

Covid-19 Assessment



Replacement Local Development Plan 2018-2033
Cynllun Datblygu Lleol Newydd 2018 - 2033

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1.0 INTRODUCTION

1.1 The purpose of this document is to reflect on the impact of the Covid-19 pandemic on Blaenau Gwent and consider the consequences for the Replacement Local Development Plan. The document outlines the impact of Covid-19 on Blaenau Gwent and assesses the consequences on the Replacement Local Development Plan's evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic. It also provides robust conclusions on the need for action.

2.0 BACKGROUND

2.1 Preparation of a Replacement Plan was well underway with consultation on the Preferred Strategy completed and a 2nd Call for Candidate Sites about to take place when on the 18th March 2020 Welsh Government wrote to all Chief Planning Officers in Wales regarding the implications of the Covid-19 pandemic and the preparation of Local Development Plans. The letter identified that it was important not to progress plans that could be in conflict with legal requirements set out in the Community Involvement Scheme in their Deliver Agreements. As a result Blaenau Gwent was advised to put on hold its plans for a 2nd Call for Candidate Sites.

2.2 On the 7th of July 2020 the Minister for Housing and Local Government wrote to all Local Authority Leaders and Chief Executives regarding the Covid-19 pandemic reflecting on the impact on those in our communities who have least, exacerbating social, economic and environmental inequalities. The Minister advised that our approach going forward must focus on addressing longstanding inequalities by taking a values based approach to recovery which promotes social, economic and environmental justice. The Minister identified the planning system as being central to shaping a better future for Wales and that it is essential that all levels of government ensure that plans, policies and procedures improve the well-being of our people and the resilience of our environment. It is her strongly held view that we must not sacrifice the principles of sustainable development and place making in the pursuit of economic recovery at any cost.

2.3 In terms of Local Development Plans, Local Planning Authorities are required to reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented. The Minister considers that long held views and policies on matters including transportation, economic development, housing, regeneration, role of town centres and the importance of green infrastructure have all been brought into focus recently. We must think differently to promote a sustained recovery.

2.4 The Minister considers that as LDPs are evidenced based the result of the pandemic and resulting downturn in the economy will mean that much of the evidence on which LDPs are based is likely to be out of date. This she considers is particularly the case for economic and social evidence covering areas such as the need for social and market housing, viability, economic forecasts and transport modelling.

2.5 To address these concerns she advised that LDPs currently undergoing review should undertake an assessment of the evidence, strategy and policies in terms of sensitivity to the consequences of the pandemic. Robust conclusions should be reached on the need for new evidence and any consequential changes to strategy and policy before progressing plan preparation. The Assessment is to be submitted to the Welsh Government together with requests to extend Delivery Agreements.

2.6 Following this letter Welsh Government released a document Building Better Places, The Planning System Delivering Resilient and Brighter Futures, Placemaking and Covid-19 recovery (July 2020). The document sets out the Welsh Government's planning policy priorities that will assist in taking action in the recovery period after the Covid-19 pandemic crisis. Local Development Plans are being tasked with taking a long-term view to improve health and well-being for all. Up to date LDPs are needed to urgently give local effect to local development priorities and national planning policy. They should be distinctive, with a truly local feel and dimension to them which provide a strategic framework for the development of local areas, whilst responding to the opportunity provided by national policy and legislation. The Minister wants us to reset the clock and think again about the places we want to live, work and play in. We need to rebuild a greener cleaner society with decarbonisation and social justice at its heart which respects our environment whilst giving people good places to live in, which are accessible on foot, bike and public transport.

2.7 The key message is that a plan led approach is the most effective way for the planning system to combat climate change. We must identify, plan for and achieve key steps in achieving the switch to a decarbonised and climate resilient society. A strategic role for the planning system is to direct growth to sustainable locations and prevent the creation of car-dependent developments. The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable travel.

2.8 Other relevant PPW policy areas relating to tackling climate change and making more resilient places include:

- the importance of Ultra Low Emission Vehicles (ULEVs), which includes electric vehicles, in the decarbonisation of transport;
- a requirement for local planning authorities to establish targets for renewable energy generation in development plans, as well as to identify spatial areas where renewable energy developments will be permitted;
- severely restricting the extraction of new fossil fuels;
- ensuring biodiversity enhancement (a net benefit for biodiversity), ecosystem resilience and green infrastructure as part of advocating nature-based solutions;
- taking forward measures to embed the principles of a circular economy, particularly in the construction, and use, of the built environment and land, and the sustainable management of mineral resources; and
- directing development away from areas at risk of flooding.

2.9 The document identifies particular areas of national policy which should be the focus of consideration and action, in order to act as a catalyst for a recovery across the pillars of sustainable development. The eight issues identified are:

- Staying local: creating neighbourhoods
- Active travel: exercise and rediscovered transport methods
- Revitalising our town centres
- Digital places: the lockdown lifeline
- Changing working practices: our future need for employment land
- Reawakening Wales' tourism and cultural sectors
- Green infrastructure, health and well-being and ecological resilience
- Improving air quality and soundscapes for better health and well-being

2.10 All these issues will be used to assess the performance of the Blaenau Gwent Replacement Local Development Preferred Strategy.

3.0 IMPACT OF COVID-19

Overview of Economic Impact

3.1 The economic policy response to Covid-19 can be seen as having three main phases. The first phase was rapid initial lock down of the economy. The main policy goals at this stage were to provide people and business with financial support to be able to follow lockdown guidance and support themselves. The intention was to prevent unnecessary damage to otherwise viable businesses and economic capacity so that when lockdown was lifted it would be easier to restore. The second phase has been the re-opening of the economy but with restrictions on the economy that force it to operate at pre-pandemic levels. At this stage policy has been targeting support at specific sectors to allow them to re-open. The timing of withdrawal of support it is crucial, removing support too early may lead to job losses and business closures having only been delayed rather than avoided. This is what is happening now. In the third phase the economy emerges from the health emergency as all demand side options become available once again. Crucially the shape and speed of this resumption of full economic activity will be shaped by the impacts of earlier measures. Added to this there is a risk of a further wave which risks local or even a further national lockdown.

3.2 The impacts of Covid-19 are not evenly distributed across the economy. The most severely impacted sectors have been food/accommodation and arts/leisure sectors. In other sectors such as construction and manufacturing whilst impacts on work place arrangements have an impact, the greater impact comes from the initial collapse in demand and it is restoring both demand and supply chains that is central to determining reopening. Those sectors that are least affected, in addition to critical sectors that have had to stay open, are those sectors where working from home is possible and demand is much less immediately impacted by lockdown such as the public sector and utilities.

3.3 At a UK level almost a quarter of workers have stopped working since the crisis started, the majority of which have been furloughed rather than lost their jobs. With the furloughing scheme coming to an end at the end of October there is great uncertainty around future employment rates and economic recovery. To date numerous announcements have been made regarding staff cuts in the retail, travel and restaurant sectors.

3.4 The average fall in household earnings has been 8%, but this is not evenly distributed with 23% having lost over 20% of their income. Neither, are these variations evenly distributed with just 5% of those earning over £40,000 having lost their jobs, compared to 12% for those earning less than £20,000. This reflected in the fact that 72% of the former group were able to work from home compared to just 33% of the latter group. In addition, those on lower pay tend to be less securely employed; only 26% of those with a permanent contract suffered a fall in earnings, compared to 66% of those on a temporary contract and 75% of the self-employed.

3.5 The total number of unemployment claimants rose by 850,000 in April 2020 to hit 2.1 million, the fastest monthly rise in a generation. This is now expected to rise to 3 million by next year. In Wales this unemployment rate rose from 3.3% to 6.8%. Levels are running close to twice the pre-crisis levels and there has since been a second wave of job losses with more expected following the closure of the furloughing scheme.

3.6 There are also differential impacts based on demographic characteristics. Young people are disproportionately employed in low paying jobs in the most affected sectors (food/accommodation and arts/leisure). Women are more likely to work in sectors that are locked down. BAME groups are also more economically exposed as they are more likely to fulfil roles in care, transport and delivery sectors and in the more marginal hospitality and self-employed sectors.

3.7 It should be noted that the economic downturn resulting from the response to Covid-19 is different from 'ordinary' recessions in both scale and the types of economic impact. The size and speed of falls in many measures of economic activity are already historical records. However, there is a fundamental difference between the Covid-19 situation and ordinary recessions in that Government policy deliberately suppressed economic activity in order to slow infection of the pandemic. This has meant that the effects are both larger and spread across more economic sectors than in recessions that typically originate in specific parts of the economy, although the effects of these initial problems may then spread more widely. Also the main policy response to recessions, to stimulate demand, was not available to government in the short-term. This makes it all the more difficult to predict future trends whilst making it more imperative to address.

Impacts for Blaenau Gwent Economy

3.8 Blaenau Gwent has a low economic activity rate (72.9%), below the GB (79.1%) and Wales (76.6%) averages and a high unemployment rate (4.4%) in the national context (Wales 3.7% and GB 3.9%) (Source: NOMIS March 2020). The number of people claiming

out-of-work benefits at 7.2% is again higher than the Wales (6%) and GB (6.3%) rates (Source: NOMIS June 2020).

3.9 Blaenau Gwent also has issues with skill levels, with a low proportion of residents having NVQ4 and above (24.9%) compared to national figures (Wales 36.3% and GB 40.3%) and a high proportion of people having no qualifications (13.8%) compared to national figures (Wales 8.5% and GB 7.7%) (Source: NOMIS Jan 2019-Dec 2019).

3.10 Together these issues result in low wages for those Blaenau Gwent residents who are in work with Gross Weekly pay (£457.8) well below that of Wales (£540.7) and GB (£587.0) (Source: NOMIS 2019). It also means that Blaenau Gwent residents are more likely to have seen a cut in their income and be more susceptible to losing their jobs.

3.11 The largest sector in Blaenau Gwent's economy is manufacturing (4,000 jobs 22.2% of total) with nearly three (2.7) times the proportional size of the manufacturing sector in Great Britain. This sector whilst initially impacted due to phase 1 of the lockdown has since seen an opening as demand for goods is returning. The main issue for this sector is the reliance on the automotive sector which is performing poorly due to a lack of confidence in the market, the move to electric vehicles and Brexit.

3.12 The other main sectors are retail (3,000 16.7%) and health and social activities (3,000 16.7%). There has been a mixed picture in terms of retail with convenience stores doing well having had no lockdown restrictions whilst comparison shopping experienced a long period of closure. The ability of the comparison sector to bounce back has been impacted by a greater shift to on line shopping. Whilst there have been many national closures announced the impact on Blaenau Gwent's towns is unknown at this stage. Though not necessarily impacted by these national closures local shops may not have been able to survive the lockdown or survive through the restricted measures currently in place.

3.13 In terms of health and social activities whilst those working in hospital environments have experienced the worst of Covid-19, the impact on jobs and finance has been more positive. However, moving forward there is some uncertainty over the finances for social care providers.

3.14 The greatest impacts have been on the 1,000 (5.6%) working in the accommodation and food service activities and 500 (2.8%) people working in arts and entertainment who have seen the greatest impacts in terms of lockdown.

3.15 In terms of the industries doing well, there are 300 people working in utilities (1.7%) with a further 3,000 (16.6%) in the public and education sectors.

3.16 As Blaenau Gwent has relatively high numbers (25.1%) of people working in the sectors most affected (retail, food, arts and entertainment) and less people (18.3) working in areas least affected (public services, education and utilities) it is likely to be impacted disproportionately by the pandemic.

Impacts on the Environment

3.17 There have been positive impacts on the environment as a result of Covid-19 particularly during the lockdown period when movement was restricted and work limited leading to a fall in carbon emissions. Some see the changes as a catalyst for accelerated systematic change and a new Green Deal. It has also resulted in drops in air pollution and in turn may serve as a catalyst for more structural changes in transport systems. Access to green space has become more important to people in lockdown and is becoming an important consideration for people in buying new homes. Deprived areas generally have less access to greenspace.

Impacts on Society

3.18 Homelessness has seen considerable investment to ensure that people have been housed during the pandemic. Due to the economic shock and loss of jobs it is likely that more people will become homeless and need temporary accommodation or social housing. The exact impacts of this are unknown at this time.

4.0 BLAENAU GWENT REPLACEMENT LOCAL DEVELOPMENT PLAN – EVIDENCE BASE

4.1 The replacement plan evidence base is quite extensive covering social, economic and environmental issues. The Minister is particularly concerned with evidence covering areas such as the need for social and market housing, viability, economic forecasts and transport modelling.

4.2 In terms of the need for social and market housing it will be possible to update the Local Housing Market Assessment in terms of the latest information on need and the latest information on the housing market. It will however be impossible to predict future trends and in response to this flexibility will be required in terms of housing policies in the Deposit Plan.

4.3 Evidence on viability is currently being prepared and will be able to take into account the latest information. However, as already stated it is difficult to predict future changes that might impact on viability and hence again some flexibility will be required to ensure that development will remain viable.

4.4 The economic evidence was prepared pre-pandemic however the consultant who prepared the study advises that it will be very difficult to update the information now in light of the lack of available trend data and ability to predict future trends with any certainty - given the economic downturn is different to previous downturns. So far we have had one quarter of negative growth and it is assumed that this will continue for the rest of the year. However, if we get a bounce back of the economy in 2021 or 2022 then there will be no real impact on land needs as the models used in the current study assumes some recessionary periods over the RLDP plan period. Added to this, Blaenau Gwent does not have a significant office sector and is therefore unlikely to see significant surpluses due to the shift in people working from home. On the other hand, it will be well placed to benefit from the

increase in logistics demand. In addition it has a cluster of medical supply companies which could benefit from growth in this sector. It is considered that flexibility is the key for the Plan to deliver a sustainable economic recovery. The Employment Land Review suggested that Blaenau Gwent requires between 3 and 46 ha of employment land with the higher figure being based on increasing economic activity, reducing unemployment, reducing out migration and out-commuting. This will help reduce the longstanding inequalities and promote social, economic and environmental justice.

4.5 A more detailed evaluation of the sensitivity of the existing evidence base to the impacts of Covid-19 and actions required are attached at Appendix 1.

Conclusion

4.6 Generally the evidence can either be updated or is currently in preparation and will take account of Covid-19 issues. The only area where this is not possible is in terms of the economic information as we are advised by the consultants who undertook the study that extent of the uncertainties would make prediction of trends virtually impossible.

5.0 BLAENAU GWENT REPLACEMENT LOCAL DEVELOPMENT PLAN – STRATEGY AND POLICIES

5.1 It should be noted that the Blaenau Gwent Strategy and policies have been developed from the policy context, key challenges, drivers for change and participation of stakeholders. With the exception of the Welsh Government Building Better Places document the policy context has not changed. The key challenges which were developed into objectives for the Plan to meet will be assessed against the Building Better Places document. The Vision for the Blaenau Gwent Replacement Local Development Plan identified in the Preferred Strategy is as:

Through collaborative working, by 2033, Blaenau Gwent will become a network of connected sustainable, vibrant valley communities that support the well-being of current and future generations with:

- *a prosperous low carbon economy where people have the skills, knowledge and opportunities to achieve a better quality of life;*
- *residents living in well connected, healthy and safe communities, in a range of good quality homes with better access to services; and*
- *its distinctive natural environment, cultural and historic identity is protected and enhanced creating a place where people want to live, work and visit.*

5.2 This is considered to be distinctive and provides a local feel and dimension to the national policy framework within which we must work and the challenges Blaenau Gwent faces. To deliver the Vision four outcomes and nineteen objectives were identified. In order to ensure the vision, outcomes and objectives are relevant post Covid-19, an assessment has been undertaken to identify if they cover the priorities and actions for places identified by Welsh Government in Building Better Places (Source: Building Better Places, The Planning

System Delivering Resilient and Brighter Futures, Placemaking and the Covid-19 recovery (Welsh Government, July 2020).

Table 1: Assessment of Objectives against WG priorities and actions for places post Covid-19

Objective	Staying local	Active travel	Revitalising our towns	Digital places	Changing working practices	Re-awakening Wales' tourism and cultural sectors	Green Infrastructure health and well-being and ecological resilience	Improving air quality and soundscape for better health and well-being.
Outcome 1: Create a Network of Sustainable Vibrant Valley Communities								
1. Spatial Strategy	✓		✓					
2. Demography								
3. Placemaking	✓					✓		
4. Climate change	✓			✓	✓		✓	✓
Outcome 2: Create Opportunities for a Prosperous Low Carbon Economy and Promote Learning and Skills								
5. Economic Growth	✓							
6. Education and skills	✓							
7. Minerals / Waste								
8. Circular Economy					✓			
9. Tourism			✓			✓		
Outcome 3: Create Well-Connected, Active and Healthy Communities								
10. Housing	✓							
11. Town Centres	✓		✓					
12. Sustainable Transport		✓						✓
13. Accessibility		✓						
14. Infrastructure							✓	
Outcome 4: Protect and Enhance the Distinctive Natural and Built Environment								
15. Ecosystems							✓	
16. Green Infrastructure	✓						✓	
18 Historical / Cultural						✓		
19. Environmental Quality								✓

- **Staying Local: creating neighbourhoods**

5.3 The only element that isn't specifically covered in the objectives is explicit reference to community growing spaces though this is generally covered by objective 14.

- **Active travel: exercise and rediscovered transport methods**

5.4 Active travel, sustainable travel and the transport hierarchy are fully covered by the objectives for the plan.

- **Revitalising our town centres**

5.5 Blaenau Gwent is well aware of the need to revitalise its town centres and this is recognised as an objective for the Plan to address. Though a retail assessment is being prepared for the Deposit Plan a town centre study has also been undertaken and both will inform the Deposit Plan policies.

- **Digital places – the lockdown lifeline**

5.6 The importance of broadband connectivity is recognised under the climate change objective.

- **Changing working practices – our future need for employment land**

5.7 Whilst there has been a seismic shift in lockdown with a significant increase in the number of people working from home Blaenau Gwent with a very low office base is unlikely to see significant loss of office space. Whilst the Council have plans to close the Civic Centre in Ebbw Vale plans are already in place to replace the site with housing. It is agreed that the plan will need to adapt quickly to the economic challenges which will occur as a result of the pandemic but this can be achieved through building in flexibility rather than designating sites for other uses. It must be recognised that other land hungry sectors such as logistics are growing. An assessment of strategic sites has recently been undertaken for the greater Gwent area and if we get a bounce back of the economy in 2021 or 2022 then there will be no real impact on land needs as the models used in the current study assumes some recessionary periods. Rather than having a knee jerk reaction it is considered more appropriate to build flexibility into the Deposit Plan.

- **Reawakening Wales' tourism and cultural sectors**

5.8 The vision and objectives recognises the need for a positive framework for tourism and culture in Blaenau Gwent.

- **Green Infrastructure, health and well-being and ecological resilience**

5.9 The importance of green infrastructure, health and well-being and ecological resilience are all identified as objectives for the Plan to address.

- **Improving air quality and soundscapes for better health and well-being.**

5.10 The importance of air quality and soundscapes for better health and well-being is identified as an objective for the Plan to address.

The Preferred Growth and Spatial Strategy

5.11 The Plans strategy is based on the aim to improve prosperity to close the employment gap with the rest of Wales. This involves helping 3,375 people into work through increasing economic activity, reducing unemployment, reducing out-migration and out-commuting. This is to be achieved by enabling good quality, secure and sustainable jobs.

5.12 The strategy encourages growth based on a clear understanding of the population and household changes over the plan period. It accepts that in order to create sustainable and viable places it must plan for a more balanced age structure. It must strike a balance of providing the right level of housing and employment growth and the necessary community infrastructure to encourage the younger population to return and middle aged population to remain in the area. Whilst enabling the older population to live healthy and active lives.

5.13 The distribution of the growth reflects a desire to spread this growth in an equitable manner in order to achieve a sustainable pattern of growth, minimise unsustainable patterns of movement and support local services and facilities. This involved an assessment of the level of sustainable transport and accessibility, the availability of local facilities and services and the level of employment in and around settlements.

5.14 To deliver the vision, objectives and the strategy there are 15 strategic policies. To ensure the policies remain relevant post Covid-19, an assessment has been undertaken to identify if they are sensitive to Covid-19, if they are, what actions are required and whether or not they cover the actions identified in Building Better Places. The assessment is attached at appendix 2.

Conclusion

5.15 The Strategy and supporting Strategic Policies are generally in conformity to current national policy as set out in Planning Policy Wales (Edition 10) or where there are issues these will be addressed in the Deposit Plan and reported in the Consultation Report on the Preferred Strategy. To address the Ministers concerns further assessment has been undertaken of the vision, objectives, strategy and supporting policies. The vision was considered to be distinctive and provided a local feel and dimension in accordance with the national policy framework. The objectives of the Plan cover all the priorities and actions identified in the Building Better Places document. The sensitivity assessment of the strategic policies identified a number of sensitive areas but due to the uncertainties identified the best approach was to provide flexibility in policies and a monitoring framework that can reflect the risks. A number of the policies were found to address issues identified in the Building Better Places document.

5.16 As much of the evidence base is in preparation or can be updated and the Preferred Strategy has flexibility built in, it is considered that the Deposit Plan when prepared will be able to address the Ministers concerns. The Deposit Plan will be able to address longstanding inequalities through taking an approach to recovery which will address social, economic and environmental justice.

Appendix 1: COVID 19 Assessment of Evidence Base

Document Title	Purpose	Sensitivity to COVID 19 consequences	Action
Review Report (Sept 2017)	To set out the proposed extent of likely changes to the existing LDP (2006-2021) and to confirm the revision procedure to be followed in preparing the Replacement LDP.	Not sensitive	No action required.
Replacement LDP Delivery Agreement (October 2018)	To set out how people will be given the opportunity to influence future development in Blaenau Gwent. Explain how and when people will be involved and consulted in developing the replacement Plan.	Sensitive Covid-19 and lockdown measures have resulted in a delay to undertaking consultation on the 2 nd call for candidate sites. It also means that the way we consult people will need to be changed to overcome risks of spreading the pandemic.	An extension to the existing timetable of 7 months will be required. Alterations to the community involvement scheme such as longer consultation periods, enhanced online participation methods, will also be required.
SA/SEA Scoping Report (October 2018)	To outline the proposed approach to the LDP's Sustainability Appraisal, incorporating the Strategic Environmental Assessment. This report is the first stage of a SA process to identify, assess and address any likely significant effects on the environment from the emerging Blaenau Gwent RLDP.	Not sensitive	No action required.
Integrated Sustainability Appraisal (ISA) for the Blaenau Gwent Replacement Local Development Plan - Initial ISA Report (December 2019)	To consider and communicate the likely effects of an emerging plan and alternatives in terms of key sustainability issues. The ISA seeks to maximise the development plan's contribution to sustainable development.	Not sensitive Covid-19 was not a consideration when this work was undertaken.	A further assessment will be undertaken of the Deposit Plan.
Initial Habitat Regulation Assessment	Set out the approach for the Habitat Regulation Assessment and identifies	Not sensitive	No action required.

Screening Report (October 2018)	the relevant designated sites.		
Habitats Regulation Assessment of the Blaenau Gwent Local Development Plan Preferred Strategy	To identify any aspects of the Plan that might cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.	Some Sensitivity There may have been some short term positive impacts for the identified sites in terms of improvements to air quality during lockdown.	Some air quality monitoring is required and will inform a further assessment undertaken of the Deposit Plan.
Candidate Site Register (June 2019)	A log of sites submitted by land-owners, developers and the public as part of the call for candidate sites.	Not sensitive	No action required.
LDP Demographic Evidence (June 2019)	To provide a summary of demographic evidence, including a suite of population, housing and economic growth outcomes to inform the Strategic Growth Options	Some sensitivity Covid-19 has led to increased death rates. Though at a Blaenau Gwent level these are limited and are unlikely to have a significant impact on overall requirements. The evidence is being updated in light of the latest 2018-based projections.	An update is currently being undertaken. If there are significant changes as a result of this these will be incorporated into the Deposit Plan.
LDP Demographic Evidence Employment Growth Analysis (July 2019)	An addendum to the LDP Demographic Evidence the document examines the relationship between population, housing and employment growth under different assumptions.	Some Sensitivity Welsh Government requires a broad balance of employment and housing growth to minimise the need for long distance commuting. This has become more of an issue during the Covid-19 lockdown. It is important that any change to employment or housing figures are considered together.	Update the assessment based on any changes to employment or housing requirements. Incorporate any changes into the Deposit Plan.
Employment Land Review	To quantify the future employment land	Highly Sensitive There have been	Due to the level of uncertainty with the

<p>Study (October 2019)</p>	<p>requirements of Blaenau Gwent based on Welsh Government Practice Guidance.</p>	<p>significant short term impacts on the economy. As we come out of lockdown a number of closures have been announced particularly in the retail, restaurant and travel sectors. The Retail and Leisure study covers these sectors. The study focuses on business uses such as B1, B2 and B8. In this area the greatest impacts are likely to be for office demand which is likely to reduce and an increased demand for logistics. The problem is that the exact impacts and future trends are unknown at this stage. In light of the range in the employment land requirement figure in the study there should be no need to change employment land requirements.</p>	<p>economy it is not possible to predict future land requirements. The Bank of England only recently announced a much reduced downturn in the economy than originally anticipated. Though a slightly longer recovery period than first anticipated. The bounce back is now expected by the end of 2022.</p>
<p>Local Housing Market Assessment (May 2019)</p>	<p>To identify housing market areas and provide detailed market analysis of housing need, demand and supply. Identifying different sizes, types and tenures of properties.</p>	<p>Highly Sensitive The loss of jobs and reduced income leads to a greater need for affordable properties.</p>	<p>The Local Housing Market Assessment will be updated with latest household projections and housing need information. This will then inform the Deposit Plan.</p>
<p>Sustainable Settlement Assessment (January 2020)</p>	<p>To identify those settlements which are potentially suitable to accommodate future growth in terms of their location, role and function. This involved an assessment of the current role and function of settlements, as well as an understanding of the relationships between settlements and their</p>	<p>Some Sensitivity In terms of the closure of some facilities in the settlements though this is considered to have a limited impact on overall scores. The pandemic has reaffirmed the importance of directing development to the most sustainable settlements.</p>	<p>No action required.</p>

	potential future roles.		
Evidence in Support of the Deposit Plan – Currently Being Prepared			
Topic Papers	Provide supporting information and rationale for the Replacement LDP policies on a topic basis.	Some Sensitivity Sensitivity will depend on the topic area.	All Topic Papers will be updated to take into account the latest evidence available.
Candidate Site Assessment Report	A proportionate assessment of sites with regards to their compatibility with the Replacement LDP.	Some Sensitivity The 2 nd call for candidate sites has been delayed as a result of the pandemic. This will delay the assessment of all sites.	Undertake a 2 nd call for candidate sites and further information when a revised Delivery Agreement has been agreed.
Gypsy and Traveller Accommodation Assessment	To assess the future accommodation needs of the Gypsy Traveller and Travelling Show People Communities and determine whether there is a requirement for additional site provision within Blaenau Gwent County Borough. This will inform any related site allocations and criteria based policies in the LDP.	Not Sensitive. All survey work was completed prior to lockdown. This information is still considered robust and current.	The inclusion of a criterion based policy in the Deposit Plan will ensure that any changing need can be met over the lifetime of the Plan.
Strategic Flood Consequences Assessment	To provide the evidence to inform policies and site selection processes.	Not Sensitive	None required.
Retail and Leisure Study	To identify a retail and leisure strategy, retail hierarchy and land requirements to inform the Replacement Local Development Plan.	Highly Sensitive The comparison retail sector has been particularly hard hit by the pandemic with long closures during lockdown and limited customers during the recovery stage. Pubs and restaurants have also been hit along with community and entertainment venues. The study is currently in preparation and survey work has considered pre and post lockdown views in terms of the town centres and retail patterns.	This study together with a town centre study already undertaken will inform policies in the Deposit Plan.
Green Infrastructure	An assessment of natural and semi-natural features,	Some Sensitivity The pandemic has further	A Green Infrastructure

Assessment	green spaces and corridors.	served to emphasise the importance of having locally accessible green spaces for health, well-being and recreation.	Assessment is in preparation and will inform the Deposit Plan policies.
Open Space Assessment	An assessment of existing outdoor sport and playing space provision compared to the Fields in Trust Standards, to identify shortfalls in provision and inform related policies.	Some Sensitivity The pandemic has further served to emphasise the importance of having locally accessible recreational spaces for health and well-being.	The Open Space Assessment is in preparation and will inform Deposit Plan policies.
Renewable Energy Assessment	Estimates the potential renewable energy resource to inform policies and targets for the RLDP.	Some Sensitivity Positive impacts on the environment as a result of Covid-19 and the lockdown led to a fall in carbon emissions. This may be a catalyst for accelerated systematic change and in terms of the move to renewable technologies.	The assessment is in preparation and together with the Council's ambition to become a low carbon Borough will inform Deposit Plan policies.
Special Landscape Areas Review	To review the current Special Landscape Areas, provide a statement of value and provide development management/landscape advice for each area.	Not Sensitive	The assessment is in preparation and will inform Deposit Plan policies.
Plan – Wide Viability Assessment	A high-level study which assesses broad levels of development viability in Blaenau Gwent.	Highly Sensitive During lockdown the housing industry was impacted due to the inability to sell houses. In addition reduced income and job losses impact on people's ability to purchase properties which leads to a lack of confidence in the market. Blaenau Gwent's marginal viability makes it susceptible to such changes in the market.	The study is currently in preparation and will be informed by discussions with representative groups and thus take into account the latest available information. This will inform the Deposit Plan policies.
Infrastructure Delivery Plan 2020	To identify the infrastructure required to support delivery of development during the plan period.	Some Sensitivity Infrastructure covers a broad range of areas and certain areas such as active travel will have been given greater	The Plan is in preparation and will take account of any issues and will then inform the Deposit Plan.

		priority in terms of infrastructure investment.	
Integrated Planning and Transport Strategy	To ensure integration between land use and transport planning. To set out aims, how policies support other objectives of the plan and how the plans policies and allocations will support sustainable transport.	Highly Sensitive The pandemic has led to modal shifts and different patterns of vehicle movements throughout the day. The strategy should be able to build on this impetus.	The strategy is in preparation and will inform the Deposit Plan.

Strategic Policy	Potential Covid-19 Impacts	RLDP Mitigation	Action Required
Outcome 1: Deliver a Network of Vibrant Valley Communities (Placemaking)			
SP1:Sustainable Economic Growth	<p>Levels of Economic Growth</p> <ul style="list-style-type: none"> • Economic forecasts are unreliable as they don't take account of Covid-19 • Changes in working practices as a result of homeworking • Less demand for office space • Potential for additional space for logistics and medical supply companies • Impacts of economic recession as a result of Covid-19, Brexit and inherent structural changes 	<p>Evaluating the impact of growth is difficult due to the lack of data available to predict the required supply. These are very uncertain times and the best way to address them is to provide flexibility. The RLDP with a range of 1,500 to 3,375 new jobs and between 3 and 46ha has sufficient flexibility to cope with what might lie ahead. At present there are enquiries on nearly all of the sites included in the LDP.</p> <p>Monitoring mechanisms need to be put in place to reflect the risks associated with the uncertainties.</p>	<ul style="list-style-type: none"> • Deposit Plan policies to provide flexibility. • Monitoring framework to reflect the risks associated with the uncertainties.
	<p>Level of Housing Growth</p> <ul style="list-style-type: none"> • Demand for housing has been limited due to lockdown • There has been a shortage of materials • Affordability has been impacted due to lockdown and further changes could arise due to people losing their jobs 	<p>Evaluating the impact on future growth is difficult due to the lack of data available to predict future trends.</p> <p>Whilst the data is being updated to account for the 2018 WG projections this will not take account of Covid-19 impacts.</p> <p>It will be possible to update the Housing Market Assessment to include the latest housing need and demand figures.</p> <p>Flexibility already built into the strategic policy along with a sensible trajectory and appropriate monitoring will enable the Plan to overcome any uncertainties.</p>	<ul style="list-style-type: none"> • Update Housing requirement figures based on latest WG projections. • Update Affordable housing target based on latest need and viability information.
	<p>Growth Distribution and Hierarchy of Settlements</p> <ul style="list-style-type: none"> • Some facilities could be lost (public houses, shops, businesses etc.) which would impact on the sustainability of some settlements 	<p>These changes are unlikely to significantly impact on the overall sustainability of settlements.</p>	<p>None.</p>

	<p>Strategic Mixed use Sites</p> <ul style="list-style-type: none"> • Delivery of the three strategic sites included in the Preferred Strategy may be impacted by changes to developers plans 	Discussion will be required with the owners and developers of the sites to determine delivery timescales for inclusion in the housing trajectory.	<ul style="list-style-type: none"> • Discussion with developers and owners to determine delivery timescales.
SP2: Sustainable Placemaking and Design	<p>No Impact</p> <p>This is a criterion based policy that is not impacted by Covid-19 but will support a placemaking solution and enable the Plan to meet requirements of Building Better Places and delivering placemaking.</p>	None.	None.
SP3: Climate Change	<p>No Impact</p> <p>This is a criterion based policy that is not impacted by Covid-19 but will support climate change and decarbonisation solutions and enable the Plan to meet requirements of Building Better Places action on Climate Change and Decarbonisation.</p>	None.	None.
SP4: Employment and Skills	<p>Employment Land allocation</p> <ul style="list-style-type: none"> • Economic forecasts are unreliable as they don't take account of Covid-19 • Changes in working practices as a result of homeworking • Less demand for office space • Potential for additional space for logistics and medical supply companies • Impacts of economic recession as a result of Covid-19, Brexit and inherent structural changes 	<p>Evaluating the impact of growth is difficult due to the lack of data available to predict the required supply. These are very uncertain times and the best way to address them is enabling flexibility. The LDP with a range of 1,500 to 3,375 new jobs and between 3 and 46ha has sufficient flexibility to cope with what might lay ahead. At present there are enquiries on nearly all of the sites included in the LDP.</p> <p>Monitoring mechanisms need to be put in place to reflect the risks associated with the uncertainties.</p>	<ul style="list-style-type: none"> • Deposit Plan policies to provide flexibility. • Monitoring mechanisms to reflect the risks associated with the uncertainties.
	<p>Strategic Sites</p> <ul style="list-style-type: none"> • Delivery of the two strategic sites included in the Preferred Strategy may be impacted by changes to developers plans 	Discussions will be required with the owners and developers of the sites to determine delivery timescales for inclusion in the Deposit Plan.	<ul style="list-style-type: none"> • Discussions with developers and owners to determine funding and delivery timescales.
	Abertillery Metro support for economic development proposals	Inclusion will be reliant on WG decisions.	<ul style="list-style-type: none"> • Monitor WG decision.

	<ul style="list-style-type: none"> This proposal relies on the extension of the Ebbw rail line to Abertillery. The Welsh Government Transport Plan indicates that this under review. 		
	<p>Capitalising on Funding Sources</p> <ul style="list-style-type: none"> These funding sources may change as a result of Covid-19 commitments. 	Discussion will be required with the funding sources to determine viability and delivery timescales for inclusion in the Deposit plan.	<ul style="list-style-type: none"> Discussions with fund holders to determine availability of funding and inform site allocation delivery.
	<p>Employment Roles of major industrial areas</p> <p>The aim is to help assist in the diversification of existing and allocated areas identified and includes sustainable technologies and the foundation economy which will support the delivery of Building Better Places action on Changing working practices.</p>	None.	None.
SP5: Growing Tourism	This is a criterion based policy which encourages tourism facilities and the Valleys Regional Park. The policy accords with PPW and helps deliver Building Better Places action on reawakening Wales' tourism and cultural sectors.	None.	None.
SP6:Sustainable Minerals Management	<ul style="list-style-type: none"> Though Covid-19 has probably resulted in a downturn in use of minerals during lockdown the UK government's policy to grow ourselves out of the economic downturn will likely result in mineral use returning to previous levels. The Regional Technical Statement is nearing completion and it is unlikely that projected figures will be changed as a result of the pandemic. 	Keep up to date with progress on the RTS.	<ul style="list-style-type: none"> Contact RTS working group.
SP7: Sustainable Waste Management	<ul style="list-style-type: none"> The lockdown resulted in the closure of waste transfer facilities. There will be an increase in waste as a result of increased use in the medical 	None.	None.

	<p>sector and some other sectors of single use equipment and gowns.</p> <p>As the policy is a criteria based policy with no specific land allocations or targets it is not impacted by Covid-19.</p>		
SP8: Delivery of Homes	<p>Housing Delivery</p> <ul style="list-style-type: none"> • The housebuilding industry was shut down for a period of time during lockdown • There has been a shortage of materials • Affordability has been impacted due to lockdown and further changes could arise due to people losing their jobs 	<p>Flexibility already built into the strategic policy along with a sensible trajectory and appropriate monitoring will enable the Plan to overcome any uncertainties.</p> <p>Discussion will be required with the owners and developers of the sites to determine delivery timescales for inclusion in the housing trajectory. The provision of affordable housing will need to be reconsidered based on the latest available information.</p>	<ul style="list-style-type: none"> • Discussions with developers and landowners to determine timescales. • Update the Housing Market Assessment. • Inform Deposit Plan policies.
	<p>Allowances for existing commitments and windfall contributions</p> <ul style="list-style-type: none"> • Estimates were undertaken prior to lockdown and based on the latest information available at that time. • Whilst figures may well be lower for this year there is no certainty as to what will happen in future years. 	<p>Flexibility and appropriate monitoring will enable the Plan to overcome any uncertainties and a review will be undertaken if delivery is outside acceptable limits.</p>	<ul style="list-style-type: none"> • Ensure that the Deposit Plan has the flexibility, the right trajectory and appropriate monitoring to overcome uncertainties.
	<p>Priority for allocating housing land</p> <p>No Impact</p> <p>This is not impacted by Covid-19 but will enable the Plan to meet Planning Policy Wales requirements.</p>	None.	None.
	<p>Provision of a range of sites</p> <p>No Impact</p> <p>This is not impacted by Covid-19 but will enable the Plan to meet Planning Policy Wales requirements.</p>	None.	None.
	<p>Bringing Empty Properties back into use</p> <p>No Impact</p>	None.	None.

	This is not impacted by Covid-19 but will enable the Plan to meet Planning Policy Wales requirements.		
SP9: Gypsy and Travellers	No impact The policy states that provision will be made for any unmet future demand.	None.	None.
SP10 Retail Centres and Development	Retail Hierarchy <ul style="list-style-type: none"> Town centres have been particularly hard hit by lockdown with long closures in the comparison sectors Changes in peoples shopping habits will also impact on town centres 	The retail hierarchy has yet to be identified and will be able to take account of the recent Retail and Leisure Study and latest information from town centre surveys.	<ul style="list-style-type: none"> The new retail hierarchy will be based on the latest available information.
	Roles of Town Centres <ul style="list-style-type: none"> The move to on line shopping which has been accelerated in lockdown has led to town centres requiring other roles and uses to support them. The Preferred Strategy recognises that towns need to be centres for more than retail and in line with Building Better Places (WG 2020) seeks to identify additional roles. 	None.	None.
	Improved vibrancy, vitality and attractiveness of town centres <ul style="list-style-type: none"> Whilst the need for this is greater as a result of Covid-19 and the ensuing economic downturn this is a criteria policy to help address the issue and does not require change. 	None.	None.
	Town Centre Boundaries <ul style="list-style-type: none"> Lockdown and the ensuing economic downturn has led to retail closures 	Town Centre boundaries are to be redrawn and will be based on the latest information available together with a degree of flexibility.	<ul style="list-style-type: none"> Amend town centre boundaries.
	New retail allocations <ul style="list-style-type: none"> The comparison market has been greatly impacted by the lockdown. Peoples shopping habits are changing and 	New allocations will be informed by the Retail and Leisure Study which is taking account of changes during lockdown.	<ul style="list-style-type: none"> Identify allocations if required.

	have been accelerated as a result of lockdown.		
SP11:Sustainable Transport and Accessibility	<p>Delivery of Metro Improvements</p> <ul style="list-style-type: none"> • Lockdown has resulted in limitations on the use of Public Transport • As the economy is opened up public transport is to play a major role in modal shifts away from the car • The Metro improvements are reliant on Welsh Government and City Deal funding 	Delivery will be dependent on funding still being available for the projects identified.	<ul style="list-style-type: none"> • Inclusion of schemes will be reliant on WG decisions.
	<p>Accessibility Requirements for new development No Impact</p> <p>This is a criterion based policy aimed at ensuring that new development meets the transport hierarchy, expands active travel networks, provides sufficient access to the travel network and provides electric charging infrastructure. The policy accords with PPW and helps deliver Building Better Places actions on active travel.</p>	None.	None.
SP12:Social and Community Infrastructure	<p>This is a criterion based policy aimed at either protecting or providing new community facilities where required.</p> <ul style="list-style-type: none"> • Whilst Covid-19 will impact on the need for facilities such as burial grounds and health facilities land allocations will be based on needs identified by the service areas. • Whilst open space and allotments have been valued more during the pandemic need is based on standard assessments in line with national requirements and the ability to meet requirements. 	Discuss requirements with service areas.	Identify needs based on service area requirements and the open space assessment.
SP13: Protection and Enhancement of the	This is a criterion based policy which seeks the protection and enhancement of the Natural	None.	None.

<p>Natural Environment</p>	<p>Environment. The policy accords with PPW and helps deliver Building Better Places action on Green Infrastructure, health and well-being and ecological resilience.</p> <ul style="list-style-type: none"> • The crisis has highlighted the importance of easy access and proximity to quality greenspaces 		
<p>SP14: Preservation and Enhancement of the Historic Environment</p>	<p>This is a criterion based policy which seeks the protection and enhancement of the Historic Environment. The policy accords with PPW and helps deliver Building Better Places action on Reawakening Wales’ tourism and cultural sectors.</p>	<p>None.</p>	<p>None.</p>
<p>SP15: Environmental Protection</p>	<p>This is a criterion based policy which seeks the environmental protection. The policy accords with PPW and helps deliver Building Better Places action on Improving air quality and soundscapes for better health and well-being.</p>	<p>None.</p>	<p>None.</p>



Cyngor Bwrdeistref Sirol

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