

TORFAEN
COUNTY
BOROUGH



BWRDEISTREF
SIROL
TORFAEN



Torfaen Replacement Local Development Plan (2018-2033)
Cynllun Datblygu Lleol Newydd Torfaen (2018-2033)

Covid-19 Assessment
Asesiad Covid-19

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1.0 BACKGROUND

1.1 In recognition of the current Covid-19 pandemic, the Minister for Housing and Local Government, in a letter (dated 7 July 2020) to Local Planning Authorities in Wales stated that:-

“Local planning authorities must reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented. Long held views and policies on matters including transportation, economic development, housing, regeneration, the role of town centres and the importance of green infrastructure have all been brought into focus recently. We must think creatively and differently to promote a sustained recovery which has people and places at its heart.

LDPs are evidence based documents. As a result of the pandemic and resulting downturn in the economy much of the evidence on which LDPs are based is likely to be out of date. This is particularly the case for economic and social evidence covering areas such as the need for social and market housing, viability, economic forecasts and transport modelling. LDPs currently undergoing review, which have not yet been submitted to the Planning Inspectorate for examination, should undertake an assessment of the evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic. Robust conclusions should be reached on the need for new evidence and any consequential changes to strategy and policy before progressing plan preparation. The assessment should be submitted to the Welsh Government with requests to extend Delivery Agreements (DA). It is acknowledged that this will slightly delay plan preparation in the short term. It will however minimise delays at later stages of plan preparation and reduce the chances of a plan being found unsound at examination. ...”

1.2 Also in July 2020, the Welsh Government published “Building Better Places: The Planning System Delivering Resilient and Brighter Futures - Placemaking and the Covid-19 Recovery”, which is to be applied immediately and read in conjunction with Welsh Government Planning Policy Wales - 10th Edition (PPW10). In summary, ‘Building Better Places’ sets out planning policy priorities during Covid-19 recovery: and states:-

- Planners to operate within a wider context of priorities and action at all scales, beyond statutory processes to help implement plans in practice;
- Policy direction towards better places and placemaking has not changed - highlighted need for good quality places for people to live, work and relax in;
- Economic recovery should be facilitated but not at the expense of quality (health / wellbeing / climate / nature emergencies);
- Developer approach should be: ‘*Could I live my whole life here?*’; should have meaningful engagement with communities and the LPA; and demonstrate commitment to infrastructure obligations;
- RLDP should have bold vision, actively embracing placemaking agenda, and be unique to an area (character, strengths and improvements);
- PPW10 National Sustainable Placemaking Outcomes highly relevant at this time;
- Legal obligations under Environment Act and Well Being for Future Generations Act continue;
- RLDPs needed urgently but must be done properly; reflect national policy, but focus on local responsiveness, innovation and creativity to achieve better places, and new ideas;

- Sharing good practice is supported, but should not result in identical plans - placemaking demands truly local planning strategies, policies and approaches;
- the Welsh Government 'National Development Framework' (NDF) consultation report anticipated Autumn 2020, and the final NDF in early 2021;
- PPW10 / NDF to be used directly in Development Management decisions where LDP is silent or out of date on an issue;
- Direct growth to sustainable locations and prevent the creation of car dependent developments; and
- Support healthier lifestyles and reduce inequalities; and refers to 'Health Impact Assessment: A Practical Guide: Planning for better health and well-being in Wales', and 'Creating Healthier Places and spaces for our present and future generations'.

1.3 'Building Better Places' also identifies the following eight Key Policy Issues:-

1. Staying Local: Creating Neighbourhoods - Community growing spaces, protecting the Best and Most Versatile (BMV) agricultural land, well designed energy efficient homes, focus on new social housing (avoid homelessness), integration with existing services / infrastructure;
2. Active Travel: Exercise and Rediscovered Transport Methods - Build on positive transport modal shift, promote sustainable locations with maximum walking and cycling opportunities, sustainable transport hierarchy - reduce need to travel and prevent car dependent developments in unsustainable locations, promote people oriented streets (active and social streets as per Manual for Streets 2);
3. Revitalising our Town Centres - Retail and commercial centres to operate flexibly, identify a vision for each centre in RLDP, realistic boundaries and identify redevelopment sites, creative uses for open spaces, hub of activity, flexible local co-working spaces, primary retail areas to be urgently reviewed through town centre assessments (to include retail, employment, leisure and public service sectors), sequential test expanded to all town centre uses;
4. Digital Places: the Lockdown Lifeline - Reliable and good quality communications systems, new development to provide sufficient infrastructure;
5. Changing Working Practices: Our future need for employment land - Economic forecasts to be re-examined and proposed allocations reviewed, collaborative assessment across a region, flexible workplaces for remote workers to be located in retail and town centres;
6. Re-awakening Wales' tourism and cultural sectors - Tourism and culture opportunities that can deliver community benefits to be supported (especially in rural / coastal areas), positive way of reusing empty buildings, historic buildings or disused land as part of regen proposals, can attract and complement investment in communities, outdoor spaces to be carefully managed to allow associated businesses;
7. Green Infrastructure, Health and Well Being and Ecological Resilience - Prioritise addressing inequalities re access to quality green space, planning has a key role in securing green infrastructure (fundamental role in shaping places, sense of well-being, intrinsic to quality of spaces), preference for nature based solutions, relook at traditional / current uses of space, prioritise public realm opportunities for connecting with nature; and
8. Improving Air Quality and Soundscapes for Better Health and Well Being - Reconsider use of space to reduce exposure to pollution and take into account soundscape

assessment and good acoustic design - integral qualities of place. TAN 11 on 'Noise' being revised in line with PPW10.

- 1.4 Therefore, the purpose of this report is to assess the preparation of the Torfaen Replacement Local Development Plan (RLDP) in light of the current Covid-19 pandemic. This assessment evaluates the foundations of the Plan's strategic direction to determine whether the Vision, Strategic Objectives, Strategic Policies and supporting evidence base remain appropriate given the latest planning policy and emerging impacts of the pandemic. It also considers whether any updates and/or modifications to the evidence or RLDP Preferred Strategy are necessary to ensure the Plan remains sufficiently flexible to accommodate any potential eventualities.
- 1.5 The pandemic has caused delay in RLDP preparation, which will necessitate a Revised Delivery Agreement being approved / agreed. However, the Council remains committed to plan preparation and this assessment demonstrates that the overall direction of the RLDP still holds true, subject to minor flexibility amendments to ensure the RLDP Policies can respond to changing circumstances over the plan period.

2.0 INTRODUCTION

- 2.1 The Council is statutorily required, under Section 69 of the Planning and Compulsory Purchase Act 2004, to undertake a full review of the adopted LDP at intervals no longer than every 4 years from the date of adoption. The RLDP is now being prepared and will express, in land-use terms, the wellbeing objectives and priorities of Torfaen's Public Services Board's Well-being Plan. The RLDP will cover the period 2018-2033 and is currently progressing towards Preferred Strategy Consultation Stage (originally due to take place in March / April 2020).
- 2.2 To coincide with the RLDP Preferred Strategy consultation, the Council prepared the first stages of the Candidate Sites Assessment process. The draft Candidate Sites Assessment Report (draft CSAR - March 2020) incorporates Stage 1 (high-level assessment, Stage 2A (detailed planning assessment), Stage 2B (RLDP Objectives) and Stage 2B (Integrated Sustainability Appraisal). This draft document was due to be part of the public consultation planned for March / April 2020. When it became apparent that the public consultation would not be taking place at that time, due to the pandemic lockdown, and given the importance of feeding back information to site promoters, the Council made the draft CSAR documents available on its website with accompanying text to clarify that they were for information only pending the formal consultation being able to take place.
- 2.3 Similarly, emails (dated 16th April 2020) were sent to all those on the LDP consultation database and all site proposers updating them as to the postponement of the consultation and advising them on the availability of the draft Candidate Site Assessment Report (March 2020).
- 2.4 In the interim period, work on the Candidate Sites Assessment has progressed with Stage 2C (External Consultation) currently underway and various communications with site proposers of both strategic and non-strategic sites. A Brief has been produced to inform site proposers of the Council's expectations with regards producing a masterplan for potential sites and, along with Green Infrastructure Opportunities Maps and Renewable Energy Statements for the strategic sites, this has been forwarded to site proposers of those sites remaining within the Candidate Site Assessment process.
- 2.5 The Council has also progressed work on Stage 2D (Viability Appraisal) with the receipt of the jointly procured Development Viability Model (DVM) produced by Burrows-Hutchinson Ltd and preliminary arrangements for the Viability Steering Group that will inform its inputs. This will be a key area of work to address the potential impacts of Covid-19 and ensure that proposed sites are deliverable within the current economic climate as well as allowing for flexibility for future improved circumstances.

3.0 EVIDENCE BASE ASSESSMENT

3.1 Table 1 below contains an assessment of the supporting evidence base that fed into the RLDP Preferred Strategy, to identify any documents that may have been affected by the current pandemic and thus may need reviewing / updating. Table 1 also contains information on supporting evidence currently being produced or to be prepared shortly to inform the Deposit RLDP. In summary, the Assessment shows that the majority of this evidence is considered robust / still valid, and does not need to be updated or reviewed at this time; or the impacts of the current pandemic can be assessed in evidence yet to be updated or produced.

Table 1: Torfaen RLDP - Evidence Base Assessment

Supporting Evidence	Purpose	Sensitivity to the Consequences of the Pandemic
RLDP: Preferred Strategy Documents		
Adopted Torfaen LDP Review Report (April 2018)	To set out the effectiveness of and proposed extent of likely changes to the Adopted Torfaen LDP (2006-2021) and to confirm the full revision procedure to be followed in preparing the Replacement LDP.	The Review Report primarily relates to the effectiveness of the Adopted LDP and the decision to commence a review. It is not considered integral to the proposed Preferred Strategy; therefore, a review to consider the impacts of the pandemic is not necessary.
Torfaen RLDP Revised Delivery Agreement (March 2020)	To provide a timetable for preparing the Torfaen RLDP and to set out in the Community Involvement Scheme (CIS) how consultation and engagement will be undertaken.	The pandemic will necessitate a further revised DA being agreed by the Council / Minister - including an extension to the existing Timetable due to delays in safely consulting on the Preferred Strategy and alterations to the CIS to take account of the restrictions imposed by the pandemic itself. These alterations could include a longer consultation period with enhanced online participation methods, telephone appointments and socially distanced meetings / exhibitions in appropriate settings, etc.
Report of Pre-Deposit Participation: Torfaen RLDP Preferred Strategy (March 2020)	Sets out a summary of the information used and the comments received in relation to the growth and spatial options consultation workshops with key stakeholders, together with a summary of the Council's response.	As this Assessment has identified the implications of the pandemic and concludes that the RLDP Preferred Strategy remains appropriate to address Torfaen's issues and establish a policy framework in response, it is considered this factual report remains valid. Therefore, key stakeholders do not need to be re-consulted at this time. Furthermore, it is recognised that everyone will be able to comment on the Preferred Strategy and supporting evidence in due course and key stakeholders will be able to feed into the detailed policies of the Deposit Plan in 2021. All of which will be detailed in the resultant factual 'Report

		of Consultation on the RLDP Preferred Strategy' in 2021.
Integrated Sustainability Appraisal (ISA) Scoping Report (April 2019)	Updated to take account of responses from a targeted consultation, this sets out the background for the ISA process that will be followed throughout the RLDP preparation process and considers the characteristics of the RLDP area through a review of relevant plans, policies & programmes, and baseline information.	This establishes the scope of the ISA process to be followed throughout the RLDP preparation process, which will not change because of the pandemic as it is set by legislation and WG guidance. Similarly, under this process, a review of relevant plans, policies & programmes, and baseline information has already been carried out for the Preferred Strategy and will be carried out for the Deposit RLDP in due course. Therefore, a review of the ISA Scoping Report due to implications of the pandemic is not considered necessary, as it reflects the position at that point in time.
Integrated Sustainability Appraisal (ISA) of the Torfaen RLDP Preferred Strategy (February 2020)	<p>ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WFG) matters.</p> <p>ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. This is done by considering the likely significant effects (either positive, neutral or negative) of a range of reasonable Plan alternatives (mainly the level and distribution of growth) against the 'ISA Framework' (which is a list of agreed sustainability 'themes' and associated 'objectives'). In addition, the 'better performing' Candidate Sites (as identified in the draft CSAR) that have the potential to be included in the RLDP are also assessed under the ISA Framework.</p> <p>The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the development plan's contribution to sustainable development.</p>	<p>The ISA Report assesses the Preferred Strategy and the 'better performing' Candidate Sites against the sustainability themes (listed below) and objectives of the 'ISA Framework'; which after considering the implications of the pandemic are still considered valid and do not need to be revisited:-</p> <ul style="list-style-type: none"> ▪ Economy & Employment; ▪ Population & Communities; ▪ Health & Well-being; ▪ Equalities, Diversity & Social Inclusion; ▪ Transport & Movement; ▪ Natural Resources; ▪ Biodiversity & Geodiversity; ▪ Historic Environment; ▪ Landscape; ▪ Climate Change; and ▪ Flood Risk. <p>Similarly, as the 'better performing' Candidate Sites have not changed and the RLDP Preferred Strategy, after considering the implications of the pandemic, is still considered the appropriate policy response to addressing Torfaen's issues and establishing a policy framework that facilitates the creation of sustainable communities. Therefore, the ISA Report remains valid, and a review because of the pandemic is not considered necessary.</p>
Habitats Regulations Appraisal (HRA) Initial Screening	Updated to take account of responses from a targeted consultation, this outlines the requirement to undertake a HRA in respect of the RLDP and	This is a process based document rather than assessing the contents of the Preferred Strategy. Therefore, a

Report (February 2019)	identifies the relevant European sites for consideration within the HRA process.	review because of the pandemic is not considered necessary.
Habitats Regulation Assessment (HRA) of the Torfaen RLDP Preferred Strategy (March 2020)	<p>To identify any aspects of the Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.</p> <p>However, given its relatively early stage the RLDP does not yet set out the full list of the specific site allocations nor detailed policy wording. As such, the Appropriate Assessment (the second stage of the HRA process) of some of the impact pathways was deferred to the Deposit Plan HRA and areas of further work are identified to inform that HRA.</p>	The HRA Report assesses the Preferred Strategy against an agreed HRA framework. As the Preferred Strategy is still considered to be the appropriate policy response to addressing the Borough's issues and establishing a policy framework that facilitates the creation of sustainable communities, this report remains valid.
Updated Candidate Site Register (March 2020)	A record of sites submitted by land-owners, developers, the public and planning officers, which will be used as a reference point to assess each site against National Policy and the Strategy for possible inclusion within the RLDP.	As this document is a factual register of sites submitted during the first call for candidate sites, no Covid-19 review is necessary.
Draft Candidate Sites Assessment Reports (draft CSAR) (March 2020)	<p>A staged (Stages 1, 2A and 2B) assessment of the 100 Candidate Sites submitted at the end of 2019. The CSAR has been published in draft to allow site proposers to submit further supporting information during the 'Second Call for Candidate Sites exercise' alongside consultation on the RLDP Preferred Strategy, which will be used by the Council to review the site against these stages.</p> <p>Stage 1 comprised a high level review of each of the sites to establish any sites which were subject to 'insurmountable constraints'; such sites were rejected at Stage 1 with no further consideration by the Council.</p> <p>The 58 remaining sites that were determined to be suitable for detailed assessment proceeded to Stage 2A; which involved a more thorough consideration of each site by internal Officers (comprising Planning, Highways, Ecology, Landscape,</p>	<p>The staged Candidate Site Assessment methodology, being based upon national policy, is still considered appropriate in the light of the pandemic, although the pandemic has caused a delay in undertaking the 2nd Call exercise; which would have allowed new sites to be submitted and for the public to comment on the submitted sites.</p> <p>The Council is currently working on the Stage 2C (external consultation with relevant statutory agencies) and 2D (viability assessment) Assessments of the most promising sites following the Stage 2A & 2B Assessments. The stage 2C assessments are not considered to be affected by the pandemic, as they are to gather information on constraints or issues; and any effects of the pandemic on viability can be taken into account in the future Stage 2D assessments.</p>

	<p>Environmental Health, Conservation, Drainage and Education) resulting in an overall conclusion based upon the principles of sustainable placemaking, the nature and degree of any constraints and the likelihood of deliverability.</p> <p>The sites which were considered to have merit in further consideration were subject to the Stage 2B Assessment. This was a two part appraisal, firstly against the RLDP Objectives and secondly against the Integrated Sustainability Appraisal Themes / Objectives.</p>	<p>Stage 3 will consider the degree to which the site is in accordance with the Plan Strategy, and will be undertaken to inform the Deposit RLDP.</p> <p>Therefore, the future Candidate Sites Assessment Report and process is not considered to be affected by the pandemic.</p>
<p>Torfaen Employment Land Study (ELS) (March 2020) and 'Advice Relating to Implications of Covid-19 Impacts' (Sept 2020)</p>	<p>In-line with Welsh Government Guidance, this Study provides an evidence-based assessment of the supply and demand for employment land in the County Borough, looking at the available employment allocations and existing employment areas and reviews the property market, consults with local stakeholders and forecasts employment growth to understand employment land requirements for the Plan period, whilst also making policy / land allocation recommendations to inform emerging policies and site allocations.</p>	<p>The consultant who produced this study has undertaken a review to assess the implications of the pandemic. In summary, this has shown:-</p> <p>Covid-19 is still an ongoing situation and therefore much of the actual, near-term impacts have yet to be fully realised and the economic data (which has a lag time) has yet to fully emerge. The impacts over the longer term (such as the planning period for the RLDP) are less certain, most pertinently in relation to the upward curve of the economic recovery from the recession in the medium term following the pandemic.</p> <p>In Torfaen, the number of people claiming out of work benefits nearly doubled from March to July, from 2,035 to 3,735, rising from 3.6 percent to 6.6 percent of the 16-64 year old population; which is above the Welsh average and the 7th highest in Wales (of 22 LAs).</p> <p>The Coronavirus Job Retention Scheme (furlough scheme) has protected some jobs during the lockdown, including in Torfaen. Unemployment would be higher if not for the scheme; therefore, the number and proportion of claimants would be higher. For August 2020, some 12,300 jobs were furloughed in Torfaen, approximately 30 percent of eligible jobs. This was in line with the Welsh average of 31 percent.</p> <p>Across Wales, the employment sectors with the largest proportions of their jobs furloughed were</p>

	<p>accommodation and food services (78%), arts, entertainment, recreation and other services (77%) and construction (62%). By business sector, Torfaen is not particularly dependant on these sectors, such as accommodation and food services (4.7%), arts, etc. (3.3%) and construction (5.4%) in 2018.</p> <p>By comparison, the largest employment sectors in Torfaen, in 2018, were manufacturing and health, which accounted for 18.8% of employment each. Across Wales 42% of the manufacturing workforce has been furloughed, but only 9.0% of the health workforce has been furloughed.</p> <p>As regard the different B-Class Employment uses, which have informed the ELS the consultant considers:-</p> <p><u>B1 offices</u> - During the lockdown, office-based firms have adjusted to being able to work remotely. Some businesses have already indicated that they will change the way their offices function, with a higher degree of home working. However, this is not uniform, and there will still be demand for office space. Changing workplace expectations in regard to safety and social distancing will mean that businesses will be looking for larger floor plates to enable distance between workers and team bubbles. Therefore, there are differing forces impacting on the market in different directions, including demand for increased space and demand for smaller space as higher percentages of workers work remotely. Generally, the need for face-to-face interactions, the creative and innovation benefits of an active office environment and the mental health benefits of socialising with colleagues and separating home and work environments for office-based businesses will mean that an office presence will still be the norm, for at least part of a working week. Offices with higher levels of parking (e.g. business park, rather than city centre location) may be seen as more attractive if staff are reluctant to use public transport, or are actively discouraged from using public</p>
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		<p>transport, over a prolonged period of time due to the risk of catching the virus and the restrictions on travel. For Torfaen, this may be manifested in some businesses looking for office premises outside of Cardiff, into a business park with higher levels of car parking. However, this is likely to be a minor uplift in local demand, strongly focused in Cwmbran, if observed at all.</p> <p><u>B2 General Industry</u> - Throughout the UK some manufacturing businesses have reduced or closed their operations, though many others have remained open, deemed essential businesses. Those that have reduced operations are beginning to scale back up as restrictions ease. Manufacturers providing medical equipment and some household staples have seen substantially increased operations, driven by spikes in demand and difficulties in accessing comparable products from overseas. However, manufacturers in vulnerable sectors, such as aviation and automotive, have experienced severe negative impacts, with several major brands announcing substantial job reductions (e.g. Airbus, Rolls Royce). Several of Torfaen's largest employers, including Meritor, TRW Automotive / ZF Friedrichshafen and Trico are in automotive sectors and could be vulnerable to a sustained downturn in production. Conversely, prospects for a 'Medi Park' at Grange University Hospital must surely be strengthened, as the UK increases both medical research activities and the production of medical equipment and Personal Protective Equipment in the face of the pandemic. In general, the demand for industrial premises is likely to be influenced more by the health of the economy, rather than lockdown or social distancing restrictions. Therefore, the ability of the economy to bounce back from this economic shock will be critical for the demand for stock in Torfaen. Demand for B2 industrial premises was significant at the time of writing the ELS and once businesses regain confidence in the local economy, it would be expected that such demand would return.</p>
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	<p>B8 Warehousing - For the logistics sector, there have been several urgent requirements throughout the UK for short-term storage and warehousing needs, including from the NHS, online retailers and supermarkets. However, with a likely sustained increase to online retailing and a recognition that further capacity in supply chains is needed, it is expected that demand in this sector will continue to be buoyant. In Torfaen, employment locations linked to the main A4042 and A472 corridors, which can provide logistics premises are likely to be seen as more attractive in the current and emerging market. In the ELS, it was noted that Cwmbran is well integrated into the B2/B8 property market of the M4 corridor and enjoys the particular advantage of being east of the congested Brynglas Tunnels, a desirable location for companies seeking unconstrained HGV access to England.</p> <p>In reviewing the Torfaen ELS, the consultant has concluded that the following ten recommendations remain valid and appropriate:-</p> <ol style="list-style-type: none"> 1. using the past take-up rate methodology, the future employment land need of 14.12ha to 2033, including a buffer; and a recommendation that sites be planned for in a flexible manner that would enable a range of employment uses as appropriate; 2. definition of 26.33ha of available Employment Land Provision to be allocated in the RLDP still valid; 3. existing employment areas to be protected, and even if a prolonged recession occurs there is no justification for large scale losses of stock which may be needed again once growth returns and restrictions on business operation are removed; 4. existing Employment Area Protection recommendations to allow flexibility by allowing relevant non B Use Classes in 'Secondary', 'Key Local' & 'Neighbourhood Sites'; 5. allocating above the Minimum Need Level - with a further 20-30ha being allocated in the RLDP to
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		<p>2033 to service the strong demand for larger industrial units in the County Borough, specifically B2/B8 units of 1,500-2,000m² and then large regional inward investment requirements of 10,000m²; allow local business to grow and/or acquire more modern and efficient facilities; to meet the focus of demand in Cwmbran and to a lesser extent Pontypool; and offset companies displaced by the permitted redevelopment at Mamhilad Park Estate;</p> <ol style="list-style-type: none"> 6. existing employment allocation sites to be retained for employment uses; 7. protecting Strategic Land - at Craig y Felin (10ha); 8. prioritise delivery of employment sites - the Council may wish to take a more active role than previously envisaged, in working with landholders to try to bring sites forward, as a means of stimulating the local economy and improving confidence. Unlocking the sites through the funding of key infrastructure, in partnership with Welsh Government, may be means of delivering some of the larger sites more quickly; 9. future reviews of employment land need; and 10. maintain awareness of external influences. <p>Therefore, in conclusion, the consultant considered that the recommendations of the Torfaen ELS remain appropriate, most critically, the overall forecast for employment land need to 2033 and the recommendation to allocate employment land above baseline needs. The uncertainty in the market at present highlights the need for any planning for employment land to provide flexibility to adapt to change, whether through incorporating a buffer of additional land in the forecast calculations or enabling a range of employment uses to be provided on the allocated sites.</p>
<p>Regional Employment Study (RES) - Larger Than Local Study</p>	<p>The report addresses the issues of employment land on a regional basis and covers five local authorities: - Monmouthshire, Blaenau Gwent, Torfaen, Caerphilly and Newport. It is</p>	<p>As stated above the consultant has undertaken a review of the RES to assess the implications of the pandemic; and concluded that the</p>

<p>(March 2020) and 'Advice Relating to Implications of Covid-19 Impacts' (Sept 2020)</p>	<p>made up of two main sections: looking at the economic evidence base and the property and employment land market in the larger than local area. The study has had regard to the relevant policies at the national, regional and local levels. The economic assessment has presented the quantitative evidence on demographics, labour market, current and future state of the economy. The property and employment land assessment has reviewed the current market characteristics of the commercial property sector (transactions volumes, locations, supply) and the availability of allocated employment sites, drawing on the supply detailed in the Local Development Plans (LDPs) of each of the constituent local authority areas.</p>	<p>following five recommendations remain valid and appropriate:-</p> <ol style="list-style-type: none"> 1. continue to plan at the larger than local level; 2. using the past take-up rate methodology, future employment land need of 275.4 ha to 2040, including a buffer; with B2/B8 uses still likely to predominate over B1 uses; 3. definition of 'Strategic' employment sites still valid; 4. allocation of further employment sites in Caerphilly (20.4ha), Monmouthshire (14.4ha) and Torfaen (4.3ha); noting that changing market conditions may increase the demand for B8 warehousing over other uses; and 5. the primacy of Newport City Centre, with a particular focus for high grade, corporate offices.
<p>Torfaen Sustainable Settlement Assessment (March 2020)</p>	<p>To identify which of Torfaen's 5 settlements are potentially suitable to accommodate future growth in terms of their location, role and function. In order to effectively assess this, an audit of existing services and facilities was undertaken within each settlement, based on the 3 principles set out below:-</p> <ol style="list-style-type: none"> 1. The level of sustainable transport and accessibility in and around settlements; 2. The availability of local facilities and services in and around settlements; and 3. The level of employment opportunities in and around settlements. <p>As a result, taking account of settlement size, it sets out a settlement hierarchy arising from the assessment to inform the RLDP Strategy and Policies.</p>	<p>No impact, although the pandemic and latest policy guidance has reaffirmed the importance of directing growth towards sustainable settlements capable of expanding in a manner conducive to placemaking principles.</p>
<p>Monmouthshire, Blaenau Gwent and Torfaen LDP Demographic Evidence (June 2019)</p> <p>Torfaen Demographic Evidence</p>	<p>This consultant's report considers the impact of demographic, housing and employment change in the three Unitary Authorities (UAs); Blaenau Gwent, Monmouthshire and Torfaen. Alternative scenarios using different migration assumptions and past housing completion rates are developed and compared to the WG 2014-based 'benchmark' scenario, allowing for sensitivity analysis where</p>	<p>An updated Demographic Report has just been completed using the latest WG 2018-based household projections rather than the 2014-based projections previously used.</p> <p>This latest Report is showing that over the plan period (2018-2033), the WG 'Principle Projections' have increased from 118 people / 1,169 households / 0.1% growth (2014-based) to 3,169 people / 2,200 households / 3.4%</p>

<p>Addendum Report (November 2019)</p> <p>Torfaen LDP Demographics (September 2020)</p>	<p>relevant. The potential employment growth that could be supported by the demographic and dwelling-led scenarios is also set out. The report provides the three Councils with a suite of population, housing and economic growth outcomes to consider in the formulation of their RLDPs.</p> <p>The 2019 Addendum Report provided information on two further Dwelling-led growth scenarios (300 / 320 dpa) for Torfaen.</p> <p>The 2020 Report updated many of the Torfaen growth scenarios using the latest WG 2018-based population projections.</p>	<p>growth (2018-based). These WG projections would respectively equate to a need for 81 or 153 dwellings p.a. during the Plan Period (or 1,215 / 2,295 dwellings respectively in total). Other growth scenarios have been updated using the 2018-based data; including the 'WG 2018-based High & Low Variant Projections', the 'Short and Long Term Trend Based', the 'Long Term Adjusted', the '300 and 320 Dwelling Led' scenarios, and an Employment-led (Oxford Economics) scenario.</p> <p>As regards the impact of the pandemic, the consultant has stated, <i>"Currently, there is insufficient evidence to inform an assessment of the Covid-19 impact upon long term demographic trends. The latest scenario evidence provides a timely and robust suite of outcomes from which Torfaen Council can consider its LDP options, reviewed and scrutinised in the light of social, economic and demographic changes that will result from the post Covid-19 recovery."</i></p> <p>Notwithstanding this, the RLDP Preferred Strategy recognised that, due to extant / expected residential planning permissions and current housebuilding rates, the WG projection based dwelling numbers would be exceeded in any event (i.e. 3,194 dwellings at April 2019). Therefore, in the context of delivering the RLDP's Strategy, Vision, Aims and Objectives, a policy choice was made to set a 320 dwelling p.a. (4,800 dwellings in total) housing target in the Preferred Strategy.</p>
<p>Torfaen Local Housing Market Assessment (August 2017) (being updated)</p>	<p>Provides a detailed insight into the local housing markets across the County Borough. It includes a quantitative assessment of housing need that will be used to inform the housing policies of the RLDP in terms of affordable housing provision, tenures and types of accommodation required.</p>	<p>An updated 2020 Torfaen LHMA is currently being prepared to feed into the Deposit RLDP and be ready to support requests for affordable housing during the post LDP 'drop-dead date' period. This will re-assess local trends, the social and intermediate housing registers waiting lists and the recently published 2018 based household projections.</p> <p>The 2020 LHMA update will reflect the short-term implications of the pandemic to date as issues such as increase in social housing need feed directly into the study.</p>

		<p>The issue of housing affordability is likely to be exacerbated by the pandemic over a longer term, which is likely to increase unemployment, and there are potential issues for first time buyers as mortgage deposits are starting to rise from 5% to 10%, etc. Although, currently there are no indication of house price reductions to counteract this; and it is noted that recent Land Transaction Tax (stamp duty) reductions should also help.</p> <p>Finally, it is also noted that the LHMA will be updated again (probably in 2021) following the publication of new WG Guidance on their production expected at the end of 2020; at which time the longer term implications of the pandemic are likely to be more apparent.</p>
Housing Background Paper (March 2020)	Identifies the amount of land the Council will be required to allocate for housing in the RLDP in order to meet the proposed level of growth. This process involves analysing the various components of housing supply, plus extant allocations that can be 'rolled forward' to the Replacement Plan. This paper analyses each component of housing supply in more detail before arriving at a new housing allocations provision based on the methodology detailed within the Welsh Government Development Plans Manual Edition 3 (March 2020).	As the Preferred Strategy is still considered to be the appropriate policy response to addressing Torfaen's issues and establishing a policy framework that facilitates the creation of sustainable communities, this report remains valid.
Torfaen's Active Travel Integrated Network Map	These plans detail a network of Active Travel routes and facilities proposed over the next 15 years. These are found in the Integrated Network Maps (INMs). The proposals aim to: enhance access to key services and facilities including town centres, transport hubs, as well as employment and retail areas; develop access to education facilities such as schools and colleges; and improve and expand the existing strategic connectivity network throughout the County Borough.	The pandemic has demonstrated even greater reliance on active travel to access local services and recalibration of peoples work / life balance. The RLDP will remain committed to enhancing the active travel network to this end.
Evidence Currently in Preparation or to be Prepared		
Draft Torfaen Gypsy and Traveller Accommodation Assessment (GTAA) (February 2020)	To assess the future accommodation needs of the Gypsy & Traveller and Travelling Show People Communities and determine whether there is a requirement for additional site provision within the County Borough. This will inform any related site	The latest Assessment was completed and submitted to the Welsh Minister in February 2020 before the Covid-19 lockdown; noting that it was prepared in accordance with WG Guidance and is considered to not be affected by the pandemic

	allocations and criteria based policies in the RLDP.	
'Gwent' & Torfaen Renewable & Low Carbon Energy Assessments (anticipated Sept 2020)	These Studies assess the region's and County's renewable energy resource against an assessment methodology established by Welsh Government. They will identify preferred areas for renewable energy schemes and suggested targets for inclusion in the RLDP. This is the first stage in the process with further refinement to follow through key stakeholder / Member engagement.	The assessment methodology for these studies is established in Welsh Government guidance and is not considered to be affected by the pandemic. Continuation of the work is considered appropriate.
Torfaen RLDP: Plan / Site Level Viability Assessments (ongoing)	This work establishes a development viability model with two key outputs in terms of 'tools' for the assessment of viability. These are Site-Specific Development Viability Model ("DVM") for the appraisal of specific proposals; and the High Level Regional Viability Model ("RVM") used primarily to understand the levels of affordable housing and S106 contributions that are likely to be viable on windfall sites and set affordable housing policy thresholds.	Work on the local viability assessment (high-level viability model) is at a very early stage. Its findings and recommendations are going to be central to viability issues within the Deposit RLDP and site allocations through the Candidate Site process. The continuation of this work is considered appropriate, as any potential effects of the pandemic (such as house price, build rates, etc.) can be taken into account in the modelling.
Torfaen Settlement Boundary Review (ongoing)	The review looks at the current development boundaries of settlements identified in the Sustainable Settlement Appraisal as being potentially suitable to accommodate future housing and employment growth in terms of their location, role and function. The assessment aims to ensure that these boundaries remain up to date and that there is a consistency of methodology to development boundary definition, based on National Policy based criteria.	Work on the settlement boundary is ongoing and will continue to inform policies in the Deposit RLDP. The pandemic is not considered to have affected the suitability of the assessment methodology and continuation of this work is considered appropriate.
Green Wedge Review	Monmouthshire, Torfaen, Newport and Blaenau Gwent Councils are currently exploring a joint review of green wedge allocations to inform their RLDPs. The purpose of the commission is to review the appropriateness and extent of existing green wedge allocations and assess the need for any new green wedges.	Work has yet to commence on this piece of evidence. However, the purpose and function of the Green Wedge as set out in PPW10 is not considered to be affected by the pandemic. The commencement of this assessment with a view to informing the Deposit RLDP is considered acceptable.
Torfaen Town Centres & Retail Study (ongoing)	This study is currently being undertaken which will provide:- 1. A review of retail and town centre trends; 2. An overview of the retail hierarchy in Torfaen and summary of external influences in surrounding administrative areas;	Work on this study, including the 1,000 household surveys, was commenced before the Covid-19 lockdown and will be completed in time to inform the Deposit RLDP. It is noted that the latest WG guidance (to be read in conjunction with PPW10) 'Building Better Places' (July 2020)

	<ol style="list-style-type: none"> 3. A review of the health of the three main town centres in Torfaen; 4. An assessment of the need for additional retail floor-space across Torfaen; 5. An assessment of potential (re)development sites to accommodate the scale and type of identified need; and 6. A Summary and conclusions (including recommended retail and town centres strategy). 	<p>states that Retail Studies should no longer be limited to retail uses but should address a much wider remit of appropriate town centre uses to effectively become Town Centre Studies; and this study will take this and the impacts of the pandemic into account. Therefore, it is concluded that no further action is required.</p> <p>The Deposit RLDP will contain detailed town centre / retail policies which will take account of this study and other work being undertaken by the Council's Regeneration Service on town centres and also be informed by key stakeholder workshop(s).</p>
<p>Torfaen Infrastructure Plan (IP) (ongoing)</p>	<p>The DPMv3 advises on the production of an 'Infrastructure Plan' to ensure development is served by the necessary infrastructure, which should be assessed and identified to demonstrate how the plan can deliver the necessary infrastructure, in the right place, by the right body, at an appropriate time.</p>	<p>Utility companies have been involved from an early stage in the development of the Preferred Strategy to ensure consistency with their programmes. For example, liaison has taken place between officers and Western Power and Welsh Water, with more detailed discussions currently being undertaken as part of the Stage 2C assessment of candidate sites to inform the preparation of the Deposit RLDP and associated Infrastructure Plan and draft Development Briefs.</p> <p>Ongoing liaison with the relevant infrastructure providers will help highlight if improvements are required in some areas due to the pandemic, e.g. transport, broadband, etc.</p>
<p>Integrated Planning & Transport Strategy (IPTS) (ongoing)</p>	<p>PPW10 advises that an IPTS should be developed which is consistent with Local Transport Plans, the Wales Transport Strategy and the National Transport Finance Plan. An IPTS <i>"should set out how the planning authority will: integrate and co-ordinate sustainable transport and land use planning; facilitate and promote accessibility for all; reduce the need to travel; reduce dependency on private vehicles; prioritise and support walking, cycling and use of public transport; support the uptake of Ultra Low Emission Vehicles; reduce transport related airborne pollution; and facilitate the provision of transport infrastructure and necessary sustainable transport improvements and development."</i> and <i>"Where significant travel patterns cross local authority boundaries, development</i></p>	<p>It is considered that when the Torfaen IPTS is produced to inform the Deposit RLDP, the impacts of the pandemic can be taken into account.</p>

	<i>plan strategies and LTPs must be co-ordinated and regional working encouraged.”</i>	
Torfaen Green Infrastructure Assessment (ongoing)	<p>Green Infrastructure Assessments produce up-to-date inventories and maps of existing green infrastructure and ecological assets and networks.</p> <p>They should be used to develop a robust approach to enhancing biodiversity, increasing ecological resilience and improving well-being outcomes. They also identify key strategic opportunities where the restoration, maintenance, creation or connection of green features and functions would deliver the most significant benefits.</p>	<p>The Torfaen Green Infrastructure Assessment is currently being prepared to inform the Deposit RLDP. These assessments are considered factual assessments not affected by the pandemic.</p> <p>However, it is noted that, because of the pandemic, there is an increased emphasis on the importance of the ecosystem services provided by Green Infrastructure, both within walking distance and further afield.</p>
Strategic Flood Consequence Assessment (SFCA) (ongoing)	<p>It is proposed to undertake the SFCA in a two phased approach as considered necessary by each LPA in the sub-region:</p> <p>Step A: LPAs work together in / across catchment areas to commission work on the high level impacts on flood risk and opportunities for mitigation / management; then</p> <p>Step B: Undertake a local assessment to influence the RLDP and assess candidate sites.</p>	<p>Work has commenced with our LPA partners, in consultation with NRW on exploring a sub-regional approach to undertaking an SFCA. The proposed assessment methodology, linked to river catchment areas is not affected by the pandemic, therefore, continuation of the work is considered appropriate to inform the Deposit RLDP.</p>
Aggregates: Gwent Sub-Regional Statement of Collaboration (anticipated Qtr4 2020)	<p>Awaiting the imminent publication of the SWRAWP Regional Technical Statement: 2nd Review (RTS2) and its associated aggregate mineral apportionment for each MPA - for endorsement by the constituent MPAs and the Welsh Minister.</p> <p>Upon publication of the RTS2, officers will commence work with its sub-regional partners, made up of Torfaen, Newport, Blaenau Gwent and Monmouthshire, to prepare a 'Gwent Sub-Regional Statement of Collaboration' on aggregate apportionments.</p>	<p>Given that the RTS2 is based upon 'using current LDP housing targets a proxy for aggregate consumption in order to encourage a more sustainable pattern of supply based upon sub-regions to inform these aggregate apportionments', it is not affected by the pandemic and continuation of the work is considered appropriate to inform the Deposit RLDP.</p>

4.0 TORFAEN RLDP: PREFERRED STRATEGY ASSESSMENT - Issues, Vision & Objectives and Strategic Policies

4.1 **Issues** - The Torfaen RLDP Preferred Strategy 'key' issues, challenges and drivers (detailed in Chapter 3 of the Preferred Strategy) are listed in Table 2A below, with an accompanying assessment of any Covid-19 implications.

Table 2A: Torfaen RLDP Preferred Strategy - Assessment of Key Issues

Key Issue	Covid-19 Implications
Economic	
Need for Employment Land & Premises	Probably due to the pandemic, Torfaen is seeing some unfortunate job losses as companies reduce their workforce, but generally, they thankfully remain in business and in occupation of their premises. In addition, it is too early to fully understand the longer-term impact of the pandemic. But clearly, there is now an increased need for the RLDP to create opportunities for even more new jobs to compensate for these job losses and enable the economic recovery; and thus there is still a need to protect employment land / premises and allocate / enable the development of new employment sites; as well as capitalising on the opportunities of the new Llanfrechfa Grange Hospital, Torfaen's strategic location and the potential of 'new growth industries' such as med-tech, logistics / home delivery, 'green' technologies, the local foundation economy, etc. Therefore, this issue remains valid and no further action required. However, it is recommended that a new issue on the 'Impacts of Covid-19 and enabling the recovery' needs to be added - see Table 2B below for details.
Employers leaving	As stated above, at this time the pandemic generally has not resulted in companies closing; however, the issue of companies relocating to nearby Authorities due to a lack of sites / premises to expand in Torfaen is still occurring. Therefore, this issue remains valid and no further action is required.
Good Location	Issue still valid and no impact from pandemic forecast. However, need to maximise potential of employment sites / premises in Cwmbran / South Pontypool as strategic employment locations to maximise job growth / retention. Therefore, no further action required.
Commuting to Work	Potential for positive impact of pandemic due to more home working in the long term; but potential for negative impacts as people who have lost their job potentially travel further to obtain employment - unless new jobs can be created in Torfaen. Therefore, it is recommended that this issue be updated accordingly.
Town Centres	Given the continuing trend and potential for high street retail closures / accelerated growth of online shopping due to the pandemic, there is a need for town centres to address a wider set of uses than traditional retail and become community centres / hubs of activity including remote working opportunities, etc. However, whilst this need for the diversification of town centres was already known, it was not clearly articulated in the issue. Therefore, it is recommended that this issue be updated to recognise the wider future roles of town centres.
WG Transport Strategy & Investment	The current WG Transport Strategy (2008) is currently being reviewed, but no consultation document has been published to date. However, the Welsh Government has recently awarded Torfaen £1,373,500 (against a £2.1m bid) to fund local sustainable transport measures (a plethora of walking, cycling and active travel schemes and temporary low-cost solutions to reallocate road space in favour of sustainable forms of transport) in response to Covid-19. Indeed, there

	<p>has been an upsurge in these modes of transport because of the pandemic.</p> <p>However, public transport usage is currently down by the need to observe social distancing on buses and reduced demand from workers, etc. (which has the potential for more car journeys; tempered by more home working / deliveries); noting that all bus services in Torfaen have been maintained, some at reduced frequencies. In addition, it is currently predicted that it could take up to 4 years for bus usage to return to pre-pandemic levels. Furthermore, WG have recently announced a £10m fund to support public transport, which Torfaen is expected to benefit from.</p> <p>In conclusion, the preceding paragraphs maybe an indication of how WG policy / expenditure may change in the future, but until more is known, it is considered that this issue currently remains valid and no further action is required.</p>
Traffic Issues	As above and noting that levels of vehicular traffic is currently reduced by the pandemic and we will not know its full impact until things return to the new normal, which is unknown at this time. Therefore, it is recommended that this key issue be updated accordingly.
Addressing Traffic Issues	As above and noting that, as the mitigation measures to address the traffic issues remain valid, i.e. <i>“encouraging ‘modal shift’ and ‘active travel’, changing from using petrol / diesel vehicles to electric vehicles and public transport, park and ride, walking and cycling; as well as shifting freight from road to rail”</i> . Therefore, no further action is required.
Public Transport	As noted above - as there has been an impact of the pandemic on public transport it is recommended that this key issue be updated accordingly.
Minerals	There is currently less demand for aggregates in short term due to the pandemic but it remains necessary for supply to be available to support the longer-term recovery and associated infrastructure investment. Therefore, as this issue relates to the need to implement the recommendations of the Regional Technical Statement 2 nd Review on Aggregates, no further action is required.
Environmental	
Air Quality	There are currently positive short-term air quality improvements from reduced economic activity / road traffic due to the pandemic (with traffic pollution levels down 30-65% (across 18 monitoring stations) compared to 2019 during the ‘lockdown’ in April / May). However, as the long-term trend over the Plan period is currently unknown and as the RLDP strategy aim to address the causes of poor air quality remain valid, it is considered that no further action is required.
Biodiversity, Flora & Fauna	As a result of the pandemic there are short-term positive impacts from reduced air pollution on this issue as identified above; and there is also increased appreciation and value for surrounding natural environments and habitats. However, this issue identifies that, in the RLDP, these assets need to be protected, conserved and enhanced from the potential effects of new development and climate change; whilst also improving connectivity, which remain valid. Therefore, it is considered that no further action is required.
Climate Change	As noted above (in traffic, air quality, etc.) whilst there are some impacts of the pandemic on climate change, this issue relates to the need to adapt to and mitigate against climate change, which is still considered valid, therefore, no further action is required.
Greenhouse Gas Emissions	As noted above (traffic, climate change, etc.) whilst there are some impacts of the pandemic on greenhouse gas emissions, this issue

	mainly relates to the need to move to a carbon zero future, which is still considered valid, therefore, no further action is required.
Renewable Energy	No impact associated with the pandemic anticipated, therefore, no further action required.
Flooding	No impact associated with the pandemic anticipated, therefore, no further action required.
Water	No impact associated with the pandemic anticipated, therefore, no further action required.
Agricultural Land Quality	No impact associated with the pandemic anticipated, therefore, no further action required.
Social	
Population Growth	No impact associated with the pandemic anticipated, therefore, no further action required.
Ageing Population	No impact associated with the pandemic anticipated, therefore, no further action required.
Deprivation	This issue is based upon the details of the 2014 Welsh Index of Multiple Deprivation (WIMD), which is updated every 4 to 5 years; the most recent Index was published in 2019. Therefore, the pandemic will not change the WIMD data for many years, at which time the medium term implications of the pandemic on the numerous indicators that feed into the index can be ascertained. Therefore, the issue remains valid, albeit it is recommend that the details of this issue be updated from the 2014 Index (as currently provided) to those of the 2019 Index.
Housing Delivery	This issue is about the overall UK, Welsh & regional demand for housing generally not being matched by the supply of new dwellings, which has not been changed by the pandemic. However, as regards supply whilst lockdown reduced the number of new properties being built, it is not known if the pandemic will change this in the longer term; anecdotally, our building control service have reported that they “are currently as busy as ever”, Therefore, subject to longer term monitoring, no further action required at this time.
House Prices	The issue of high and rising house prices in Torfaen has not been changed by the pandemic. Despite fears nationally that house prices may fall; anecdotally this is probably not the case locally, with estate agents reporting a surge in demand and a small rise in house prices as people move out of the cities for a bigger property with gardens, etc. and a ‘good’ location. However, a longer monitoring period is required to ascertain the impact of the pandemic on this issue; noting that it takes several months for house sale prices to appear in the Land Registry data. Therefore, subject to longer term monitoring, no further action required at this time.
Affordable Housing Stock / Waiting Lists	Again, it is too early to ascertain the impact of the pandemic on this matter; the fear is that affordable housing need will rise with increases in unemployment associated with the pandemic over time. However, during the pandemic, under WG Guidance, the Council has had to house all people presenting as homeless regardless of having a duty owed under the Housing Wales Act, which has significantly increased the higher demand categories on the housing waiting list. To some degree, the matter is being investigated in the 2020 Torfaen Local Housing Market Assessment (LHMA) currently being produced; which is likely to be revisited in 2021 as new WG Guidance on producing LHMA’s is expected at the end of 2020. At which time, the effects of the pandemic on this issue are likely to be more evident. Therefore, subject to longer term monitoring, no further action required at this time.
Affordable Housing Need by Location / Tenure	As stated above, the 2017 Torfaen LHMA is currently being updated in the 2020 Torfaen LHMA in time to inform the Deposit RLDP next year and future planning decisions. However, whilst the pandemic may

	affect the overall numbers of affordable housing need over time, the conclusions as regards the location of that need is likely to remain the same, i.e. 3% in North Torfaen, 24% in Pontypool and 73% in Cwmbran. Similarly, the current tenure split (i.e. 88% social rented / 12% intermediate) may change in any event, as that is generally a product of the 'ratio of earning v. house prices'; and whilst earnings haven't increased much since 2017, house prices have. Therefore, subject to the results of the 2020 Torfaen LHMA and longer-term monitoring, no further action required at this time.
Private Rented Sector (PRS)	Whilst no evidence has been found on the current level of PRS stock, it is assumed that the pandemic has not affected this issue on the lack of private rented properties in Torfaen when compared to Wales and the region. However, it is noted that landlords have not been able to serve 'Notices To Quit' for rent arrears etc. during lockdown, which is expected to increase significantly once the Courts open. In addition, recent Welsh Government rule changes mean that landlords have to give 6 months' notice for evictions, so the effect of the pandemic on the PRS is yet to be felt. Furthermore, the worry is that private landlords will withdraw their property from this sector as a result. Therefore, subject to longer term monitoring, no further action required at this time.
Gypsy & Travellers	No impact associated with the pandemic anticipated, therefore, no further action required.
Education	No impact associated with the pandemic anticipated, therefore, no further action required.
Green Infrastructure	This issue, which recognises the importance of green infrastructure, has not changed because of the pandemic; it has only increased its importance. Therefore, no further action required.
Access to Green Infrastructure	Similarly, this issue, which recognises the importance of securing access to, protecting and enhancing green infrastructure, has not changed because of the pandemic; it has only increased its importance. Therefore, no further action required.
Healthier Lifestyles	Similarly, the need to improve healthier lifestyle choices in Torfaen has not changed because of the pandemic; it has only increased its importance. Therefore, no further action required.
Cultural	
Welsh Language	No impact associated with the pandemic anticipated, therefore, no further action required.
Heritage Assets	No impact associated with the pandemic anticipated, therefore, no further action required.
Landscape Assets	No impact associated with the pandemic anticipated, therefore, no further action required.
Green Wedges (Belts)	No impact associated with the pandemic anticipated, therefore, no further action required.

4.2 In conclusion Table 2A above shows that, as regards the impacts of the pandemic, it is considered that the majority of 'Key Issues' identified in the RLDP Preferred Strategy remain valid and therefore no further action is required; a few have been recommended for updating (shown in bold text) and one new Key Issue has been recommended for inclusion. Therefore, Table 2B below identifies a new Key Issue, which is recommended to be inserted into the approved RLDP Preferred Strategy (March 2020):-

Table 2B: Torfaen RLDP Preferred Strategy - New Economic Key Issue

Economic
Impacts of Covid-19 and Enabling the Recovery - Probably due to the pandemic, Torfaen is seeing some unfortunate job losses as companies reduce their workforce, but generally, they thankfully remain in business and in occupation of their premises. In addition, it is too early to fully understand the longer-term impact of the pandemic. But clearly, there is now an increased need for the RLDP to create opportunities for even more new jobs to compensate for these job losses and enable the economic recovery; and thus there is still a need to protect employment land / premises and allocate / enable the development of new employment sites; as well as capitalising on the opportunities of the new Llanfrechfa Grange Hospital, Torfaen's strategic location and the potential of 'new growth industries', such as med-tech, logistics / home delivery, 'green' technologies, the local foundation economy, etc.

- 4.3 **Vision** - The Torfaen RLDP Preferred Strategy Vision states what the Plan sets out to accomplish by 2033 and reflects the ambitions and intentions of the land use policies within the Replacement Local Development Plan as follows:

At the eastern edge of the South Wales Valleys, Torfaen will be part of a Networked City Region supporting healthy, thriving communities and a sustainable prosperous economy in an outstanding historical, cultural and natural environment.

To achieve this: By 2033, through collaborative working, the development strategy for the Replacement Torfaen Local Development Plan will deliver sustainable growth that supports the wellbeing of current and future generations whilst responding to the challenges of climate change. It will provide a distinctive, vibrant and prosperous area for people to live work and visit and where people have the skills, knowledge and opportunities to achieve a better quality of life in safe, healthy and thriving communities with accessible green infrastructure and local facilities.

- 4.4 The above Vision, was arrived at through reviewing the current Torfaen LDP (2006-2021) Vision; and has taken account of the requirements of national, regional and local strategies (including the Torfaen Wellbeing Plan, 2018-2023), the 'Torfaen LDP Review Report' (April 2018), the Draft Sustainability Appraisal Scoping Report (April 2019), key issues and objectives, the background evidence, and pre-deposit participation with key stakeholders and Torfaen Councillors. It is considered that whilst certain elements of what the Plan is looking to achieve, such as provision of employment, enhancement of green infrastructure assets and maximising sustainable travel options may have been elevated in importance as a result of the pandemic, the overall statement of the RLDP Preferred Strategy Vision remains valid.
- 4.5 **Objectives** - The 17 Torfaen RLDP Preferred Strategy Objectives are detailed in Table 3 below, with an accompanying assessment of any Covid-19 implications. This assessment has shown that all of the current RLDP Objectives remain valid and none need to be changed, or any new ones added. Indeed, the main conclusion is that several objectives have gained in importance because of the Covid-19 pandemic, such as:-
- the need to create local employment / tourism opportunities, retain existing employers and promote flexible town centre uses to mitigate any short term job losses / recession and facilitate the economic recovery;

- the importance of placemaking, community facilities, green infrastructure, addressing climate change, etc. to health and well-being, etc.;
- the need for both market and affordable housing as people seek larger market properties with gardens, etc. and the potential for an increased affordable housing need if short-term job losses are not mitigated; and
- the importance of integrated and efficient transport infrastructure, public transport and broadband networks which encourage active travel and a reduction in private car use to build on changes as a result of the pandemic, such as more home working, increased levels of walking / cycling, etc.

4.6 **Strategic Policies** - The RLDP Preferred Strategy Strategic Policies are listed in Table 4 below, with an accompanying assessment of any Covid-19 implications. In summary, the conclusions are similar to those for the RLDP Objectives above, i.e. they remain valid and none need to be changed, or any new ones added because of the pandemic; with many gaining in importance.

4.7 In detail, it is considered the growth strategy of 50ha of employment land and a 4,800 dwellings (320 dpa) housing target remain valid, as well as their proposed spatial distribution across the three housing market areas within the County Borough. Similarly, the five housing and employment Strategic Sites remain valid (noting that County Hall has recently been permitted and no longer needs to be allocated in the Preferred Strategy).

4.8 The remaining Strategic Policies are generally set around promoting development for the better, which are also still considered valid; such as placemaking, green infrastructure, climate change, sustainable transport, etc., and making appropriate allocations for Gypsy & Travellers, aggregates, renewable energy, etc.

4.9 Finally, it is also recognised that many of the Preferred Strategy 'Strategic Policies' will be developed further in complimentary Deposit RLDP policies (the next stage of the RLDP preparation process) informed by new evidence (currently being prepared or to be produced shortly) that will take account of the pandemic.

Table 3: Torfaen RLDP Preferred Strategy - Assessment of Objectives

No.	RLDP Objectives	Covid-19 Implications
1	Employment - To ensure the protection and provision of an appropriate quantity and range of employment sites and retail, commercial and leisure opportunities to support high and stable levels of employment in Torfaen and deliver a competitive, modern and sustainable economy and thriving & diverse town centres, which support local needs and the foundation economy.	Objective remains valid and even more important given the expected implication of the pandemic on employment - short-term job losses / recession, followed by a recovery over time. No action required.
2	Community Facilities - To promote health and well-being through the provision of development including in the development sites and by providing accessible community facilities, leisure and outdoor recreational opportunities accessible to all, as well as the protection and maintenance of such facilities.	Objective remains valid, and even more important given the expected implication of the pandemic on the need for accessible local community facilities. No action required.
3	Flooding - To ensure that the location of development does not result in unacceptable risk from flooding, subsidence or health hazards.	Objective remains valid, and no implications from Covid-19. No action required.
4	Placemaking - To ensure that all new developments achieve the highest quality of sustainable design, location, construction, operation and energy usage in all developments and to deliver placemaking of safe, healthy and attractive environments.	Objective remains valid, and even more important given the expected implication of the pandemic on the need for placemaking. No action required.
5	Education - To provide opportunities for the establishment of a network of quality educational and training facilities which serve local communities and are accessible for all existing and future generations.	Objective remains valid, and no implications from Covid-19. No action required.
6	Tourism - To protect, manage and enhance sustainable tourist attractions and facilities in Torfaen for the benefit of tourists and the community	Objective remains valid, and even more important given the expected implication of the pandemic on tourism. No action required.
7	Heritage - To conserve and enhance the distinctive cultural and historic resources of the County Borough, including the Blaenavon Industrial Landscape World Heritage Site	Objective remains valid, and no implications from Covid-19. No action required.
8	Minerals - To allocate mineral sites if required and practicable and safeguard appropriate mineral resources from sterilisation.	Objective remains valid, and no implications from Covid-19. No action required.
9	Green Infrastructure - To protect, manage and enhance green infrastructure, biodiversity and ecological networks across Torfaen.	Objective remains valid, and even more important given the expected implication of the need for green infrastructure. No action required.
10	Climate Change - To minimise climate change impacts through, enabling renewable energy generation and energy efficiency improvements, reducing emissions of greenhouse gases in both new and existing development, promoting innovation and adaption to climate change by considering its effects in the design and location of new development.	Objective remains valid; noting that the pandemic may have beneficial implications as more people work from home, travel less and have expectations of a 'green' recovery. No action required.

11	Landscape - To protect and enhance the valued urban and rural landscape character of Torfaen, including important open space and sense of rurality between settlements.	Objective remains valid, and no implications from Covid-19. No action required.
12	Previously Developed Land - To protect Greenfield land by enabling and promoting the most efficient use of appropriate brownfield sites for redevelopment across Torfaen.	Objective remains valid, and no implications from Covid-19. No action required.
13	Water - To ensure all development contributes to improving water quality, protecting water supply and maximising the efficiency of water consumption.	Objective remains valid, and no implications from Covid-19. No action required.
14	Soil - To identify and conserve important soil (including 'high quality' agricultural land) and geological resources including Regionally Important Geological Sites (RIGS) and maintain their quality.	Objective remains valid, and no implications from Covid-19. No action required.
15	Housing - To ensure the allocation of an appropriate quantity and variety of housing sites to deliver high quality choice in form and construction in sustainable locations, well served by essential facilities and accessible by a range of transport modes.	Objective remains valid, and even more important given the expected implication of the pandemic on housing need. No action required.
16	Transport - To develop integrated and efficient transport infrastructure, public transport and communication networks which protect air quality and are accessible and attractive to all, and encourage active travel and a reduction in private car use.	Objective remains valid, and even more important given the expected implication of the pandemic on modal shift and reducing the need to travel. No action required.
17	Waste - To ensure people and organisations reduce, reuse and recycle waste and to foster this through the provision of regional and local waste management facilities.	Objective remains valid, and no implications from Covid-19. No action required.

Table 4: Torfaen RLDP Preferred Strategy - Strategic Policy Assessment

Strategic Policy	Details	Sensitivity to the Consequences of the Pandemic	Action Required
Creating Sustainable Places and Placemaking			
<p>S1 - Strategic Sustainable Growth</p>	<p>In order to meet Torfaen’s objective of Creating safe, confident communities and develop economic resilience, between 2018 and 2033 the plan will make provision for:-</p> <ul style="list-style-type: none"> ▪ 50ha land for employment and business purposes (use classes B1, B2 and B8); and ▪ 5,600 homes to meet a housing requirement of 4,800 homes. <p>This development will be distributed in accordance with the spatial strategy set out in RLDP Policies S8 and S12</p>	<p>As regards the requirement to allocate 50ha of employment land, whilst the pandemic is generally likely to result in job losses rather than complete company closures, there is a resultant increased need for the RLDP to create opportunities for even more new jobs and enable the economic recovery. Indeed, as recommended in the recent consultants’ ‘Advice Relating to Implications of Covid-19 Impacts’ on the 2020 Torfaen Employment Land Study (ELS), there is still a need to allocate 50ha of employment land to capitalise on the opportunities of Torfaen’s strategic location and the potential of the ‘new growth industries’.</p> <p>Similarly, whilst the pandemic may result in fewer houses being built in the short term, and noting that house prices remain buoyant, the high, but sustainable (matching housing growth with employment growth and allocating housing led</p>	<p>No action required.</p>

		strategic sites to deliver employment land in sustainable locations) housing target of 4,800 new dwellings (320 per annum) over the Plan period remains valid and deliverable.	
S2 - Spatial Distribution of Development	<p>In order to deliver safe, confident communities and promote community cohesion new development will be distributed based on supporting and developing the roles and functions of the following settlements as detailed in the RLDP Strategy:-</p> <ul style="list-style-type: none"> ▪ Cwmbran ▪ Pontypool ▪ North Torfaen <p>(Details of roles and functions of settlements based on update of existing LDP Section 4.2)</p>	The spatial distribution of development is based on a robust Settlement Assessment, which considers the role and function of existing settlements to inform decisions as to where development should be spatially located to achieve a sustainable pattern of growth. The distribution is still considered appropriate in light of the pandemic and is well placed to build on the positive modal transportation shifts witnessed during lockdown. The distribution already considers which settlements are most sustainable and have capacity to deliver additional growth utilising principles of sustainable placemaking.	No action required.
S3 - Strategic Sites	<p>Strategic Sites to deliver the RLDP Strategy are identified at:-</p> <ul style="list-style-type: none"> ▪ Pontypool College, Pontypool; ▪ County Hall & Police HQ, Cwmbran; ▪ Llantarnam Business Park, Cwmbran; ▪ Llanfrechfa Strategic Action Area (SAA1), Cwmbran; and ▪ Craig-y-felin Strategic Action Area (SAA2), New Inn, Pontypool. 	Given that the levels of employment and housing growth, strategic settlement assessment and strategic candidate sites assessments are still considered appropriate, there is no need to revisit the listed strategic sites.	No action required. Albeit, as County Hall has recently obtained planning permission there is no longer a need to allocate it in the Preferred Strategy, and the residual Police HQ site is below the site

			capacity threshold to continue to be identified as a strategic site in its own right.
S4 - Managing Settlement Form: Urban Boundaries	<p>Urban boundaries are identified on the Proposals Map to promote the full and effective use of urban land by defining the boundary between urban and countryside areas in order to:</p> <ul style="list-style-type: none"> a) allow for development which would contribute to the creation and maintenance of sustainable communities in accordance with the LDP Strategy; and b) define the urban area, within which there is a presumption in favour of sustainable development, taking into account material planning considerations. <p>Development proposals in the countryside will be dealt with in line with relevant LDP policies and national planning policy.</p>	<p>The national policy requirement to distinguish between urban areas where sustainable development is acceptable, and the countryside where limited forms of development are acceptable has not been changed by the pandemic.</p> <p>It is noted that the urban boundaries will be assessed in the forthcoming 'Torfaen Settlement Boundary Review' to inform the Deposit RLDP next year.</p>	No action required.
S5 - Sustainable Placemaking and Design Context	<p>All development shall evidence the highest standards of sustainable placemaking, taking into account local distinctiveness and landscape character, the highest possible quality of design, minimising the need for energy by way of site / building layout, prioritising active travel modes and connections, and ensuring appropriate green infrastructure including key ecological / biodiversity features, open space, recreation facilities and SuDS. Torfaen County Borough benefits from three distinct character areas and these must form the context for proposed development schemes as follows:</p> <ul style="list-style-type: none"> a) The town of Blaenavon and its environs designated as Blaenavon Industrial Landscape World Heritage Site characterised by high density residential terraces supporting the former coal mining industry. The social and physical legacy of the intense industrial activity of the locality should be reflected in any design response to a site. b) The linear section of North to Mid Torfaen including the settlements of Abersychan and Pontypool and their surrounding 	<p>This is a criteria based policy, which establishes a tangible framework to deliver sustainable placemaking. The pandemic may result in changes to the way in which buildings and places are utilised, although the policy is considered flexible enough to respond to these impacts.</p>	No action required.

	<p>neighbourhoods is strongly connected to the industrial heritage of the locality with an ingrained association of neighbourhood and community that must be addressed in development proposals.</p> <p>c) The New Town of Cwmbran features a comprehensively planned network of seven neighbourhoods around a central employment and retail core. The new town features a high proportion of open space which serves as a green infrastructure and active movement network. At the time of its construction, Cwmbran promoted innovative and forward looking architecture, the rationale of which should be adapted to reflect current innovation in building construction of the highest design and environmental standards.</p> <p>Strategic development sites and Strategic Action Areas identified within the RLDP will be developed in accordance with Concept Masterplans produced by the Council to ensure that the key sites within Torfaen address the highest standards of placemaking possible.</p>		
<p>S6 - Climate Change</p>	<p>All development proposals will be required to make a positive contribution towards addressing the causes of, and adapting to, the impacts of climate change. Means of achieving this will include:</p> <ol style="list-style-type: none"> 1. having low / zero carbon energy requirements by reducing energy demand and promoting energy efficiency; 2. supporting the development of renewable and low / zero carbon energy generation and a presumption against energy generation utilising fossil fuels and methods that are not low / zero carbon; 3. supporting development proposals that incorporate district energy network development and district heating networks; 4. promoting the efficient use of land through giving preference to brownfield land and development at higher densities on sites located close to transport corridors or town centres, thereby reducing the overall need to travel and maximising opportunities for active travel and public transport use; 	<p>This criteria based policy is still considered relevant for the RLDP to address the causes and impacts of climate change. The promotion of active travel and directing development away from flood risk areas all remain pertinent considerations. Certain elements of the policy could prove more challenging to achieve (i.e. developing renewable and low/zero carbon energy generation) if other infrastructure requirements take priority as a result of the pandemic. However, the policy wording is considered flexible enough to adapt to such</p>	<p>No action required.</p>

	<ol style="list-style-type: none"> 5. utilising sustainable construction techniques and local supplies adopting through the adoption of circular economy principles; and 6. avoiding locating development in areas at risk of flooding including the incorporation of measures such as Sustainable Drainage Systems and flood resilient design. 	infrastructure priority and viability considerations.	
Creating Healthy & Social Places			
S7 - Sustainable Transport	<p>Development proposals should promote sustainable, safe forms of transport which reduce the need to travel, increase provision for walking and cycling and improve public transport provision. This will be facilitated by:</p> <ol style="list-style-type: none"> 1. favouring development in locations which reduce the need to travel, especially by car, and promoting walking, cycling and public transport. 2. providing electric vehicle charging infrastructure; 3. promoting active travel through safeguarding, enhancing and expanding on the Active Travel Network identified in the Integrated Network Maps; 4. designing developments to facilitate and incorporate public transport infrastructure and connections; 5. improving road safety; and 6. minimising the adverse effects of parking. 	Active Travel and sustainable transport orientated development are already core elements of the Replacement LDP. The Settlement Hierarchy, Spatial Strategy and Growth Strategy have all been formulated to support and enhance sustainable forms of transport in the first instance. Close liaison with Highways will be maintained throughout the process to enable implementation of the policy, ultimately to support enhancement and provision of new transport infrastructure.	No action required. The policy already reflects the importance of active travel, sustainable transport and accessibility, which will prove key in overcoming issues presented by the pandemic.
S8 - Delivery of Homes	<ol style="list-style-type: none"> 1. In order to meet the housing requirement of 4,800 new dwellings provision will be made for the development of up to 5,600 new dwellings during the Plan period to enable an approximate 15% flexibility allowance (<i>to be given further consideration through the Deposit Plan preparation process</i>). These will be broken down within the following Housing Sub-Market Areas (HSMAs): <ol style="list-style-type: none"> a) North Torfaen - approximately 250 dwellings; b) Pontypool - approximately 1,750 dwellings; and c) Cwmbran - approximately 2,800 dwellings. <p>(These Housing Sub-Market Area figures include an allowance of 382 dwellings already built in 2018/19, 392 dwellings on</p> 	It is difficult to estimate the pandemic's impact on future household formation and housing supply. On this basis, the full impacts of the pandemic are unlikely to be known for several years. However, it is important for the RLDP to remain capable of delivering sustainable levels of economic growth to best achieve an equilibrium between new homes	No action required. A refreshed analysis of the existing Demographic Forecasts and Analysis Paper is due to be completed shortly, which will include a fact-check of the extant evidence base and an addendum that will

	<p>small sites (9 or less) and 537 dwellings on windfall sites (10 or more dwellings) over the Plan Period 2019-2033 remaining, with net demolitions being added to the dwelling requirement).</p> <ol style="list-style-type: none"> 2. In allocating housing sites priority will be given to previously developed (brownfield) land within existing settlements, then previously developed land on the edge of existing settlements and then greenfield sites within or on the edge of settlements. 3. Proposals to bring empty properties back into use will be supported. 4. The plan makes provision for 5,600 homes to deliver a housing requirement of 4,800 dwellings, of which XXXX homes are affordable. 	<p>and employment provision, balanced against other key infrastructure requirements. It is only possible to plan based on the evidence available, although this can be safeguarded through incorporation of an appropriate flexibility allowance and monitoring framework (incorporating a robust housing trajectory) to help overcome any unknown issues that may arise.</p>	<p>consider the latest dwelling completions, mid-year household estimates and 2018-based household projections.</p>
S9 - Gypsy and Traveller Accommodation	<p>Land will be made available to accommodate any future unmet Gypsy and Traveller accommodation needs over the plan period.</p>	<p>The 2020 Torfaen Gypsy & Traveller Accommodation Assessment (GTAA), which identifies any unmet need, was completed and submitted to the Welsh Minister in February 2020 before the Covid-19 lockdown; noting that it was prepared in accordance with WG Guidance and is considered to not be affected by the pandemic.</p>	<p>No action required, albeit the pandemic has affected the Minister's ability to agree the Draft Torfaen 2020 GTAA in a timely manner.</p>
S10 - Retail Centres & Development	<ol style="list-style-type: none"> 1. New retail, commercial, leisure, social, cultural and appropriate office developments will be focused according to the following retail hierarchy within the County Borough, having regard to the nature, scale and location of the proposed development: - <ul style="list-style-type: none"> • Sub-Regional Centre - Cwmbran; • District Centre - Pontypool; • Minor District Centre - Blaenavon; and ▪ Local & Neighbourhood Centres - Fairwater, Llanyrafon, Old Cwmbran, Oakfield, Edlogan Way, Maendy Square, Pontnewydd Village, Thornhill, St Dials, Griffithstown, New Inn, Pontnewynydd, Trevethin, Abersychan and Garndiffaith. (The South Sebastopol, Llantarnam and Mamhilad local / 	<p>The demand / supply for larger convenience retailing is likely to be less sensitive to the impacts of the pandemic. However, use of sequential tests alongside careful management of out-of-centre locations will remain key to avoid promotion of unsustainable travel patterns. High streets will continue to change especially in the short-term due to the increase in online shopping associated with</p>	<p>The Policy is already considered flexible to accommodate changes in demand/supply. However, further Development Management policies in the Deposit RLDP will need to be flexible enough to enable town / local centres to evolve and respond to</p>

	<p>neighbourhood centres once built will become part of Torfaen's Retail Hierarchy)</p> <ol style="list-style-type: none"> 2. To support the centres in the hierarchy the following roles have been identified: - <ul style="list-style-type: none"> • Major retail and main town centre leisure and culture developments will take place in the identified Town Centre Boundary of the Sub-Regional Centre of Cwmbran. • The District Shopping Centres of Pontypool and Blaenavon will be protected and enhanced to improve vitality & viability and to ensure that they meet the needs of local residents and provide a range of facilities. • Local & Neighbourhood Shopping Centres will be protected and enhanced to provide services and facilities for the local community. 3. Any identified retail capacity will be expected to be delivered within the Town Centre Boundary of Cwmbran. 4. Proposals will be permitted where they maintain & enhance the vibrancy, viability, attractiveness of our retail centres and also accord with the sequential test approach. They should protect and promote the viability and vitality of the defined retail centres, supporting the appropriate delivery of new retail, commercial, leisure, social, cultural and appropriate office developments. 5. Opportunities will be sought to regenerate and improve the retail environment and improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling (active travel) and public transport. 	<p>the pandemic; which may further accelerate changes in town centres and high streets if longer-term consumer spending habits continue to alter.</p> <p>The Torfaen Town Centres & Retail Study currently being prepared will also provide further information in due course to inform the Deposit RLDP.</p>	<p>changing situations. This will be accompanied with designation of realistic and sensible town centre boundaries and frontage policies that enable a variety of uses.</p>
<p>S11 - Promoting Healthier Places</p>	<p>In order to promote healthier places and improve the quality of life, health and well-being of residents the RLDP will:</p> <ol style="list-style-type: none"> 1. enable opportunities for outdoor activity and recreation; 2. support the provision and / or enhancement of community facilities, recreation facilities and open space and prevent their unjustified loss; 3. promote active travel opportunities; and 	<p>This policy already seeks to promote healthier places and improve the quality of life, health and well-being, which have risen in importance due to the pandemic.</p>	<p>No action required.</p>

	4. seek environmental and physical improvements, particularly in the built environment.		
Creating Productive & Enterprising Places			
S12 Employment Land Strategy	<p>- The employment economic development needs of Torfaen will be met by the identification of 50ha land for employment and business purposes (use classes B1, B2 and B8).</p> <p>The employment role of important industrial and business areas will be enhanced and protected. A range and choice of accessible employment sites will be delivered throughout Torfaen to enable opportunities for business and local employment needs to be met. This will include provision to enhance town centre based employment and economic uses and to increase the tourism, leisure and retail offer in Torfaen.</p>	<p>As regards the requirement to allocate 50ha of employment land, whilst the pandemic is generally likely to result in job losses rather than complete company closures, there is a resultant increased need for the RLDP to create opportunities for even more new jobs and enable the economic recovery. Indeed, as recommended in the recent consultants' 'Advice Relating to Implications of Covid-19 Impacts' on the 2020 Torfaen Employment Land Study (ELS), there is still a need to allocate 50ha of employment land to capitalise on the opportunities of Torfaen's strategic location and the potential of the 'new growth industries' and to protect a range of existing industrial and business areas.</p>	<p>The Policy already allows for flexibility in changing circumstances and so no action is necessary.</p>
S13 - Sustainable Minerals Management	<p>The Council will sustainably manage its mineral resources by:</p> <ul style="list-style-type: none"> i) safeguarding appropriate sandstone and limestone resources for future possible use; ii) maintaining a minimum 10 year land bank of permitted aggregate resources throughout the plan period in line with the requirements of the latest South Wales Regional Aggregates 	<p>This policy is still currently in line with relevant guidance and is therefore considered up to date.</p>	<p>No action required.</p>

	<p>Working Party Regional Technical Statement on Aggregates; and</p> <p>iii) encouraging the efficient and appropriate use of high quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary land won resources.</p>		
S14 - Sustainable Waste Management	<p>To facilitate the delivery of sustainable management of waste the Plan will:</p> <ol style="list-style-type: none"> 1. ensure that proposals conform to the principles of the waste hierarchy supporting those that move waste up the hierarchy; 2. support an integrated and adequate network of waste management installations that has regard to the nearest appropriate installation concept and self-sufficiency principles where necessary; 3. encourage the provision of in-building waste management treatment facilities on Class B2 industrial sites, subject to detailed planning considerations; 4. support the circular economy by encouraging the minimisation of the generation of waste and the use of reused and recycled waste materials in the design, construction and demolition stages of development; and 5. ensure that provision is made for the sustainable management, sorting, storage and collection of waste in all new development. 	<p>This policy is still currently in line with relevant guidance and is therefore considered up to date.</p>	<p>No action required.</p>
S15 - Energy	<p>In order to maximise Torfaen's contribution to meeting national renewable and low carbon energy targets:</p> <ol style="list-style-type: none"> 1) All development proposals will be required to minimise their operational energy requirements by way of design / layout of buildings to maximise solar gain / microclimate benefits, utilising sustainable construction techniques and incorporation of energy saving technologies. 2) All development proposals for new residential, commercial and community facilities (including public service buildings) will be required to incorporate low carbon heating systems and 	<p>This policy is still currently in line with relevant guidance and is therefore considered up to date. However, application of this policy will be subject to infrastructure priority and viability.</p>	<p>No action required.</p>

	<p>Building Integrated Renewable (BIR) technologies to maximise energy generation on site from low / zero carbon sources.</p> <p>3) Local Search Areas will be identified (within the Deposit Draft) for renewable energy generation and storage within which there will be a presumption in favour of granting planning consent. Proposals for renewable energy generation and storage as part of a wider development will be encouraged subject to the proposal not giving rise to unacceptable impacts assessed under other policies of the RLDP.</p> <p>Strategic development sites and Strategic Action Areas identified within the RLDP will be developed in accordance with Concept Masterplans produced by the Council to ensure that the key sites within Torfaen address energy efficiency and renewable / low carbon energy generation as an integrated and imbedded facet of the development.</p>		
Protecting and Enhancing Distinctive & Natural Places			
S16 - Green Infrastructure	<p>Development proposals must: maintain, protect and enhance the integrity and connectivity of Torfaen's green infrastructure, landscape and biodiversity assets through the following key functions:</p> <ul style="list-style-type: none"> i) Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character; ii) Habitat Provision and Connectivity by protecting, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them; iii) Greenspace provision, Connectivity and Enjoyment by ensuring that Green infrastructure assets and opportunities embrace the placemaking approach and are designed and managed to deliver a multifunctional resource; capable of delivering a wide range of social, economic, environmental and 	<p>The pandemic has served to highlight the importance of green infrastructure in terms of enhancement, conservation and accessibility. Therefore, this policy is still currently in line with relevant guidance, is considered up to date; and will be supported through complementary policies in the Deposit RLDP.</p>	<p>No action required.</p>

	<p>health and well-being benefits for local communities and the county as a whole;</p> <p>iv) Local Food Production; and</p> <p>v) Flood Attenuation and Water Resource Management.</p>		
<p>S17 - Conservation and enhancement of the natural, built and historic environment</p>	<p>Development proposals should seek to ensure the conservation and enhancement of the natural, built & historic environment of Torfaen, in particular:</p> <p>a. biodiversity resources;</p> <p>b. geodiversity resources;</p> <p>c. the water environment;</p> <p>d. landscape setting;</p> <p>e. the character of the built environment; and</p> <p>f. historic assets.</p>	<p>The pandemic has served to highlight the importance of the natural, built and historic environment in terms of its enhancement, conservation and accessibility. Therefore, this policy is still currently in line with relevant guidance, is considered up to date; and will be supported through complementary policies in the Deposit RLDP.</p>	<p>No action required.</p>