



**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL  
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT**

# **Annual Planning Performance Report 2017-18**

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# **Neath Port Talbot LPA**

## **PLANNING ANNUAL PERFORMANCE REPORT (APR) – 2017-18**

### **PREFACE**

As the Cabinet Member for Regeneration and Sustainable Development, I have responsibility for delivering the Planning function within Neath Port Talbot. The contribution of the Planning service to secure the broader regeneration aspirations of the Council cannot be underestimated, especially after a prolonged period of austerity and the problems we are currently facing and will continue to face as a consequence of Brexit.

Through the adopted Local Development Plan and individual Development Management decisions, we are creating a place where everyone has an equal chance to be healthier, happier, safer and more prosperous. These responsibilities and statutory documents will also underpin the Council's ability to deliver its Wellbeing Goals which will in turn improve the health and wellbeing of our communities and as such the quality of life for all.

Councillor Annette Wingrave Cabinet Member for Regeneration and Sustainable Development.

### **CONTEXT**

#### **GEOGRAPHICAL CONTEXT**

Neath Port Talbot is located on the coast between the City & County of Swansea to the west and the County Borough of Bridgend to the east. We also share boundaries and characteristics with Carmarthenshire, Powys, Rhondda Cynon Taf and the Brecon Beacons National Park. The Authority also forms part of the wider Swansea Bay City region and is the link authority between West and South Wales. Following its designation earlier this year, the County also hosts the largest Enterprise Zone in Wales, the need for which arose from the economic downturn in the steel industry which in turn jeopardised the continued operation of the Port Talbot steelworks which is the biggest employer in the local area. It is anticipated that this designation will boost economic development within the local area which will result in spin off benefits to the wider region.

The County Borough has a resident population of 139,800 (Census 2011), covering an area of over 44,217 hectares, the physical characteristics of the County Borough, can be broadly divided into the following two areas; the coastal corridor and the valleys.

The coastal corridor encompasses a relatively narrow coastal strip extending around Swansea Bay where the main centres of population, employment and the M4 corridor are located. The main towns and settlements of Neath and Port Talbot continue to be the major focus for house building both by private market and registered social landlords.

The valleys are characterised by the attractive landscape setting of river valleys separated by upland plateaus and mountains. They are rural in aspect and contain scattered communities throughout. While the individual valleys have strong individual characteristics and identities, they share common features and problems. Historically large scale house building has predominantly been limited to Pontardawe and the Upper Swansea Valley.

## **Corporate Context**

The Planning and Public Protection Service sits within the Environment Directorate which is one of four Directorates within the Council each of which report directly to the Chief Executive. In addition to Planning and Public Protection there are three further Heads of Service within the Environment Directorate which include the Head of Streetcare, Head of Engineering and Transport and the Head of Property and Regeneration. Each of the Four Directorates work towards achieving the following Corporate Wellbeing Objectives as illustrated within the Corporate Plan:

### **NPT Well-being Objective 1 – To improve the well-being of Children and young people.**

“All of our children and young people have the best start in life, so they can be the best they can be.”

### **NPT Well-being Objective 2 – To improve the well-being of all adults who live in the county borough.**

“Everyone participates fully in community life – socially and economically”

### **NPT Well-being Objective 3 – To develop the local economy and environment so that the wellbeing of people can be improved.**

“The whole of Neath Port Talbot county borough will be a vibrant and healthy place to live, work and enjoy recreational time.”

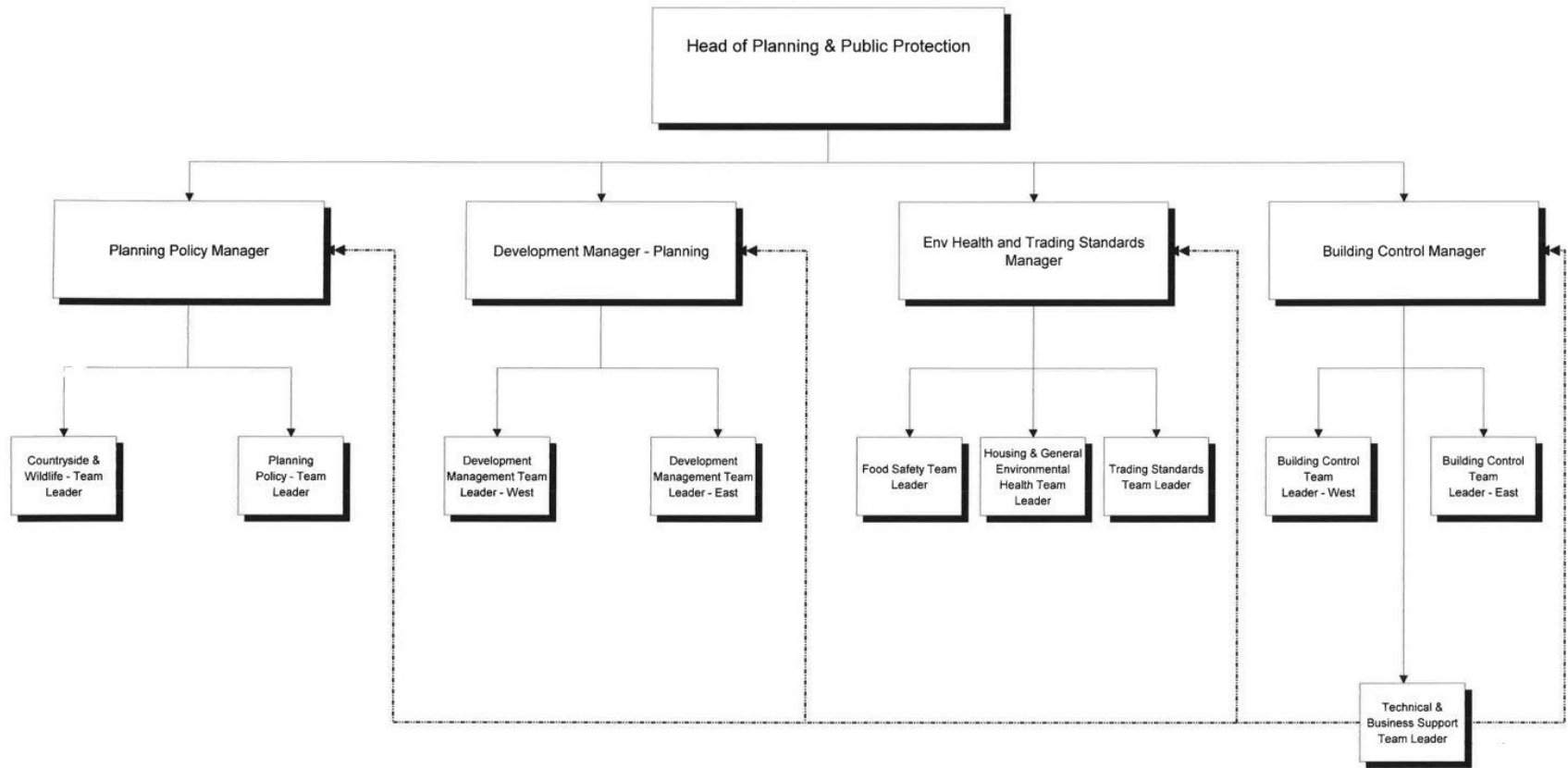
### **NPT Wellbeing Objective 4 – Governance and Resources (cross cutting) – To ensure the business of the council is managed to maximise the long term benefit for the citizens of Neath Port Talbot.**

The objectives are very broad in order to respond to the 7 wellbeing goals as defined within the Wellbeing of Future Generations Act. However flowing from these objectives are detailed Corporate Action Plans and Service Action Plans which link to all service areas within the council including Planning and Public Protection.

Whilst the Planning function sits within a wider service area, this Report will primarily cover the traditional planning functions delivered by Neath Port Talbot Council.

## **The Planning and Public Protection Service**

As stated above the service has been extended since April 2016 following its merger with the Environmental Health and Trading Standards service. As a consequence of this merger the following structure (to third tier level) was created as follows:



This enlarged service works collaboratively to secure the following:

### **Aim**

To establish the framework for shaping, creating and delivering quality, safe, healthy and sustainable communities within which to live and thrive.

To secure this aim the following vision will be pursued:

### **Vision**

A pro-active front loaded service where everyone works together to achieve a shared purpose of promoting and creating safe, healthy and sustainable places to work and live in. This will enable us to achieve the corporate priority of securing prosperity for all, better, simpler and cheaper.

### **Values**

Adopting strong values are key to securing the above aim and vision. This new service aims to work collaboratively to maximise shared knowledge and learning thus improve efficiency. We intend to help each other to secure continuous improvement, improve communication both internally and to our external customers. We will work in an environment of openness, with consistency, transparency, and equality at the heart of all of our operating principles. We will reduce waste within our services concentrating on adding value and doing what matters for all of our customers.

The services offered by the traditional Planning Service within that overall structure are as follows:

## **Development Management**

### **Planning Applications**

The team deal with all applications made under primary and secondary planning legislation including the Town and Country Planning Act 1990 and Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. The main types of applications dealt with are:-

- Planning Applications (full, outline or 'reserved matters')
- Listed Building Consent
- Conservation Area Consent
- Applications for Certificate of Lawful use or Development (Existing and Proposed)
- Advertisements
- Minerals
- Waste
- Works to Protected Trees
- Hazardous Substances Consent
- High Hedges
- Hedgerow Removal

### **Pre-Application Advice**

Whether through the statutory or non-statutory route, the team provides applicants / developers with a pre-application service which places significant importance upon the provision of the best

possible advice to a potential developer/applicant before a formal planning application is submitted. Officers seek to promote high quality development and use the pre-application service to front load the development process and therefore speed up the formal planning process.

## **Enforcement**

The Enforcement section deals with complaints in respect of alleged breaches of planning control, which predominately relate to: -

- Undertaking building works without permission, or developing without complying with approved plans
- Failing to comply with condition(s) imposed on a planning permission
- Change of use of land or buildings without permission
- Untidy Land
- Unauthorised work to protected trees

## **Planning Appeals**

If the Council refuses to give planning permission, or grants it subject to conditions, fails to deal with an application within statutory time limits, or issues an enforcement notice, the applicant/alleged offender has a right to appeal to the Planning Inspectorate. Planning Officers within the team deal with all appeals, which can be heard by one of three procedures: - Written Representations; Hearing or Public Inquiry.

## **Minerals and Waste**

The Minerals and Waste service, including all applications for mineral works, aftercare and restoration, and monitoring of existing Mineral and Landfill sites is currently provided in conjunction with Officers within the Carmarthenshire County Council under a Service Level Agreement which is reviewed periodically.

## **Section 106 Agreements**

The team is responsible for negotiating and monitoring compliance with all legal agreements made under Section 106 of the Town and Country Planning Act.

## **Planning Policy**

Planning Policy comprises the Planning Policy team and Countryside & Wildlife team. The teams cover the following areas of responsibility:

### **Planning Policy**

- **Local Development Plan** – statutory duties in respect of the preparation, delivery, monitoring and review of the Local Development Plan (LDP). This ensures that development is delivered in a planned and sustainable way in accordance with the agreed corporate priorities and objectives of the Council.

- **LDP Evidence Base** – duties in respect of maintaining an up-to-date evidence base to support the LDP.
- **Supplementary Planning Guidance (SPG)** – duties in respect of preparing a raft of SPG setting out more detailed topic or site specific guidance on the way in which policies of the LDP will be applied in particular circumstances or areas.
- **Gypsy & Traveller Accommodation Assessments** – duties in respect of preparing and publishing the Council’s 5 yearly Gypsy & Traveller Accommodation Assessments.
- **Joint Housing Land Availability Studies** – duties in respect of the annual production of studies outlining the extent of the housing land supply.
- **Active Travel** – statutory duties in respect of preparing and reviewing the Council’s Existing Route Map (ERM) and Integrated Network Map (INM).
- **Cycling Network** – duties in respect of cycle route development and promotion.
- **Asset Sponsorship** – duties in respect of facilitating the partnership contract with a third party provider to generate income through the sponsorship of infrastructure / assets.

### **Countryside & Wildlife**

- **Public Rights of Way Network** – statutory duties in respect of the registered network of footpaths, bridleways and byways [including the definitive map and statement; diversions and closures; maintenance in respect of structures and obstructions; and delivering the Rights of Way Improvement Plan (RoWIP)].
- **Adopted Highway Network** – duties in respect of advising on the extent of the adopted highway network.
- **Biodiversity / Ecology** – statutory duties in respect of advising on all aspects of biodiversity conservation [including habitat management and species conservation (e.g. bats); Local Nature Reserves; Sites of Importance for Nature Conservation; and delivering the Local Biodiversity Action Plan].
- **Coed Cymru** – duties in respect of advising on the creation, management and funding of woodlands as part of the Coed Cymru network.

Having regard to the above functions the role of the Planning Service overall is to develop a robust, evidence based and deliverable Development Plan and to undertake the decision making process for individual developments in accordance with that plan.

After a lengthy and detailed evidence gathering process and a robust Examination in Public, the Council successfully adopted our Local Development Plan (LDP) in January 2016. The Plan period extends up until 2026 and supersedes the Council’s Unitary Development plan which covered the period up until 2016. The LDP is due for review in January 2020, although a number of communities are seeking an early review to assist the delivery of their aspirations under the Valleys Task Force initiative. Given that the Annual Monitoring Report does not indicate that our policies are not achieving their objectives such a review will be resisted.

The LDP sits alongside the Neath Port Talbot Wellbeing Plan (2018-2023) which was published in 2018 and replaced the Council’s Single Integrated Plan (SIP) (2013-2023). These documents set out the Vision for Neath Port Talbot and seeks to bring about a number of outcomes in respect of health, safety, sustainability, prosperity and education. The LDP has been prepared in order to

provide a spatial expression of the land-use implications of the SIP and the LDP Vision in particular complements the Council's overall vision as set out in the SIP.

In addition, there are a range of regional and local strategies and policy statements that provide the framework for the LDP. Some of these key strategies include:

- Joint Transport Plan for South West Wales (2015-2020);
- Regional Technical Statement 1st Review (2014);
- Shoreline Management Plan (2010);
- Swansea Bay City Region (2013);
- The Economic Growth Strategy for South West Wales (2013-2030);
- Neath Port Talbot Waterfront Regeneration Strategy (2011);
- Neath Port Talbot Local Housing Strategy (2015-2020);
- Neath Port Talbot Local Biodiversity Action Plan (2014);
- Neath Port Talbot Environment Strategy (2008-2026); and
- Neath Port Talbot Tourism Development Action Plan (2011-2014).

The LDP encompasses a broad range of social, economic and environmental issues and the Plan's objectives provide synergy with the Wales Spatial Plan – i.e. building healthy, sustainable communities; promoting a sustainable economy; valuing our environment; achieving sustainable accessibility; and respecting distinctiveness. The LDP seeks to deliver Neath Port Talbot's role in supporting the wider aims, objectives and aspirations of the City Region.

### **Economy & Employment**

Employment in the County Borough has a relatively high proportion of jobs in the manufacturing and public sectors and a relatively low proportion in the service sector. The employment base is predominantly located along the coastal corridor where Tata Steel and the Council are the largest employers. In the Valleys, the largest employers relate to the mineral extraction industries with the remainder being employed in small and medium sized enterprises.

Significantly more people travel out of the County Borough to access work than those who travel inwards. This work travel pattern reflects the fact that the County Borough is part of the broader Swansea Bay travel to work area. The landbank of industrial land with good access to road, rail and sea performs an important role in the sub-region, as will the University of Swansea Science and Innovation Campus on Fabian Way and the Coed Darcy Urban Village.

### **Transport & Infrastructure**

The coastal corridor is traversed by the key road and rail infrastructure which underpins the County Borough as a key employment area within the sub-region, providing connections eastwards, via the M4 and rail, to Cardiff and beyond, and westwards to Swansea and to the Midlands via the A465 (T) Heads of the Valleys road. The docks at Port Talbot are also considered an asset to the area providing for both general cargo and deep water facilities for bulk cargo.



## **Natural Resources**

The County Borough contains mineral resources, both coal and aggregate, which are significant on a UK scale. They are also important both in terms of their contribution to the Welsh economy and more locally in terms of employment.

Virtually the whole of the County Borough is underlain by coal resources. Coal has been mined extensively within the area for centuries and has contributed significantly to the creation and sustenance of many of the valley communities. The two major hard rock quarries in the area at Gilfach (Neath) and Cwm Nant Lleici (Pontardawe), supply high specification aggregates to various markets.

Due to the extensive upland areas within the County Borough, there is also significant potential for the exploitation of the wind resource. Two of the Strategic Search Areas (SSA E and SSA F) identified by the Welsh Government are predominantly located within the administrative area and following their designation, a significant amount of turbines are now operational or consented, while there remains interest from developers in the area.

## **Historic/landscape setting of the area**

### **Heritage**

The area has a wealth of historical, archaeological and architectural assets, in particular relating to the area's industrial history in coal, iron, steel and copper. It also has many older archaeological remains dating back to pre-Roman times. All of these are important characteristics of the area that provide local distinctiveness. Many, such as Margam Park and the canal network, also provide opportunities for tourism and recreation.

The historic heritage of the area is recognised through a range of designations. Within the County Borough there are 2 designated Landscapes of Historic Interest, 6 Historic Parks and Gardens, 6 Conservation Areas, 92 Ancient Monuments and 391 Listed Buildings.

### **Landscape & Ecology**

Neath Port Talbot has a varied landscape and a number of distinctive habitats ranging from coastal salt marsh and sand dunes through to ancient woodlands and upland areas of purple moor grass. Some of these habitats are of European, National or local importance. Large areas of the County Borough contain conifer plantations and the area also contains important geological features including glaciated valleys and rock formations.

The natural heritage of the area is recognised through a range of designations. Within the County Borough there are 20 designated Sites of Special Scientific Interest (SSSIs), 2 National Nature Reserves and 5 Local Nature Reserves.

### **Urban/Rural mix and major settlements.**

As stated above the County Borough is split into two distinct character areas; The Coastal Corridor which broadly follows the M4 corridor and the Valley Areas which comprise 5 valleys in total.

In regard to the major settlements, the LDP has defined a Settlement Hierarchy that identifies those areas which are the most sustainable locations and can more appropriately accommodate growth in terms of their function. Neath, Port Talbot and Pontardawe are identified as the 3 main towns, with Briton Ferry, Skewen, Taibach and Glynneath identified as district centres.

The remaining settlements are categorised as either 'large local centres', 'small local centres', 'villages' and 'dormitory settlements'.

### **Population change and influence on LDP/forthcoming revisions.**

The level of growth set out in the LDP is based on an economic-led scenario which is aspirational in its approach and aims to maximise job growth within the local economy. In order to address the key issues of the County Borough, wealth creation through job growth is fundamental to achieving the LDP vision.

This method has enabled the Authority to forecast how economic changes over the Plan period equate to the requirements for employment land and the number of new homes needed to accommodate the projected total population and required labour supply. This ensures alignment between employment and housing resulting in a more sustainable pattern of development which in turn improves the robustness of the LDP.

This approach has used the Welsh Government's 2008 population and household projections and detailed analysis of underlying trends in mortality and fertility rates and average household size. Based on the aspirational scenario of job growth (taking into account the Authority's aspiration to reduce unemployment and increase economic activity rates in line with the Welsh average), the population growth for the area has been driven by the ratio of working age population to total population. It is considered that this approach makes the projections more robust than purely trend-based projections which do not accurately reflect the Authority's aspirations for the area.

Based on the projected economic-led growth scenario of 3,850 jobs for the area, the Plan makes provision for an additional 7,800 new residential units, leading to an increase of approximately 7,000 people and a total population of 147,400 by 2026. This approach is aspirational, linked to the local economy and is set to complement the projected growth in economic activity and reduction in average household size in addition to helping meet the need for additional affordable residential units.

### **Budget and associated Implications**

Given the identified priorities of the Council, funding has been and continues to be prioritised towards delivering/improving services within the Social Services and Education Departments. The additional financial pressures facing the Council, following the collapse of the economy in 2008 and the consequent austerity measures which followed, have had a significant impact upon the

Environment Directorate which has seen its budget cut by £18.945 million which amounts to a 55% reduction since 2009/10. The budget for 2017/18 stands at £34,755 million which is 14.7% of the Council's net budget. The Directorate has also been tasked with securing further savings of £1.1 million for 2018/19. To-date the Directorate has identified an additional £696k of proposed savings, £109k of which is to be delivered by the Planning Service. These are to be secured through a combination of income generation ideas and staff savings and will soon be the subject of a consultation exercise as part of the Council's Forward Financial Plan (FFP). Such cuts have resulted in a reduction in staff, the cessation of some non-statutory services, the implementation of alternative service delivery models and an increase in fees where local discretion allows.

Prior to the decline in the economy, the Authority were struggling to deliver the social services function as a consequence of recruitment and retention problems together with increased demand. This culminated in the service being on the verge of going into special measures unless drastic action was taken. Such actions resulted in increased resources being directed from other services within the council to support the social services function. As a consequence, the Environment Directorate including the Planning function were targeted for financial savings as far back as 2006. When the economic crisis hit in 2008, further financial cuts were required and this has continued year after year. The impact of such sustained cuts means that proposed cuts currently being considered by other authorities in order to respond to continued austerity, have already been made by this authority. This has included cuts to staff levels in addition to significant cuts in budgets previously used to commission consultants to undertake work on behalf of the council. Since 2012 the planning service which includes Development Management, Planning Policy and Countryside and wildlife (Building Control have been excluded) has seen its staff structure reduce from 62 FTEs to 38 FTEs (this includes the associated admin support). This is a reduction of 39%. This reduction in staff coupled with the reductions experienced within the services which support the planning function i.e. highways, drainage, environmental health etc. has had a significant impact upon some areas of performance and morale within the service. As a consequence staff feel under increased pressure, are becoming less flexible and sickness is increasing.

Sickness management is a Mandatory Corporate Measure and there is a requirement for Service managers to reduce sickness levels year on year. As a consequence of the departure of a large number of staff, sickness levels within the overall Planning Service have increased from 252 days (6.6 days per FTE) in 2016/17 to 358.28 days (9.42 days per FTE) in 2017/18. This is slightly below the average for the Council which stands at 9.5 days per FTE. Sickness levels are a major influence on the ability of the Council to deliver the service as workloads associated with the staff off sick must be covered by the remaining staff. The service is currently experiencing an increase in the number of members of staff who are taking sick as a consequence of increased stress levels both work related stress but increasingly non-work related stress and they are taking more time off during each sickness episode. Unfortunately it is likely that this trend will continue due to less staff having to cover an increased and more demanding workload going forward.

The level of staff sickness is not the only factor which impacts upon service delivery. The performance charts towards the end of this report indicate that whilst we are generally performing well in dealing with most types of planning applications, there is a significant issue in relation to our performance associated with determining major applications. This has been acknowledged and resources were temporarily put in place to increase the number of senior officers from two to three. Unfortunately following the retirement of a senior officer and the budget pressures

experienced at the time and which continue to be experienced, that post was not filled. This has happened at the same time as a number of major and contentious applications have come to a conclusion, hence our performance has dipped. It is however important to note that a number of the major applications have been delayed due to the actions of the applicant. For example a number of the applicants have specifically asked for the applications to be placed on hold to allow the schemes to be re-designed to reflect a changing market. Others have been placed on hold to allow applicants to gather further information to address the objections of statutory consultees. Whilst the Authority is well within its rights to have refused those applications, potentially within the statutory time period, it was considered more important to work with the developer to enable them to potentially receive a favourable recommendation and thus contribute towards the Council's regeneration aspirations.

Due to the pressure on the council to make savings, the Service has over the years suffered a loss in specialist skills; in particular skills have been lost in relation to conservation and design, landscaping, drainage and Minerals. In terms of the latter, given that the Council has one of the largest actively exploited mineral resources in Wales, it is not possible to operate without the specialist skills of a mineral planner. Given the lack of available officers in this field, the Council signed up to a Service Level Agreement with Carmarthenshire Council in 2015 and they now provide both the mineral planning and mineral enforcement service for the council, albeit the decision making powers are retained by Neath Port Talbot. This was established as a mutually beneficial arrangement on the grounds that Carmarthenshire is now appropriately funded to maintain a team of officers thus improving the resilience of the team and officers are also able to improve their skills and experience by working on a number of complex and controversial mineral developments within Neath Port Talbot. However there is a tangible difference to having an in-house expert when compared to having a regional resource which is trying to manage competing demands from across the region. Whilst the SLA provides planning support and an enforcement monitoring role, the Authority up until this year also had a dedicated minerals and waste enforcement officer who was critical to the delivery of the amended restoration for the three opencast coal sites within the county borough. This officer has taken phased retirement and whilst continues to work for two days per week, this is unlikely to continue beyond a couple of years. This reduced resource, given the knowledge, skills and experience held by the officer, is unlikely to be replaced going forward, nor is it likely to be affordable.

The Development Management function is a fee earning service and as such the budget associated with this service is based on trend based historical fee income levels, with the shortfall covered by the central revenue budget. There is pressure every year to maximise fee income and thus reduce the need for revenue support to plug the gap. Year on year the service has failed to meet its income target, mainly as a result of a decline in the big fee earning major applications especially associated with mineral and renewable energy developments, the latter significantly affected by Central Government cuts to subsidies and Welsh Governments' introduction of Developments of National Significance (DNS) which would see any such major fees paid to WG rather than the Council. In previous years this budget gap has been plugged by reducing expenditure in other areas for example, freezing vacant posts for as long as possible and cross subsidising from other services. The service has also, where possible, sought to engage with developers in signing Planning Performance Agreements (PPAs) relating to strategic major developments, although such PPAs are voluntary and dependent on large-scale developments coming forward, which has not been the case recently. This annual pressure was acknowledged in the budget for 2017/18 when the income

target was reduced by £100k. Despite this reduction, the service finished the financial year with a £250k deficit which was subsequently covered by other services.

The Planning Policy and Wildlife and Countryside section has very little fee income although grants are sought from various sources to undertake project work relating to active travel, biodiversity and improvements to the rights of way network. The loss of the Rights of Way Improvement grant which amounts to £50k per year for 2018/19 will place a significant pressure on the service and it is likely that the quality and maintenance of the network will deteriorate as a consequence. The service is however responsible for income generation through asset sponsorship activities. To this end we have a contract with a private company who market our assets. The income target for asset sponsorship during 2017/18 was increased from £33k to £108k but only delivered £58k thus left the service with a shortfall of £50k. Despite the same company successfully marketing similar assets within an adjoining authority, the take up rate for advertising within Neath Port Talbot is very poor and we are working with the marketing company together with our economic development colleagues to establish why this is the case i.e. Is it the ineffectiveness of the marketing company, or the lack of a marketing budget for those businesses within or close to the boundaries of NPT?

Despite the above, the cost of delivering the service far outweighs the levels of income generated. The following chart identifies the overall expenditure levels for each of the services within the planning function both during 2011/12 and during the year 2016/17, thus enabling comparisons to be made over time and demonstrate the areas where we have made significant cuts over that period.

### Comparison of Net Expenditure Levels between 2011/12 and 2017/18

	Development Management	Countryside and Wildlife	Planning Policy	Total
<b>2011/12</b>	£248,740	£498,205	£544,656	<b>£1,291,601</b>
<b>2016/17</b>	£249,237	£231,412	£293,125	<b>£773,774</b>
<b>Difference</b>	<b>£497</b>	<b>-£266,793</b>	<b>-£251,531</b>	<b>-£517,827</b>
<b>% Change</b>	<b>+0.2%</b>	<b>-54%</b>	<b>-46%</b>	<b>-40%</b>

The above table indicates that there has been an overall reduction in expenditure associated with the Planning Service since 2011/12 of 40% (The reduction in real terms is significantly higher when you take into account inflation). This reduction is mainly as a consequence of staff reductions.

In terms of income levels, this is mainly secured within the Development Management section of the service through planning application fees, pre-application fees and Planning Performance Agreements. These income levels have reduced significantly from £731,012 in 2016/17 to £444,046 in 2017/18. This reduction in income is, as stated earlier, a consequence of a reduction in the submission of big fee earning planning applications which were used to cross subsidise the processing of smaller applications where the fee income was woefully short of that required to deliver the service.

Previous APPR's have confirmed that non-material amendments (NMAs) and S73 applications which allow amendments to planning permissions have also resulted in a fee reduction. Given that this has been reported previously, it is not necessary to go into detail as to why this is happening but it is important to note that it continues to have an impact.

In an attempt to address the above, the council is pursuing a commercialisation agenda whereby we are potentially looking to deliver fee earning services (subject to legislative constraints). We already provide both a statutory and non-statutory pre-application service which creates income as well as entering into Planning Performance Agreements wherever possible. Whilst this has been delivering additional income for a number of years, the lack of a planning application fee increase together with the reduction in big fee earning planning applications has necessitated an increase in focus on pre-app. This will be explained in greater detail in the following section. The fee earning potential in the pure planning sense is very restricted beyond these areas. Nevertheless our asset sponsorship work together with the consultancy work provided by the Biodiversity section and our colleagues within the Public Protection part of the service will enable us to continue cross subsidising in an attempt to prevent further cuts going forward. This is not likely to be a long term solution to the delivery of statutory services if further cuts are passed on from Central to Local Government.

### **Our Local Story**

In 2017/18 the Authority employed 13 FTE Planning Officers within the Development Management team who report to a Development Manager. We also had use of specialist mineral officers within Carmarthenshire via a SLA although it is acknowledged that the demand for these services is declining. They comprise of 2 Team leaders, 3 Senior Planning officers, 5 Planning Officers, and 3 Assistant Planners. We also employed 2.4 Enforcement Officers 0.4 of which deals with minerals and waste.

During 2017/18 they determined 804 planning applications and investigated 257 enforcement complaints. Due to disappointing performance figures in relation to the determination of major planning applications, a business case was made for the appointment of an additional senior planning officer increasing the number of officers to three. It was intended that these officers would concentrate on fast tracking major developments through the planning process with a view not only to improving the speed of determination but also enabling the Council to achieve its ambitious regeneration programme. Unfortunately, one of the officers has subsequently retired and due to the ongoing budget pressures experienced within the service, the post has been retained on the structure but frozen. In addition to this a further restructure has taken place as a consequence of the retirement of an enforcement officer. Given that the service has only two enforcement officers covering the county borough, one of the existing planning officers part way

through the year was re-deployed to enforcement. The Section 106 Officer was also regrettably made redundant due to the above financial pressures. As a result the service has not only lost a senior planning officer but there has also been a net reduction of two planning officers within the service towards the end of the 2017/18 financial year.

Despite the above, during this period the Planning Officers and Assistants carried a varied workload as follows:

**Assistant Planners** were allocated an average caseload of 109 applications last year and had an average determination rate of approximately 115 application each over the year

**Planning Officers** were allocated an average caseload of 68 applications last year and had a determination rate of approximately 71 applications over the year.

**Senior Planning Officers and Team Leaders** were allocated an average caseload of 33 applications per year and had an average determination rate of approximately 35 applications over the year.

*(This includes applications which are not normally reported to the Welsh Government such as consultations from neighbouring authorities, TPOs screening and scoping opinions etc.)*

It is encouraging to see that despite the significant legislative and procedural changes that the planning system has recently undergone, the above figures demonstrate an increase in terms of the caseload handled by a reducing number of officers and an improvement in performance when compared with last year. There is however further work required to ensure that we are able to re-appoint to the now vacant senior officer post and thus enable major applications to be fast tracked through the planning system and delivered on the ground. In addition to improving the Authority's performance in that regard, our objective is to reinforce the message to all of our customers that Neath Port Talbot is a 'place to do business', with potential benefits to the local economy as a consequence.

It is noted from the above figures that the workloads carried by the officers appears to be less than that which was identified within a research document commissioned by the Planning Officers Society in 2004. This piece of research confirmed that a reasonable case officer workload should be in the region of 150 applications (not including pre-apps, appeals and other non-planning application related work). However, that research was undertaken some 12 years ago and the complexity of the planning legislation has increased significantly since then. The Planning Advisory service recently undertook research into the quality of the service, the cost of delivery as well as assessing the capacity of each service to deal with the demands from our customers. Whilst the research wasn't commissioned by Local Planning Authorities, our co-operation was sought on the basis that the information would be shared with each authority and it would be anonymised to ensure that it wasn't used as a tool to use against specific authorities. As a consequence the vast majority of authorities co-operated including NPT but we have not been provided with the detailed reports we were promised. Furthermore we have been advised that a report was completed for Welsh Government which was not anonymised. This project therefore undermined the commitments given by the project provider in addition to undermining the objectives of collaboration and transparency. (The results of that research have yet to be published).

Neath Port Talbot has emphasised previously and as part of this research that it is also in a unique position whereby the Planning service no longer has planning technicians to support it. As a result case officers are required to undertake their own administration of applications including the validation, registration, scanning and indexing of documents on the electronic document management system and preparing files for dispatch post determination. All of this takes time and resources and needs to be considered on top of the case number details.

In addition, the responsibilities of all Planning Officers are also currently being reviewed to ensure that any potential spare capacity is actively utilised to support delivery of the enforcement service and our income generation activities.

Turning to Planning Policy, the section comprises the Planning Policy team, including active travel and asset sponsorship (6 FTEs) and Countryside & Wildlife team (8.7 FTEs) who report to the Planning Policy Manager.

Whilst the number of staff within the Planning Policy team has reduced since the start of the LDP process (by 3 FTEs), the responsibilities have increased from being purely planning policy (i.e. LDP preparation, monitoring and review, Supplementary Planning Guidance (SPG) etc.) to now extending to include active travel / cycling promotion and development and asset sponsorship. Having successfully steered the LDP through an EIP concluding with the adoption of the plan in January 2016, the emphasis of the work in 2017/18 has primarily switched to delivering a number of associated SPG, responding the first Annual Monitoring Report (AMR) and preparing the second AMR and delivering upon the requirements of the Active Travel legislation [i.e. the Existing Route Map (ERM) and the Integrated Network Map (INM)].

The Countryside & Wildlife team, who are responsible for biodiversity, public rights of way and highways advice, also input into the planning process. The number of staff within the team has also reduced over a period of time (3.4 FTEs) and consequently the role of the team has had to be re-evaluated to now provide a greater emphasis on consultancy style advice to other departments. Both biodiversity and rights of way are consultees to Development Management.

All of the above sections work together to deliver the planning service for Neath Port Talbot and are reliant upon the income generated from the planning application process in order to continue to function. Despite this, the number of planning applications submitted for minor and major applications has reduced significantly since austerity commenced. This was no doubt as a consequence of investor uncertainty associated with the unstable financial markets following the economic crash in 2008 and has since been replaced by concerns over Brexit and what this will mean. It is notable that during this time period the one consistent factor relates to viability. Whilst research has been commissioned to establish why development is stalled in Wales, there is very little movement to address this issue with potential exception to recent discussions regarding a vacant Land Tax. Whilst such a tax in theory should dissuade landowners/developers from land banking, the majority of sites are not stalled intentionally but for reasons of viability.

Locally, the sales values in Neath Port Talbot are considerably lower than in the neighbouring areas of Bridgend and Swansea, and as a consequence these neighbouring areas are experiencing a higher demand from national housebuilders. This in turn enables the associated councils to secure a higher fee income from the planning applications and enables them to deliver their LDP growth ambitions. Given the economic climate of recent years, even the large volume housebuilders are



more cautious and tend only to invest in a site which they consider will deliver maximum returns. It is quite clear that national housebuilders will choose to concentrate on higher value areas where the potential for return is greater. Not only does this impact upon planning fee income but more importantly it could exacerbate the shortfall of housing in certain areas of Wales including Neath Port Talbot.

The impacts of viability have had a knock on effect upon the delivery of affordable housing given that it is delivered as a percentage of overall housing numbers and only in areas deemed viable when the LDP was adopted. Since that time land values have continued to decline while build costs have increased. Moreover land owner expectations have also increased. This is demonstrated in the following example where we are dealing with a pre-application inquiry to develop a LDP allocated site for up to 200 residential units on 10 hectares. The site was being marketed at £5 million and the developer had offered 10% affordable housing in addition to £500k towards planning obligations which would include off site highway works. Given that such contributions are lower than the councils SPG seeks to achieve the submission was referred to the District Valuer (DV), who acknowledged that given the abnormalities associated with this site, the proposed offer from the developer was generous and couldn't possibly deliver a return to the house builder. The DV suggested that the land should be valued at £1.85m rather than the £5m sought. In response to this the land owner has increased the price of the site to £7.3m, which pays no regard to abnormalities or even comparable land values within the surrounding area. It is examples such as this which are making it very difficult for the council to deliver both general market and affordable housing in accordance with the ambitions within the LDP. Whilst it is acknowledged that the proposed vacant land tax has a number of potential unacceptable consequences, it would certainly help to address the unreasonable expectations of landowners such as this. Furthermore, it justifies a potential change in LDP policy and procedure to demonstrate deliverability/viability before a site is allocated.

Despite the budget pressures and reduction in staff experienced within the service, the Planning Service has secured a number of achievements over the last financial years, which are summarised as follows:

1. Since LDP adoption, a total of 11 SPG documents have been published including those relating to Planning Obligations; Affordable Housing; Open Space and Greenspace; Baglan Energy Park Development Framework; Landscape and Seascape; Biodiversity and Geodiversity; Pollution; Renewable and Low Carbon Energy; Parking Standards; Design; and Development and the Welsh Language. Work is already underway on the remaining SPG.
2. Research and preparatory work has been undertaken to deliver a 'Biodiversity Compensation Scheme' to support the planning process feeding into the development of SPG. This piece of work will assist in the development and delivery of strategic biodiversity compensation sites which will be sited across the county borough and will reflect the diverse range of habitats which are evident. They will be used as repositories for flora and fauna which need to be translocated from sites to aid their redevelopment. The benefits will be three fold in securing enhancements to biodiversity in line with the council's biodiversity action plan; enabling the release of land for redevelopment which is currently impacted upon by biodiversity and lastly generating a revenue stream from

developers/landowners who wish to translocate species onto the strategic sites given that such translocation will be supported by a commuted sum to cover the cost of management.

3. Systems and procedures for monitoring the performance of the LDP were finalised to secure the efficient and effective collection of data. The 1st Annual Monitoring Report (AMR) was submitted to the Welsh Government in October 2017. Work has already commenced on the 2nd AMR due for submission in October 2018.
4. The annual Joint Housing Land Availability Study (JHLAS) was published and demonstrated that we had a 5-year land supply. This removes the pressure on the council to approve development in areas which are considered less suitable for redevelopment.
5. The Active Travel Act commitment in relation to the Existing Route Map (ERM) and the Integrated Network Map (INM) was achieved. Following a Welsh Government direction to revise the ERM, further work was undertaken and an amended ERM was submitted in July 2016. The Council received Ministerial approval of the ERM in August 2016.
6. The ERM has been kept under review alongside the preparation of the INM. The revised ERM and INM were prepared, consulted upon, finalised and submitted to the Welsh Government in November 2017. Following a period of review, the Council received Ministerial approval of both maps on 27th February 2018.
7. The management and maintenance regimes associated with our Public Rights of Way (PRoW) network have been amended following a review of the Community Council Path Maintenance Scheme. Work has also commenced on a review of the Rights of Way Improvement Plan (RoWIP). An assessment is currently underway to determine the extent to which rights of way meet the present and future needs of the public; the opportunities provided by our rights of way for exercise and other forms of recreation; the accessibility of our rights of way for blind, partially sighted people and others with mobility problems; the degree to which the current RoWIP has been delivered; and the present condition of the rights of way network. This is an extensive piece of work which will be constrained due to the loss of government funding.
8. Support and contributions have been made to regional collaboration initiatives and studies. This is particularly important in the light of the new planning regime in Wales and the introduction of Strategic Development Plans (SDPs). SDP workshops have taken place to discuss the scope of topics to be covered and establish aspirations for the region and there is potential for collaborative studies to commence shortly in respect of a Local Housing Market Assessment (LHMA) and a 'Larger than Local' Economic Study.
9. The 'Biodiversity Duty Plan' was prepared and published in December 2017. The Plan outlines actions already being undertaken by the Council and further actions that will be undertaken to ensure compliance with the Duty.
10. The sponsorship of council owned assets to secure fee income has been extended. Following a full procurement exercise, the contract with Immediate Solutions has been restructured and extended. In addition to the established roundabout assets, additional

assets have been identified for marketing including boundary signs, gateway signs, verges and lighting columns.

11. Officers have successfully delivered planning permissions for a number of Vibrant and Viable Places projects and related schemes. This includes the completion of the transport interchange at Port Talbot, and ongoing major developments at Aberafan House, PT Police Station; Glanafan School, plus new schools developments at Sandfields, Margam, Briton Ferry and Ystalyfera.
12. An approved SPG relating to Planning Obligations has been adopted and is being implemented by Development Management. This is supported by a workable and up-to-date S106 database, an organised structure for Section 106 obligations to facilitate easy access to key information, and a key list of priorities moving forward. Despite this a review is likely to be required within the next year or so (probably alongside the LDP Review) to reflect aspirations for encouraging greater development within NPT, having regard to serious ongoing viability issues within the County Borough.
13. The visibility and accessibility of staff on the front line and at managerial level has improved to ensure that all problems are identified at an early stage thus smoothing the way to expeditious and consistent decision-making.
14. Procedural changes have been made to address legislative changes, including matters such as Living Decision Notices.
15. Performance in the determination of planning applications has improved significantly, albeit against a background of reduced major applications. The authority is now back up into 4th position out of 25 Local Planning Authorities in Wales with 96% of applications determined on time.
16. A timetable of Members' training has been undertaken since the last review, including: - delegation arrangements/ members' site visits; Flooding; Enforcement; LDP / Policies; Archaeology and Planning. In addition, training has been held with all new members of the Planning Committee.
17. Amendments to the delegated arrangements were approved at Council, alongside changes to the Council's public speaking and Members' site visit protocol / procedures. The latter changes have addressed the concerns/constructive criticism received from elected Members and members of the public.
18. Significant work has been undertaken on the Enforcement service, including the approval of the Council's first Enforcement Charter, and amendments to procedures to reflect the charter and the amendments to the Welsh Government's reporting indicators. Due to ER/VR issues, this has also included a restructure of the service resulting in the appointment of a new Senior Planning Enforcement Officer, to ensure that the enforcement service has appropriately qualified and experienced officers to work in accordance with the standards set out in the Charter, and thus ensure that the service expeditiously enforces in the wider public interest.

19. Our website has been improved to enable for the submission of complaints and supporting information electronically. If used to maximum effect whereby complainants upload photographs and film of the subject matter to which their complaint relates it enables us to prioritise complaints and speed up the investigation process. Many complaints (if submitted electronically) can now be assessed via a desk top exercise rather than travelling often quite considerable distances. It also allows officers to confirm whether a breach of the planning legislation has occurred without even leaving their desks and in turn enables us to focus our time and resources on the more serious complaints straight away.
20. The programme of works associated with the Open Cast Coal Sites at East Pit, Margam and Selar has been maintained with officers working closely with the operator of the sites and other regulators to ensure that the extraction activities and the restoration schemes remain on target in terms of delivery without impacting upon the surrounding environment and communities over and above that projected at the planning application stage. Restoration on all three sites is progressing very well and will leave a legacy of a fully restored environment.
21. The Council continues to deliver a robust and efficient pre-application service (both statutory and non-statutory) which provides choice in the level of service available to customers, in addition to giving them the opportunity to continue having confidential discussions with the Council until such a time as a planning application is submitted. This has resulted in a boost to income which is used to cross subsidise the poor income levels associated with planning applications.

These are the most significant achievements secured during 2016/17. In addition to the above, our staff continue to deliver statutory functions despite a decreasing budget for customers who have increasingly higher expectations. This will become gradually worse over the next few years when budgets become even more constrained. Managers within the section are monitoring and trying to boost morale to ensure that sickness levels are maintained at a minimum and performance at a maximum although this is becoming more and more challenging.

### **Priorities going forward**

There are a number of key priorities and service improvements which have been identified for this year, some of which intend to build upon and continue to improve upon the success secured up until recently. These include the following:

- **Deliver a mobile working platform for planning and enforcement officers to secure more efficient working practices.** We have purchased mobile tablets for use by officers on an experimental basis. It is anticipated that these can be used to enable officers to enter data direct into our back office system and take photographs which can automatically be loaded into the system. In time it is even hoped that officers can write the bare bones of a report whilst on site. This should in turn reduce duplication and improve the efficiency of the service. This has been a priority for some time but following experimentation with a particular piece of hardware that experimentation continues. The wider Planning and Public Protection service incorporates the Environmental Health and Trading Standards service

which is currently piloting agile working for the authority. To-date this appears to be working well for both the council and the staff. The pilot appears to be demonstrating that the floor area required to accommodate services is reducing, hence the operating costs to deliver services will in turn reduce. In the longer turn it may result in the council reducing its asset base and securing income as a consequence. In terms of staff benefits, the council has for some time now struggled to compete against the private sector in terms of recruiting and retaining professional staff. This is as a consequence of the remuneration associated with local government. Whilst in the past certain job sectors have relied on market supplements, this was effectively removed after job evaluation. Furthermore it isn't the answer when the pressure relates to a large number of professional sectors, as is the case. The only opportunity open to the council is to therefore take a more flexible approach to working arrangements with a view to supporting the work life balance. The agile working arrangements currently being piloted allows greater freedom to work from home or from other public buildings and also removes the core time working restrictions. This allows staff with commitments outside of work to manage their work demands around their other commitments on condition that their efficiency is maintained or even improved upon and they continue to deliver the needs of the service when it is demanded by service users. As indicated earlier, whilst it is early days and is reliant upon technology and robust performance management measures being in place, the outcomes are positive and a priority going forward is to ensure that the planning service adopts agile working practices.

- **Implement a new back office Planning system.** A new system (IDOX UNI-Form) has been procured and is currently in the process of being installed. Staff are currently reviewing workflows and procedures. The system is the same as that operated by Swansea City Council and whilst Local Government Re-organisation seems to be less of a priority for Welsh Government, the same IT system will enable the two authorities to work closer together going forward and therefore maximise any associated efficiency savings.
- **Officer time will continue to be focused on delivering the schemes forming part of the Vibrant and Viable Places (VVP) Project and in time the second phase of this programme and the work required to deliver the Valleys Task Force priorities.** The two existing senior officers will be tasked with supporting developers through the planning application through early intervention. The constraints which could prevent schemes from coming forward will be identified at the earliest possible stage and partners will be engaged to identify viable and deliverable solutions to ensure that the schemes are approved having regard to all material planning considerations.
- **A reinforced focus on securing Planning Performance Agreements (PPA).** With a reduction in major applications over the last year, our ability to secure income has reduced. Early indications suggest that non-residential schemes appear to be coming forward in terms of investor inquiries through our regeneration team. The Planning service will need to capitalise on these inquiries by proactively contacting the developers and offering bespoke advice and guidance via a PPA. This income together with cuts in spending will enable us to cross subsidise the drop in planning application fees which have been and will no doubt continue to be experienced going forward.

- **Establish a cross boundary agent's workshop.** Given that many of the agents who work in Neath Port Talbot also practice in Swansea, it is proposed to deliver shared agents workshops ideally twice a year. In order to implement such an arrangement, the individual practices of each authority needs to be considered to ensure consistency in procedure and to a certain extent culture and therefore ensure that the sessions are not used by agents to complain about different practices between the two authorities. This should in turn reduce the ability of agents to criticise differing practices and attitudes and play each authority off against each other.
- **Provide additional Added Value Services.** This may involve the introduction of a fast track planning application service potentially aligned with the building control service to deliver a one stop shop service for householders. The introduction of a fast track service for household development would assist in meeting the increasing expectations of the public in terms of the quality and speed of the service. The Building control section are actively competing against the private sector in the form of Approved Inspectors who have more flexibility in terms of the work they take on and the fees they charge. The unique selling point for the Council is that we have both a building control and statutory planning function, which is not a position available to any of the Approved Inspectors. The establishment of a partnership between the two services to ensure that householder schemes are designed to address both planning and building control issues concurrently will enable developers to commence work without delay. The merger of both services will also ensure that all issues are addressed under one process. The fast track process will attract an additional fee and will contribute towards the commercialisation agenda the council is pursuing to minimise the impact of continued budget cuts.

A further added value service is the re-introduction of a service to support the conveyance and land charges process whereby properties are assessed in detail for compliance with approved and implemented planning permissions. This service operated in the past when a compliance post was on the structure. This post has been removed from the structure as a consequence of budget cuts and lack of income. If a different approach is taken to marketing the service and the structure re-organised, it can be re-introduced for certain types of properties. In the first instance this will be for individual residential properties only, and if successful and there is capacity it can be rolled out to larger scale projects.

- **Undertake work on behalf of neighbouring authorities.** A DNS project is currently in its inception on the boundary between NPT and Powys. Whilst only 10% of the site lies within NPT, there are skills and experience within NPT to deliver the project. A Service Level Agreement (SLA) can be put in place to enable NPT to act on behalf of both authorities. The work will be paid via a Planning Performance Agreement (PPA) which will be negotiated by NPT with the developer. This again will contribute towards the council's commercialisation agenda.
- **Facilitate the continued redevelopment of the Coed Darcy Urban Village.** This is a strategically important development for the County Borough. St Modwen who own the site have stalled bringing forward future phases of this development site since securing a resolution to grant a variation of their S106 agreement in February 2015. The delays have

been associated with viability and whilst the council is currently working with St Modwen to ensure that the S106 only seeks to secure essential infrastructure, the sticking point continues to be the delivery of affordable homes. The council will continue to work to ensure that the site is delivered with all essential infrastructure but in a manner that enables the developers to commence development.

- **Continue work on the remaining SPG required to support the LDP.** The last batch of three SPG will be consulted upon, finalised and adopted (i.e. The Historic Environment, Fabian Way Innovation Corridor and Port Talbot Harbourside and Town Centre Development Framework). Once adopted, the SPGs will provide further clarity to developers and Development Management staff when interpreting policies within the LDP. This will reduce risk and should encourage good quality development within Neath Port Talbot. The adoption of the SPGs will be the appropriate measure.
- **Complete and submit the second LDP Annual Monitoring Report (AMR) in addition to responding to its conclusions.** The second AMR is complete and ready for submission to Welsh Government. It demonstrates that 67 of the 89 indicators are working to achieve the vision and objectives of the plan. 4 of the indicators are not being implemented in the intended manner and further discussions with officers within Development management are required to resolve the issues. 3 of the indicators require the outstanding SPG to be in place and as such should be resolved later this year. The remaining 15 indicate that the policy in question is not proving to be as effective as originally expected. As a consequence further research and investigation will be undertaken to establish the reason for failure. This will be picked up in the third AMR which will be completed in October 2019.
- **Undertake / publish the annual Joint Housing Land Availability Study (JHLAS).** Since adoption of the LDP, the authority has been in a position whereby we can successfully demonstrate a five year land supply. It is acknowledged that this was a struggle in 2018 and to ensure that this supply is maintained it will be necessary to establish the reasons why allocated land isn't coming forward for development and facilitate mechanisms to assist their delivery in the future. This may well result in the viability study which supported the LDP being re-visited. This work will also assist the review of the LDP which is currently forecast to commence in January 2020.
- **Undertake improvements to the footpath and cycle path network to support the Integrated Network Map (INM).** The INM sets out the Council's aspirations for the next 15 years, identifying either improvements to existing routes that could be made or new routes that could be developed and added to the active travel network. The INM was adopted earlier this year and identifies a number of gaps in the network. Work needs to be progressed to prioritise the delivery of infrastructure to plug these gaps. This will require a successful Local Transport Fund (LTF) bid to undertake feasibility with a view to undertaking work on the ground to improve the network going forward. As part of this process it will also be necessary to draw Welsh Governments attention to the long term sustainability of the network. Whilst funding through LTF is available to undertake feasibility and to deliver the improvements, there is no funding available to maintain the network going forward. This could potentially jeopardise the delivery of the INM if the council cannot afford to maintain the extended network.

- **Continue to support and contribute to regional collaboration initiatives / studies.** In its lead/secretariat role for the South West Wales region the Council will seek to facilitate ongoing discussion and progress in respect of regional collaboration initiatives and studies. Extensive discussions have already commenced in relation to the commissioning of joint studies to support both a potential Strategic Development Plan (SDP) across the region and the LDPs or LDP lights which are required at a local level. This joint commissioning currently relates to a regional Housing Needs Market Assessment (HNMA) and a regional Employment Study. Given the different programme positions for each of the LPAs within the region it has not been possible to link the above two studies into one study and thus secure a consistent policy-on approach. However the tender document which is being prepared will require the documents to be designed so that a LPA can integrate them and thus secure a Policy-on approach if such an approach is appropriate.
- **Continue to extend Asset Sponsorship opportunities and associated income.** The procurement process to secure a private sector partner was concluded and the assets are being sponsored in an attempt to generate income. This has had a mixed response to date and is under performing in terms of income generation. Officers are to secure a better working relationship between colleagues in economic development and the private sector partner to improve the marketability of our assets and in turn the income.
- **Complete assessment of the Rights of Way network and commence a review of the ‘Rights of Way Improvement Plan’ (RoWIP).** The timetable for this process has already been agreed. The expectations of the public are going to be difficult to manage going forward given that the £50,000 grant previously available to undertake improvement works from the Welsh Government has been lost, which flies in the face of the objectives of the Wellbeing of Future Generations Act and the Active Travel Act both of which encourage sustainable travel through walking and cycling. Alternative methods of securing the maintenance and improvement of the network need to be identified and considered.
- **Establish a ‘Biodiversity Compensation Service’ working group.** Given that a number of development sites within the county borough have been left to naturally regenerate and have in turn become of interest in terms of biodiversity, it is necessary to consider establishing strategic offsite compensation areas, into which translocation can occur and/or investment can be made to release and maximise the development potential of development sites. In order to facilitate this, a working group of officers from planning and the Estates service needs to be established to identify council land which has no or limited development value for use as host sites.
- **Complete the ‘Green Infrastructure Opportunity Mapping and Multi-Scale Delivery’ Partnership Project and identify a mechanism for integration into the LDP review.** The service is involved in a partnership project with Natural Resources Wales and Public Health Wales to map our green infrastructure and in turn identify shortfalls and opportunities to improve. A pilot has started in the ward which is identified as having the lowest levels of access to open space and has one of the highest levels of air pollution. If the results of this pilot are positive and the funding is available it is proposed to roll it out to other areas and even to link it into the biodiversity project, given that the two objectives overlap.



- **Commence implementation of the Biodiversity Duty Plan.** Initial work will focus on risk assessment of service areas and agreeing a methodology for an audit of Council owned land. The audit will include an identification of opportunities for enhancement and measures to be put in place should mitigation / compensation be required.
- **Deliver a programme of well-being and conservation activities.** This will raise the profile of the natural environment and its wider benefits and will work towards delivering the wellbeing objectives contained within the Corporate Plan.
- **Take forward additional funding opportunities for local and/or landscape scale projects.** This project will focus on delivering multiple-benefits from the natural environment (e.g. Craig Gwladus, Wild Valleys Partnership Project, Lost Peatlands HLF Bid), in order to achieve the wellbeing objectives of the Corporate Plan in addition to the objectives contained within the Biodiversity Duty Plan.

## WHAT SERVICE USERS THINK

In 2017-18 we conducted a customer satisfaction survey aimed at assessing the views of people that had received a planning application decision during the year.

The survey was sent to 315 people, 10% of whom submitted a whole or partial response. The majority of responses (44%) were from members of the public. 9% of respondents had their most recent planning application refused.

We asked respondents whether they agreed or disagreed with a series of statements about the planning service. They were given the following answer options:

- Strongly agree;
- Tend to agree;
- Neither agree nor disagree;
- Tend to disagree; and
- Strongly disagree.

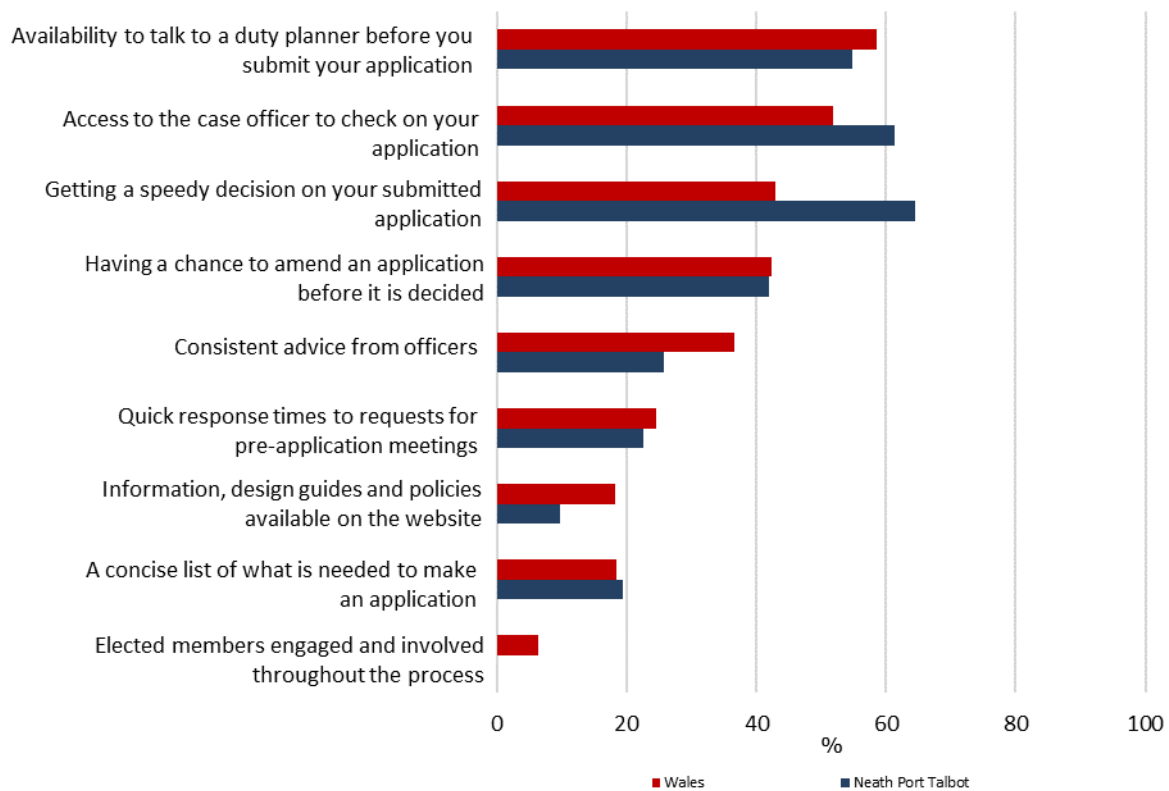
Table 1 shows the percentage of respondents that selected either 'tend to agree' or 'strongly agree' for each statement for both our planning authority and Wales.

**Table 1: Percentage of respondents who agreed with each statement, 2017-18**

<b>Respondents who agreed that:</b>	<b>Neath Port Talbot LPA %</b>	<b>Wales %</b>
The LPA applies its planning rules fairly and consistently	60	55
The LPA gave good advice to help them make a successful application	59	60
The LPA gives help throughout, including with conditions	53	52
The LPA responded promptly when they had questions	65	62
They were listened to about their application	61	60
They were kept informed about their application	61	52
They were satisfied overall with how the LPA handled their application	63	63

We also asked respondents to select three planning service characteristics from a list that they thought would most help them achieve successful developments. Figure 1 shows the percentage of respondents that chose each characteristic as one of their three selections. For us, 'getting a speedy decision on a submitted application' was the most popular choice.

**Figure 1: Characteristics of a good planning service, 2017-18**



Comments received include:

- “The service we received was first class.”
- “I have found my experience with NPT Planning department a very professional and helpful experience.”
- "Over the last year or so, there has been an immense improvement in the service offered.”
- “Our application required significant amendments, at the request of the client. The LPA has acted in a co-operative and flexible manner to accommodate this”
- “When I do have contact with Officers by phone or in person, I find their advice consistent and professionalism high.

### **OUR PERFORMANCE 2017-18**

This section details our performance in 2017-18. It considers both the Planning Performance Framework indicators and other available data to help paint a comprehensive picture of performance. Where appropriate we make comparisons between our performance and the all Wales picture.

Performance is analysed across the five key aspects of planning service delivery as set out in the Planning Performance Framework:

- Plan making;
- Efficiency;
- Quality;
- Engagement; and
- Enforcement.

## Plan making

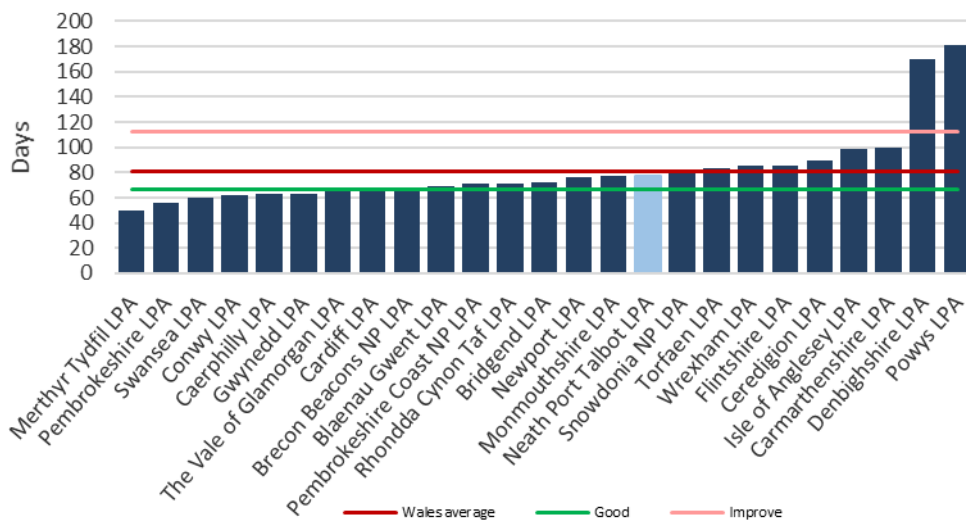
As at 31 March 2018, we were one of 22 LPAs that had a current development plan in place.

During the APR period we had 5.3 years of housing land supply identified, making us one of 7 Welsh LPAs with the required 5 years supply.

## Efficiency

In 2017-18 we determined 804 planning applications, each taking, on average, 76 days (just under 11 weeks) to determine. This compares to an average of 81 days (12 weeks) across Wales. Figure 2 shows the average time taken by each LPA to determine an application during the year.

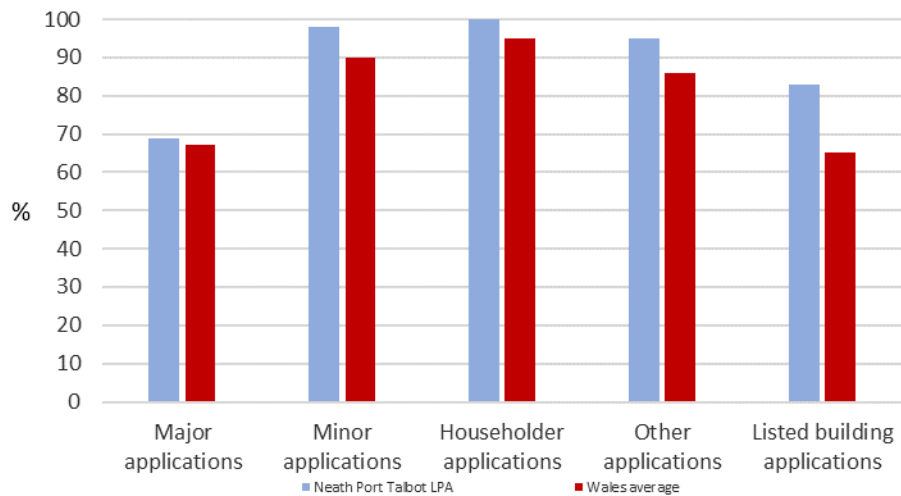
**Figure 2: Average time taken (days) to determine applications, 2017-18**



97% of all planning applications were determined within the required timescales. This was the fourth highest percentage in Wales and we were one of 22 LPAs that had reached the 80% target.

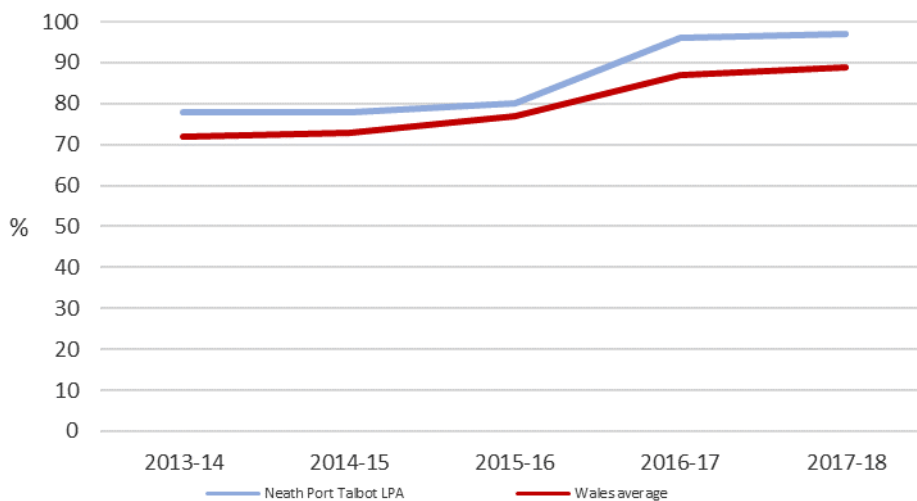
Figure 3 shows the percentage of planning applications determined within the required timescales across the main types of application for our LPA and Wales. It shows that we determined 100% of householder applications within the required timescales. We also determined 83% of Listed Building Consent applications within the required timescales.

**Figure 3: Percentage of planning applications determined within the required timescales, by type, 2017-18**



Between 2016-17 and 2017-18, as Figure 4 shows, the percentage of planning applications we determined within the required timescales increased from 96%. Wales also saw an increase this year.

**Figure 4: Percentage of planning applications determined within the required timescales**



Over the same period: The number of applications we received increased slightly;

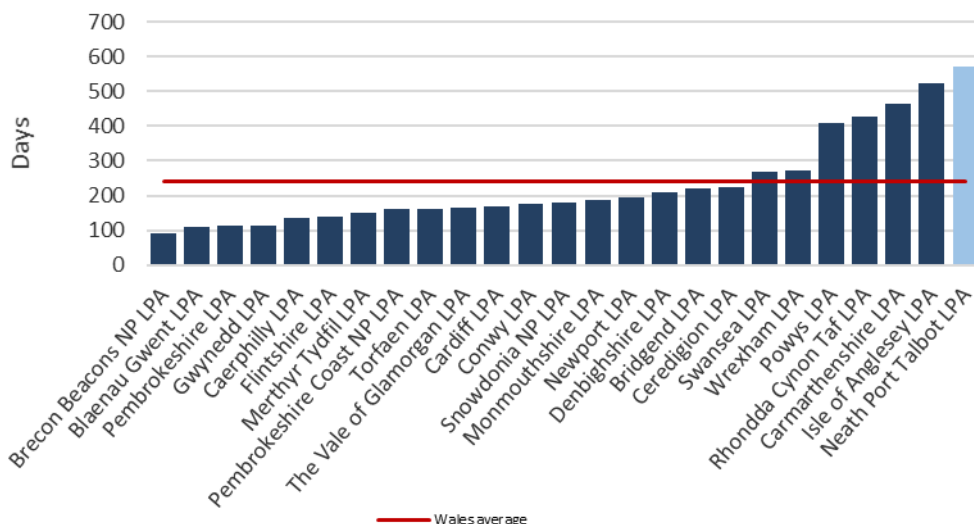
- The number of applications we determined decreased slightly; and
- The number of applications we approved decreased.

### Major applications

We determined 13 major planning applications in 2017-18, 15% (2 applications) of which were subject to an EIA. Each application (including those subject to an EIA) took, on average, 573 days (82 weeks) to determine. This figure has been exaggerated by the length of time it took to determine 4 controversial applications, all of which were held up due to delays from the applicants

rather than delays in officers processing the applications. As Figure 5 shows, this was the longest average time taken of all Welsh LPAs

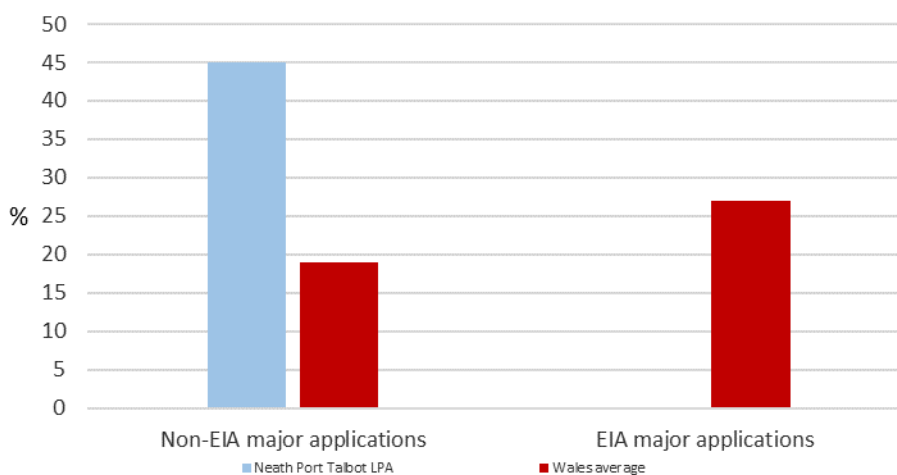
**Figure 5: Average time (days) taken to determine a major application, 2017-18**



69% of these major applications were determined within the required timescales which corresponds with the average across Wales.

Figure 6 shows the percentage of major applications determined within the required timescales by the type of major application. 45% of our ‘standard’ major applications i.e. those not requiring an EIA, were determined within the required timescales during the year.

**Figure 6: Percentage of Major applications determined within the required timescales during the year, by type, 2017-18**

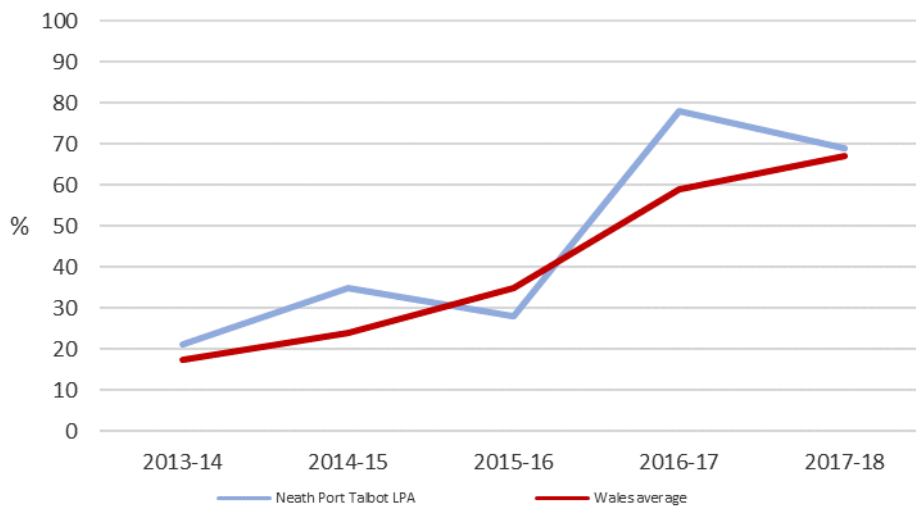


In addition we determined 4 major applications that were subject to a PPA in the required timescales during the year.

Since 2016-17 the percentage of major applications determined within the required timescales had decreased from 78%. Similarly, the number of major applications determined decreased while the number of applications subject to an EIA determined during the year increased.

Figure 7 shows the trend in the percentage of major planning applications determined within the required timescales in recent years and how this compares to Wales.

**Figure 7: Percentage of major planning applications determined within the required timescales**



Over the same period:

- The percentage of minor applications determined within the required timescales increased from 97% to 98%;
- The percentage of householder applications determined within the required timescales increased from 99% to 100%; and
- The percentage of other applications determined within required timescales stayed the same at 95%.

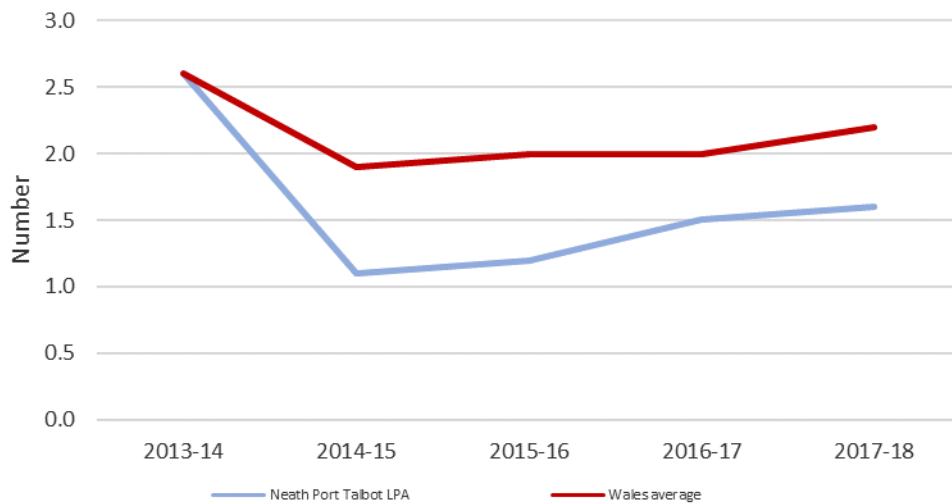
## Quality

In 2017-18, our Planning Committee made 24 planning application decisions during the year, which equated to 3% of all planning applications determined. Across Wales 7% of all planning application decisions were made by planning committee.

0% of these member-made decisions went against officer advice. This compared to 9% of member-made decisions across Wales. This equated to 0% of all planning application decisions going against officer advice; 0.6% across Wales.

In 2017-18 we received and the Planning Inspectorate subsequently determined 13 appeals against our planning decisions, which equated to 1.6 appeals for every 100 applications received. Across Wales 2.2 appeals were received for every 100 applications. Figure 8 shows how the volume of appeals received has changed since 2016-17 and how this compares to Wales.

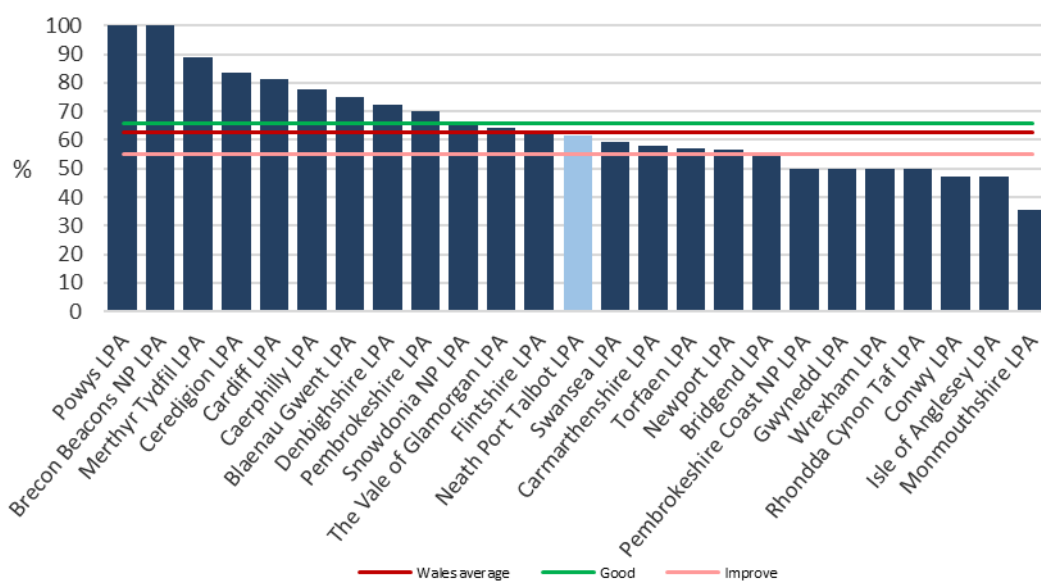
**Figure 8: Number of appeals received per 100 planning applications**



Over the same period the percentage of planning applications approved decreased from 84% to 80%.

Of the 13 appeals that were decided during the year, 62% were dismissed. As Figure 9 shows, this was lower than the percentage of appeals dismissed across Wales as a whole and was below the 66% target. It must however be acknowledged that we had a number of split decisions during this period, for example, we had a few appeals against multiple conditions where the appellant sought to remove a number of conditions and whilst PINs allowed one or two of the conditions to be removed, the vast majority were retained and the officers reasons for imposing them were supported. Nevertheless for statistical purposes this is considered to be an appeal that is Allowed for the purposes of KPIs.

**Figure 9: Percentage of appeals dismissed, 2017-18**



During 2017-18 we had no applications for costs at a section 78 appeal upheld.



## Engagement

We are:

- one of 24 LPAs that allowed members of the public to address the Planning Committee; and
- one of 21 LPAs that had an online register of planning applications.

As Table 2 shows, 59% of respondents to our 2017-18 customer survey agreed that the LPA gave good advice to help them make a successful application.

**Table 2: Feedback from our 2017-18 customer survey**

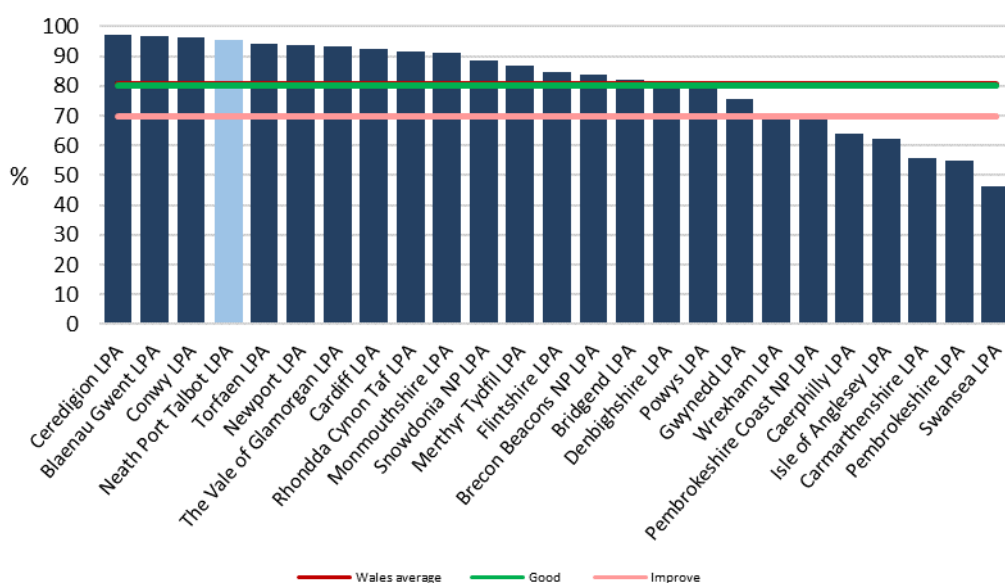
Respondents who agreed that:	Neath Port Talbot LPA	
	%	Wales %
The LPA gave good advice to help them make a successful application	59	60
They were listened to about their application	61	60

## Enforcement

In 2017-18 we investigated 256 enforcement cases, which equated to 1.8 per 1,000 population. This compared to 2.0 enforcement cases investigated per 1,000 population across Wales.

We investigated 95% of these enforcement cases within 84 days. Across Wales 81% were investigated within 84 days. Figure 10 shows the percentage of enforcement cases that were investigated within 84 days across all Welsh LPAs.

**Figure 10: Percentage of enforcement cases investigated within 84 days, 2017-18**



The average time taken to pursue positive enforcement action was 188 days.

## ANNEX A - PERFORMANCE FRAMEWORK

### OVERVIEW

MEASURE	GOOD	FAIR	IMPROVE	WALES AVERAGE	Neath Port Talbot LPA LAST YEAR	Neath Port Talbot LPA THIS YEAR
<b>Plan making</b>						
Is there a current Development Plan in place that is within the plan period?	Yes		No	Yes	Yes	Yes
LDP preparation deviation from the dates specified in the original Delivery Agreement, in months	<12	13-17	18+	67	N/A	N/A
Annual Monitoring Reports produced following LDP adoption	Yes		No	Yes	Yes	Yes
The local planning authority's current housing land supply in years	>5		<5	7 of 25	5	5
<b>Efficiency</b>						
Percentage of "major" applications determined within time periods required	>60	50-59.9	<50	67.4	78	69
Average time taken to determine "major" applications in days	Not set	Not set	Not set	240.1	448	573
Percentage of all applications determined within time periods required	>80	70-79.9	<70	88.5	96	97
Average time taken to determine all applications in days	<67	67-111	112+	80.7	72	78
Percentage of Listed Building Consent applications determined within time periods required	Not set	Not set	Not set	65.4	-	83
<b>Quality</b>						
Percentage of Member made decisions against officer advice	<5	5-9	9+	8.6	8	0
Percentage of appeals dismissed	>66	55-65.9	<55	62.6	63	62
Applications for costs at Section 78 appeal upheld in the reporting period	0	1	2+	0	1	0
<b>Engagement</b>						
Does the local planning authority allow members of the public to	Yes		No	Yes	Yes	Yes

MEASURE	GOOD	FAIR	IMPROVE
address the Planning Committee?			
Does the local planning authority have an officer on duty to provide advice to members of the public?	Yes		No
Does the local planning authority's web site have an online register of planning applications, which members of the public can access, track their progress (and view their content)?	Yes	Partial	No
<b>Enforcement</b>			
Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days	>80	70-79.9	<70
Average time taken to take positive enforcement action	Not set	Not set	Not set

WALES AVERAGE	Neath Port Talbot LPA LAST YEAR	Neath Port Talbot LPA THIS YEAR
Yes	Yes	Yes
Yes	Yes	Yes
80.6	98	95
184.6	101	188

## SECTION 1 – PLAN MAKING

Indicator	01. Is there a current Development Plan in place that is within the plan period?	
“Good”	“Fair”	“Improvement needed”
A development plan (LDP or UDP) is in place and within the plan period	N/A	No development plan is in place (including where the plan has expired)

Authority’s performance	Yes
<p>The Council’s Local Development Plan (2011-2026) was adopted in January 2016. By the end of March’18, the Council had adopted 9 key Supplementary Planning Guidance (SPG) documents with only a further 5 outstanding.</p> <p>In addition to the above our first Annual Monitoring Report was submitted to the Welsh Government in October 2017 with the first Review not scheduled until 2020.</p>	

Indicator	02. LDP preparation deviation from the dates specified in the original Delivery Agreement, in months	
“Good”	“Fair”	“Improvement needed”
The LDP is being progressed within 12 months of the dates specified in the original Delivery Agreement	The LDP is being progressed within between 12 and 18 months of the dates specified in the original Delivery Agreement	The LDP is being progressed more than 18 months later than the dates specified in the original Delivery Agreement

Authority’s performance	N/A

Indicator	03. Annual Monitoring Reports produced following LDP adoption	
“Good”	“Fair”	“Improvement needed”
An AMR is due, and has been prepared		An AMR is due, and has not been prepared

Authority’s performance	First review submitted
<p>The first Annual Monitoring Report was submitted on the 31<sup>st</sup> October 2017 which demonstrated that the policies were successfully achieving the vision and objectives of the LDP at that time. The second Annual Monitoring Report is due to be submitted on the 31<sup>st</sup> October 2018.</p>	

Indicator	04. The local planning authority's current housing land supply in years	
<b>"Good"</b>		<b>"Improvement needed"</b>
The authority has a housing land supply of more than 5 years		The authority has a housing land supply of less than 5 years

Authority's performance	5.3
<p>The Local Authority successfully demonstrated that we have sufficient land available for housing however this is reliant upon the limited number of volume housebuilders delivering the planning permissions they have been granted.</p> <p>It is acknowledged that there are significant viability issues in the county borough and developers are struggling to deliver the essential infrastructure required to support housing developments whilst also securing a developer profit.</p> <p>It is anticipated that this problem will continue going forward. The Council are however looking to secure investment from the Valleys task force to assist in the delivery of developments within our valleys communities where viability is at its most acute.</p> <p>It may well also result in the need to commission a new viability assessment in advance of the review of the LDP which is due to commence in January 2020. Such a viability assessment can be considered as a material planning consideration in the determination of planning applications.</p>	

## SECTION 2 - EFFICIENCY

Indicator	05. Percentage of "major" applications determined within time periods required	
<b>"Good"</b>	<b>"Fair"</b>	<b>"Improvement needed"</b>
More than 60% of applications are determined within the statutory time period	Between 50% and 60% of applications are determined within the statutory time period	Less than 50% of applications are determined within the statutory time period

Authority's performance	69
<p>Performance has slightly dipped compared to last year. This is as a consequence of the complexity of the applications being considered and the temporary increase and subsequent decrease in the number of senior officers responsible for concentrating on and fast tracking such applications through the process. This reduction was required to secure savings within the service, which is as a consequence of a continually reducing budget.</p>	

Indicator	06. Average time taken to determine "major" applications in days	
"Good"	"Fair"	"Improvement needed"
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority's performance	573
<p>It is important to note that these figures include a number of very old applications which have been with the authority for a number of years, and have as a result skewed the figures.</p> <p>Whilst the Authority tries its best to determine applications as quickly as possible, the constraints identified above make it very difficult and rather than refusing applications at submission, we allow developers to address the constraints and thereby improve the potential for developers to deliver their developments. This is reflected in our approval rate across the board of 96%.</p> <p>We have also dealt with a number of very old applications this year which have been stalled for some time. Examples include 2 mineral schemes which have been with the authority for 2747 and 1570 days respectively together with a residential scheme on an allocated site and a wind farm development which were also in for an extreme period of time. The reasons for the delays in all cases related to the fact that the developers were failing to submit requested information. Whilst it is accepted that in such circumstances the authority are able to refuse the applications, this authority prefers to work with developers to enable sites to be delivered rather than refusing applications and achieving targets.</p> <p>The 'average time' issue has been debated at length by POSW, the Development Managers group and by the task group who have been assessing performance monitoring generally. The use of average times can skew the fact that the vast majority of applications go through the planning process in a reasonable period of time. As a result, the use of either median figures or alternatively the removal of the first and last 5% of applications from the averages figures may well enable for the averages to be a more accurate reflection of the overall performance picture. This is a matter which needs further consideration.</p>	

Indicator	07. Percentage of all applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
More than 80% of applications are determined within the statutory time period	Between 70% and 80% of applications are determined within the statutory time period	Less than 70% of applications are determined within the statutory time period

Authority's performance	97
<p>This improved performance is as a result of an acknowledgement by developers that their applications are not straight forward and as such they have agreed to 'Extensions of Time'.</p>	

The biggest constraint for developments within this authority are normally associated with flooding, contaminated land and biodiversity, all of which take time to address properly in terms of acceptable submissions (especially for biodiversity whereby the survey periods are controlled by the seasons). They also take a long time to consider by both internal and external consultees who have restricted resources.

Indicator	08. Average time taken to determine all applications in days	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
Less than 67 days	Between 67 and 111 days	112 days or more

Authority’s performance	78
<p>We were one of the first authorities in Wales to measure end to end times, following a systems review back in 2008 when it was considered to be important to acknowledge the amount of time taken to register an application. This is still considered important given the poor quality of a large number of submissions. The national validation procedures have improved this situation however our customers find it too formal. We therefore ensure that the notices we send applicants are accompanied either by a jargon free letter/email and/or an explanatory phone call, to ensure that applicants know exactly what they need to do in order to submit a valid planning application.</p> <p>The pre-application service will help this situation improve further and whilst we encourage all prospective developers to use the service, many are deterred by the fact that fees are charged for the delivery of this service.</p>	

Indicator	08a. Percentage of Listed Building Consent applications determined within time periods required	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority’s performance	83
<p>This authority does not have a specialist officer with experience, skills and qualifications associated with the historic built environment. We have a visit every few months from an officer within CADW who can provide both general and specific advice on projects however apart from that we rely on the experience of DM officers who are effectively learning on the job. Given the aforementioned, the performance achieved is very positive.</p>	

**SECTION 3 - QUALITY**

Indicator	09. Percentage of Member made decisions against officer advice	
"Good"	"Fair"	"Improvement needed"
Less than 5% of decisions	Between 5% and 9% of decisions	9% or more of decisions

Authority's performance	0
<p>Officers and Members within NPT have a strong working relationship. Members are encouraged by the Chair of Planning to speak with officers about any concerns they have at an early stage and thus grasp the opportunity to address those concerns early in the process rather than waiting until the application is being considered by Committee.</p> <p>This strong working relationship also enables the vast majority of decisions to be made under delegated powers, which in turn maximises the efficiency of the determination process.</p>	

Indicator	10. Percentage of appeals dismissed	
"Good"	"Fair"	"Improvement needed"
More than 66% (two thirds) of planning decisions are successfully defended at appeal	Between 55% and 66% of planning decisions are successfully defended at appeal	Less than 55% of planning decisions are successfully defended at appeal

Authority's performance	62
<p>This is similar to the performance achieved last year and demonstrates the robustness of the Authority's decision making process. The actual number of appeals against decisions made by this authority is very small, and as such small fluctuations can have huge impacts upon the percentage rates. During this period the authority successfully defended 8 out of 13 decisions. If appeals against enforcement cases were included within this figure the performance would increase to 67% which would have exceeded 66% and would have taken us into the green band.</p>	



<b>Indicator</b>	<b>11. Applications for costs at Section 78 appeal upheld in the reporting period</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
The authority has not had costs awarded against it at appeal	The authority has had costs awarded against it in one appeal case	The authority has had costs awarded against it in two or more appeal cases

<b>Authority’s performance</b>	0
The lack of costs awarded against the council further demonstrates the robustness of the decision making process.	

#### SECTION 4 – ENGAGEMENT

<b>Indicator</b>	<b>12. Does the local planning authority allow members of the public to address the Planning Committee?</b>	
<b>“Good”</b>		<b>“Improvement needed”</b>
Members of the public are able to address the Planning Committee		Members of the public are not able to address the Planning Committee

<b>Authority’s performance</b>	Yes
<p>Since 2014, Members of the public have been allowed to address the Planning Committee. Unfortunately despite publicising this opportunity, the number of participants has been very low. The policy and protocol has been updated to specifically identify the ability of community councils to address committee in addition to members of the public. This has also failed to increase the engagement of either the public or the community councils.</p>	

<b>Indicator</b>	<b>13. Does the local planning authority have an officer on duty to provide advice to members of the public?</b>	
<b>"Good"</b>		<b>"Improvement needed"</b>
Members of the public can seek advice from a duty planning officer		There is no duty planning officer available

<b>Authority's performance</b>	Yes
<p>All officers are available to the public when they are in the office. We are aware that many authorities have a specific officer who is on a rota to cover all phones during specific periods of the day. Whilst this may be appropriate for general queries they will not be able to answer queries which are application specific without referring to the case officer. This referral results in at least two officers being involved in dealing with the query which seems to defeat the object of maximising the efficiency of the service. As a result all customers have access to their case officer during office hours. If the case officer is out on site or on leave, their colleague will assist if possible, thus maximising the quality of service to the public.</p>	

<b>Indicator</b>	<b>14. Does the local planning authority's web site have an online register of planning applications, which members of the public can access track their progress (and view their content)?</b>	
<b>"Good"</b>	<b>"Fair"</b>	<b>"Improvement needed"</b>
All documents are available online	Only the planning application details are available online, and access to other documents must be sought directly	No planning application information is published online

<b>Authority's performance</b>	Yes
<p>This facility has been in existence for a number of years but is becoming increasingly difficult to resource. Whilst officers scan their own plans and application forms for current undetermined applications, the determined applications are scanned by a small administration team who service the whole of the Environment Directorate. Given the budget constraints affecting the council, back office staff have been severely hit by cuts and are struggling to keep up to date with scanning the planning files. There are concerns therefore about the ability for the system to be kept up to date going forward.</p>	

**SECTION 5 – ENFORCEMENT**

<b>Indicator</b>	<b>15. Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
More than 80% of enforcement cases are investigated in 84 days	Between 70% and 80% of enforcement cases are investigated in 84 days	Less than 70% of enforcement cases are investigated in 84 days

<b>Authority’s performance</b>	95
<p>We only have two enforcement officers covering the whole of the county borough, one of which applied during this period for early retirement. That application was allowed and a restructure took place as a consequence. This restructure has resulted in the enforcement service being supported by one enforcement officer and a Senior Planning and Enforcement Officer. The latter post-holder ensures better integration of the enforcement service with the planning application service and also ensures that complex enforcement investigations and subsequent applications and/or appeals are dealt with by the same senior Planning Enforcement officer.</p> <p>The service also continues to be supported by our building control officers who undertake basic checks in relation to householder development and if there is a potential non-compliance, they notify the enforcement officers. This is a tricky balancing act given that the building control officers are required to secure sufficient income to cover their operational costs and are also competing against the private sector. Nevertheless it is successfully enabling us to investigate cases quickly and see a high number of resolutions within statutory time periods.</p> <p>Since the merger of Planning and Public Protection, the enforcement section has also benefitted from a closer working relationship with colleagues within Environmental Health who have similar and often overlapping Enforcement responsibilities.</p>	

<b>Indicator</b>	<b>16. Average time taken to take positive enforcement action</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

<b>Authority’s performance</b>	188
<p>This figure is not a fair reflection of the service provided by the section. The restructuring that has taken place resulted in a change in one of the posts roles and responsibilities. This new post holder, who joined the team towards the end of the 2017/18 financial year, concentrated on putting new procedures in place and dealing with the backlog associated with the departing officer as well as assisting the existing enforcement officer with their caseloads.</p>	

A new Planning Enforcement Charter is also now in place which clearly conveys to customers the process associated with making a complaint, together with the timescales within which such a complaint will be dealt with. This charter was introduced in conjunction with an online complaint system which enables complainants to submit details of their complaint together with film and other images. This new system should enable officers to prioritise complaints going forward and will ensure that a number of complaints can be addressed by officers without even having to leave the office. This will enable them to use their time more productively and thus improve the efficiency of the service.

## SECTION 6 – SUSTAINABLE DEVELOPMENT INDICATORS

The purpose of the Sustainable Development Indicators is to measure the contribution the planning system makes to sustainable development in Wales.

The Sustainable Development Indicators will be used to measure the progress against national planning sustainability objectives, set out in Planning Policy Wales, and can be used to demonstrate to our stakeholders the role and scope of the planning system in delivering wider objectives. The information will also be useful to local planning authorities to understand more about the outcomes of the planning system and help inform future decisions.

<b>Authority's returns</b>	
The Authority, has as in previous years, submitted a full return in relation to the Sustainable Development Indicators.	

<b>Indicator</b>	<b>SD1. The floorspace (square metres) granted and refused planning permission for new economic development on allocated employment sites during the year.</b>
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<b>Granted (square metres)</b>	
<b>Authority's data</b>	596

<b>Refused (square metres)</b>	
<b>Authority's data</b>	0

As seen from the figures above, we work proactively with our colleagues in the Regeneration section to support economic development on allocated sites. Unfortunately due to issues regarding viability, as explained earlier in this report, developer interest in the authority is reducing when compared to last year.

We are awaiting news from the Welsh Government in relation to the Valleys Task Force projects and anticipate that there will be greater interest in developing our valleys going forward. This will however prove a challenge for the Local Development Plan given that the majority of our allocated employment sites are within the coastal corridor. This may well result in an increase in employment developments approved within our valley communities which are technically contrary to the LDP, on the basis that at the time of preparation and adoption, many of our sites were undeliverable due to lack of available finance and/or lack of developer interest. The Valleys task force projects aim to address this in certain areas. Furthermore a number of sites which were previously identified as being appropriate under previously adopted plans were removed from the most recently adopted LDP due to issues of flooding. The new DAM maps have recently indicated that a number of these sites are no longer affected by flooding and as such may well be available to deliver the council's economic development aspirations.

For these reasons it is anticipated that the floorspace will increase going forward.

<b>Indicator</b>	<b>SD2. Planning permission granted for renewable and low carbon energy development during the year.</b>
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<b>Granted permission (number of applications)</b>	
<b>Authority's data</b>	1

<b>Granted permission (MW energy generation)</b>	
<b>Authority's data</b>	6

This scheme relates to a small biomass development. Since the reduction in subsidy to the renewable energy industry, the submission of applications has reduced dramatically. Moreover, the larger scale developments are now considered to be Developments of National Significance and as such will no longer be determined by the authority. It is anticipated that these may well increase during the next performance period given that the Welsh Government are releasing a further tranche of land for large scale energy development to wind farm companies. There are a number of concerns in relation to this further release of land. Initial discussions with wind farm companies are suggesting that while 120m and 145m high turbines have been the maximum size of turbines on previous schemes, in order to maximise the efficiency of the sites going forward turbines need to increase to 200m in height. This increase will have a huge impact upon the landscape and as such Welsh Government need to review the boundaries of Strategic Search Areas to ensure that they are still fit for purpose. It may also impact upon the ability to deliver such schemes given that larger turbines will be more difficult to transport.

Notwithstanding the above, in addition to a potential new wave of wind farm development, the industry appears to be re-focussing its efforts on generating electricity within and on the buildings which will ultimately require use of the energy. Co-locating energy generation and use will reduce energy loss and will help to address fuel poverty for end users. Neath Port Talbot is currently piloting one such scheme 'Homes as Power stations' as part of the City Deal project. Whilst these

schemes are generating renewable energy, they don't appear to be counting under the planning system towards the sustainable development targets.

<b>Indicator</b>	<b>SD3. The number of dwellings granted planning permission during the year.</b>
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<b>Market housing (number of units)</b>	
<b>Authority's data</b>	218

<b>Affordable housing (number of units)</b>	
<b>Authority's data</b>	35

These figures relate to the number of dwellings approved. Given concerns nationally relating to land banking, it remains to be seen when or if these units will be developed. The figures do however highlight that Registered Social Landlords are active within this County borough. In fact they are often the only developers interested and willing to deliver developments in marginally viable areas.

This issue has been considered in detail earlier in this report and there is no need to repeat concerns re: viability and land banking further.

<b>Indicator</b>	<b>SD4. Planning permission granted and refused for development in C1 and C2 floodplain areas during the year.</b>
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<b>Number of residential units (and also hectares of non-residential units) which were GRANTED permission</b>	
<b>Authority's data</b>	12 Residential dwellings and 3ha non-residential land

<b>Number of residential units (and also hectares of non-residential units) which were REFUSED permission on flood risk grounds</b>	
<b>Authority's data</b>	2

The approvals referred to above relate mainly to one site which was an allocated site with the LDP. The council undertook a Strategic Flood Consequences Assessment for Port Talbot town centre and the Harbourside area. This piece of work demonstrated that the model used by NRW was flawed as the incorrect calculation had been used to assess the impact of bridges over the River Afan. Once this was amended the impact of flooding upon Port Talbot was significantly reduced. The application was also supported by a detailed Flood Consequences Assessment, which was accepted and supported by NRW.

<b>Indicator</b>	<b>SD5. The area of land (ha) granted planning permission for new development on previously developed land and greenfield land during the year.</b>
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<b>Previously developed land (hectares)</b>	
<b>Authority's data</b>	7

<b>Greenfield land (hectares)</b>	
<b>Authority's data</b>	4

These figures are below those projected within the trajectory which formed part of our LDP supporting documents. This is as a consequence of viability as land values remain low yet build costs are increasing rapidly.

In addition to the above, much of our allocated brownfield land is sited at Coed Darcy. The council and St Modwen, who own the site, remain in detailed discussions regarding the amendment of the S106 agreement which was originally secured back in 2008. These amendments will ensure that essential infrastructure continues to be delivered to support this strategically important site but with amended triggers.

<b>Indicator</b>	<b>SD6. The area of public open space (ha) that would be lost and gained as a result of development granted planning permission during the quarter.</b>
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<b>Open space lost (hectares)</b>	
<b>Authority's data</b>	0

<b>Open space gained (hectares)</b>	
<b>Authority's data</b>	0.29ha

Rather than creating large areas of new open space, developers are being asked to contribute towards the improvement of existing facilities, which due to lack of funds and therefore investment, have suffered decline over the years.

The Planning Obligations SPG is however used to secure financial contributions towards formal and informal play facilities, sports facilities and allotments. On the larger schemes, on site provision continues to be negotiated, however this can often fall through for reasons of viability.

In addition to the above the council is currently working with partners to deliver Green Infrastructure in areas where there is an acknowledged shortfall. The outcome of such work will be reported next year.

<b>Indicator</b>	<b>SD7. The total financial contributions (£) agreed from new development granted planning permission during the quarter for the provision of community infrastructure.</b>
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<b>Gained via Section 106 agreements (£)</b>	
<b>Authority's data</b>	209,964

<b>Gained via Community Infrastructure Levy (£)</b>	
<b>Authority's data</b>	0

This is a significant reduction when compared with last year and is a reflection of the reduced number of schemes being submitted and which are viable.

For viability reasons the council does not currently intend to progress with CIL.