Development in the Coastal Corridor Strategy Area sets out how the spatial strategy to facilitate growth within Neath Port Talbot will be applied in the coastal corridor. It will be implemented through a number of area-specific measures and policies, including a number of housing allocations, employment allocations, mixed use regeneration schemes, university campus and a number of highway schemes.

8.2.1.2 The two Strategic Regeneration Areas (SRAs) provide opportunities for large scale redevelopment and regeneration of significant areas of brownfield land and these will be developed over the LDP period and beyond. The SRAs will make a significant contribution to delivering the LDP strategy, will promote economic growth, meet the objectives of the Plan and are fundamental to the delivery of the Authority's key regeneration proposals. They are strategically located in the urban areas of Neath and Port Talbot and are proposed for mixed use development to promote significant regeneration to take place that will bring wider benefits to Neath Port Talbot.

8.2.1.3 Section 7.3 of the report reviews the spatial strategy and documents the contextual changes relevant to the coastal corridor, the findings from the previous three AMRs and the completions on housing allocations against the targets.

8.2.2 Strategic Policy 6 - Development in the Valleys Strategy Area

8.2.2.1 Policy SP6 Development in the Valleys Strategy Area sets out the main measures that will be taken to implement the spatial strategy of reinvigorating the Valleys areas. The strategy is centred on improving economic resilience with the encouragement of tourism, small scale employment and other economic developments, the diversification away from traditional industries and the identification of growth areas where development will be concentrated with the aim of spreading the regeneration effects over a wider area.

8.2.2.2 Section 7.3 of the report reviews the spatial strategy and documents the contextual changes relevant to the VSA, the findings from the previous three AMRs and the completions on housing allocations against the targets.

8.3 Communities and Housing

8.3.1 Strategic Policy 7 - Housing Requirement

8.3.1.1 The LDP strategy aligns the employment and housing growth, with Policy SP7 making provision to deliver 7,800 new dwellings to meet the projected increase in the working age population. Delivering the required level of housing is therefore an integral part of the LDP growth strategy.

8.3.1.2 The revised PPW introduces the concept of placemaking, which is a key element in developing sustainable places that will promote healthier lifestyles and meet the requirements of the Well-being of Future Generations Act. Authorities should understand their local housing market and should identify a housing requirement that is realistic and deliverable and considers all members of the community. Future plans should therefore cater for the housing needs of all and allocate sufficient land in the most appropriate places to create inclusive communities that are attractive, accessible, active and healthy, creating prosperity for all. The focus is therefore not just about meeting housing demand, but ensuring that placemaking is at the heart of new development. The emerging NDF places Neath Port Talbot within the M&SWW region, and estimates that 23,400 homes are needed across the area by 2038.

8.3.1.3 There are two monitoring indicators that measure whether the LDP is meeting the housing need identified within the Plan, these are housing completions and housing land availability. Housing delivery has fallen significantly below the targets set within the monitoring framework, with an average delivery rate on large sites between 2011/12 and 2018/19 of 230 homes per annum, compared with a requirement of 448 homes per annum, as indicated below.

Table 8.3.1.1 Actual & Target Housing Completions on Large Sites 2011/12 to 2018/19

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Totals
Actual	231	243	262	344	231	166	113	245	1,835
Target	262	287	301	386	486	549	625	686	3,582

8 . LDP Topic Area Reviews

8.3.1.4 Given that the delivery of housing development has fallen significantly below target and the annual housing requirement has not been reached in any given year since Plan adoption, to meet the LDP identified housing need, over the latter years of the Plan period there would be a need to build housing units at a rate that has never been achieved in Neath Port Talbot. Therefore, the existing level of growth is no longer deliverable, and will require reconsideration during the review. This is detailed further within Section 7.2: Growth Strategy.

8.3.1.5 In respect of land availability, the Council was able to demonstrate a 5 year land supply in the first three years post adoption. However, the latest 2019 JHLAS Study has shown that the land supply has fallen to 4.5 years.

8.3.1.6 Review of the policies with the Officer Working Group found that viability has become an increasing concern within the area, with a number of applications unable to meet the level of planning obligations required by the existing LDP policies. The group has also found that there has been limited interest in development across Neath Port Talbot, with a number of allocations within the H1 portfolio either making no progress towards delivery, or where sites have not progressed beyond pre-application stage.

8.3.1.7 Therefore, the review will need to review all allocations within Policy H1, in the context of any revised level of growth and determine which allocations are deliverable and which sites should be de-allocated. All sites, whether existing H1 allocations or new candidate sites will be required to demonstrate they are viable, deliverable within the LDP timeframe and able to deliver planning obligations to mitigate the impacts of the development, to ensure that developments promote sustainable places and meet the placemaking principles. The Officer Working Group suggested that in particular, the review should consider smaller scale house building in the valleys area.

8.3.1.8 The review will need to consider the revised Local Housing Market Assessment to ensure that the needs of all members of the community are assessed. The potential for revision to settlement limits and consideration of smaller allocations within the valleys strategy area will also be assessed, to ensure there are opportunities for varying scales of housing development.

8.3.2 Strategic Policy 8 - Affordable Housing

8.3.2.1 The LDP aims to deliver an appropriate mix and supply of housing, with Policy SP8 setting out the approach to the delivery of affordable housing. The policy framework sets out targets and thresholds for requiring private residential developments to contribute to affordable housing and allows small scale affordable housing developments outside of defined settlement limits. The policy framework relating to affordable housing was informed by the Affordable Housing Viability Study (2012) and the Local Housing Market Assessment (2013), both of which will need to be updated as part of the review.

8.3.2.2 Affordable housing will remain an important consideration during the review, with PPW requiring authorities to create sustainable places and ensure an adequate mix of house types to meet the identified housing need. Plans must understand all aspects of the housing market and appreciate the demand for different types of affordable housing. The emerging NDF identifies providing sufficient housing to meet identified need as one

of the main priorities and estimates that 47% of new homes should be affordable. The NDF aims to increase the delivery of affordable housing by ensuring funding is effectively utilised and development plans have sufficient policy frameworks to deliver affordable housing.

8.3.2.3 The AMR monitors the number of affordable homes delivered through the planning system, the changes in residual values and applications for affordable housing exception sites. New affordable housing delivered through the planning system has fallen significantly below the targets set in the monitoring framework. By the 31st March 2019, only 50 new affordable homes had been delivered through the planning system, against a target of 478, representing just 10.5% of the target. Whilst any amount of new, affordable housing is positive, the shortfall in delivery will create a backlog of need and place more pressure on the future resources to deliver affordable homes.

8.3.2.4 There are a number of reasons why delivery has fallen so far behind target, the main reasons being the shortfall in development of general market housing and viability. A large number of housing sites within the H1 portfolio have not progressed as anticipated, and therefore have not delivered the level of affordable housing through S106 agreements. On sites that have progressed, there has been the need to renegotiate the level of affordable housing provided on sites due to viability issues.

8.3.2.5 Viability has become an increasing concern within Neath Port Talbot, with the AMR concluding that the changes in residual value since Plan adoption having a negative impact. Across the 6 sub-market areas, residual value has decreased substantially. Within the 2019 AMR, the changes in residual value across the spatial areas where affordable housing is sought were -21.46% in Neath, -28.1% in Port Talbot and -23.1% in Pontardawe. These changes are significantly greater than the 5% trigger point within the monitoring framework. One reason for the change is the large increase in build costs since the Affordable Housing Viability Study was undertaken, which has not been met by an uplift in house prices thereby having a detrimental impact on viability,

8.3.2.6 The Officer Working Group reconfirmed the findings of the AMR, and highlighted viability as an issue in developing sites in the area, with the majority of planning applications having to renegotiate the required planning obligations due to viability, with certain types of developments, such as small scale conversion schemes rarely able to provide financial contributions.

8.3.2.7 As part of the review, updated viability testing will be required to reflect changes in development costs and the market since the original viability work was undertaken to determine a suitable target and threshold for the Replacement Plan and to ensure that targets are realistic and achievable. PPW now requires sites to demonstrate their financial viability prior to their inclusion within the Plan, this should help to ensure that sites allocated are deliverable within the Plan period and able to deliver the necessary planning obligations to ensure developments create sustainable places. An updated Local Housing Market Assessment is also required to identify the housing need in the area and assess the requirements for niche groups, to ensure housing for all members of the community is considered.

8 . LDP Topic Area Reviews

8.3.2.8 There have been no applications for affordable housing exception sites over the Plan period. The current threshold is restricted to 9 units, and during the review the existing threshold will be reviewed in discussion with the Officer Working Group and Registered Social Landlords active within the area. The group also highlighted the increase in applications for Houses in Multiple Occupation (HMO) which will also need to be considered during the review.

8.3.3 Strategic Policy 9 - Gypsies and Travellers

8.3.3.1 Neath Port Talbot has a well established Gypsy and Traveller Community. Policy SP9 provides the policy framework for ensuring there is adequate pitch provision to accommodate the needs of the community over the Plan period, through the allocation of a site and providing a criteria policy to assess applications for new sites.

8.3.3.2 The policy was informed by the findings of the 2012 Gypsy and Traveller Accommodation Assessment (GTAA) which identified a need of 20 pitches: 4 pitches by 2017; 7 pitches by 2022; and 9 pitches by 2026. To accommodate the short to medium term need (11 pitches by 2022) an extension to the existing site at Cae Garw, Margam was allocated, with the longer term need (9 pitches 2023-26) to be addressed through the monitoring framework based on updated GTAA's.

8.3.3.3 Under the requirements of the Housing (Wales) Act (2014), a new GTAA was completed and approved by Welsh Ministers in 2016. This most recent assessment concluded that the 11 pitches accommodated at Cae Garw was sufficient to meet the needs of the community, with an additional 4 pitches required by the end of the Plan period (2026); lower than the need identified in the 2012 study.

8.3.3.4 GTAA's are required at intervals of at least 5 years, with the next assessment due by 2021. This study will identify the needs of the Gypsy and Traveller Community over the period of the Replacement Plan and will be used to form a new policy if a need is identified. The extension of 11 pitches at Cae Garw was completed in 2016 and therefore Policy GT1 will need to be amended during the review to reflect the new assessment.

8.3.3.5 The Officer Working Group found the general policy approach to be working effectively. Since LDP adoption, Planning Circular 005/2018 '*Planning for Gypsy, Traveller and Showpeople Sites*' was published, providing guidance on the duty to provide sites, engaging the community in the process and policies to include within development plans. Policy GT2 may require some minor amendments to ensure conformity with the new Circular.

8.3.4 Strategic Policy 10 - Open Space

8.3.4.1 The Strategic Policy (SP10) , Policy OS1 (Open Space Provision), OS2 (Protection of Existing Open Space) and the Open Space and Greenspace SPG seek to ensure that new development proposals make provision for the open space needs of its future occupiers and employees, by providing on or off-site provision or making S106 contributions to enable provision or enhancement to be made locally. In addition, existing open space is afforded protection from development unless specified criteria can be met.

8.3.4.2 The Open Space Topic Paper and Open Space Assessment (2013) provided the evidence base which underpinned the policies contained within the LDP. The assessment identified deficiencies in the quantity and quality of existing provision in relation to the Fields in Trust (FIT) Six Acre Standard adopted in the LDP. The FIT Standard has now been revised since the adoption of the LDP: *Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard (2017)* recommends benchmark guidelines for both formal and informal outdoor space. The Review will need to fully consider whether to implement these requirements in the light of TAN 16: *Sport, Recreation and Open Space (2009)* which promotes evidence based locally generated standards.

8.3.4.3 Open Space directly relates to a number of the placemaking principles identified in PPW, and in respect of the requirements for Green Infrastructure as well as being embedded in the well-being principles: a 'Healthier Wales' and a 'Wales of vibrant culture and thriving Welsh Language', directly reference physical and mental health and behaviours or encouraging participation on sports and recreation. These principles will need to be considered as part of the review, especially the multi-functional and multi-generational use of open space.

8.3.4.4 The Officer Working Group indicated that further consideration should be given to the threshold in the policy, particularly in light of the viability issues on some sites and whether this may impact on site delivery. Some minor rewording of the policies may also be appropriate to improve clarity.

8.3.4.5 The AMR monitors both the provision and loss of open space. In respect of the provision of open space, the indicator shows that the policy is largely working to secure open space although this is often affected by viability considerations. The latest AMR identifies that the policy should be reviewed. In respect of the protection of open space, this is generally applied consistently, but may have the potential to be strengthened.

8.3.4.6 As indicated under Policy SP4 (Infrastructure) viability has become a major issue in the determination of planning applications. The review will need to consider the most appropriate and effective method of securing planning obligations and ensuring that there is sufficient infrastructure in place to deliver the strategy. PPW now states that the financial viability of development sites must be demonstrated prior to their inclusion to ensure sites are deliverable and can comply with other Plan policies to deliver infrastructure and plan requirements. Whilst this may assist on allocated sites, viability may still be an issue on smaller sites or windfall sites. The review of Policy SP4 does have linkages to SP10 so careful consideration will need to be given to how any changes may impact on the policies.

8.3.4.7 Over the course of the review, consideration will also need to be given to whether there is a need to allocate land for open space and whether the open space policy should be located in a different section of the Plan under a placemaking theme.

8 . LDP Topic Area Reviews

8.4 The Economy

8.4.1 Strategic Policy 11 - Employment Growth

8.4.1.1 Policy SP11 Employment Growth aims to promote a sustainable economy through a number of measures including the allocation of sites for economic development, safeguarding existing employment sites and providing a more flexible approach to development in the valley areas.

8.4.1.2 The policy framework was informed by the Economic Assessment and Employment Land Provision Study (2012), which used macro-economic trends to forecast the requirements for employment land over the Plan period. The recommended amount of floorspace was then adjusted to make allowances for alternative plot ratios, to account for stock losses and to ensure there was sufficient flexibility. Employment allocations and areas of safeguarding were based on the conclusions of the Employment Land Review (2014).

8.4.1.3 One of the key components of the updated PPW is '*Productive and Enterprising Places*', with the economy an important component of placemaking and creating sustainable places. The economy will remain one of the fundamental elements of the Plan including, allocating sufficient land to meet market demand and ensuring there is appropriate economic infrastructure in place (i.e. physical, electronic or digital).

8.4.1.4 The draft NDF identifies the areas of Neath and Port Talbot within the Swansea Bay and Llanelli NGA for the M&SWW Region, which will influence where employment provision is directed within the spatial strategy of the Replacement Plan.

8.4.1.5 The AMR has identified a number of issues relating to the delivery of employment development within the area. Of the four sites allocated for economic development in Policy EC1 (Employment Allocations), there has been no development for employment uses at J38 (M4) or Coed Darcy. Whilst there has been some development at Baglan Bay and Harbourside, this has been limited and fallen significantly behind the anticipated delivery rates within the monitoring framework. Policy EC1 allocated 96ha of employment land, of which 32ha was for traditional B Class uses, whilst the remainder (64ha) to meet the needs of the growing energy sector. To date, there has been a total of 5.1ha of development across the allocations, of which 1.8ha has been for B class uses and 3.3ha for a solar photovoltaic scheme.

8.4.1.6 A number of the monitoring indicators measure the performance of the economy as a whole, in terms of job numbers, economic activity and unemployment. These are key elements of the Plan strategy and are examined in further detail within section 7.2: Growth Strategy. The AMR also found that there have been no applications for live-work units since Plan adoption, and therefore the review will need to consider if the policy is still necessary, or whether there are amendments required that would encourage its use.

8.4.1.7 The Officer Working Group suggested that some elements of the policy framework could be amended to provide further clarity and to encourage more development. Existing policies EC3 (Employment Area Uses) and EC4 (Protection of Existing Employment Uses) currently define appropriate uses in employment areas (EC3) and protect employment

uses from development that would result in the loss of employment land or buildings (EC4). The group suggested that the policies could be combined into one policy that would be able to cover both elements. Policies EC5 (Employment Uses in the Valleys) allows a more flexible approach to development in the valleys. It was suggested that whilst development is permitted outside of settlement limits, considerations should be given to whether this could be relaxed further to promote employment development in the valleys, providing it was balanced with principles of sustainable development.

8.4.1.8 The review will need to consider the findings of the updated evidence base, namely the Economic Assessment Study and the Employment Land Review to establish the need for employment floorspace over the Plan period, based on projected growth sectors and identify the most suitable locations for development. Existing allocations will need to be reassessed to determine if they are viable and able to deliver the Plan's revised strategy. Contextual changes, such as the identification of the Port Talbot Enterprise Zone, and a number of the emerging NDF policies such as the Swansea Bay Metro, mobile action zones, and the identification of the growth area will all need to be considered during the review.

8.4.2 Strategic Policy 12 - Retail

8.4.2.1 The Strategic Retail Policy (SP12) and Policies R1 (Retail Allocations), R2 (Proposals Within Retail Centres) and R3 (Out of Centre Retail Proposals), seek to protect, enhance and support the retail centres across the area through the planning process.

8.4.2.2 The evidence base informing the development of these policies includes the Retail Topic Paper, the Retail Hierarchy Paper and the Retail Study. In the years since these documents were prepared (2013/14), the retail climate nationally has changed significantly with the growing popularity of internet shopping and the closure of a significant number of important retail businesses, and these documents and studies will need to be updated. An annual retail survey is also undertaken that will help to inform policy development.

8.4.2.3 The draft NDF includes policies intended to support urban centres and ensure that significant developments are located within town and city centres, while PPW promotes retail and commercial centres as being the most appropriate location for a range of activities in addition to retail services. The emphasis on placemaking within PPW is also significant in respect of managing change and in the development of retail and commercial centres.

8.4.2.4 At the Officer Working Group meeting held to discuss this topic it was noted that whilst the retail hierarchy was effective, it was acknowledged that boundaries will need to be reviewed and amended based on evidence including changes from retail studies. It was suggested that there might be a need for bulky goods allocations on edge of centre sites, although this would need to be justified through a new retail study. In respect of Policy R2 criteria (3) and (4), these have not always been successfully applied and these and the extent of the primary street designations will need to be reviewed. Policy for dealing with 'pop-up' businesses and retail kiosks should also be considered.

8 . LDP Topic Area Reviews

8.4.2.5 The AMR has identified no specific issues with retail policy implementation, but the overall need for the policies and their effectiveness should be considered, in particular in respect of the necessity for and usefulness of R2 Retail Centre policy restrictions. In addition, although the R2 small shops policy concession has had a small but positive effect, the policy thresholds should be reviewed.

8.4.2.6 Other issues that should be considered as part of the review include the general refocussing of the topic to relate to retail *and commercial* development and the placemaking theme, in accordance with more recent national policy and guidance.

8.4.3 Strategic Policy 13 - Tourism

8.4.3.1 Over recent years, the tourism industry has been growing in Neath Port Talbot, with considerable investment in some areas. To support the growing industry, the policy approach in the LDP provided flexibility to encourage sustainable tourism development. The Valley Strategy Area in particular benefits from existing visitor attractions, such as mountain biking at the Afan Valley and Waterfall Country in the Vale of Neath.

8.4.3.2 PPW recognises that the role of tourism is vital to economic prosperity and job creation in parts of Wales, and requires plans to provide a framework to maintain and develop well-located, good quality tourism facilities. The emerging NDF identified tourism as a potential growth area for the M&SWW region, and supports high quality development across the region to ensure all communities are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to grow their economies.

8.4.3.3 The AMRs have not identified any issues relating to tourism indicators and have not identified that any action is required. A number of tourism related proposals have been approved since Plan adoption, and all walking and cycling routes identified in Policy TO4 have been implemented. The tourism led regeneration scheme at Rheola has had planning approval, subject to the signing of a S106 agreement. Given that the S106 is yet to be signed and development has not progressed, the status of the allocation and the potential for future delivery will be considered as part of the review.

8.4.3.4 The Officer Working Group found that the policies relating to tourism are functioning effectively and identified areas where clarity could be improved. Policy TO2 protects existing tourism facilities, and will only permit changes to residential use where it is demonstrated tourism or other employment generating uses are no longer viable. The group suggested the policy should be expanded to provide a sequential approach to allow conversion to other uses, not just residential. This will be considered during the review.

8.5 Environment and Resources

8.5.1 Strategic Policy 14 - The Countryside and Undeveloped Coast

8.5.1.1 The Strategic Policy (SP14) and Policies EN1 (The Undeveloped Coast), EN2 (Special Landscape Areas), EN3 (Green Wedges), EN4 (Replacement Dwellings in the Countryside) and EN5 (Conversion and Extension of Existing Dwellings in the Countryside), supplemented by the Landscape and Seascapes SPG, seek to ensure that the countryside

and important landscapes and undeveloped coast across the area are protected from inappropriate development and are conserved, while supporting rural enterprise including tourism and leisure activities.

8.5.1.2 The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on the Countryside and Undeveloped Coast), the NPT LANDMAP Landscape Assessment (2004) and the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment (2017). On the whole, the character of the countryside and landscape across Neath Port Talbot is unlikely to have changed significantly in respect of the evidence base, but it may be appropriate to consider updating the LANDMAP Landscape Assessment (to assess the need for changes to the extent and possible additions to the Green Wedge and Special Landscape Areas). The need for these updates will require assessment in the light of changing national policy as this emerges (refer below).

8.5.1.3 Countryside and Rural Economy policy contained within PPW and relevant TANs is largely unchanged since LDP adoption. However, one of the major impacts on the countryside and landscapes of Neath Port Talbot is likely to be from the development of renewable energy schemes, in particular wind and solar farms. Only proposals below 10MW are now determined by LPAs and covered by LDP policy, and draft NDF Policy 10 is proposed to cover larger schemes which will be determined by the Welsh Government. Draft Policy 10 indicates a presumption in favour of schemes within the identified *Priority Areas* as shown in the draft NDF. The Priority Areas are areas within which landscape change is deemed to be acceptable and may therefore be essentially incompatible with LDP Special Landscape Area designations. This issue will need to be addressed as national policy emerges over the LDP preparation period.

8.5.1.4 At the Officer Working Group meeting held to discuss these policies, it was noted that the Special Landscape Area designations and Policy EN2 are likely to need reassessment in the light of emerging NDF policy on renewable energy (refer above). Policy EN3 (Green Wedges) was considered to be effective and only likely to need minor amendments to the boundaries of some designations. Policies EN4 (Replacement Dwellings in the Countryside) and EN5 (Conversion and Extension of Existing Buildings in the Countryside) were generally considered to be effective in principle, but amendments and clarification may be required in relation to the guideline sizes given for extensions and replacement dwellings.

8.5.1.5 The main finding of the AMR in respect of the Countryside and Undeveloped Coast policies was that of mixed impacts in respects of development in Green Wedges and Special Landscape Areas, where developments have been permitted contrary to policy. It was also noted that there appears to be a conflict between EN2 SLA policy and policy relating to the refined Strategic Search Areas for renewable energy (Policy RE1).

8.5.1.6 Other issues that may need to be considered as part of the review include addressing potential overlaps between policies relating to development outside settlement limits (Policy SC1), Special Landscape Areas (EN2), Green Wedges (EN3), biodiversity designations (SP15, EN6 and EN7) and new approaches to green infrastructure.

8 . LDP Topic Area Reviews

8.5.2 Strategic Policy 15 - Biodiversity and Geodiversity

8.5.2.1 The Biodiversity and Geodiversity Strategic Policy (SP15) and Policies EN6 (Important Biodiversity and Geodiversity Sites) and EN7 (Important Natural Features), supplemented by the Biodiversity and Geodiversity SPG, seek to protect, conserve and enhance important biodiversity and geodiversity sites and features within the area through the planning process.

8.5.2.2 The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on Biodiversity and Geodiversity). Although geodiversity matters are unlikely to have changed significantly, the information will require updating in respect of the area's biodiversity.

8.5.2.3 Biodiversity and Geodiversity policy within the draft NDF and PPW embodies a strengthening of the role and importance of biodiversity considerations within the planning system, following on from the Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities requiring them to seek to maintain and enhance biodiversity in the exercise of all their functions. The emphasis on placemaking within PPW is also likely to be relevant in respect of complying with this duty.

8.5.2.4 At the Officer Working Group meeting held to consider these policies the following matters were discussed: It was indicated that there had been some issues with identifying suitable sites for biodiversity compensation in relation to certain schemes. A number of the LDP allocations are on sites designated as SINCs this causes problems and should ideally be avoided. Sites should be surveyed to identify features of interest to be retained as part of the placemaking approach. Previously there was a policy to require one tree to be planted for each new dwelling and consideration should be given to reintroducing this. PPW now requires biodiversity enhancement: this may require the integration of Green Infrastructure (GI) and placemaking approaches together with more information about the biodiversity present on allocated sites. Policy EN7 is useful and frequently used and it may be appropriate to strengthen it as part of a placemaking approach.

8.5.2.5 The main finding of the AMR in respect of the Biodiversity and Geodiversity policies was the continuing net loss of biodiversity as a result of planning decisions, without adequate mitigation or compensation being secured in all cases.

8.5.2.6 Other issues that should be considered as part of the review include consideration of the approach to the overlap between biodiversity policy and policies relating to development outside settlement limits (Policy SC1), Special Landscape Areas (EN2), Green Wedges (EN3) and new approaches to GI. Consideration should also be given to the possible need to designate areas as National Forest, as proposed in the draft NDF.

8.5.3 Strategic Policy 16 - Environmental Protection

8.5.3.1 The Environmental Protection Strategic Policy (SP16) and Policies EN8 (Pollution and Land Stability), EN9 (Developments in the Central Port Talbot Area) and EN10 (Quiet Areas), supplemented by the Pollution SPG, seek to protect the quality of air, water and soil and the environment generally and ensure that developments do not increase the number of people exposed to significant levels of pollution.

8.5.3.2 The evidence base informing the development of these policies includes the Environment Topic Paper (Environmental Protection section). The evidence base information and documents for this topic will need to be updated to take into account the latest information on pollution and land stability issues and in the light of any changes to national policy but there are not anticipated to be any major changes in these respects with regard to this topic.

8.5.3.3 Environmental protection policies within PPW re-emphasises the importance of pollution and stability issues and introduces some revised approaches and terminology including the need to achieve appropriate soundscapes rather than simply address noise pollution, and advocates the adoption of a de-risking approach. These changes will need to be reflected in the LDP policies.

8.5.3.4 At the Officer Working Group meeting held to discuss these policies issues with land stability in parts of Neath Port Talbot were discussed. The possibility of dividing Policy EN8 should be considered to provide separate policies for pollution and land stability, referring to areas having historic land stability issues. This could include a requirement for developers to provide information to justify development in such areas. Problems with air quality in relation to specific LDP allocations were discussed together with the possibility of strengthening consideration of impacts that new development would have on existing uses in terms of exacerbating existing pollution issues. Links between requirements to provide sustainable drainage systems in new developments (SuDS) and the water quality criterion of Policy EN8 should also be taken into account.

8.5.3.5 No specific issues were identified in the AMR in respect of the application of LDP pollution and land stability policies.

8.5.4 Strategic Policy 17 - Minerals

8.5.4.1 Neath Port Talbot is underlain by a significant amount of mineral resources with a number of sites operational within the area. The Minerals Strategic Policy (SP17) and Policies M1 (Development in Mineral Safeguarding Areas), M2 (Surface Coal Operations), M3 (Development in Mineral Buffer Zones) and M4 (Criteria for the Assessment of Mineral Development), seek to regulate the exploitation of mineral resources in order to make a proportionate contribution to meeting the national, regional and local demand for minerals while achieving an acceptable and sustainable balance with protecting the environment and local communities.

8 . LDP Topic Area Reviews

8.5.4.2 The evidence base informing the development of these policies includes the Minerals Topic Paper. Guidance for mineral extraction and related development in Wales is set out in the updated PPW and supplemented by Minerals Technical Advice Notes (MTANs).

8.5.4.3 Under the provisions of MTAN1: Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a Regional Technical Statement (RTS) setting out how aggregates demand will be met in the region for a 15 year period. The RTS assesses the demand and supply of aggregates within the region and considers the environmental capacity of each Mineral Planning Authority (MPA) to make a contribution to meeting the regional demand.

8.5.4.4 The SWRAWP has recently consulted on and will shortly be publishing an updated RTS 2nd Review and the implications of the statement will need to be fully considered as part of the LDP review. The Replacement LDP will need to continue to show evidence that the Authority has the necessary landbank of aggregate reserves to meet the identified need. Evidence set out in the AMRs to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations will be required.

8.5.4.5 Whilst in general terms the mineral policies are considered to remain sound, the need to respond to changing circumstances will need to be considered. Given the declaration of a 'climate emergency' and the need to decarbonise the economy, the policy of the Welsh Government is to no longer support the working of coal. PPW has therefore been updated setting out the position that new applications for the working of coal should now be resisted unless there are identified exceptional circumstances, and that there is no longer a requirement for LDP policies to safeguard coal resources or to indicate where coal operations would not be acceptable (i.e. Policy M2).

8.5.4.6 In addition, the draft NDF sets out the policy framework for determination of renewable energy proposals including the introduction of Priority Areas within which there will be a presumption in favour of wind and solar schemes (refer below). A large part of Neath Port Talbot is within the draft wind and/or solar priority areas, so the question of sterilisation of mineral resources / reserves by renewable energy developments will need to be clarified as part of the review.

8.5.5 Strategic Policy 18 - Renewable and Low Carbon Energy

8.5.5.1 The Strategic Policy (SP18) and Policies RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development) and RE2 (Renewable and Low Carbon Energy in New Development), supplemented by the Renewable and Low Carbon Energy SPG, seek to ensure that the area makes a proportionate contribution to renewable energy generation while balancing the impact of renewable energy developments on the environment and communities.

8.5.5.2 The evidence base informing the development of these policies includes the Renewable and Low Carbon Energy Topic Paper, the LDP Renewable Energy Assessment, the TAN 8 Annex D Study of Strategic Search Areas E and F: South Wales Valleys, and the Provision of Landscape Advice Report. The evidence base information and documents

for this topic will need to be reconsidered and revisited in the light of changes to national policy and consenting regimes and changes in renewable energy technologies. Additional information may be required in respect of the following:

- Study into the potential for developing district heat networks, particularly in the Neath area;
- Assessments of the energy needs of all new proposed development and need for additional generating capacity;
- Identify *challenging but achievable* targets for renewable energy (absolute energy installed capacity/resource potential); and
- Implement the Low Carbon Toolkit (including assessment of resource potential, impacts and opportunities, cumulative impacts and connection issues).

8.5.5.3 All proposals for onshore generating projects between 10MW and 50MW capacity (and greater for wind energy) are now dealt with by Welsh Ministers with Local Authorities dealing only with proposals below 10MW.

8.5.5.4 The draft NDF sets out the policy framework for determination of renewable energy proposals including the introduction of Priority Areas within which there will be a presumption in favour of wind and solar schemes. Other draft NDF policies cover other aspects of renewable energy development and district heat networks. A large part of Neath Port Talbot is within the draft wind and/or solar priority areas, where there would be a presumption in favour of Renewable Energy (RE) developments. Neath is identified as a priority area for District Heat Networks where opportunities should be identified and implemented.

8.5.5.5 National policy in respect of renewable energy is therefore currently under review. PPW currently promotes the development of renewable energy resources, introduces the Energy Hierarchy and requires planning authorities to plan positively for local power generation including providing for the co-location of developments to enable local heat opportunities, maximising the use of waste heat, district heating and combined heat and power. Both PPW and TAN8 (Renewable Energy) will be reviewed once NDF policy is finalised and LDP policies will need to reflect and comply with this emerging framework.

8.5.5.6 At the Officer Working Group meeting held to discuss the LDP policies it was noted that Policy RE1 would need to be amended but that the form it would take will depend on the finalised national policy framework. It was considered that the need to split RE1 to have separate policies for wind and solar power should be assessed as part of the review. The question of sterilisation of mineral reserves by renewable energy developments has been an issue in the past and this issue will also need to be clarified.

8.5.5.7 In respect of Policy RE2 (Renewable and Low Carbon Energy in New Development) it was recommended that consideration should be given to amending the thresholds for the requirement of Energy Assessments and whether the threshold of 100 dwellings for residential developments in particular should be reduced although this will need to be considered in the light of development viability issues.

8 . LDP Topic Area Reviews

8.5.5.8 No specific issues were identified in the AMR in respect of the Renewable and Low Carbon Energy LDP policies. However, the SA monitoring has identified mixed impacts in relation to the thresholds for requiring the submission of renewable energy assessments (Policy RE2).

8.5.5.9 In addition to the above, consideration will need to be given to the need for a separate policy for district heat networks, particularly in the Neath area, and the formal identification of renewable energy targets.

8.5.6 Strategic Policy 19 - Waste Management

8.5.6.1 The Waste Management Strategic Policy (SP19) and Policies W1 (In-Building Waste Treatment Facilities), W2 (Deposit of Inert Waste on Agricultural Land) and W3 (Waste Management in New Development), seek to take a sustainable approach to waste management and contribute to making provision for an integrated and adequate network of waste management facilities.

8.5.6.2 The evidence base informing the development of these policies includes the Waste Topic Paper and the Waste Planning Monitoring Reports (WPMRs) which are published annually by the South West Wales Region. PPW indicates that *Circular Economy* principles should underpin all developments and encourages design approaches that prevent waste. It also sets out the waste hierarchy for dealing with waste materials with disposal as the last option.

8.5.6.3 Furthermore, PPW supplemented by TAN 21 (Waste) requires that progress towards establishing an integrated and adequate network of facilities is monitored to identify whether sufficient landfill capacity is being maintained; sufficient treatment capacity is being maintained; whether the spatial pattern of provision is appropriate to address identified needs; and whether any further action is needed by LPAs to address unforeseen issues.

8.5.6.4 Central to the process of preparing the WPMR is the collection and analysis of information regarding the waste situation within the region. The principle role of the WPMR is to collate and present all available data to enable the effective monitoring of both the region's waste arisings and waste management facilities and to assess the region's performance against the targets set out in the National Waste Strategy for Wales – 'Towards Zero Waste' (TZW).

8.5.6.5 Whilst the evidence set out in the AMRs to date indicates that in general terms the waste policies are considered to remain sound, the need to respond to changing circumstances will need to be considered throughout the review. The information and analysis presented in the WPMRs will inform this process and provide a basis to take action on the waste arising's within each local authority area and by implication the region as a whole.

8.6 Transport and Access

8.6.1 Strategic Policy 20 - Transport Network

8.6.1.1 The Transport Network Strategic Policy (SP21) and policies TR1 (Transport Proposals), TR2 (Design and Access of New Development), TR3 (Safeguarding of Disused Railway Infrastructure) and TR4 (Safeguarding Freight Facilities), supplemented by the Parking Standards SPG seek to support and develop the transport network to safely and effectively facilitate the movement of people and freight within the area, reduce reliance on the private car and improve connectivity.

8.6.1.2 The evidence base informing the development of these policies includes the Transport Topic Paper. All the information and documents relating to this topic will need to be updated to take into account transport infrastructure changes and other developments that have taken place since the Plan was adopted, together with general updating of the information available. Regard will be had to the Joint Local Transport Plan (LTP) for South West Wales 2015-2020. Replacing the Regional Transport Plan (prepared by the SWWITCH consortia) the four authorities in South West Wales have worked collaboratively in preparing the LTP as an overarching City Region LTP. Consideration needs to be given to the policy and land use implications of the schemes identified in the LTP.

8.6.1.3 The draft NDF emphasises the growing importance of ultra low emission vehicles (ULEVs), active travel and public transport and includes a policy supporting development of the Swansea Bay Metro system. The placemaking theme embodied in PPW is of significance in relation to transport policy, and enabling more sustainable travel choices is emphasised, together with making best use of existing capacity and managing demand. The Sustainable Transport Hierarchy is set out as a key principle for development plans, favouring walking and cycling first, followed by public transport, then ULEVs with other private motor vehicles at the bottom of the hierarchy.

8.6.1.4 The Active Travel (Wales) Act 2013 places a legal requirement on local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities. Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.

8.6.1.5 At the Officer Working Group meeting to discuss these policies it was noted that some of the developments/sites listed in policies TR1 (Transport Proposals) and TR4 (Safeguarding Freight Facilities) need to be reconsidered and updated where appropriate to take into account the completion of some proposals, reconsider of others that have not come forward as expected and to add any new schemes. The possibility of new specific policies for ULEVs, Active Travel and Green Infrastructure were discussed. The proposed Swansea Bay Metro has potential positive and negative implications for Neath Port Talbot which will need to be assessed as more detailed proposals come forward.

8.6.1.6 The AMR identifies the schemes (listed in Policy TR1) that have not been completed and indicates that TR1 will need to be subject to a review process to take into account the current situation. No specific issues have been identified with the other policies.

8 . LDP Topic Area Reviews

8.7 Culture and Heritage

8.7.1 Strategic Policy 21 - Built Environment and Historic Heritage

8.7.1.1 Strategic Policy (SP21), Policies BE1 (Design), BE2 (Buildings of Local Importance) and BE3 (The Canal Network), the Design SPG and the Historic Environment SPG seek to ensure that new development is undertaken to a high design standard and that the important existing historic environment of the area is conserved and enhanced wherever possible.

8.7.1.2 The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on the Built Environment and Historic Heritage) and the Schedules of Buildings of Local Importance and of Designated Canal Structures (contained within the Historic Environment SPG). For the most part, the built and historic environment is unlikely to have changed significantly in respect of the evidence base, but areas that may require updating include the Schedule of Buildings of Local Importance (to take into account losses and possible additions as part of the review of the SPG) and the undertaking of Conservation Area Appraisals.

8.7.1.3 The placemaking theme introduced by PPW10, together with TAN12 (Design) amended in 2016 together have significant implications for design issues in particular, and will have to be taken into account. Similarly, the new TAN24 (The Historic Environment) consolidates and expands significantly on the previous guidance and will need to be reflected in the review.

8.7.1.4 At the Officer Working Group meeting held to discuss these policies, concerns were expressed that the design policy (BE1) is insufficiently clear and effective when used to determine applications. The need and usefulness of Policy BE2 (Buildings of Local Importance) was also debated, given the lack of resources available to deal with the conservation of the historic environment generally.

8.7.1.5 No specific issues were identified in the AMR in respect of the operation of the LDP policies for the Built Environment and Historic Heritage.

8.7.1.6 Other issues that may need to be considered as part of the review include changing the terminology used to bring it in line with the latest guidance (e.g. *Historic Environment* rather than *Historic Heritage* and *Historic Assets of Special Local Interest* rather than *Buildings of Local Importance*). The new emphasis on placemaking and design issues also suggests that consideration should be given to splitting design policy from historic matters and the addition of a new placemaking/design strategic policy.

8.7.2 Strategic Policy 22 - Welsh Language

8.7.2.1 The Strategic Policy (SP22), Policy WL1 (Development in Language Sensitive Areas) and the Development and the Welsh Language SPG seek to ensure that development in the designated 'Language Sensitive Area' (LSA) mitigate any negative impacts of the development on the Welsh language and culture, through the provision of Section 106 contributions to protect, promote and enhance the Welsh language.

8.7.2.2 A Wales of vibrant culture and thriving Welsh language is one of the seven well-being goals identified in the Well-being of Future Generations Act, which is also embedded in PPW and its sustainable placemaking principles. The importance of the Welsh Language is also highlighted by the Welsh Government's ambitious target to achieve one million Welsh speakers by the year 2050⁽⁷⁾.

8.7.2.3 The evidence base informing the development of these policies includes the Welsh Language Topic Paper and the Welsh Language Impact Assessment. For the most part, the evidence base is unlikely to have changed significantly, but a review of the latest statistical data will be needed to determine whether there will be a need to amend the extent of the designated LSA or whether the policy thresholds require revision. Consideration may also be given to a bilingual signage policy.

8.7.2.4 No specific issues have been identified in the AMR in respect of the operation of the LDP policies for the Welsh language and no concerns were expressed in terms of the clarity and wording of the policies at the Officer Working Group. In general, the policy appears to be working well and will be retained within the Replacement LDP.

8 . LDP Topic Area Reviews

9 Reconsideration of the SA/SEA and HRA

9.1 Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)

9.1.1 The Planning and Compulsory Purchase Act 2004 requires that the process of drawing up and developing an LDP is informed throughout by an iterative process of Sustainability Appraisal (SA). The SA also incorporates Strategic Environmental Assessment (SEA) required under European Directive 2001/42/EC. This is intended to ensure that policies in the LDP all promote 'sustainable development' through integrating economic, environmental, social and cultural objectives into the development of all aspects of the LDP.

9.1.2 The findings of the SA monitoring are summarised annually in the AMR to give an assessment of the impacts of the implementation of the LDP policies, and a summary of the main findings is set out in Section 4 above.

9.1.3 The SA/SEA will need to be the subject of a thorough review process to take into account all broader contextual changes in terms of national policy and guidance, changes and updates to baseline information and other new approaches and information. The SA Scoping Report will be reviewed accordingly, including the SA methodology and monitoring framework. Consideration will also need to be given to integrating the Well-being of Future Generations Act 2015 requirements, Equalities Act, Welsh Language and Health Impact Assessment into a single Integrated Sustainability Appraisal (ISA).

9.2 Habitats Regulations Assessment (HRA)

9.2.1 The LDP was also the subject of Habitats Regulations Assessment (HRA) to assess whether its implementation would have any impacts on any European sites of nature conservation importance (i.e. Special Areas of Conservation and Special Protection Areas, including Ramsar Sites). This involves an extensive screening process relating to all LDP policies and proposals and a detailed assessment of likely impacts.

9.2.2 The Replacement LDP will again need to be subject to HRA, and this will require the HRA screening process and methodology to be reviewed and revisited and applied to developing LDP proposals in an iterative process to ensure that the relevant legislation and regulations are complied with and any issues are fully addressed.

9 . Reconsideration of the SA/SEA and HRA

10 Opportunities for Collaborative Working

10.1 Joint LDPs and Collaborative Studies

10.1.1 Collaboration is a requirement of the Well-being of Future Generations Act and part of the first LDP test of soundness (i.e. Does the Plan Fit?). In addition, the updated draft '*Development Plans Manual (Edition 3)*', indicates that LPAs will need to demonstrate that all opportunities for joint working and collaboration on both plan preparation and the evidence base have been exhausted. This is particularly relevant where the LDPs of neighbouring authorities are on similar preparation timescales and where there are strong cross-boundary linkages.

Joint Local Development Plans

10.1.2 Neath Port Talbot Council shares its administrative boundary with six other Local Planning Authorities (LPAs): Swansea, Carmarthenshire, Powys, Rhondda Cynon Taf, Bridgend and Brecon Beacons National Park. The following table summarises each LPA's current position in respect of their LDP preparation cycle.

Table 10.1.1 LDP Status in Adjoining Local Planning Authorities

Local Authority	Date of LDP Adoption	Plan Period	Progress of Review
Swansea	2019	2010 - 2025	Not required at present
Carmarthenshire	2014	2006 - 2021	Work started on Replacement LDP with recent consultation on the Preferred Strategy.
Powys	2018	2011 - 2026	Not required at present
Rhondda Cynon Taf	2011	2006 - 2021	N/A
Bridgend	2013	2006 - 2021	Work started on Replacement LDP with recent consultation on the Preferred Strategy.
Brecon Beacons National Park	2013	2007 - 2022	Work started on Replacement LDP with recent consultation on the Preferred Strategy.

10.1.3 The above information highlights that in terms of timescales, there is little opportunity to prepare a Joint LDP with any adjoining authority, as all are at significantly different stages in the plan preparation process. Despite the incompatible timescales, collaboration with all neighbouring authorities will nevertheless be a central part of the work to prepare the Replacement LDP which will need to align as far as possible with existing and/or emerging strategies and proposals of adjoining areas.

10 . Opportunities for Collaborative Working

Collaborative Initiatives and Studies

10.1.4 Recognising that the most effective focus and use of resources at this stage would be to build on joint working opportunities on cross-boundary issues and key areas of evidence, a significant amount of collaborative work involving all authorities affiliated to the Mid and South West Wales Strategic (M&SWW) Planning Group has already commenced.

10.1.5 To date, discussions and progress have centred on three key studies: a 'Regional Employment Study' (RES), a 'Joint Local Housing Market Assessment' (LHMA) and a 'Regional Viability Study' (RVS). All three studies will not only inform reviews of individual LDPs but will also contribute positively as a potential baseline for future work on SDPs (refer below).

10.1.6 The work associated with the RES has currently been put on hold primarily due to resource / capacity issues within those LPAs that are focusing their efforts and attention on putting in place an evidence base for their respective LDPs. Notably, 'Regional Officer' posts have recently been created within the Welsh Government and as such, it is the intention that the RES be re-visited in the future, with a potentially greater SDP focus, in conjunction with WG officers.

10.1.7 Following the appointment of Opinion Research Services (ORS), the Joint LHMA study is nearing completion. The final regional report and sub area (LPA) reports are expected at the end of December 2019. The aim of the commission was to ensure that a consistent methodological approach was established to assess the housing needs across the M&SWW region in accordance with best practice, to provide robust data to inform forthcoming LHMA's.

10.1.8 The RVS, lead by Andrew Burrows of 'Burrows-Hutchinson' is also nearing completion: with the Development Viability Model (DVM) currently in the process of being made available on each respective LA's website. The DVM is a spreadsheet based appraisal tool capable of testing the suitability of sites for inclusion in a Plan/Strategy and also to assist the assessment of financial viability of a specific development proposal at application stage. Use of the DVM can be used as part of submissions to the Council for pre-application advice, planning applications and 'Candidate Sites' submitted as part of the LDP review process.

10.1.9 Additional collaborative work that will inform LDP preparation has also been undertaken with specific neighbouring authorities, with an example being the preparation with colleagues in Swansea of the Fabian Way Innovation Corridor Supplementary Planning Guidance. Future preparation of joint and shared evidence such as this, including potential Statements of Common Ground (SoCG) where shared interests exist, will be pursued wherever the opportunities arise.

10 . Opportunities for Collaborative Working

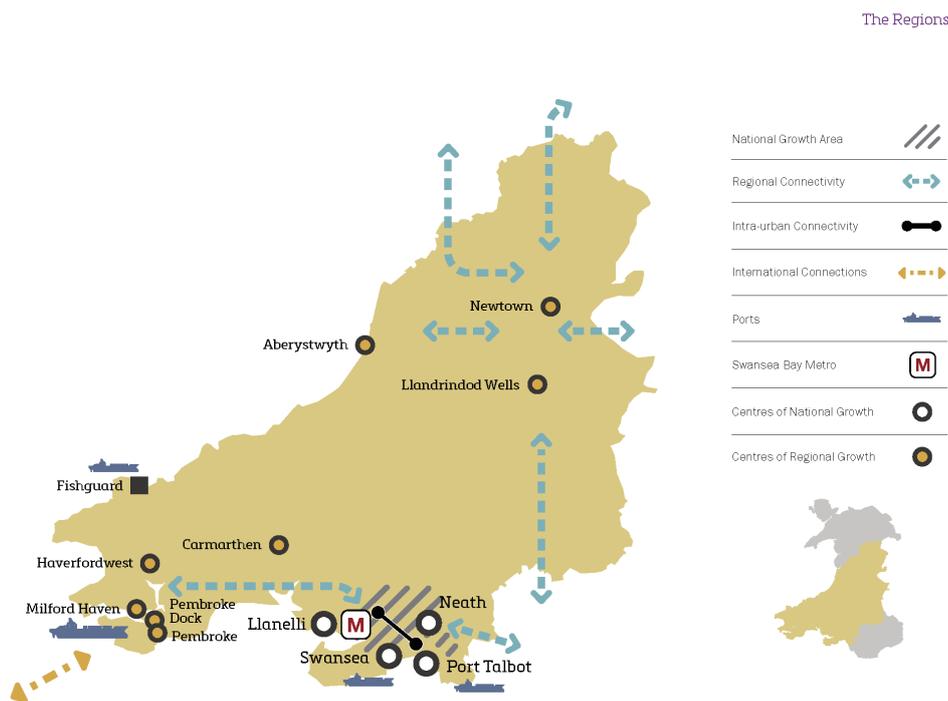
10.2 Strategic Development Plans

10.2.1 The Planning (Wales) Act 2015 introduced the legal framework to strengthen the plan led approach in Wales by introducing the legal basis to prepare the National Development Framework (NDF) and also Strategic Development Plans (SDPs). LDPs or LDP *Lites* (i.e. a shorter, more focused version of an LDP where a SDP is in place), will ultimately need to conform with these higher tier plans.

10.2.2 The *Draft* NDF policy framework requires SDPs to come forward in each of the three identified regions: North Wales; Mid and South West Wales (M&SWW) and South East Wales. These areas will be the focus for WG policy and future investment. The SDP will need to address cross-boundary issues at a regional level and must be in general conformity with the NDF. Notably, in respect of the *Draft* NDF policy framework specific to the M&SWW region:

- Swansea, Neath, Port Talbot and Llanelli are identified as 'Centres of National Growth' with these areas being the main focus for investment and growth;
- Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four haven towns are identified as 'Centres of Regional Growth' and will be the focus for managed growth reflecting their important sub-regional functions;
- As a proportion of national need, 23,400 homes are needed by 2038 and over the initial 5 years (2018/19 to 2022/23) 44% of the homes needed should be affordable; and
- The policy framework also specifically supports the continued development of the Haven Waterway and Swansea Bay Metro.

Figure 10.1 Mid and South West Wales Region



10 . Opportunities for Collaborative Working

10.2.3 In light of this new emerging planning regime in Wales, SDP related discussions are now taking place on a regular basis across the M&SWW region to establish the future role of authorities and the scope of the work required. Following the publication of the *Draft* NDF, discussions between the constituent LPAs will now be gathering pace to determine how the preparation of a SDP should progress, including agreeing the geographical footprint, the governance arrangements, the resources available and the timing of plan preparation.

10.2.4 Over the course of preparing the Replacement LDP therefore, there will be a need for the Council to closely consider the implications of the SDP as and when the new regional policy direction emerges.

Appendix A: LDP Policy Review

A.1 The following provides an overview of the LDP Policies (Strategic Policies are in **Bold**):

Table A.0.1 Overarching Policies

Policy Ref	Title	Overview
SP1	Climate Change	The Policy will be retained but the individual policy criteria will be reviewed to ensure that the latest information and approaches are incorporated.
SP2	Health	This Policy will be subject of review to consider whether the Policy considerations should be widened in the light of legislative changes and a greater focus on a holistic approach to development.
SP3	Sustainable Communities	No specific issues identified in relation to Policy SP3. The need for an additional detailed policy relating to new community facilities should be given consideration.
SC1	Settlement Limits	The policy will be reviewed in respect of the wording of the criteria.
SC2	Protection of Existing Community Facilities	Consideration to be given to providing additional clarification about the definition/scope of the term Community Facilities.
SP4	Infrastructure	This Policy will be the subject of a review as it is not delivering the benefits anticipated. The term 'infrastructure' can cover a range of planning considerations and therefore the policy text will require amendments to ensure physical infrastructure and planning obligations can be readily separated to provide clarity.
I1	Infrastructure Requirements	The Policy is essential in ensuring that there is sufficient infrastructure to mitigate the impacts of new development and should be carried forward in the new plan. However, as with the Strategic Policy, the policy needs to be amended to provide further clarify on the requirements for planning obligations. Viability testing will determine the scope for developer contributions in new developments and an assessment of the key issues will determine if the list of potential requirements are still appropriate.

Table A.0.2 Area Based Policies

Policy Ref	Title	Overview
SP5	Development in the Coastal Corridor Strategy area	The policy requires amendment to reflect the revised spatial and growth strategies. The policy will need to consider the emerging NDF, updated evidence base and will require an assessment of existing and potential new allocations to determine their ability to accommodate future development.
SRA1	Coed Darcy Strategic Regeneration Area	Revise policy to reflect reconsideration of spatial and growth strategy.
SRA 2	Harbourside Strategic Regeneration Area	Revise policy to reflect reconsideration of spatial and growth strategy.
CCRS 1	Coastal Corridor Regeneration Schemes	Revise policy to reflect reconsideration of spatial and growth strategy.
CCRS 2	Coastal Corridor University Campus	Campus mostly developed, consider whether a specific policy is still relevant.

Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
SP6	Development in the Valleys Strategy area	Whilst, in view of the emerging NDF, it is likely that the coastal/ valley split will be retained, there are a number of indicators relevant to this Policy, which have had mixed success. Those relating to overall housing delivery and that in Pontardawe SGA have not delivered as anticipated. Whilst the housing indicators for Glynneath SGA and the Neath Valley have not raised issues, this is because the delivery date has not been reached. It is likely that new allocations within the Valleys will need to be made to help enable its growth, which will include residential development, safeguard employment, cultural heritage and regeneration opportunities.
VRS 1	Valleys Strategy Regeneration Scheme	Revise policy to reflect reconsideration of spatial and growth strategy.

Table A.0.3 Communities and Housing Topic Based Policies

Policy Ref	Title	Overview
SP7	Housing Requirement	Policy will be subject to amendment to reflect the updated spatial and growth strategies and the level of housing need required over the plan period.
H2	Housing Sites	Revise housing allocations to reflect the spatial and growth strategies and the spatial distribution of housing over the plan.
SP8	Affordable Housing	The policy will be subject to amendment to reflect the updated strategy, viability evidence, and national policy relating to affordable housing.
AH1	Affordable Housing	The policy will require amendment to reflect updated viability work.
AH2	Affordable Housing Exception Sites	No relevant applications since LDP adoption. Further investigation and discussion with RSL partners and possible amendments required.
SP9	Gypsies and Travellers	The policy is functioning effectively. Amendments required to reflect the next Gypsy and Traveller Accommodation Assessment.
GT1	Gypsy and Traveller Site	The allocation has been delivered. Policy to either be removed or updated to reflect the requirements of the next Gypsy and Traveller Accommodation Assessment.
GT2	Proposals for New Gypsy and Traveller Sites	The policy is functioning effectively. Some minor amendments required to align with updated national policy guidance.
SP10	Open Space	The strategic policy may not require any revision, as the issues it covers are still relevant and appropriate.
OS1	Open Space Provision	This Policy requires review, there have been changes to the FIT standard, which a review will need to consider. In addition the requirement for Green Infrastructure may need to feature in this Policy, if it is not included elsewhere. In addition some amendments required in response to the Officer Working Group comments to improve clarity.
OS2	Protection of Existing Open Space	Policy seems to be working relatively well on the whole, it may need some slight revision to add further clarity, but should be carried forward into the new Plan. In addition some amendments required in response to the Officer Working Group comments to improve clarity.

Table A.0.4 The Economy Topic Based Policies

Policy Ref	Title	Overview
SP11	Employment Growth	Policy will be reviewed in line with updated economic assessment to ensure the policy reflects the plan's strategy.
EC1	Employment Allocations	Review to establish the expected demand for employment floorspace required to deliver the strategy. Review of the employment allocations to determine if allocations are deliverable and viable.
EC2	Existing Employment Areas	Review to establish the expected demand for employment floorspace required to deliver the strategy. Consider whether the protection of all employment areas listed are required based on conclusions of Employment Land Review.
EC3	Employment Area Uses	The policy is functioning effectively. Consider some minor amendments to improve clarity and consider whether policies EC3 and EC4 can be combined.
EC4	Protection of Existing Employment Uses	The policy is functioning effectively. Following comments from Officer Working Group, consider some minor amendments to improve clarity and consider whether policies EC3 and EC4 can be combined.
EC5	Employment Uses in the Valleys	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
EC6	Live work Units	No relevant applications since LDP adoption. Consider whether policy is still necessary.
SP12	Retail	The Policy is functioning effectively, with the issues covered still relevant. Some minor amendments may be required to reflect changes to national retail policy. The retail hierarchy and retail boundaries will be subject to review and amendment to ensure designations are up to date and appropriate.
R1	Retail Allocations	The policy will require amendment to reflect the revised assessment of need.
R2	Proposals within Retail Centres	The policy is functioning effectively. Where necessary, there may be some minor revisions to the policy required to reflect changes to national retail policy.
R3	Out of Centre Retail Proposals	The policy is functioning effectively. Where necessary, there may be some minor revisions to the policy required to reflect changes to national retail policy.
SP13	Tourism	The policy is functioning effectively.
TO1	Tourism Development in the Countryside	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
TO2	Protection of Existing Tourism Facilities	The policy is functioning effectively. Following comments from Officer Working Group, consideration needed as to whether the policy should be expanded to cover the conversion to other uses, not just residential.
TO3	Tourism Led Regeneration Scheme	The allocation has not been delivered. Consider whether the allocation is still appropriate and deliverable within the plan period and consider whether other allocations are required to meet the strategy.
TO4	Walking and Cycling Routes	The routes identified have been delivered. Consider the allocation of alternative walking and cycling routes required to deliver the strategy.

Appendix A: . LDP Policy Review

Table A.0.5 Environment and Resources Topic Based Policies

Policy Ref	Title	Overview
SP14	The Countryside and Undeveloped Coast	The policy is functioning effectively.
EN1	The Undeveloped Coast	The policy is functioning effectively.
EN2	Special Landscape Areas	The policy may need to be reviewed in the light of national policy changes and application decisions.
EN3	Green Wedges	The policy may need to be reviewed in the light of application decisions.
EN4	Replacement Dwellings in the Open Countryside	The policy is functioning effectively.
EN5	Conversion and Extension of Existing Buildings in the Countryside	The policy is functioning effectively.
SP15	Biodiversity and Geodiversity	The policy will be reviewed in the light of the on-going loss of biodiversity as a result of planning decisions.
EN6	Important Biodiversity and Geodiversity Sites	The policy is functioning effectively.
EN7	Important Natural Features	The policy is functioning effectively.
SP16	Environmental Protection	The policy is functioning effectively.
EN8	Pollution and Land Stability	The policy is functioning effectively. Following comments from the Officer Working Group, consider splitting the policy to have separate policies for Pollution and Land Stability to improve clarity.
EN9	Developments in the Central Port Talbot Area	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
EN10	Quiet Areas	The policy is functioning effectively.
SP17	Minerals	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.
M1	Development in Mineral Safeguarding Areas	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.
M2	Surface Coal Operations	The policy is no longer required due to changes to national minerals policy.
M3	Development in Mineral Buffer Zones	The policy is functioning effectively.
M4	Criteria for the Assessment of Mineral Development	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.

Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
SP18	Renewable and Low Carbon Energy	The policy is functioning effectively. Amendments are required to reflect changes to national renewable energy policy.
RE1	Criteria for the Assessment of Renewable and Low Carbon Energy Development	The policy is functioning effectively. Amendments are required to reflect changes to national renewable energy policy.
RE2	Renewable and Low Carbon Energy in New Development	The policy functioning effectively. Consider amending the threshold for submitting assessments in response to Office Working Group comments.
SP19	Waste Management	The policy is functioning effectively. Amendments are required to reflect changes to national waste policy.
W1	In-Building Waste Treatment Facilities	The policy is functioning effectively.
W2	Deposit of Inert Waste on Agricultural Land	The policy is functioning effectively.
W3	Waste Management in New Development	The policy is functioning effectively.

Table A.0.6 Transport and Access Topic Based Policies

Policy Ref	Title	Overview
SP20	Transport Network	The policy is functioning effectively. Amendments are required to reflect changes to national transport policy.
TR1	Transport Proposals	The policy is functioning effectively. Amendments are required to reflect the fact that schemes have been completed.
TR2	Design and Access of New Development	The policy is functioning effectively.
TR3	Safeguarding of Disused Railway Infrastructure	The policy is functioning effectively.
TR4	Safeguarding Freight Facilities	The policy is functioning effectively.

Table A.0.7 Culture and Heritage Topic Based Policies

Policy Ref	Title	Overview
SP21	Built Environment and Historic Heritage	The policy is functioning effectively.
BE1	Design	The policy will be reviewed in order to consider amendments in response to officer working group comments.
BE2	Buildings of Local Importance	The policy is functioning effectively.

Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
BE3	The Canal Network	The policy is functioning effectively.
SP22	Welsh Language	The Policy may require some minor revision, if any other Language Sensitive Areas are identified from research.
WL1	Development in Language Sensitive Areas	The Policy will remain, but may require some minor revision, if the thresholds need revision. Some minor revision may be required in response to the Officer working group comments e.g. In respect of thresholds, or the inclusion of an Advertisement / Signage Policy.

Appendix B: Sustainability Appraisal Monitoring - Key Findings

Table B.0.1 SA Monitoring Findings (Summary Table)

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
1A	Climate Change Adaptation	6	Flooding: 3 Approvals in Zone C2	N/A	N/A	There have been approvals contrary to policy within flood zone C2. This was addressed through officer/member training. Monitoring of this issue should continue.
		62	N/A	N/A	Development in GW and SLA	Areas of GW/SLA have not been protected. The policies should be reviewed to ensure designated areas/controls are appropriate.
1B	Climate Change Mitigation	1	CCSA Density - 50% compliance	CCSA Density - 32% compliance	CCSA Density - 17% compliance	Significant (& increasing) shortfalls in density requirements are unsustainable in terms of resources and env impact. The terms and operation of the policy should be reviewed.
		2	VSA Density - 27% compliance	VSA Density - 24% compliance	VSA Density - 16% compliance	
		75	No REAs submitted	N/A	1 REA submitted	There have been significant shortfalls in the number of REAs submitted, and therefore in the provision of Renewable/low carbon energy technologies. The terms and operation of the policy should be reviewed.
1C	Climate Change Energy	74	N/A	No RE Proposals	N/A	Concerns at low number of RE/LC proposals although this appears to be improving. Policy should be reviewed, but national policy appears to be changing in respect of larger proposals.
		75	No REAs submitted	N/A	1 REA submitted	There have been significant shortfalls in the number of REAs submitted, and therefore in the provision of Renewable/low carbon energy technologies. The terms and operation of the policy should be reviewed.
2A	Natural Resources	1	CCSA Density - 50% compliance	CCSA Density - 32% compliance	CCSA Density - 17% compliance	Significant (& increasing) shortfalls in density requirements are unsustainable in terms of resources and env impact. The terms and operation of the policy should be reviewed.

Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		2	VSA Density - 27% compliance	VSA Density - 24% compliance	VSA Density - 16% compliance	
		62	N/A	N/A	Developments approved in GW and SLA contrary to policy	Areas of GW/SLA have not been protected in accordance with policy. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
3A	Loss of Biodiversity	SA8	N/A	N/A	0.15ha SINC lost	Biodiversity targets not being met. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
3B	Biodiversity Improvements	12	N/A	N/A	No biodiversity enhancements made as a result of developer contributions	No biodiversity enhancements achieved through planning process (info only available for 2019): The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
4A	Landscape & Townscape	62	N/A	N/A	Developments approved in GW and SLA contrary to policy	Areas of GW/SLA have not been protected in accordance with policy. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
6A	Social Cohesion	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to prevent losses of community facilities wherever possible.
		10	1 application was approved for town centre uses in an out of town location	1 application was approved for town centre uses in an out of town location	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to support communities.

Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		14	N/A	Delivery of housing on allocated sites behind targets	Delivery of housing on allocated sites behind targets	Shortfalls in housing delivery are likely to have detrimental impacts on the local economy and affordable housing provision and therefore may adversely affect community cohesion. The relevant policies should be reviewed to ensure that benefits for social cohesion are maximised.
		31	N/A	Delivery of housing on allocated sites in VSA behind targets	Delivery of housing on allocated sites in VSA behind targets	
		32	N/A	Delivery of housing on allocated sites in Pontardawe behind targets	Delivery of housing on allocated sites in Pontardawe behind targets	
		39	N/A	Delivery of all types of housing behind target	Delivery of all types of housing behind target	
		41	N/A	Delivery of affordable housing behind target	Delivery of affordable housing behind target	
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on social cohesion. The relevant policies should be reviewed to ensure that benefits are maximised.
		52	N/A	Targets for the provision of new employment floorspace not fully met	Targets for the provision of new employment floorspace not met for two consecutive years	Shortfalls in employment floorspace provision are likely to have negative impacts on social cohesion. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	Lack of new small scale local retail provision is likely to have a negative impact on social cohesion. The policy should be reviewed to ensure that benefits are maximised.
7A	Physical and mental health outcomes	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to prevent adverse outcomes wherever possible.

Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on health outcomes. The relevant policies should be reviewed to ensure that benefits are maximised.
		49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on health outcomes. Relevant policies should be reviewed to ensure that benefits are maximised.
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on health outcomes. Relevant policies should be reviewed to ensure that benefits are maximised.
7B	Minimise the incidence and impacts of ill health	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to minimise adverse effects wherever possible.
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on health. The relevant policies should be reviewed to ensure that benefits are maximised.
		49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on health. Relevant policies should be reviewed to ensure that benefits are maximised.
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on health. Relevant policies should be reviewed to ensure that benefits are maximised.
7C	Minimise the incidence and impacts of poverty	49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on poverty. Relevant policies should be reviewed to ensure that benefits are maximised.

Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on poverty. Relevant policies should be reviewed to ensure that benefits are maximised.
8A	Economic Infrastructure	14	N/A	Delivery of housing on allocated sites behind targets	Delivery of housing on allocated sites behind targets	Shortfalls in housing delivery are likely to have detrimental implications for economic infrastructure.
		31	N/A	Delivery of housing on allocated sites in VSA behind targets	Delivery of housing on allocated sites in VSA behind targets	
		39	N/A	Delivery of all types of housing behind target	Delivery of all types of housing behind target	
		41	N/A	Delivery of affordable housing behind target	Delivery of affordable housing behind target	
		52	N/A	Targets for the provision of new employment floorspace not fully met	Targets for the provision of new employment floorspace not met for two consecutive years	Shortfalls in employment floorspace provision are likely to have negative impacts on economic infrastructure. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	Lack of new small scale local retail provision is likely to have a negative impact on economic infrastructure. The policy should be reviewed to ensure that benefits are maximised.
8B	Use of local resources and assets	15	N/A	N/A	Delivery of housing at Coed Darcy below target for 2 consecutive years	Shortfalls in housing delivery are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		16	N/A	N/A	No new employment developments at Coed Darcy	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The

Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
						relevant policies should be reviewed to ensure that benefits are maximised.
		19	N/A	N/A	Delivery of housing at Harbourside below target for 2 consecutive years	Shortfalls in housing delivery are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		20	N/A	N/A	No new employment developments at Harbourside for 3 consecutive years	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		21	N/A	N/A	No new retail developments at Harbourside for 3 consecutive years	Lack of retail development is likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	
8C	Use of local skills and knowledge	16	N/A	N/A	No new employment developments at Coed Darcy	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		20	N/A	N/A	No new employment developments at Harbourside for 3 consecutive years	
		58	N/A	N/A	No small scale local retail proposals approved	Lack of small scale local retail proposals likely to have adverse impacts on the use of local skills and knowledge. The relevant policies should be reviewed to ensure that benefits are maximised.

Appendix C: Status of LDP Allocations

C.1 The following tables provides an up-to-date summary of the status of the current LDP allocations.

C.2 As part of the LDP review, all allocations not yet commenced will be reassessed to determine if they remain deliverable. Those sites that are no longer considered deliverable will be de-allocated and removed from the LDP. In addition, those existing allocations with no current planning approval will need to be re-submitted as part of the Candidate Sites stage so their suitability can be reassessed.

Table C.0.1 Policy H1 - Current Status of Housing Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/1	Gorffwysfa, Bryncoch	15	No planning application received
H1/2	Leiros Park Extension, Bryncoch	200	No planning application received. Site has been subject to pre-application discussions
H1/3	Groves Road (Phase 2), Neath	42	Site under construction
H1/4	Ocean View, Jersey Marine	81	Site complete
H1/5	Dwr Y Felin Lower School, Longford	100	No planning application received
H1/6	Hafod House Care Home, Neath	12	Site under construction
H1/7	Neath Town Centre Redevelopment	50	Site has full planning permission for 12 units. No planning application received for remainder of site
H1/8	Crymlyn Grove (Phase 2) to the rear of Crymlyn Parc, Skewen	75	Site complete
H1/9	Crymlyn Grove (Phase 3) to the rear of Crymlyn Parc, Skewen	150	No planning application received
H1/10	Wern Goch, Crymlyn Road, Skewen	50	Site complete
H1/11	Neath Road / Fairyland Road, Tonna	300	Part of site has permission for 138 units. No planning application received for remainder of site
H1/LB/1	Waunceirch, Neath	13	Site complete

Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/LB/2	Groves Road (Phase 1), Neath	34	Site complete
H1/LB/3	Elba Crescent, Crymlyn Burrows	50	Application allowing extension of time for submission of reserved matters lapsed
H1/LB/4	Area 1, Coed Darcy Urban Village, Llandarcy	157	Site has full planning permission for 140 units
H1/LB/5	Coed Darcy Urban Village, Llandarcy	2,400	Site has outline consent. Reserved matters application for 75 units awaiting decision. No reserved matters applications received for remainder of site
H1/LB/6	Eaglesbush, Melincryddan	50	Application to extend the period for submission of reserve matters undetermined
H1/LB/7	Garthmor (Phase 2), Melyncryddan	34	Site complete
H1/LB/8	Briton Ferry Road, Neath	28	Site complete
H1/LB/9	Barrons Court, Neath	12	Site complete
H1/LB/10	The Rope Walk, Neath	15	Site complete
H1/LB/11	Cardonnel Road, Skewen	16	Site complete
H1/LB/12	Crymlyn Grove (Phase 1), Skewen	81	Site complete
H1/12	Blaenbaglan School (land to the rear of), Baglan	141	No planning application received
H1/13	Hawthorn Close, Cwmafan	100	No planning application received
H1/14	Western Logs, Cwmafan	130	No planning application received
H1/15	Neath Port Talbot College (Margam Campus)	70	No planning application received
H1/16	Glanafan Comprehensive School, Port Talbot	50	Site complete
H1/17	Harbourside, Port Talbot	385	Phase 1 complete. No planning application received for remainder of site
H1/18	Afan Lido and land to the rear of Tywyn School, Sandfields	150	No planning application received. Site has been subject to pre-application discussions

Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/19	Bay View Social Club, Sandfields	23	Site complete
H1/20	Purcell Avenue, Sandfields	115	Current outline application P2013/1047 undetermined
H1/21	Morfa Afan Care Home, Sandfields	10	Site complete
H1/22	Tir Morfa Road, Sandfields	75	No planning application received
H1/LB/13	Land at Blaenbaglan Farm, Baglan	160	The site has an extant planning consent
H1/LB/14	Thorney Road, Baglan	10	Site complete
H1/LB/15	Stycyllwen, Baglan	24	Site under construction
H1/LB/16	Abbottsmoor, Baglan Moors	42	Site complete
H1/LB/17	Farteg Fawr, Bryn	25	Site under construction
H1/LB/18	Copperminers, Cwmafan	90	Site complete
H1/LB/19	Forest Lodge Lane, Cwmafan	12	Site under construction
H1/LB/20	Groeswen, Margam	39	Site complete
H1/LB/21	Station Road, Port Talbot	14	Site complete
H1/LB/22	Royal Buildings Talbot Road, Port Talbot	46	Site complete
H1/LB/23	Dyffryn Road	14	Site complete
H1/LB/24	Maes Marchog, Banwen	16	Site complete
H1/LB/25	Glyn Dulais Care Home, Crynant	21	The site has full permission for 22 units
H1/LB/26	Heol Y Waun, Seven Sisters	68	Planning consent P2007/1376 lapsed
H1/23	Park Avenue, Glynneath	150	No planning application received
H1/LB/27	Heol y Glyn, Glynneath	81	The site has an extant planning consent

Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/LB/28	Welfare Hall, Glynneath	17	Current application P2011/0486 undetermined
H1/LB/29	Ynys Y Nos Avenue, Pontwalby	16	Site complete
H1/24	Bryn Morgrug (Phase 2), Alltwen	52	Site complete
H1/25	Ynysymond Road, Alltwen	50	No planning application received
H1/26	Cwmtawe School (Phase 2), Pontardawe	32	Site complete
H1/27	Waun Sterw / Waun Penlan, Rhydyfro	115	Current application P2019/5543 undetermined
H1/28	Bryn Brych Farm, Rhos	150	Part of site has permission for 79 units. No planning application received for remainder of site
H1/29	Parc Ynysderw, Pontardawe	50	No planning application received
H1/LB/30	Bryn Morgrug (Phase 1), Alltwen	56	Site complete
H1/LB/31	Cwmtawe School (Phase 1), Pontardawe	80	Site complete
H1/LB/32	Holly Street, Pontardawe	45	Planning consent P2007/0215 lapsed
H1/LB/33	Waun Penlan, Rhydyfro	19	Planning consent P2007/0281 lapsed
H1/LB/34	Glan Yr Afon (Phase 2), Ynysmeudwy	15	Site complete
H1/30	Compair/GMF, Ystalyfera	70	Current application P2013/0737 undetermined
H1/31	Tirbach Washery, Ystalyfera	160	No planning application received
H1/LB/35	Golwg Y Mynydd, Godre'r Graig	64	Site complete
H1/LB/36	Graig Newydd (Phase 1), Godre'r Graig	42	Site complete
H1/LB/37	Graig Newydd (Phase 2), Godre'r Graig	66	Site complete

Appendix C: . Status of LDP Allocations

Table C.0.2 Policy GT1 - Current Status of Gypsy and Traveller Site Allocation

Ref	Site Name	Commentary
GT1	Cae Garw, Margam	Site complete

Table C.0.3 Policy EC1 - Current Status of Employment Allocations

Ref	Site Name	Site Area (ha)	Commentary
EC1/1	Baglan Bay, Port Talbot	75	Limited amount of employment land developed
EC1/2	Junction 38 (M4) Margam	6	No planning application received
EC1/3	Land within Coed Darcy SRA	4	No planning application received
EC1/4	Land within Harbourside SRA	7	Limited amount of employment land developed

Table C.0.4 Policy R1 - Current Status of Retail Allocations

Ref	Site Name	Commentary
R1/1	Neath Town Centre Regeneration Scheme	Part complete
R1/2	Glanafan Comprehensive School, Port Talbot	Complete
R1/3	Harbourside, Port Talbot	No planning application received
R1/4	Park Avenue, Glynneath	No planning application received

Table C.0.5 Policy TO3/1 - Current Status of Tourism Allocation

Ref	Site Name	Commentary
TO3/1	Rheola Estate, Glynneath	Planning Application awaiting the signing of a S106 agreement

Table C.0.6 Policy TR1 - Current Status of Transport Proposals

Ref	Scheme Name	Commentary
TR1/1	Baglan Energy Park Link Road	Complete.
TR1/2	Coed Darcy Southern Access Road	Not started
TR1/3	Ffordd Amazon (Stage 2)	Complete
TR1/4	Junction 43, M4 Improvements	Part complete
TR1/5	Harbour Way (PDR), Port Talbot	Complete
TR1/6	Integrated Transport Hub, Port Talbot	Complete

Appendix C: . Status of LDP Allocations

Ref	Scheme Name	Commentary
TR1/7	Amman Way Cycle Way	Part complete
TR1/8	Afan Valley Trail (Port Talbot - Afan Valley)	Complete
TR1/9	Junction 38 (M4) Margam (Park and Share)	Not started

Appendix D: General and Specific Consultation Bodies

Specific Consultees	General Consultees
Betws Community Council	Action For Children
Blaengwrach Community Council	Action on Hearing Loss
Blaenhonddan Community Council	Adult Learning Wales
Brecon Beacons National Park Authority	Afan Tawe Nedd Crime Prevention Panel
Bridgend County Borough Council	Age Concern, Port Talbot
British Telecom	Aggregates Industries UK Ltd
Briton Ferry Town Council	Business in Focus
BT Openreach HQ	Business Wales
Cadw	Calan D V S
Carmarthenshire County Council	Canolfan Maerdy
Cefn Cribwr Community Council	Childrens Commissioner For Wales
Centrica Energy	Church in Wales
Cilybebyll Community Council	Citizens Advice Bureau (NPT)
Clydach Community Council	Coalfields Regeneration Trust
Clyne & Melincourt Community Council	Community Lives Consortium
Coedffranc Community Council	Confederation of British Industry
Cornelly Town Council	Country Land & Business Association Ltd
Crynant Community Council	Dansa Ltd
Cwmamman Town Council	Dewis Ltd
Cwmllynfell Community Council	Diocese of Menevia
Department For Business Energy & Industrial Strategy	Disability Forum (NPTCVS)
Department For Transport	Disability Wales Ltd
Dwr Cymru Welsh Water	Disabled Persons Advisory Group
Dyffryn Clydach Community Council	Disabled Persons Transport Advisory Committee
E E	DOVE Workshop
Ecotricity	E Y S T
EDF Energy	Eco-Schools
Garw Valley Community Council	Elim Pentecostal Church
Glynneath Town Council	Ethnic Minority Foundation

Appendix D: . General and Specific Consultation Bodies

Good Energy	Farmers' Union of Wales
Gwaun Cae Gurwen Community Council	Federation of Master Builders Cymru
Home Office	Federation of Small Business
Hutchinson 3 G UK Ltd	Freight Transport Association
Llangynwyd Lower Community Council	Friends, Families and Travellers
Llangynwyd Middle Community Council	Future Generations Commissioner for Wales
Maesteg Town Council	Guide Dogs
Mawr Community Council	Gypsies and Travellers Wales
Ministry of Defence	HBF Wales
National Grid	Mineral Products Association
Natural Resources Wales	Muslim Council of Wales
Neath Port Talbot Local Health Board	National Farmers' Union Cymru
Neath Town Council	National Federation of Gypsy Liaison Groups
Network Rail Ltd	National Youth Agency
O2	Neath and District Trades Council
Ogmore Valley Community Council	Neath Area Economic Forum
Onllwyn Community Council	Neath Port Talbot Community Transport
Pelenna Community Council	Neath Port Talbot Council For Voluntary Service
Pontardawe Town Council	Neath Port Talbot Methodist Circuit
Powys County Council	Neath Port Talbot Youth Council
Public Health Wales	Neath YMCA
Pyle Community Council	New Sandfields Aberafan and Afan-Community Regeneration
Quarter Bach Community Council	NPT BME Community Association
Resolven Community Council	Older Persons' Council Forum
Rhigos Community Council	Presbyterian Church of Wales
Rhondda Cynon Taff County Borough Council	Princes Trust Volunteers
Senedd Cymru / Welsh Parliament (formely known as the National Assembly)	Private Landlords Forum
Seven Sisters Community Council	R N I B Cymru
SWALEC	Race Council Cymru
Swansea Bay University Health Board	Rail Freight Group

Appendix D: . General and Specific Consultation Bodies

Swansea Council	Renewable UK Association
Tawe Uchaf Community Council	Road Haulage Association
Tesco Mobile LMT	Royal Voluntary Service
Tonna Community Council	RSVP Wales
United Utilities	Scope
Utilita Energy	Showmen's Guild of Great Britain (Wales)
Virgin Media	South Wales Chamber of Commerce
Vodafone Group plc	South Wales Chamber of Trade
Wales & West Utilities Ltd	South West Wales Economic Forum
Wales Office	Stonewall Cymru
Welsh Health Estates	Swansea Bay Racial Equality Council
Western Power	Swansea Hebrew Congregation
Ystalyfera Community Council	Tata Steel
Ystradfellte Community Council	The Gypsy Council
Ystradgynlais Town Council	Thrive Women's Aid
	Travellers Law Reform Project
	Wales Council For Deaf People
	Wales Council of the Blind
	Welsh Womens Aid
	West Wales Exporters' Association
	Workways +
	Young Enterprise (South & Mid Wales)
	Young Wales
	Youth Access
	Youth Cymru
	Ystalyfera Development Trust

Appendix E: . Consultation Comments and Responses

Appendix E: Consultation Comments and Responses

Full details of the comments received and the officer's responses are provided in the table below and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

ID	Name	Organisation	Section	Para	Representation	Officer Response
1	Mr R W Ebley		LDP Review Report (Consultation Draft - January 2020)		International Standards Organisation standards need to be used to achieve the required result.	The comment is noted.
2	Ryan Norman	Dwr Cymru Welsh Water	LDP Review Report (Consultation Draft - January 2020)		Dwr Cymru offers its support to the LPA in progressing through the replacement LDP.	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WCFG Act and LDP Regulations.
16	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Yes, we would suggest that this should be reviewed in line with the principles of Sustainable Management of Natural Resources as set out in the Environment Act. We would raise the opportunities for collaboration on green infrastructure projects with neighbouring authorities as species and habitats connectivity should be considered on a landscape scale.</p> <p>We also wish to emphasise the opportunities within the review to consider priorities for habitat connectivity for key species at a landscape scale.</p>	The support is welcomed. The need for collaborative working is key and is part of the LDP Regulations.
23	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Are there any other comments in respect of the Draft Review Report?</p> <p>We welcome the opportunity to engage formally through the review process.</p>	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WCFG Act and LDP Regulations.
54	Tata Steel		LDP Review Report (Consultation Draft - January 2020)		Tata Steel is supportive of a continued economic-led growth strategy for the Neath Port Talbot LDP. The approach suggested above in respect of any amendments to policies EC3, EC4 and EN8 will help to ensure the replacement LDP	The Council welcomes the support. The consultation frequency and extent will be set out and agreed in the forthcoming Delivery Agreement for the Replacement Plan.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>continues to support existing important employment facilities such as the Steelworks and retains the appropriate flexibility to allow the sector to flourish and diversify.</p> <p>We would welcome the opportunity to discuss any proposed policy amendments and renewable energy approaches with the Council in advance of the next round of consultation.</p>	
56	Mr Peter Horsley		LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Changes in legislation and government policy, together with consideration as to why housing delivery has fallen short of expected, are justification for a full review of the Plan.</p>	The comment is noted.
3	Mrs Chris Thomas		LDP Annual Monitoring Reports - Key Findings	3	<p>I wish to disagree with the comments in the report up for consultation. Namely that in paragraph 3.0.23 it states that no developments were planned in VSA areas which were outside a settlement area, but adjacent to. I believe this to be wrong on the grounds of an appeal being dismissed on application A2016 /0014, this development was planned directly alongside McDonalds drive-thru and the A465. This site is known as the Glyn Neath Business Park, and owned by Welsh Assembly, so would have had a return for the public purse.</p>	<p>Paragraph 3.0.23 refers to 'live work units' and states that there have been no applications for such units since the LDPs adoption. Policy EC6 provides the policy framework for Live-work units, which are defined as properties designed for dual use, combining residential and employment space.</p> <p>The application referred to was for a road side service area comprising petrol filling station and kiosk, drive-thru coffee shop, car parking, access, landscape and associated works which was refused planning permission and dismissed on appeal by the Planning Inspectorate.</p>
30	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports Key Findings	3	<p>Paragraph 3.0.9 HBF suggests the Council consider rewording this paragraph to make the point that all the land allocated may not actually be suitable, correctly located or viable.</p>	<p>The comment is noted. At the time of adoption all sites were deemed to be suitable, correctly located and viable. All sites will be reassessed as part of the review process.</p>
31	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	<p>Paragraph 3.0.12 HBF suggests the Council consider re-wording this paragraph as not all affordable housing is delivered through S106. Many affordable housing sites are</p>	<p>The comment is noted. Paragraph 3.0.12 relates to the findings of the Annual Monitoring Report (AMR), and the delivery of affordable housing through Policy AH1.</p>

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					delivered directly by RSL's as 100% affordable and therefore not reliant on the delivery of market homes.	This policy only reports on affordable housing delivered through the planning system (via Section 106 agreements) and therefore whilst RSLs are delivering 100% affordable housing schemes, these are not recorded in this section of the AMR.
<u>32</u>	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	Paragraph 3.0.18 HBF suggests adding the reasons for delays more specifically than paragraph 3.0.20 and adding commentary what is likely to happen if known.	Paragraph 3.0.20 acknowledges that the large scale redevelopment of these sites is complex and has been delayed due to factors including site constraints, viability and in some cases land ownership. It is considered that this provides the broad reasons for delayed development. All Strategic Regeneration Areas (SRA) will be re-assessed and re-evaluated as part of the review process.
<u>17</u>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	Are there any matters that should be considered as part of the contextual review? The review document appears to highlight all relevant policy and legislative changes that require consideration in the context of the review. From a biodiversity perspective, the Section 6 duty introduced by the Environment Act and the well-being goals set out in the Well-being of Future Generations Act must be key considerations of the revised LDP in delivering sustainable development.	The comment is noted. Delivering sustainable development is a key requirement of the LDP review. All relevant legislation including the Environment Act and Well-being of Future Generations Act will be considered.
<u>18</u>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	With regard specifically to paragraph 5.0.21 "The Well-Being of Future Generations Act 2015" we feel it is important to raise and emphasise that a "resilient" Wales refers to the "resilience of ecosystems". This links directly with the newly enhanced duty of public authorities to "maintain and enhance biodiversity wherever possible with the proper exercise of their functions". This enhanced duty should be a core issue as part of the review. Consideration should be given to the Outcomes and Policies proposed in the National Development	The comment is noted. The Well-being of Future Generations Act, biodiversity enhancement and the emerging NDF will all be considered as part of the Review process.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					framework, due for release in September 2020.	
<u>52</u>	Tata Steel		Contextual Changes	5	<p>Question 7: Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraphs 5.0.34 and 5.0.35 of the LDP Review Report recognises the important context of the Port Talbot Waterfront Enterprise Zone as a distinct location for cutting edge and world class industries and as a catalyst for growth. Tata Steel is supportive of a Replacement LDP which is set within this context and recognises these aspirations.</p>	The support is noted.
<u>59</u>	Mr Peter Horsley		Contextual Changes	5	<p>Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraph 5.0.27 - This paragraph states that "the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be meeting the region for a 15 year period". Whilst MTAN states "The RAWP's provide a suitable forum for informed discussions on the provision of aggregates", the RTS is commissioned by WG and not the SWRAWP. MTAN1 requires the RTS to provide a strategy for the provision or aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development plans.</p> <p>Further, the requirement is for each individual Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years in the case of land-based sand & gravel which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
<u>33</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	<p>Paragraph 6.0.13 HBF asks for this to be re-worded as we currently consider that it suggests that the number of homes that the revised LDP plans for could be affected by "Placemaking". Placemaking is not directly linked to housing numbers so it should not be referred to in this paragraph which is dealing with the factors that do affect the number of</p>	The comment is noted, however, the Council believes there is a relationship between Placemaking and future housing development, with Placemaking a key consideration in accordance with Planning Policy Wales, Edition 10.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					new homes planned for. Placemaking should have an impact on the number of homes that the plan needs to plan for this should be about the identified need alongside the growth aspirations of the Council.	
<u>34</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.16 Building on the comments above to paragraph 6.0.13 the HBF do not agree that placemaking should be a reason to plan for less homes as suggested by the current wording. In order for the plan to meet the Placemaking aspirations of national guidance it needs to ensure that the right sites are located in the right locations and that policies are in place to ensure the mix of development appropriate and that the infrastructure required to serve the development is in place. The HBF state again that we do not consider that placemaking is about the number of houses planned for.	The comment is noted. However, the comment is stating that the replacement plan will have a fully evidenced housing requirement, and that delivery of housing is a priority. Placemaking will be a key consideration for the plan, and ensuring that the housing requirement can be achieved by development in the right places, in the interests of well-being and sustainable development. The Council does not therefore, recommend any changes to the paragraph.
<u>40</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 8.1.3.4 HBF notes the reference to the Draft NDF which identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. It is suggested that this same reference should be used in Section 6 of the report where the Council look at the factors affecting future population growth and demand for new housing.	Section 6 does contain a reference to the NDF and future housing growth across the Swansea Bay Region.
<u>24</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	It was disappointing to see that very few of the objectives had been achieved however, this was due to the change in the economic environment since the creation of the plan rather than any other factors.	The comment is noted. The Replacement LDP will review the existing key issues and objectives to establish if these are still relevant. The Review process will also assess new data / information which highlights any new key issues and consider how the plan can address these.
<u>26</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	Planning and development should begin at a local level and follow a bottom up, rather than top down approach. The Town Council is soon to create a strategic "Place Plan" in order to identify the overall direction required by the community and hopes that the County Borough would like to work together to achieve the communities plan.	The approach taken in development plans follows National Planning Policy, Guidance (Development Plans Manual) and Regulations set by the Welsh Government. The Welsh Government has recently published a draft National Development Framework (NDF), which will be the highest tier of development plans, with LDPs coming under this.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
						Whilst this could be classed as a 'top down' approach, a critical part of preparing a LDP is community involvement. The Council will in due course publish its Delivery Agreement which will include a Community Involvement Scheme (CIS), identifying how the Council will engage with the local community and organisations throughout the plan preparation process. The Council would welcome future dialogue with the Town Council and other community members.
<u>27</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	The Committee felt that the original Local Development Plan was now ineffective as the economic position had changed so radically since its creation (for example, Austerity and Brexit). They felt that the direction being followed was unlikely to be successful in this new economic environment and action should be taken now to alter the plan. They felt that there needed to be more flexibility to change direction in plans of this nature.	The comment is noted. The LDP evidence base, including the economic-led growth strategy will be reviewed and updated as part of the preparation of the Replacement Plan, to take account of any contextual changes and ensure that the strategy and policies within the plan are robust and can address the key issues identified.
<u>28</u>	Mr Mark Harris	HBF Wales	LDP Vision, Objectives and Strategy	7	Does the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan? This is for the Council to decide however the significant under delivery of private and affordable housing is of real concern, simply reducing the number of homes required as suggested by the document is not the answer and will not support the wider economic and well-being both at a national and local level.	The comment is noted. A number of studies will be undertaken as part of the LDP Review, which will form the evidence base for the Replacement LDP. Future studies will determine a suitable level of future housing provision whilst considering the economy and well-being of residents.
<u>19</u>	Rhian Isaac	Natural Resources Wales	Key Issues, Vision and Objectives	7.1	Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan? We feel that nature based solutions should be embedded as a cross cutting objective within both the LDP and the local Well-Being Plan and form part of the vision for the revised plan. Appropriate mechanisms are also required to secure delivery of green infrastructure within development and consider habitat connectivity on a landscape scale. Undelivered allocated sites should	The comments are noted. There have been a number of contextual changes since the preparation of the LDP, such as the Well-being of Future Generations Act, which has led to the development of local Well-Being plans. These will be considered within the formation of the vision for the Replacement LDP, in addition to mechanisms to support well-being, such as green infrastructure. The

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					be re-assessed using up to date environmental constraints e.g. revised flood map information. We can provide advice on existing constraints.	Review Report acknowledges that undelivered allocations will be re-assessed to determine if they are still appropriate, or if they should be deallocated.
55	Mr Peter Horsley		Key Issues, Vision and Objectives	7.1	<p>Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>However, changes in legislation and government policy (Well-Being and Future Generations; Environment Act; PPW (v10); etc.) must be reflected in the Key Issues, Vision and Objectives.</p>	The comment is noted. Contextual and legislative changes, including those mentioned within the representation, will be reviewed as part of the formulation and establishment of the RLDP's Key Issues, Vision and Objectives.
20	Rhian Isaac	Natural Resources Wales	Growth Strategy	7.2	<p>Do the existing Growth and Spatial Strategies remain appropriate for the Revised plan?</p> <p>The current Growth and Spatial strategies need to reflect the requirements of the Draft NDF which includes "sustainable urban growth". The strategies should include biodiversity enhancement and ecosystem resilience by maximising the use of green infrastructure and nature-based solutions, and safeguarding areas which provide important ecological networks.</p>	The comments are noted. The NDF, biodiversity enhancement and green infrastructure will all be fully considered in the preparation of the Replacement LDP.
47	Tata Steel		Growth Strategy	7.2	<p>Question 4; Do the existing Growth and Spatial Strategies remain appropriate for the revised plan?</p> <p>Tata Steel is supportive of an economic-led growth strategy. It recognises the important role that the company plays in investment, growth and economic development in Neath Port Talbot. Economic growth should remain a fundamental part of any strategy moving forward NPTCBC and can also facilitate wider investment to improve housing delivery.</p> <p>As highlighted in paragraph 7.4.3 of the NPTCBC Review Report, Tata Steel would be pleased to work with NPTCBC to establish the impact changes in the global steel market have had on local investment and the opportunities for growth which exist in the region to inform any revised growth strategy.</p>	The support for an economic-growth strategy is noted. As part of the preparation of the Replacement LDP, the evidence base will be updated to determine an appropriate and up to date strategy based on robust evidence. Through additional evidence-based studies, the Council will determine if an economic-led strategy is still appropriate for Neath Port Talbot and will determine a suitable level of future growth. The Council welcomes the work TATA Steel are undertaking, particularly in relation to investment and diversification and modernisation and recognises the importance of the steelworks to the local economy.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					Tata Steel is working internally and closely with other economic stakeholders and employers in the region to invest in, and diversify, the function and role of the steelworks. This includes significant investment in improving and modernising existing facilities with consideration to future growth and environmental responsibility.	
<u>29</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	HBF supports the current plans growth and spatial strategies in principle but notes that this does not mean that the right sites are currently allocated. The current plan is also to be heavily reliant on one or two large strategic sites which have as accepted by the report failed to deliver.	The comment is noted, all existing allocations will be reassessed as part of the review and only sites that are deemed to be viable, deliverable and can contribute towards the overall strategy will be included within the Replacement LDP.
<u>35</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.13 HBF do not agree that this paragraph can conclude that the demand for new housing has not therefore materialised. Economic growth is one of the factors that drives housing demand, there are others such as population growth and the number of potential homeowners living at home while saving to buy a house. This final sentence should be reworded to say "the expected level of demand from employment growth has therefore not been as strong".	The comment is noted, however, this section of the Review Report provides an analysis of the existing strategy and how this has been implemented since the base date. Whilst it is agreed that economic growth is only one factor that drives housing demand, within the economic-led strategy, the majority of housing growth was projected to support the increases in working age population, directly linked to the number of jobs. In this context, as job numbers have not reached the projected target, the subsequent housing growth has not materialised.
<u>36</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.19 HBF do not agree that from the evidence provided in the report that the Council can simply say that the current level of growth cannot be carried forward. HBF members consider that there is demand for new housing in the area but their attempts to deliver these new homes have been frustrated by the allocated site not coming forward particular the large Coed Darcy strategic site on which the plan is heavily reliant. The Council in this document admit that there have been a number of reasons why sites have not come forward but then do not accept that this has affected annual delivery rates. Using the low delivery rates as a suggested justification to lower the housing requirements in the Replacement LDP is not the way to	Paragraph 7.2.19 states that both the housing requirement and the existing allocations cannot be carried forward into the new plan and will need to be reconsidered. Housing delivery has fallen significantly below target and therefore the Council would not be able to continue with a high housing requirement that was not delivering, therefore an assessment of up to date evidence is required to determine a suitable, robust and evidenced based housing target. In addition, existing allocations will also require reassessment to determine

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					plan for the future, particular when the wider strategy plans for economic growth.	if these sites are deliverable and viable within the plan period, or whether they should be deallocated to allow for deliverable alternatives. The Council therefore considers that a reassessment of the growth strategy and housing allocations is required as part of the review.
<u>57</u>	Mr Peter Horsley		Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised Plan? The evidence base should review why the economy has "stagnated" within the area and put forward remedies to address this.	The comment is noted and will be considered as part of the updated evidence base for the Replacement LDP.
<u>60</u>	Mr Peter Horsley		Growth Strategy	7.2	Are there any other comments in respect of the Draft Review Report? Paragraph 7.2.17 - This paragraph states that "there are a number of reasons why sites (housing) have not come forward as anticipated". The evidence base to support the plan should consider in detail why this is the case and identify remedies to address this to ensure the plan delivers on its objectives.	The comment is noted. The evidence base for the Replacement LDP will consider why housing sites have not come forward and will reassess allocations to determine if they are deliverable. The level of growth will also be reviewed to determine if this is still appropriate.
<u>25</u>	Mrs D Phillips	Pontardawe Town Council	Spatial Strategy	7.3	The Western Valley Strategy received a great deal of input from Pontardawe and the local community at inception however there was very little feedback provided at the time and the plan does not seem to have taken their views on board.	The LDP strategy of reinvigorating the valleys considered all relevant programmes and strategies within the area, including the Western Valley Strategy. As this Strategy has now come to an end, the replacement plan will consider any existing, relevant work within the area and consult with the community and partner organisations throughout the plan preparation process.
<u>37</u>	Mr Mark Harris	HBF Wales	Spatial Strategy	7.3	Paragraph 7.3.11 This paragraph should include some indication of likely timescales associated with the proposed metro infrastructure. HBF's understanding is that this is unlikely to be within the near future, so its impact on the first few years of the plan is unlikely to be significant.	There is still no clarification on the timing of the Swansea Metro.
<u>38</u>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.1 - 7.4.3 Identifies lots of negatives and reasons why a reduction in housing numbers and moves away from an economic led strategy should be considered.	This section states that given the plan has not achieved a number of its objectives, the strategy needs to be reconsidered to determine

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					However, although the City Deal is mentioned the wording does not really identify it as a positive reason why an economic-led growth strategy could actually now be more relevant/needed. HBF requests that the role of the City Deal is better explained in the document.	whether an economic-led strategy is still appropriate, or whether alternative strategies should be considered. In the context of the findings of the Annual Monitoring Report, the Council considers that the strategy should be reviewed, to take account of up to date evidence and therefore it is felt the wording used is appropriate.
<u>39</u>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.5 The wording should be amended to make it clearer that existing H1 allocated sites which have not come forward to date and where evidence cannot be provided to show that they are deliverable and viable in the next plan period will be removed and not simply "rolled over" as a commitment which has traditionally happened with plans in Wales.	The paragraph states that existing sites will be reassessed and with a greater emphasis on viability, some sites may be deallocated and new sites included. The Council considers this to be clear that existing sites will not be 'rolled over' and will emphasise this during the call for candidate sites.
<u>7</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the infrastructure policy and agrees with the need to provide further clarity on its definitions. We particularly welcome the need to consider other forms, such as Green Infrastructure. We would welcome inclusion in the LDP review as the Swansea Canal and its towpath should be considered as multi-functional green infrastructure.	The support for a review of the infrastructure policy and green infrastructure is welcomed. The preparation of the Replacement LDP will include an assessment of Green Infrastructure throughout the County Borough and the opportunities for its use.
<u>10</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure We also ask that the impact of development on existing infrastructure is considered, and mitigation agreed where appropriate. New development may require the provision of new infrastructure but consideration of its impact on existing infrastructure is important to ensure existing facilities are not degraded as a result of an increase in use following development nearby.	The preparation of the Replacement LDP will assess the impact on existing infrastructure and consider the need for mitigation.
<u>11</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Policy SP16 The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the Environmental Protection Policy, SP 16. The proposal to separate land stability	The support for separating land stability and pollution in Policy SP16 is noted. A robust assessment of candidate sites will address the concerns raised.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>and pollution into two topic areas seems sensible. Developers should be required to properly consider the risk associated with development in areas affected by land instability or pollution and include robust mitigation measures before determination.</p> <p>We suggest that prior to allocation all sites are reviewed in relation to these issues due to the possible impact of remediation costs on viability and thus deliverability.</p>	
12	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 18</p> <p>Glandwr Cymru note that the policy at present relates mainly to wind and solar power. Water may be used for heating and cooling new developments, or for electricity generation through hydro-electric power schemes. These sources should be included as options within studies of renewable energy potential.</p>	The comment is noted. A Renewable Energy Assessment (REA) will be undertaken as part of the evidence base for the Replacement LDP.
9	Mr Vic Price		LDP Topic Area Reviews	8	<p>The Review Document overlooks the importance, within the housing provision, of small sites for 3/5 units each for houses of distinction. These will give a variety to the availability of new housing stock in the area. They need to be in immediate proximity to existing residential areas, close to bus routes and within a reasonable time distance from the rail network, already served by adjoining adopted highway and with availability of all services; they need to be in a location capable of being extensively landscaped yet enjoying good vistas but being capable with landscaping to be almost invisible from nearby adopted highways. By way of example my client's land, part of the land surrounding his home at "The Old Stables" Broomhill, would be ideal for this although part of the land he occupies is owned by the Council so to bring this site forward (although not strictly a planning issue) the Council's agreement as landowner will be needed to be a party to any sale.</p>	<p>The comment is noted. Housing delivery within the LDP has been delivered on a variety of sites, from large housing developments on land allocated in Policy H1, to small sites and windfalls. It is therefore recognised that the housing supply should be made up of a variety of components to ensure that there is sufficient land to meet the needs of the area over the plan period and to allow choice for both housebuilders and homebuyers.</p> <p>As part of the preparation of the Replacement LDP, there will be the opportunity for land owners to submit sites (during the 'Call for Candidate Sites') for consideration.</p>
13	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 20 & 21</p> <p>The text explains that the Active Travel (Wales) Act 2013 places a legal requirement on local authorities</p>	The comments are noted and will be considered during the preparation of the Replacement LDP. The development of a clearer

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities.</p> <p>Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.</p> <p>Policy BE3, which is part of SP21 relates to the safeguarding of the Swansea canal. Officers suggested that no review was necessary of the policy. Whilst this may be correct in relation to the canal itself, the opportunity should be taken to look at whether the policy should be widened to reflect other proposed changes within in the plan and whether the towpath should also be safeguarded. It is noted that other policies such as Strategic Policy 8 and 10 relating to open space and infrastructure are also relevant as well as policy SP20. Part of the towpath is National Cycle route 43, and sections of it are currently undergoing improvement as a result of Active Travel funding.</p> <p>Policy BE3 at present makes no mention of the benefits that the canal towpath can bring to the area by linking residential areas, by providing health and well-being benefits, access to both land and water-based recreation opportunities, nor does it recognise it as a sustainable transport route. Surely now that Active Travel and Green infrastructure gain more recognition in the plan, Policy BE3 should be widened to be more than just a safeguarding policy? The canal & towpath are one of the best examples of multi-functional green infrastructure in the borough and already recognised in part as an active travel route. Policy BE3 should be reviewed and altered to reflect this.</p>	relationship between Active Travel, Green Infrastructure and the well-being gained from the use of open space / accessible natural greenspace will be a key theme in the Replacement LDP.
14	Mr Vic Price		LDP Topic Area Reviews	8	The Review document overlooks allocating specific sites for renewable energy. The priority given in the review report document to such use is welcome but it would be stronger with specific sites identified, especially for solar energy. The sites	The purpose of the Review Report is not to allocate specific sites. It is the first stage of the LDP review process. This Report reviews the existing LDP and assesses if the strategy and

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					are best to be south facing and on marginal land in agricultural terms, of an extent of some 30 acres plus and within close proximity to the electrical connection points, and capable of being landscaped so as not to be visible from housing. My client owns a 40 site just west of Bryn which would be ideal for such use.	<p>policies have been successful or if (due to a number of factors) a new strategy and policies will be needed for the Replacement LDP (RLDP).</p> <p>With regard to specific sites for renewable energy, there will be the opportunity for land owners to submit sites during the 'Call for Candidate Sites' which will be considered as part of the preparation of the RLDP.</p>
<u>21</u>	Rhian Isaac	Natural Resources Wales	LDP Topic Area Reviews	8	<p>Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>We note the summary of the proposed LDP Policy review which refers to possible amendments to policies;</p> <p>SP1 - Climate Change</p> <p>SP4 - Infrastructure - we support the inclusion of green infrastructure</p> <p>SP10 - Open Space - we support the need to allocate land for open space</p> <p>SP14 - The Countryside and Undeveloped Coast</p> <p>SP15 - Biodiversity and Geodiversity - with the main finding of the annual monitoring reports being the continuing net loss of biodiversity as a result of planning decision we strongly suggest a strengthening of this policy</p> <p>SP16 - Environmental Protection</p> <p>SP18 - Renewable and Low Carbon Energy</p> <p>SP19 - Waste Management</p> <p>We would wish to reiterate the fundamental change to maintain and enhance under Section 6 of the Environment Act which needs to be considered in the LDP Review. In addition, we wish to reiterate the focus towards ecosystem resilience which is a key goal of The Principles of Sustainability within the Well-Being of Future Generations Act 2015</p>	<p>The comment is noted. National Policy context changes through the introduction of the Environment (Wales) Act (2016) and the Well-being of Future Generations (Wales) Act (2015) will be fully considered in the preparation of the Replacement LDP.</p>

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					which also needs to be given consideration as part of the LDP Review.	
50	Tata Steel		LDP Topic Area Reviews	8	<p>Question 5; Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>Strategic Policy 11 Employment Growth</p> <p>Paragraph 8.4.1.7 of the LDP Review Report identifies the potential for combining existing policies EC3 (Employment Land Uses) and EC4 (Protection of Existing Employment Land Uses) into one policy covering both elements. The intention is for this to provide clarity and encourage more development.</p> <p>Tata Steel is supportive of opportunities to encourage economic development in the region. It does not agree that the policies should be merged. Both policies EC3 and EC4 are highly relevant for any development which takes place at the steelworks. Any policy amendments could have implications for the future of the site. Tata Steel would welcome the opportunity to be directly involved and consulted on any proposed policy amendments at the earliest opportunity.</p> <p>Any amendments or combinations of existing policies EC3 and EC4 should continue to recognise;</p> <ul style="list-style-type: none"> The ancillary facilities and services which will be appropriate at Tata Steel's site will be different to that of other general employment uses. The flexibility currently provided in supporting paragraph 5.2.22 in the adopted LDP for a range of uses on heavy industrial sites should be retained in any future policy. This will continue to support investment and diversification in the steelworks. The protection of the steelworks and associated land as an existing and significant employment area. 	<p>The comments are noted. The Review Report identified some areas of the plan where further clarity may be required. During the Officer Working Group, it was suggested that the employment policies, EC3 and EC4 could be merged, or re-written to ensure there is greater clarity over their use and interpretation. Any potential amendments would fully consider their use and would not intend to deter economic development or prevent the continued operation of employment areas. The policy review, as part of the Replacement LDP will carefully consider any amendments to policy and the impacts of such amendments.</p>
51	Tata Steel		LDP Topic Area Reviews	8	Strategic Policy 16 - Environmental Protection	The comments are noted. It is recognised that the operations at TATA are

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>Paragraph 8.5.4.3 of the LDP Review Report states that existing Policy EN8 may be divided into separate pollution and land stability policies. This paragraph also highlights that links between requirements for sustainable drainage systems on new development (SAB) and water quality criteria in existing policy EN8 will be taken into account.</p> <p>Tata Steel's Port Talbot Steelworks is a large, heavy industrial site with an existing private drainage system. The drainage required from different types of development at the site can vary greatly, is often bespoke and does not reflect the drainage approach seen on many "typical" types of development in Neath Port Talbot. In many instances, the highest priority levels set out in Standard S1 are not practicable or viable. Tata Steel has been working closely with NPTCBC's SAB team on a number of projects to ensure appropriate drainage and SAB approval is secured.</p> <p>Any links made between SAB and the water quality criteria of Policy EN8 should not impose impractical or unviable requirements on Neath Port Talbot's heavy industrial sites. Doing so could restrict, and have implications for, bringing further economic development in the region. This would be contrary to the aims of existing Policies EC3 and EC4. Tata Steel would be pleased to work with NPTCBC on any future policy wording.</p>	<p>unique and it would not be the intention of any policy amendments to restrict operations. That said, any future amendments to policy would need to ensure that it complies with National Policy and SAB requirements.</p>
53	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 18 - Renewable and Low Carbon Energy</p> <p>Paragraph 5.0.37 refers to the recent draft De-Carbonisation and Renewable Energy Strategy (DRES), noting that a strategy / action plan will be published shortly to set out a framework for carbon footprint reduction aspirations. The replacement LDP will be a key in facilitating the implementation of the strategy.</p> <p>Tata Steel is a core part of the South Wales Industrial Cluster leading the way on sustainable industry in the region, including the development of regional de-carbonisation projects, energy efficiency and low carbon power generation. The draft DRES</p>	<p>The comments are noted and the work being undertaken by TATA is recognised and supported. TATA will be consulted at each stage of plan preparation in accordance with the Delivery Agreement.</p>

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					recognises the work currently underway with the Council to develop sustainable forms of energy at the Port Talbot site. Tata Steel would be grateful for early involvement with the Council to discuss and assist with any amendments to the existing renewable energy policies and the action plan for the DRES.	
4	Mrs Chris Thomas		LDP Topic Area Reviews	8	This review seems not to have provision for the future of the above named business park (Glynneath Business Park).	The Review Report refers to the performance and delivery of sites allocated within the existing LDP. As part of the Review process, a number of evidence base studies will be undertaken, including as assessment of future employment requirements and an Employment Land Review, to establish how much employment land will be required over the replacement plan period and the most appropriate locations for such development. Once such options have been established, these will be subject to future public consultations.
5	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Land Supply; It is noted that land supply has fallen below 5 years and as such it is considered that additional land is needed to provide dwellings.</p> <p>Within the LDP Small sites are to deliver 180 dwelling which is 9.4% of the overall total. Therefore, in simple terms for every 1 dwelling on a small site 10 should be built on larger sites. Since 2013 small sites have provides 14% of all housing however, in the last 2 years of the 447 dwellings completed 89 (20%) were completed on smaller sites.</p> <p>This evidence would suggest that smaller site are being delivered faster. It is also likely that they are being delivered by local developers who retain more income within the local economy. As such it is considered that in allocating additional sites greater emphasis should be given to smaller sites.</p>	<p>The comment is noted. The Review Report acknowledges that development on large sites has fallen below the targets set out in the monitoring framework. The level of growth, and how growth is distributed will be considered as part of the review process.</p> <p>The allocation of housing sites between large sites and small sites will be a key part of the LDP review process. No further action required.</p>
6	Mr Rob Bowen		LDP Topic Area Reviews	8	Density BE1 (Design) Whilst it is recognised that there is a need to provide more housing it is considered	The comment is noted. The density requirements of Policy BE1 are used to

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					that the requirement of BE1 are too rigid. The policy limits the opportunity to trade up to a larger house, provide a variety of housing and places unnecessary restraint on small sites. It is therefore consider that a review of the policy should be undertaken with a view to applying it to sites, for example, over a specific area.	ensure that land is used efficiently, in recognition of it being a scarce resource. As part of the review process, the density requirements will be reviewed to determine if they are still appropriate.
41	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.1.4.6 The HBF objects to the suggestion that affordable housing is an infrastructure need. Unlike other infrastructure such as roads, or schools, new homes do not generate a need for affordable housing, the need already exists, requiring developers to contribute to the affordable housing supply is a policy requirement subject to consideration of the viability of the scheme.	Policy I1 'Infrastructure Requirements', lists the types of infrastructure new developments will need to consider. Affordable housing is included within this policy and therefore the Council considers the wording of 8.1.4.6 to be correct. Policy I1 is an overarching policy from which strategic policy SP8 Affordable Housing (AH) and AH topic based policies such as Policy AH1 and AH2 flow from, and set out the specific policy requirement.
42	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.2 Again the HBF consider that there is no direct link between housing requirement and placemaking, so reference to it in this section of the report should be removed.	In the context of Planning Policy Wales, Edition 10, the Council believes that there is a direct correlation between Placemaking and the amount of housing each settlement will require.
43	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.4 The HBF suggest that this is misleading as the plan review will extend the life of the plan from 2026 to 2035 so there is additional time in which to deliver the previous level of growth.	The Council is proposing a full review to the existing LDP, therefore the Replacement LDP (RLDP) will in effect be a new plan and will not simply extend the life of the existing plan. The RLDP will therefore need to establish a new level of growth for the revised plan period, based on up to date evidence.
44	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.2 Strategic Policy 8 - Affordable Housing - HBF suggests that this section should also include commentary on the recent letter from the Housing Minister regarding the use of publicly owned land to deliver affordable housing led schemes with a minimum 50% housing.	Affordable Housing will remain an important consideration for the Replacement LDP. The letter from the Housing Minister will be considered during the Replacement LDP, as will the affordable housing policies within the emerging NDF.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
61	Mr Peter Horsley		LDP Topic Area Reviews	8	<p>Paragraph 8.5.4.3 - please refer to the comments on paragraph 5.0.27 above. MTAN 1 requires the RTS to provide a strategy for the provision of aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development.</p> <p>Further, the requirement is for each individual Local Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	<p>Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years, in the case of land-based sand & gravel – which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.</p>
62	Mr Peter Horsley		LDP Topic Area Reviews	8	<p>Paragraph 8.5.4.4 states "evidence set out in the AMR's to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations will be required". Whilst this may be the case, it is important to recognise that the SWARP Annual Report confirms that Mineral Extraction ends at the two sandstone sites, Cwm Nant Lleici and Gilfach in 2026 and 2028 respectively. with mineral review (ROMP) dates of 2024 and 2027. These dates are within the replacement plan period. More importantly, these sites supply High Specification Aggregates (high PSV), which are of national importance and are not confined to local markets. The Council must therefore provide narrative and policy support in the review to demonstrate how the adequate supply of minerals, including PSV aggregates will be met on a local, regional and national scale throughout the plan period and for the requisite period beyond.</p>	<p>The comment is noted – the Council will provide the necessary policy support and narrative to demonstrate how the adequate supply of aggregates will be met. The emerging Regional Technical Statement (RTS) 2nd Review will set out the requirements for Neath Port Talbot Council [and all other Mineral Planning Authorities (MPAs)] to demonstrate how local and regional supply of aggregates will be met. As part of the process for preparing the new RTS, seven new sub-regions have been created specifically for the purpose of facilitating strategic minerals planning and collaborative approaches. Neath Port Talbot, along with Swansea and Carmarthenshire have been grouped as the Swansea City Sub Region.</p> <p>Notably, the RTS 2nd Review introduces a new requirement for all MPAs to agree 'Statements of Sub-Regional Collaboration' (SSRC) in respect of their contributions to the future provision of land-won primary aggregates. SSRCs are required to be prepared, collaboratively, by all constituent MPAs within each sub-region (as defined by the RTS 2nd Review) as part of the evidence base needed to support each</p>

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
						Replacement Local Development Plan (RLDP). Once agreed, an SSRC will remain in force until it becomes superseded by the requirements of future reviews of the RTS. The SSRC will confirm that all constituent MPAs within the sub-region accept the individual minimum requirements for aggregate apportionments and allocations for their individual Authority areas, as set out in the latest review of the RTS, and that (as a minimum) the RTS requirements for that sub-region as a whole will be met.
<u>22</u>	Rhian Isaac	Natural Resources Wales	Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>It would be beneficial if a joint LDP was undertaken with neighbouring authorities. Many of our strategic planning interests are better considered on a cross boundary level. This will also fit in with the Area Statements.</p> <p>However, we appreciate the difficulties you may have undertaking a joint LDP.</p>	The comment is noted. Whilst presently, due to the variances in stages of preparation between authorities it is not considered possible to undertake a joint LDP, the Council will however, continue to undertake regional working and studies where possible.
<u>58</u>	Mr Peter Horsley		Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>The document identifies the Regional Technical Statement (RTS) as a key document under which the Plan Review will be considered to provide a strategy for the provision of aggregates in the region and within each local authority area. There are shortfalls in aggregate provision, there will be a need for local authorities within the sub-region or an adjacent sub-region to ensure minimum provisions are met and production capacity is maintained to deliver the steady and adequate supply of aggregates. This will need to be confirmed through Sub-Regional Statements of Regional Collaboration. It is expected</p>	The comment is noted and will be considered as part of the evidence base for the Replacement LDP.

Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					that guidance on these SSRC's will be delivered alongside the RTS 2nd review.	
45	Mr Mark Harris	HBF Wales	Status of LDP Allocations	Appendix C:	<p>Appendix C Status of LDP Allocations</p> <p>Paragraph C.2 HBF would suggest that "sites with planning permission but not within the current five year land supply should also be re-assessed. There are many site in LDP's across Wales which have planning permission that has either been renewed several times or is extant by virtue of a start on site being made however, many of these will never be developed.</p>	The Review Report refers to all sites in the H1 portfolio being reassessed during the review, regardless of whether they are within the 5 year land supply.

Appendix F: Glossary

Table F.0.1 Glossary of Terms

Term	Explanation
Annual Monitoring Report (AMR)	Report to assess the extent to which policies in the adopted LDP are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations (2005).
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the LPA as allocations in an emerging LDP.
Community Infrastructure Levy (CIL)	The CIL is a planning charge, introduced by the Planning Act (2008) as a tool for LPAs to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the CIL Regulations (2010).
Community Involvement Scheme (CIS)	Part of the Delivery Agreement which sets out the Council's scheme for involving local communities in the Plan preparation process.
Consultation	A formal process in which comments are invited on a particular topic / set of topics or a draft document.
Delivery Agreement (DA)	A document comprising the Authority's timetable for the preparation of the LDP together with its Community Involvement Scheme (CIS) and submitted to the Welsh Government for agreement.
Deposit LDP	Is the Plan the Local Planning Authority (LPA) considers is sound and able to be adopted. Subject to a formal six week consultation period in which individuals and organisations can make representations on the Plan.
Evidence Base	Interpretation of information / data to provide the foundation for the Plan's policies.
Examination in Public (EIP)	A process whereby an independent Inspector considers whether the Deposit LDP is 'sound' and any representations to it.
Green Infrastructure (GI)	<p>PPW identifies GI as: the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales.</p> <p>At the landscape scale, green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges.</p> <p>At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens.</p> <p>At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.</p>

Appendix F: . Glossary

Term	Explanation
Inspector	The person appointed by the Planning Inspectorate to consider the LDP and undertake the Examination in Public.
Inspector's Report	Report of the Inspector specifying precise recommendations identifying required changes to the LDP, together with reasons for the changes. It will focus on whether the LDP is 'sound'.
Local Development Plan (LDP)	The required statutory Development Plan to be produced by each local authority in Wales under Part 6 of the Planning and Compulsory Purchase Act (2004).
Local Planning Authority (LPA)	A planning authority responsible for the preparation of a LDP – i.e. a County or Borough Council or National Park Authority.
National Development Framework (NDF)	The NDF will set out a 20 year land use framework for Wales, and will replace the current Wales Spatial Plan (WSP). It is presently in production and it is anticipated that the NDF will be published in the Autumn of 2020. A consultation draft was published in August 2019.
Placemaking	Is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being in the widest sense (PPW 10).
Planning Policy Wales (PPW)	A National document which sets out the land use planning policies of the Welsh Government, supplemented by Technical Advice Notes, Policy Clarification letters and Welsh Government Circulars.
Pre-Deposit Documents (LDP)	These include the vision, strategic options, preferred strategy, key policies, the Integrated Sustainability Appraisal (ISA) report, the candidate sites register and Review Report (if appropriate).
Review Report	The required statutory report under S69 of the 2004 Act and/ or Reg41 to conclude on the LDP revision procedure to be followed based on a clear assessment of what has been considered and what needs to change and why, based on evidence.
Sound	In order to be adopted, an LDP must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). The Tests of soundness and checks are identified in PPW.
Stakeholder	Individual, group or body whose interests are directly affected by the LDP.
Strategic Development Plan (SDP)	Provision is made under the Planning (Wales) Act (2015) for the preparation of SDP's at a regional level. An SDP will have regard to the NDF; responding at a regional level to strategic issues.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The SEA Directive (2001/42/EC) requires a formal 'environmental assessment of certain plans and programmes, including those in the field of planning and land use'.
Supplementary Planning Guidance (SPG)	Provides supplementary information with regard to policies in a LDP. SPG do not form part of the development plan and are not subject to independent examination but must be consistent with it and with national planning policy.

Term	Explanation
Sustainability Appraisal (SA)	A tool for appraising policies to ensure they reflect sustainable development objectives – i.e. social, economic and environmental factors. Each LPA is required by S62(6) of the Act to undertake an SA of the LDP. This form of SA fully incorporates the requirements of the SEA Directive and Regulations.
Technical Advice Notes (TAN)	A topic-based document published by the Welsh Government to supplement Planning Policy Wales (PPW).
Well-being of Future Generations Act (WBFG) (2015)	An Act which requires public bodies in Wales to take account of the long term, to prevent problems occurring or getting worse, to work collaboratively and involve people of all ages. The aim is to support and deliver a public service which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Well-being Plan	The Well-being Plan sets out the Public Services Board's (PSB) long term vision for the area as well as priorities for action over the next 5 years.





Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

CABINET

25 June 2020

Report of the Head of Engineering & Transport

D.W.Griffiths

Matter for Decision

Wards Affected: Briton Ferry East.

**(Ormond street, Ynysymaerdy Road and Old Road, Briton Ferry, Neath)
(Prohibition of waiting, loading or unloading at any time) (Limited
waiting) and (Resident permit holders)
Order 2020.**

Purpose of the Report:

To consider the objections received following the advertisement of the above traffic regulation order as indicated in Appendix A.

Executive Summary:

There were 64 letters and plans delivered to the adjacent properties detailing the proposals. Following a three-week consultation exercise, six statements of support and four objections were received.

The report outlines the objections and the recommendations for the scheme.

Background:

The scheme was prioritised by the local member following representations from residents regarding parking issues on Ormond Street. The success of the nearby recreational facilities of Briton Ferry Llansawel AFC, Briton Ferry Rugby / Cricket Social Club and Ynysymaerdy Bowling Green have

impacted the adjacent residential streets reducing the available parking for the residents. A parking survey was carried out in 2018 which confirmed that Ormond Street satisfied the Council's current policy for a residents parking scheme to be considered.

Financial Impacts:

The work is to be funded from the Capital Works Programme.

Integrated Impact Assessment:

A first stage Impact Assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment, attached at Appendix B, has indicated that a more in-depth assessment is not required. A summary is included below:-

A full impact assessment is not required as the proposed traffic regulation order will provide a benefit for the local community.

Valleys Communities Impacts:

No implications.

Workforce Impacts:

There are no workforce impacts associated with this report.

Legal Impacts:

The scheme was advertised for a 21-day period as part of the statutory process between 20th March and 10th April 2020.

Risk Management Impacts:

No implications.

Consultation:

A consultation exercise was undertaken in March / April 2020.

There were 64 letters and plans delivered to the adjacent properties detailing the proposals. Following a three-week consultation exercise, six statements of support and four objections were received.

A summary of the support and objections received are given below:-

Support:-

- a) Residents with one vehicle per household will benefit as they currently struggle to park.
- b) Residents with two vehicles are happy to have residents parking and more than happy to pay for the required permits.
- c) Some residents expressed complete support for the proposed scheme as parking is a constant issue with them currently parking three streets away due to there being nowhere available on Ormond Street especially on sporting days.

Objection:-

- a) Residents are managing to park perfectly well at the moment perhaps not outside their respective properties but the scheme does not cater for this anyway.
- b) The proposed scheme unfairly prejudices families with more than 2 cars i.e. sons / daughters who also require a car for work.
- c) The scheme does not ensure parking for residents in that the limited waiting areas allow any vehicle to park albeit for 2 hours. A resident queries whether the council has the resources to enforce the restrictions adequately to ensure compliance with the scheme.
- d) The proposed scheme is an opportunity to raise revenue for the Council in a clearly cash strapped time and thus does not offer any benefit to residents.
- e) The notion of having to pay £20 per vehicle and gain no clear benefit flies in the face of common sense.

- f) The main issues occur when there are games at Briton Ferry football club so an answer to this would be to open up the new school car park to cater for attendees of the football club.
- g) The proposed scheme will not solve any parking problems other than making it worse and also that means charging people to park outside their own homes.
- h) The biggest parking problems are on the weekends when the football and cricket are on. The council should be looking into their licence and negotiating with them about having parking on their own grounds. During the week there is no issue.

The objections have been discussed with the local member who fully supports the scheme as advertised.

Recommendations:

It is recommended that the objections to the (Ormond street, Ynysymaerdy Road and Old Road, Briton Ferry, Neath) (Prohibition of waiting, loading or unloading at any time) (Limited waiting) and (Resident permit holders) Order 2020 (as detailed in Appendix A to the circulated report) be over ruled and that the traffic regulation order is implemented as advertised.

That the objectors be informed accordingly.

Reasons for Proposed Decision:

To prevent indiscriminate parking in the interest of highway safety and to provide a residents only parking scheme as per the Council's current residents parking policy.

Implementation of Decision:

The decision is proposed for implementation after the three day call in period.

Appendices:

Appendix A – Plan – (Ormond street, Ynysymaerdy Road and Old Road, Briton Ferry, Neath) (Prohibition of waiting, loading or unloading at any time) (Limited waiting) and (Resident permit holders) Order 2020.

Appendix B – Integrated Impact Assessment.

List of Background Papers:

None.

Officer Contact:

Martin Brumby, Project Manager Highways - Engineering & Transport

Tel. No: 01639 686013

Email: environment@npt.gov.uk

Mae'r dudalen hon yn fwriadol wag

1 THIS IS A C.A.D. DRAWING AND SHOULD NOT BE AMENDED BY HAND.

2 All dimensions in millimetres unless otherwise stated.

-  - PROPERTIES CONSULTED AS PART OF STATUTORY CONSULTATION (LETTER AND PLAN)
-  - PROPOSED LIMITED WAITING PARKING, 2 HOURS NO RETURN WITHIN 4 HOURS. RESIDENT PERMIT HOLDERS EXEMPT
-  - PROPOSED RESIDENT PERMIT HOLDERS ONLY PARKING
-  - PROPOSED PROHIBITION OF WAITING, LOADING OR UNLOADING AT ANY TIME (DOUBLE YELLOW LINES WITH KERB CLIPS)

APPENDIX A

Rev	Details	Dr	Ch	Ap	Date

Client



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

ENGINEERING AND TRANSPORT

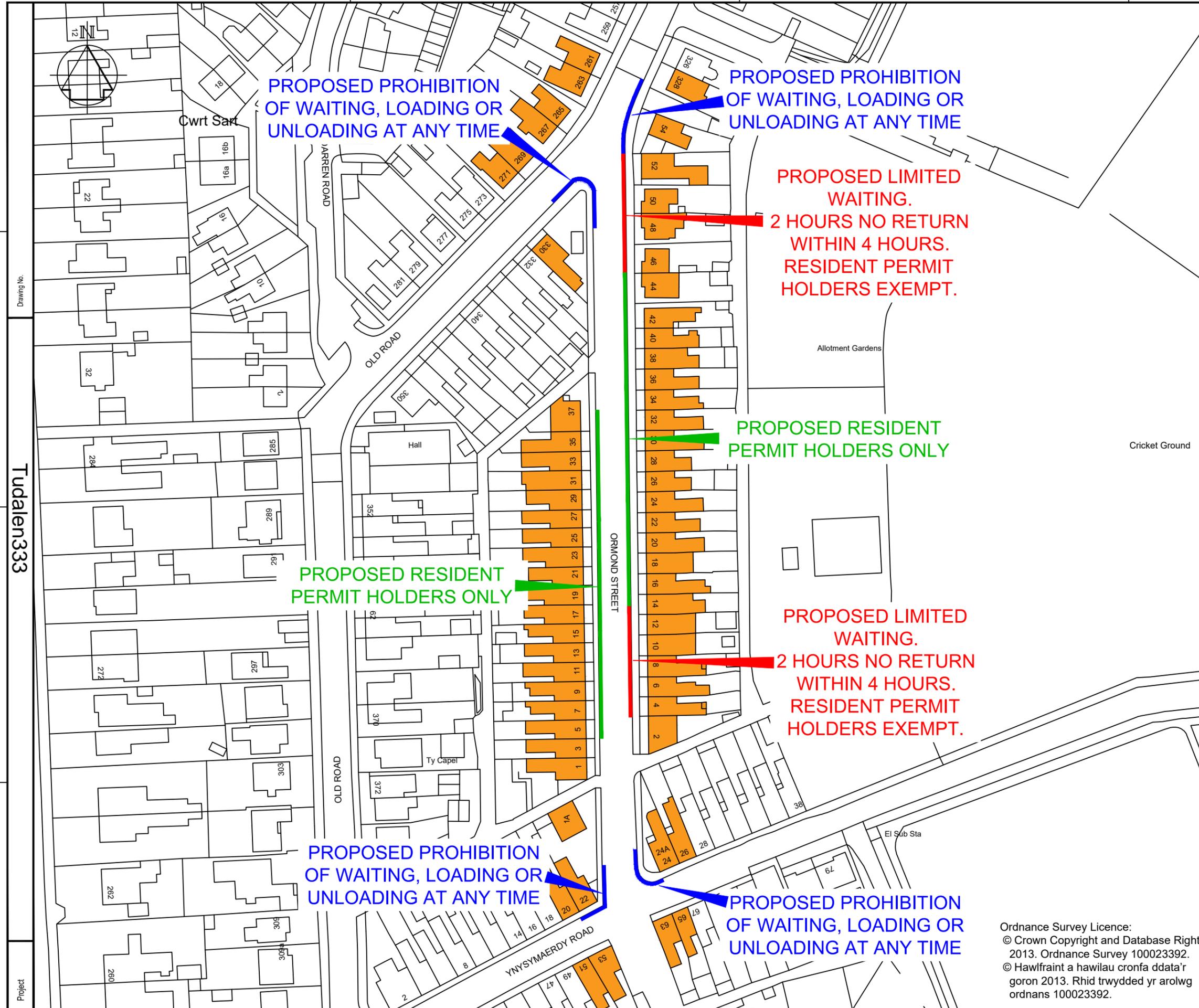
NICOLA PEARCE BSC (Hons), Dip TP, MRTPI
DIRECTOR OF ENVIRONMENT AND REGENERATION
THE QUAYS, BRUNEL WAY
BAGLAN ENERGY PARK
NEATH SA11 2GG

Project

**(ORMOND STREET, YNYSYMAERDY ROAD AND OLD ROAD, BRITON FERRY, NEATH)
(PROHIBITION OF WAITING, LOADING OR UNLOADING AT ANY TIME) (LIMITED WAITING) AND (RESIDENT PERMIT HOLDERS)
ORDER 2020**

File No.	Financial Code No.				
Drawn	CGD	Checked	MCB	Approved	HIH
Date	MAR/20	Date	MAR/20	Date	MAR/20
Scales	1:1000-@-A3				
Drawing No.	C9836B-/05				

Ordnance Survey Licence:
© Crown Copyright and Database Right 2013. Ordnance Survey 100023392.
© Hawlfraint a hawllau cronfa ddata'r goron 2013. Rhid trwydded yr arolwg ordnans 100023392.



Tudalen 333

Project

Mae'r dudalen hon yn fwiadol wag

Impact Assessment - First Stage

It is essential that all initiatives undergo a first stage impact assessment to identify relevance to equalities and the Welsh language as well as an evaluation of how the proposal has taken into account the sustainable development principle (the five ways of working); an incorrect assessment could ultimately be open to legal challenge.

The first stage is to carry out a short assessment to help determine the need to undertake a more in-depth analysis (the second stage).

Relevance will depend not only on the number of people/service users affected, but also the significance of the effect on them.

When completing the first step you must have regard to the following:

- Does the initiative relate to an area where important equality issues have been, or are likely to be, raised? (For example, funding for services to assist people who are victims of rape/sexual violence or individuals with particular care need; disabled people's access to public transport; the gender pay gap; racist or homophobic bullying in schools)
- Is there a significant potential for reducing inequalities, or improving outcomes? (For example, increasing recruitment opportunities for disabled people).
- Does the initiative relate to instances where opportunities to use the Welsh language are likely to be affected or where the language is likely to be treated less favourably? (For example, increase the number of Welsh speakers moving from/to a certain area; closing specific Welsh language services or put those services at risk services;
- Does the initiative relate to the improvement of economic, social, environmental and cultural well-being? To what extent does the initiative prevent things getting worse? (For example, funding for services to assist in cultural well-being; changes in policies that promote independence and/or assist carers)

1. Provide a description and summary of the initiative.

Identify which service area and directorate has responsibility for the initiative.

2. Identify who will be affected by the initiative.

If you answer **Yes** to service users, staff or wider community continue with the first stage of the assessment

If you answer **No** to service users, staff or wider community or **Yes** to 'Internal administrative process only', go to **Question 5 – sustainable development principle**.

3. Using relevant and appropriate information and data that is available to you think about what impact there could be on people who share protected characteristics; whether they are service users, staff or the wider community.

Some things to consider include:

- transport issues
- accessibility
- customer service
- cultural sensitivity
- financial implications
- loss of jobs

Definitions of impacts (either positive or negative):

- High – likely to be highly affected by the initiative
- Medium - likely to be affected in some way
- Low - likely to be affected by the initiative in a small way
- Don't know - the potential impact is unknown

You **must** provide reasons, and indicate what evidence you used, in coming to your decision.

4. Using relevant and appropriate information and data that is available, think about what impact there could be on opportunities to use the Welsh language and in treating the language no less favourably than English.

Definitions of impacts are the same as in **Question 3**.

The classification 'Don't Know' should be categorised as 'High Impact' in both questions 3 & 4.

5. Consider how the initiative has embraced the sustainable development principle in accordance with the Section 7c of the Well-being of Future Generations Act 2015.

Give details of the initiative in relation to the 5 ways of working:

- **Long term** - how the initiative supports the long term well-being of people
- **Integration** - how the initiative impacts upon our wellbeing objectives
- **Involvement** - how people have been involved in developing the initiative
- **Collaboration** - how we have worked with other services/organisations to find shared sustainable solutions;
- **Prevention** - how the initiative will prevent problems occurring or getting worse

6. The most appropriate statement must be selected (and the relevant box ticked) based on the first stage of the assessment and an explanation of how you have arrived at this decision must be given.

In addition a summary of the how the initiative has embraced the sustainable development principle must also be included.

Where the first stage of the assessment indicates that a more in-depth analysis is required the second stage of the assessment will need to be completed and this will need to be started immediately.

A first stage assessment must be included as a background paper for all Cabinet/Cabinet Board/ Scrutiny Committee Reports.

Where the first stage assessment is completed by an accountable manager it must be signed off by a Head of Service/Director.

Impact Assessment - First Stage

1. Details of the initiative

Initiative description and summary: (Ormond street, Ynysymaerdy Road and Old Road, Briton Ferry, Neath). (Prohibition of waiting, loading or unloading at any time) (Limited waiting) and (Resident permit holders). Order 2020

Service Area: Briton Ferry East

Directorate: Environment

2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff		✓
Wider community	✓	
Internal administrative process only		✓

3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race		✓				
Religion/Belief		✓				
Sex		✓				

Tudalen338

Sexual orientation		✓				
--------------------	--	---	--	--	--	--

4. Does the initiative impact on:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		✓				
Treating the Welsh language no less favourably than English		✓				

5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		✓				
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment,		✓				

Tudalen 339

such as air quality, flood alleviation, etc.						
--	--	--	--	--	--	--

6. Does the initiative embrace the sustainable development principle (5 ways of working):

Tudalen340

	Yes	No	Details
Long term - how the initiative supports the long term well-being of people	✓		The proposed scheme will prevent indiscriminate parking in the interest of road safety and limit the amount of time non residential vehicles can park providing greater capacity on street for the residents.
Integration - how the initiative impacts upon our wellbeing objectives	✓		The proposed scheme will prevent indiscriminate parking in the interest of road safety and limit the amount of time non residential vehicles can park providing greater capacity on street for the residents.
Involvement - how people have been involved in developing the initiative	✓		The Highways sections along with the local member for Briton Ferry East and the legal section have worked together on this initiative.
Collaboration - how we have worked with other services/organisations to find shared sustainable solutions	✓		The Highway Engineering team and the legal section team have worked together on this initiative. South wales police were consulted as part of the formal advertisement process and supported the scheme.
Prevention - how the initiative will prevent problems occurring or getting worse	✓		The proposed scheme will prevent indiscriminate parking in the interest of road safety and limit the amount of time non residential vehicles can park providing greater capacity on street for the residents.

7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) is not required	✓
Reasons for this conclusion	
A full impact assessment is not required as the proposals will provide a benefit for the local community.	

A full impact assessment (second stage) is required	
Reasons for this conclusion	

Tudalen341

	Name	Position	Signature	Date
Completed by	Hasan I. Hasan	Engineering Manager		8/06/2020
Signed off by	David W. Griffiths	Head of Service/Director		8/06/2020

Mae'r dudalen hon yn fwiadol wag

NEATH PORT-TALBOT COUNTY BOROUGH COUNCIL

CABINET

25 JUNE 2020

Report of Head of Engineering & Transport – D.W.Griffiths

Matter for Decision

Wards affected: Port Talbot

(EVELYN TERRACE AND MANOR STREET, PORT TALBOT)

(PROHIBITION OF WAITING 8AM TO 6PM)

ORDER 2020

Purpose of Report

To obtain Members approval to advertise the above scheme as indicated in Appendix A.

Executive Summary

The report outlines the proposed Traffic Regulation Order and the reason why the Order is required.

Background

The local Councillor and residents have expressed concerns regarding indiscriminate parking in the area. Evelyn Terrace and Manor Street lay adjacent to Aberavon Rugby club. Patrons of the rugby club utilise Evelyn Terrace and Manor Street for parking. Indiscriminate parking increases at weekends when the rugby club holds most of its events.

The proposed parking restrictions will prevent indiscriminate parking in the area in the interest of highway safety.

Financial Impact

The work is to be funded from the Capital Works Programme.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment, attached at Appendix B, has indicated that a more in-depth assessment is not required. A summary is included below:-

A full impact assessment is not required as the proposed traffic regulation orders will provide a benefit for the local community and provide a safe environment for motorists, pedestrians, cyclists and residents.

Valleys Community Impacts

There are '**No implications**' associated with this report.

Workforce Impacts

There are '**No Implications**' associated with this report.

Legal Impacts

The scheme is to be advertised for a 21 day period as part of the statutory process.

Risk Management Impacts

There are no risk management impacts associated with this report.

Consultation

A consultation exercise will be undertaken when the scheme is advertised.

Recommendations

It is recommended that approval is granted to advertise Evelyn Terrace and Manor Street, Port Talbot, Prohibition of Waiting 8am to 6pm, Order 2020 (as detailed in Appendix A to the circulated report) and if no objections are received the proposals are to be implemented on site as advertised.

Reason for Proposed Decision

To prevent indiscriminate parking in the interest of highway safety.

Appendices

Appendix A – Plan – Evelyn Terrace and Manor Street, Port Talbot. Prohibition of Waiting 8am to 6pm. Order 2020.

Appendix B – Integrated Impact Assessment.

Background Papers

None.

Officer Contact

Mr Martin Brumby, Engineering & Transport

Tel. No. 01639 686013

Email m.brumby@npt.gov.uk

Mr Christopher Davies, Engineering & Transport

Tel. No. 01639 686478

Email c.davies9@npt.gov.uk

Mae'r dudalen hon yn fwriadol wag



NOTES

1. All dimensions are in millimetres unless otherwise stated.

KEY

— PROPOSED PROHIBITION OF WAITING 8.00AM TO 6.00PM (SINGLE YELLOW LINE)

Rev	Details	Dr	Ch	Ap	Date

Client

Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council
ENGINEERING AND TRANSPORT
NICOLA PEARCE BSc (Hons), Dip TP, MRTPI
DIRECTOR OF ENVIRONMENT AND REGENERATION
THE QUAYS, BRUNEL WAY
BAGLAN ENERGY PARK
NEATH SA11 2GG

Job Title
EVELYN TERRACE AND MANOR STREET
PORT TALBOT
PROHIBITION OF WAITING 8AM TO 6PM
ORDER 2020

File No.	Financial Code No.
Drawn CGD	Checked MCB
Date FEB 20	Date FEB 20
Approved HIH	Date FEB 20
Scales 1:500 @ A3	Status
Drawing No. C9836P / TRO4	

Mae'r dudalen hon yn fwiadol wag

Impact Assessment - First Stage

It is essential that all initiatives undergo a first stage impact assessment to identify relevance to equalities and the Welsh language as well as an evaluation of how the proposal has taken into account the sustainable development principle (the five ways of working); an incorrect assessment could ultimately be open to legal challenge.

The first stage is to carry out a short assessment to help determine the need to undertake a more in-depth analysis (the second stage).

Relevance will depend not only on the number of people/service users affected, but also the significance of the effect on them.

When completing the first step you must have regard to the following:

- Does the initiative relate to an area where important equality issues have been, or are likely to be, raised? (For example, funding for services to assist people who are victims of rape/sexual violence or individuals with particular care need; disabled people's access to public transport; the gender pay gap; racist or homophobic bullying in schools)
- Is there a significant potential for reducing inequalities, or improving outcomes? (For example, increasing recruitment opportunities for disabled people).
- Does the initiative relate to instances where opportunities to use the Welsh language are likely to be affected or where the language is likely to be treated less favourably? (For example, increase the number of Welsh speakers moving from/to a certain area; closing specific Welsh language services or put those services at risk services;
- Does the initiative relate to the improvement of economic, social, environmental and cultural well-being? To what extent does the initiative prevent things getting worse? (For example, funding for services to assist in cultural well-being; changes in policies that promote independence and/or assist carers)

1. Provide a description and summary of the initiative.

Identify which service area and directorate has responsibility for the initiative.

2. Identify who will be affected by the initiative.

If you answer **Yes** to service users, staff or wider community continue with the first stage of the assessment

If you answer **No** to service users, staff or wider community or **Yes** to 'Internal administrative process only', go to **Question 5 – sustainable development principle**.

3. Using relevant and appropriate information and data that is available to you think about what impact there could be on people who share protected characteristics; whether they are service users, staff or the wider community.

Some things to consider include:

- transport issues
- accessibility
- customer service
- cultural sensitivity
- financial implications
- loss of jobs

Definitions of impacts (either positive or negative):

- High – likely to be highly affected by the initiative
- Medium - likely to be affected in some way
- Low - likely to be affected by the initiative in a small way
- Don't know - the potential impact is unknown

You **must** provide reasons, and indicate what evidence you used, in coming to your decision.

4. Using relevant and appropriate information and data that is available, think about what impact there could be on opportunities to use the Welsh language and in treating the language no less favourably than English.

Definitions of impacts are the same as in **Question 3**.

The classification 'Don't Know' should be categorised as 'High Impact' in both questions 3 & 4.

5. Consider how the initiative has embraced the sustainable development principle in accordance with the Section 7c of the Well-being of Future Generations Act 2015.

Give details of the initiative in relation to the 5 ways of working:

- **Long term** - how the initiative supports the long term well-being of people
- **Integration** - how the initiative impacts upon our wellbeing objectives
- **Involvement** - how people have been involved in developing the initiative
- **Collaboration** - how we have worked with other services/organisations to find shared sustainable solutions;
- **Prevention** - how the initiative will prevent problems occurring or getting worse

6. The most appropriate statement must be selected (and the relevant box ticked) based on the first stage of the assessment and an explanation of how you have arrived at this decision must be given.

In addition a summary of the how the initiative has embraced the sustainable development principle must also be included.

Where the first stage of the assessment indicates that a more in-depth analysis is required the second stage of the assessment will need to be completed and this will need to be started immediately.

A first stage assessment must be included as a background paper for all Cabinet/Cabinet Board/ Scrutiny Committee Reports.

Where the first stage assessment is completed by an accountable manager it must be signed off by a Head of Service/Director.

Impact Assessment - First Stage

1. Details of the initiative

Initiative description and summary: (EVELYN TERRACE AND MANOR STREET, PORT TALBOT) (PROHIBITION OF WAITING 8AM TO 6PM) ORDER 2020

Service Area: Port Talbot

Directorate: Environment.

2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff		✓
Wider community	✓	
Internal administrative process only		✓

3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race		✓				
Religion/Belief		✓				
Sex		✓				

Tudalen352

Sexual orientation		✓				
--------------------	--	---	--	--	--	--

4. Does the initiative impact on:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		✓				
Treating the Welsh language no less favourably than English		✓				

5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		✓				
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment,		✓				

Tudalen 353

such as air quality, flood alleviation, etc.						
--	--	--	--	--	--	--

6. Does the initiative embrace the sustainable development principle (5 ways of working):

Tudalen354

	Yes	No	Details
Long term - how the initiative supports the long term well-being of people	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.
Integration - how the initiative impacts upon our wellbeing objectives	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.
Involvement - how people have been involved in developing the initiative	✓		The Highways section and Local Members for Port Talbot have worked together on this initiative.
Collaboration - how we have worked with other services/organisations to find shared sustainable solutions	✓		The Highways section and Local Members for Port Talbot have worked together on this initiative.
Prevention - how the initiative will prevent problems occurring or getting worse	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.

7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) is not required	✓
Reasons for this conclusion	
A full impact assessment is not required as the proposals will provide a benefit for the local community.	
A full impact assessment (second stage) is required	
Reasons for this conclusion	

--

	Name	Position	Signature	Date
Completed by	Hasan Hasan	Engineering Manager		8/06/2020
Signed off by	David Griffiths	Head of Service/Director		8/06/2020

Tudalen356

NEATH PORT-TALBOT COUNTY BOROUGH COUNCIL

CABINET

25 JUNE 2020

**Report of Head of Engineering & Transport –
DW Griffiths**

Matter for Decision

Wards affected: Margam

(CYNCOED ROAD AND BERTHA ROAD, MARGAM)

**(PROHIBITION OF WAITING, MONDAY TO FRIDAY, 8.00am to
5.00pm) ORDER 2020**

Purpose of Report

To obtain Members approval to advertise the above traffic regulation order as indicated in Appendix A.

Executive Summary

The report outlines the proposed traffic regulation order and the reason why the order is required.

Background

Following the completion of the new Ysgol Cwm Brombil school on Bertha Road, Margam a Road Safety Audit Stage 3 was undertaken which identified various road safety issues. One of these issues was the need for a traffic regulation order to prohibit indiscriminate parking on the junction of Cyncoed Road and Bertha Road, Margam. The traffic regulation order was identified by the road safety audit stage 3

because vehicles are parking on the junction restricting visibility for both traffic and pedestrians.

Financial Impact

The work will be funded by the strategic school improvement programme.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment, attached at Appendix B, has indicated that a more in-depth assessment is not required. A summary is included below:-

A full impact assessment is not required as the proposed traffic regulation order will provide a safe environment for motorists, pedestrians, cyclists, school children and residents.

Valleys Community Impacts

There are '**No implications**' associated with this report.

Workforce Impacts

There are '**No Implications**' associated with this report.

Legal Impacts

The scheme is to be advertised for a 21 day period as part of the statutory process.

Risk Management Impacts

There are no risk management impacts associated with this report.

Consultation

A consultation exercise will be undertaken when the scheme is advertised.

Recommendations

It is recommended that approval is granted to advertise the Cyncoed Road and Bertha Road, Margam, Prohibition of Waiting, Monday to Friday, 8.00am to 5.00pm, Order 2020 (as detailed in Appendix A to the circulated report) and if no objections are received that the proposals are to be implemented on site as advertised.

Reason for Proposed Decision

To prevent indiscriminate parking in the interest of highway safety.

Appendices

Appendix A – Plan – Cyncoed Road and Bertha Road, Margam. Prohibition of Waiting, Monday to Friday, 8.00am to 5.00pm, Order 2020.

Appendix B – Integrated Impact Assessment.

Background Papers

None.

Officer Contact

Mr Martin Brumby, Engineering & Transport

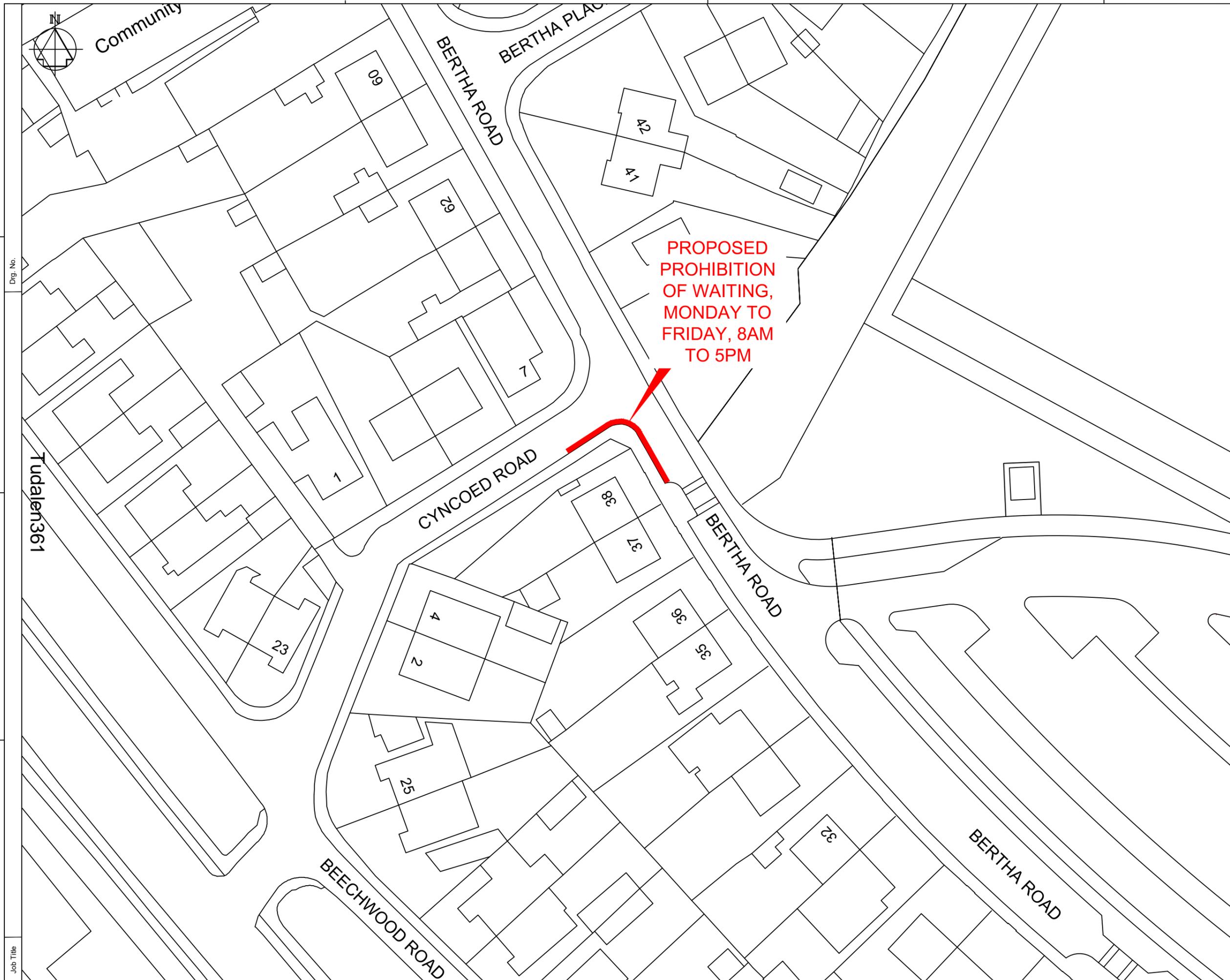
Tel. No. 01639 686013

Email m.brumby@npt.gov.uk

Mr Christopher Davies, Engineering & Transport

Tel. No. 01639 686478

Email c.davies9@npt.gov.uk



NOTES

1. All dimensions are in millimetres unless otherwise stated.

KEY

 — PROPOSED PROHIBITION OF WAITING, MONDAY TO FRIDAY, 8AM TO 5PM TRAFFIC REGULATION ORDER (SINGLE YELLOW LINE)

Dwg. No.

Tudalen 361

Job Title

Rev	Details	Dr	Ch	Ap	Date

Client



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council
ENGINEERING AND TRANSPORT
NICOLA PEARCE BSC (Hons), Dip TP, MRTPI
DIRECTOR OF ENVIRONMENT AND REGENERATION
THE QUAYS, BRUNEL WAY
BAGLAN ENERGY PARK
NEATH SA11 2GG

Job Title
(CYNCOED ROAD AND BERTHA ROAD, MARGAM)
(PROHIBITION OF WAITING, MONDAY TO FRIDAY,
8AM TO 5PM)
ORDER 2020

File No.	Financial Code No.
Drawn CGD	Checked MCB
Date MAY 20	Date MAY 20
Approved HHH	Date MAY 20
Scales 1:500 @ A3	Status
Drawing No. T47630 / TRO 1	

Mae'r dudalen hon yn fwiadol wag

Impact Assessment - First Stage

It is essential that all initiatives undergo a first stage impact assessment to identify relevance to equalities and the Welsh language as well as an evaluation of how the proposal has taken into account the sustainable development principle (the five ways of working); an incorrect assessment could ultimately be open to legal challenge.

The first stage is to carry out a short assessment to help determine the need to undertake a more in-depth analysis (the second stage).

Relevance will depend not only on the number of people/service users affected, but also the significance of the effect on them.

When completing the first step you must have regard to the following:

- Does the initiative relate to an area where important equality issues have been, or are likely to be, raised? (For example, funding for services to assist people who are victims of rape/sexual violence or individuals with particular care need; disabled people's access to public transport; the gender pay gap; racist or homophobic bullying in schools)
- Is there a significant potential for reducing inequalities, or improving outcomes? (For example, increasing recruitment opportunities for disabled people).
- Does the initiative relate to instances where opportunities to use the Welsh language are likely to be affected or where the language is likely to be treated less favourably? (For example, increase the number of Welsh speakers moving from/to a certain area; closing specific Welsh language services or put those services at risk services;
- Does the initiative relate to the improvement of economic, social, environmental and cultural well-being? To what extent does the initiative prevent things getting worse? (For example, funding for services to assist in cultural well-being; changes in policies that promote independence and/or assist carers)

1. Provide a description and summary of the initiative.

Identify which service area and directorate has responsibility for the initiative.

2. Identify who will be affected by the initiative.

If you answer **Yes** to service users, staff or wider community continue with the first stage of the assessment

If you answer **No** to service users, staff or wider community or **Yes** to 'Internal administrative process only', go to **Question 5 – sustainable development principle**.

3. Using relevant and appropriate information and data that is available to you think about what impact there could be on people who share protected characteristics; whether they are service users, staff or the wider community.

Some things to consider include:

- transport issues
- accessibility
- customer service
- cultural sensitivity
- financial implications
- loss of jobs

Definitions of impacts (either positive or negative):

- High – likely to be highly affected by the initiative
- Medium - likely to be affected in some way
- Low - likely to be affected by the initiative in a small way
- Don't know - the potential impact is unknown

You **must** provide reasons, and indicate what evidence you used, in coming to your decision.

4. Using relevant and appropriate information and data that is available, think about what impact there could be on opportunities to use the Welsh language and in treating the language no less favourably than English.

Definitions of impacts are the same as in **Question 3**.

The classification 'Don't Know' should be categorised as 'High Impact' in both questions 3 & 4.

5. Consider how the initiative has embraced the sustainable development principle in accordance with the Section 7c of the Well-being of Future Generations Act 2015.

Give details of the initiative in relation to the 5 ways of working:

- **Long term** - how the initiative supports the long term well-being of people
- **Integration** - how the initiative impacts upon our wellbeing objectives
- **Involvement** - how people have been involved in developing the initiative
- **Collaboration** - how we have worked with other services/organisations to find shared sustainable solutions;
- **Prevention** - how the initiative will prevent problems occurring or getting worse

6. The most appropriate statement must be selected (and the relevant box ticked) based on the first stage of the assessment and an explanation of how you have arrived at this decision must be given.

In addition a summary of the how the initiative has embraced the sustainable development principle must also be included.

Where the first stage of the assessment indicates that a more in-depth analysis is required the second stage of the assessment will need to be completed and this will need to be started immediately.

A first stage assessment must be included as a background paper for all Cabinet/Cabinet Board/ Scrutiny Committee Reports.

Where the first stage assessment is completed by an accountable manager it must be signed off by a Head of Service/Director.

Impact Assessment - First Stage

1. Details of the initiative

**Initiative description and summary: (CYNCOED ROAD AND BERTHA ROAD, MARGAM)
(PROHIBITION OF WAITING, MONDAY TO FRIDAY, 8.00am to 5.00pm) ORDER 2020**

Service Area: Margam

Directorate: Environment.

2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff		✓
Wider community	✓	
Internal administrative process only		✓

3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race		✓				
Religion/Belief		✓				
Sex		✓				

Tudalen366

Sexual orientation		✓				
--------------------	--	---	--	--	--	--

4. Does the initiative impact on:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		✓				
Treating the Welsh language no less favourably than English		✓				

5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		✓				
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment,		✓				

Tudalen367

such as air quality, flood alleviation, etc.						
--	--	--	--	--	--	--

6. Does the initiative embrace the sustainable development principle (5 ways of working):

Tudalen368

	Yes	No	Details
Long term - how the initiative supports the long term well-being of people	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.
Integration - how the initiative impacts upon our wellbeing objectives	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.
Involvement - how people have been involved in developing the initiative	✓		The Highways section, Road Safety Audit Team and the Local Member for Margam have worked together on this initiative.
Collaboration - how we have worked with other services/organisations to find shared sustainable solutions	✓		The Highways section, Road Safety Audit Team and the Local Member for Margam have worked together on this initiative.
Prevention - how the initiative will prevent problems occurring or getting worse	✓		The proposed scheme will prevent indiscriminate parking in the interest of highway safety.

7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) is not required	<input checked="" type="checkbox"/>
Reasons for this conclusion	
A full impact assessment is not required as the proposed traffic regulation order will provide a safer environment for the community.	

A full impact assessment (second stage) is required	<input type="checkbox"/>
Reasons for this conclusion	

--

	Name	Position	Signature	Date
Completed by	Hasan Hasan	Engineering Manager		10/06/2020
Signed off by	David Griffiths	Head of Service/Director		10/06/2020

Tudalen370

NEATH PORT-TALBOT COUNTY BOROUGH COUNCIL

CABINET

25 JUNE 2020

Report of Head of Engineering & Transportation – D.W.Griffiths

Matter for Decision

Wards affected: MARGAM

(ROAD ADJACENT TO 63 AND 65 BEECHWOOD ROAD, MARGAM, PORT TALBOT) (EXPERIMENTAL PROHIBITION OF DRIVING) ORDER 2019.

Purpose of Report

To consider the objection received following the advertisement of the above experimental order as indicated in Appendix A.

Executive Summary

Further to the opening of the new Ysgol Cwm Brombil pedestrians and traffic were seen to be in conflict in the narrow lane between Beechwood Road and Bertha Road, Margam.

The lane was being used as a rat run for traffic putting school children at risk due to the narrow footways and road width.

An Experimental Prohibition of Driving Order was implemented in the interest of road safety.

The proposal is to make the experimental order a permanent order.

One e-mail objecting to the order was received.

The report outlines the objection and the recommendations for the scheme.

Background

The experimental prohibition of driving traffic regulation order was required to prevent conflict between traffic and school children in the narrow lane between Beechwood Road and Bertha Road, Margam in interest of road safety.

Access to the lane from Beechwood Road was temporarily closed to vehicular traffic between Nos 63 and 65 Beechwood Road under the experimental order for a period of 18 months expiring in November 2020.

The proposal is to make the experimental order a permanent order.

Financial Impact

The work is to be funded by the Strategy Schools Improvement Programme.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment, attached at Appendix B, has indicated that a more in-depth assessment is not required. A summary is included below:-

A full impact assessment is not required as the proposed traffic regulation orders will provide a benefit for the local community and provide a safe environment for motorists, pedestrians, cyclists, school children and residents.

Valleys Community Impacts

There are '**No implications**' associated with this report.

Workforce Impacts

There are '**No Implications**' associated with this report.

Legal Impacts

The experimental order was advertised as part of the statutory process.

Risk Management Impacts

There are no risk management impacts associated with this report.

Consultation

An experimental prohibition of driving order was implemented in May 2019 for a period of 18 months.

One email objection to the scheme was received.

The objection is summarised as follows:-

1. The closure to vehicular traffic was not shown at the planning stage.
2. Residents will now need to drive the full length of the school frontage instead of a shorter section putting school children at risk.
3. The lane is used by a lot of people.

In response to the above objection there are suitable and adequate footways serving the school on both sides of Bertha Road.

However the lane has very narrow footways resulting in the school children having to walk in the lane thereby causing conflict with traffic using the lane as a short cut.

The local member has been consulted and fully supports the experimental order being made a permanent order.

Recommendations

It is recommended that the objection to the (Road adjacent to 63 and 65 Beechwood Road, Margam, Port Talbot) (Experimental Prohibition of Driving) Order 2019 be overruled and that the experimental order be made permanent as advertised.

That the objector is informed accordingly.

Reason for Proposed Decision

To prohibit access to vehicular traffic in order to protect school children in the interest of road safety.

Appendices

Appendix A - Plan – Temporary Prohibition of Driving Order. Road adjacent to 63 & 65 Beechwood Road, Margam.

Appendix B – Integrated Impact Assessment.

Background Papers

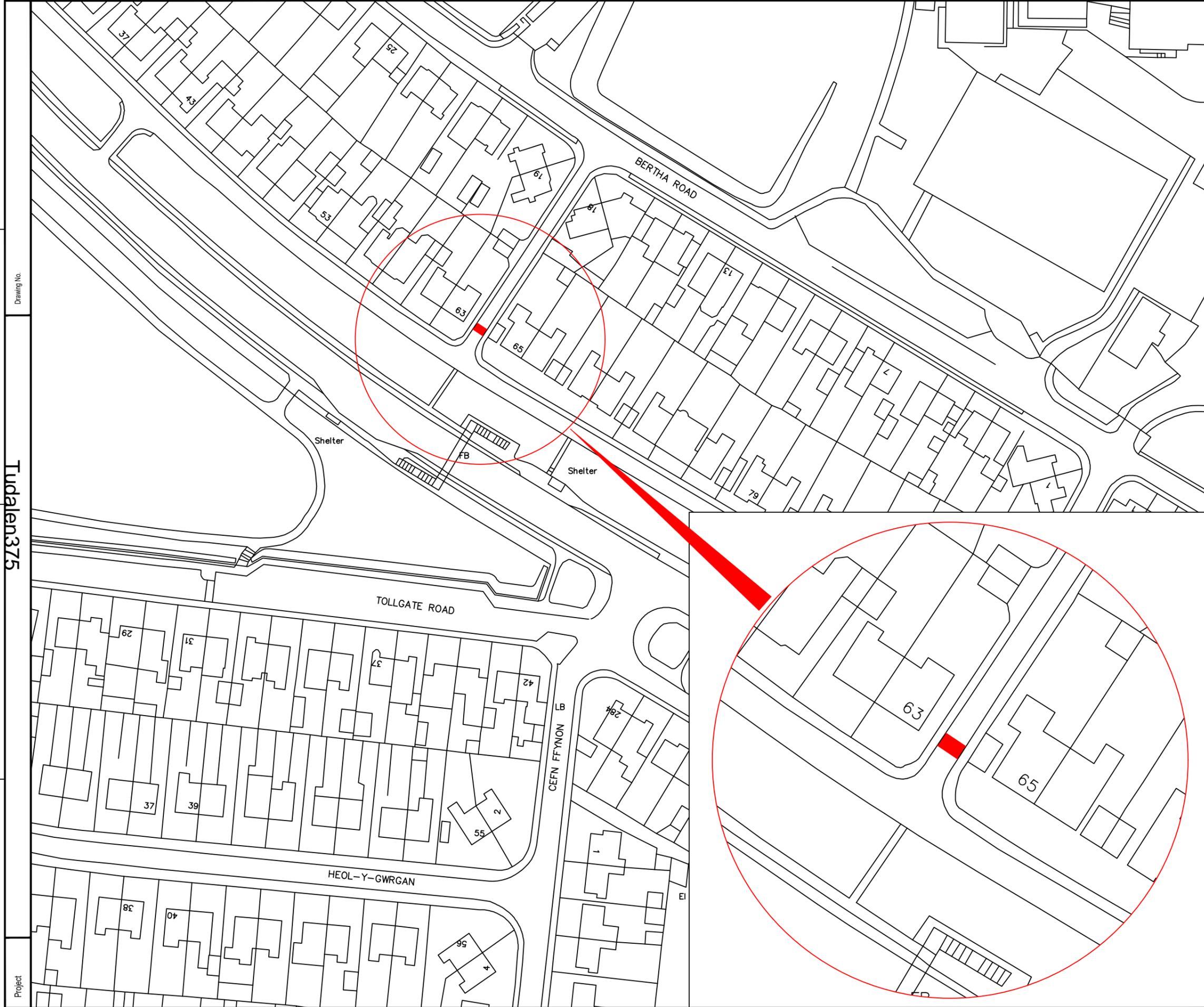
None.

Officer Contact

Mr Martin Brumby, Engineering & Transport

Tel. No. 01639 686013

Email m.brumby@npt.gov.uk



- 1 THIS IS A C.A.D. DRAWING AND SHOULD NOT BE AMENDED BY HAND.
- 2 All dimensions in millimetres unless otherwise stated.

Key:-

Proposed Temporary Prohibition of Driving Order

Drawing No.

Tudalens375

Project

Rev	Details	Dr	Ch	Ap	Date

Client



GARETH NUTT
CORPORATE DIRECTOR OF ENVIRONMENT
THE QUAYS, BRUNEL WAY
BAGLAN ENERGY PARK
NEATH SA11 2GG

Project

Temporary Prohibition of Driving Order

**Road Adjacent to
63 & 65 Beechwood Road
Margam**

File No. TR10.02	Financial Code No.				
Drawn		Checked	MCB	Approved	HIH
Date	Feb 19	Date	Feb 19	Date	Feb 19
Scales	NTS				
Drawing No.	C9826_POD_001				

Mae'r dudalen hon yn fwiadol wag

Impact Assessment - First Stage

It is essential that all initiatives undergo a first stage impact assessment to identify relevance to equalities and the Welsh language as well as an evaluation of how the proposal has taken into account the sustainable development principle (the five ways of working); an incorrect assessment could ultimately be open to legal challenge.

The first stage is to carry out a short assessment to help determine the need to undertake a more in-depth analysis (the second stage).

Relevance will depend not only on the number of people/service users affected, but also the significance of the effect on them.

When completing the first step you must have regard to the following:

- Does the initiative relate to an area where important equality issues have been, or are likely to be, raised? (For example, funding for services to assist people who are victims of rape/sexual violence or individuals with particular care need; disabled people's access to public transport; the gender pay gap; racist or homophobic bullying in schools)
- Is there a significant potential for reducing inequalities, or improving outcomes? (For example, increasing recruitment opportunities for disabled people).
- Does the initiative relate to instances where opportunities to use the Welsh language are likely to be affected or where the language is likely to be treated less favourably? (For example, increase the number of Welsh speakers moving from/to a certain area; closing specific Welsh language services or put those services at risk services;
- Does the initiative relate to the improvement of economic, social, environmental and cultural well-being? To what extent does the initiative prevent things getting worse? (For example, funding for services to assist in cultural well-being; changes in policies that promote independence and/or assist carers)

1. Provide a description and summary of the initiative.

Identify which service area and directorate has responsibility for the initiative.

2. Identify who will be affected by the initiative.

If you answer **Yes** to service users, staff or wider community continue with the first stage of the assessment

If you answer **No** to service users, staff or wider community or **Yes** to 'Internal administrative process only', go to **Question 5 – sustainable development principle**.

3. Using relevant and appropriate information and data that is available to you think about what impact there could be on people who share protected characteristics; whether they are service users, staff or the wider community.

Some things to consider include:

- transport issues
- accessibility
- customer service
- cultural sensitivity
- financial implications
- loss of jobs

Definitions of impacts (either positive or negative):

- High – likely to be highly affected by the initiative
- Medium - likely to be affected in some way
- Low - likely to be affected by the initiative in a small way
- Don't know - the potential impact is unknown

You **must** provide reasons, and indicate what evidence you used, in coming to your decision.

4. Using relevant and appropriate information and data that is available, think about what impact there could be on opportunities to use the Welsh language and in treating the language no less favourably than English.

Definitions of impacts are the same as in **Question 3**.

The classification 'Don't Know' should be categorised as 'High Impact' in both questions 3 & 4.

5. Consider how the initiative has embraced the sustainable development principle in accordance with the Section 7c of the Well-being of Future Generations Act 2015.

Give details of the initiative in relation to the 5 ways of working:

- **Long term** - how the initiative supports the long term well-being of people
- **Integration** - how the initiative impacts upon our wellbeing objectives
- **Involvement** - how people have been involved in developing the initiative
- **Collaboration** - how we have worked with other services/organisations to find shared sustainable solutions;
- **Prevention** - how the initiative will prevent problems occurring or getting worse

6. The most appropriate statement must be selected (and the relevant box ticked) based on the first stage of the assessment and an explanation of how you have arrived at this decision must be given.

In addition a summary of the how the initiative has embraced the sustainable development principle must also be included.

Where the first stage of the assessment indicates that a more in-depth analysis is required the second stage of the assessment will need to be completed and this will need to be started immediately.

A first stage assessment must be included as a background paper for all Cabinet/Cabinet Board/ Scrutiny Committee Reports.

Where the first stage assessment is completed by an accountable manager it must be signed off by a Head of Service/Director.

Impact Assessment - First Stage

1. Details of the initiative

Initiative description and summary: (ROAD ADJACENT TO 63 AND 65 BEECHWOOD ROAD, MARGAM, PORT TALBOT) (EXPERIMENTAL PROHIBITION OF DRIVING) ORDER 2019.

Service Area: MARGAM.

Directorate: Environment

2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff		✓
Wider community	✓	
Internal administrative process only		✓

3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race		✓				
Religion/Belief		✓				
Sex		✓				
Sexual orientation		✓				

Tudalen380

4. Does the initiative impact on:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		✓				
Treating the Welsh language no less favourably than English		✓				

5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		✓				
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.		✓				

6. Does the initiative embrace the sustainable development principle (5 ways of working):

	Yes	No	Details
Long term - how the initiative supports the long term well-being of people	✓		The proposed scheme will prevent vehicular access in the interest of road safety.
Integration - how the initiative impacts upon our wellbeing objectives	✓		The proposed scheme will prevent vehicular access in the interest of road safety.
Involvement - how people have been involved in developing the initiative	✓		The Highways sections along with the local member for Margam and the legal section have worked together on this initiative.
Collaboration - how we have worked with other services/organisations to find shared sustainable solutions	✓		The Highways sections along with the local member for Margam and the legal section have worked together on this initiative.
Prevention - how the initiative will prevent problems occurring or getting worse	✓		The proposed scheme will prevent vehicular access in the interest of road safety.

Tudalenn382

7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) is not required	✓
Reasons for this conclusion	
A full impact assessment is not required as the proposals will provide a benefit for the local community.	

A full impact assessment (second stage) is required	
Reasons for this conclusion	

Tudalen383

	Name	Position	Signature	Date
Completed by	Hasan Hasan	Engineering Manager		1/06/2020
Signed off by	David Griffiths	Head of Service/Director		1/06/2020

Tudalen384

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag

Document is Restricted

Mae'r dudalen hon yn fwriadol wag