

## Schedule of Council Responses to the SPG Representations (July 2017)

### Open Space and Greenspace SPG

ID	Name	Organisation	Section	Paragraph	Representation	Council Response	Council Decision
<a href="#">OS6</a>	Rhian Isaac	Natural Resources Wales	General		<p>The open space SPG is a workable document which makes it clear how much developers need to provide and pay. However, there seems to be a missed opportunity to provide a clear link between the recreational value of green spaces (or more broadly green infrastructure) and the wider benefits and ecosystem services that such measures can provide.</p> <p>Green infrastructure within development is also important in connecting habitats on a landscape scale which is essential to reduce fragmentation of habitats, improve connectivity, and secure functioning ecosystems. In this respect, it may also be useful for the document to provide some local context – to describe the current green space resource within the County and how these spaces connect within the wider landscape.</p>	<p>The comment is noted and the importance of 'green infrastructure' within developments is acknowledged.</p> <p>The practical guidance provided in Chapter 5, highlights the opportunities that may arise for increasing biodiversity when retaining or creating areas of open space, particularly in respect of informal areas, multi-use spaces and greenspace.</p> <p>The specific role and opportunities associated with green infrastructure is however considered to be more appropriately addressed in the Council's 'Biodiversity and Geodiversity' SPG. Work has already started on preparing this next batch of SPG with the next consultation scheduled to take place early in 2018.</p>	That there be no change to the SPG.
<a href="#">OS18</a>	Mr Rhodri Edwards	Fields in Trust	General		<p>The draft references Fields in Trust's 'Planning and Design for Outdoor Play and Sport' (2008) but please note that Fields in Trust issued updated guidance earlier this year in the publication '<a href="#">Beyond the Six Acre Standard</a>'.</p> <p>While the recommendations are largely the same there are some differences including new standards for other forms of open space. In terms of play space, the equipped / designated play space of 0.25ha per 1,000 remains and the previous 'informal playing space' would now be counted under 'amenity green space'. Also, the new guidance is less prescriptive in terms of the characteristics of play spaces.</p>	<p>The comment is noted and the Council is aware that the Fields in Trust issued updated guidance earlier in 2017 (i.e. following the adoption of the LDP).</p> <p>The scope of the guidance contained within the SPG however has to be consistent with the adopted policy: these policies cannot be changed through the medium of SPG. The policy was discussed and confirmed through the EIP process, as stated within the Inspectors' report, and included within the adopted Plan. It would not therefore be appropriate to change the standards of provision for any category of open space in the SPG. This could only be considered as part of a formal review of the LDP.</p> <p>Reference to the fact that the Fields in Trust</p>	<p>That the following amendments be incorporated into the SPG:</p> <p>Footnote 18 (Page 22) - amend to read: '<i>The Fields in Trust (FIT) 'Planning and Design for Outdoor Sport and Play' (2008) provides Details on the characteristics of the different play areas are These are examined in more detail in Appendix G</i>'.</p> <p>Appendix G (Paragraph G.0.1) - amend to read: '<b>Derived from the Fields in Trust (Planning and Design for Outdoor Sport and Play) 2008, the table below summarises provides detailed information on the characteristics (summarised in the table below) of the following main</b></p>

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					<p>has issued updated guidance is noted in the Council's updated 'Open Space Assessment (2016)', which underpins and informs the SPG. Notwithstanding this point, it is considered appropriate to incorporate minor amendments to the SPG to clarify the position.</p>	<p>types of designated children's play areas'.</p> <p>Insert footnote to Paragraph G.0.1: <b><i>'It should be noted that a revised version of the Fields in Trust Six Acre Standard was published in February 2017 entitled 'Beyond the Six Acre Standard'. This new guidance is less prescriptive in terms of the characteristics of play spaces'.</i></b></p>	
OS1	Mr R Lanchbury	Cilybebyll Community Council	2.1	2.1.2	<p>Whilst the Council notes your definition of open space in paragraph 2.1.2 and acknowledges that its area is well served by greenspace, it takes the view that much of this greenspace is accessed by the Public Rights of Way network, which is increasingly under stress given the restrictions on budget.</p> <p>To this end, its view is that PROWs should be brought within the remit of improvements to existing resources that developers could be asked to fund. This would ensure that accessible open space and greenspace can be reached without impediment in the future and protect an existing invaluable network of paths for healthy exercise and recreation.</p>	<p>The comment is noted and the importance of the Public Rights of Way (PROW) network is acknowledged.</p> <p>The Council's 'Planning Obligations' SPG (adopted in October 2016), establishes the national and local framework within which planning obligations will be addressed and identifies the principle categories which the Council will seek developer contributions.</p> <p>Section 5.3 of the Planning Obligations SPG addresses those related to 'Transportation and Access' and highlights that in cases where proposals for new development impact on the walking and cycling network, the Council may use planning obligations to secure improvements to the cycling / pedestrian network.</p> <p>It should be noted however that given all planning obligations will need to satisfy a number of tests (one of which is that the obligation must be directly related to the proposed development), developer contributions cannot be used to finance improvements to the wider PROW network.</p>	<p>That there be no change to the SPG.</p>
OS7	Rhian Isaac	Natural Resources Wales	3.1		<p>The SPG should refer to the Well-being of Future Generations Act because of the crucial role that well-managed greenspace has to well-being. It is arguable that unless sufficient greenspace of an appropriate quality is provided within appropriate</p>	<p>The comment is noted. The link between the provision and availability of open space / greenspace to the health and well-being of residents is well documented throughout the LDP and supporting documents. Additional text is therefore proposed to cover the point</p>	<p>That the following amendment be incorporated into the SPG:</p> <p>Insert additional text before Paragraph</p>

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					distance from people's homes, then their well-being cannot be assured. Key references to support this assertion can be found in the appendices to NRW's greenspace toolkit which we can share upon request.	raised.	<p>3.1.1:</p> <p><b><i>Well-being of Future Generations (Wales) Act (2015)</i></b></p> <p><b><i>The Act places a duty upon public bodies to produce well-being objectives that contribute to achieving a set of overarching well-being goals: A Prosperous Wales; A Resilient Wales; A Healthier Wales; A More Equal Wales; A Wales of Cohesive Communities; A Wales of Vibrant Culture and Thriving Welsh Language; and A Globally Responsible Wales. Each public body is then required to take reasonable steps to meet their objectives in the context of the principle of sustainable development and whilst following a set of five ways of working.</i></b></p> <p><b><i>The 'Resilient Wales' and 'Healthier Wales' goals are the key goals that open space and greenspace, as part of the planning process, will contribute towards delivering'.</i></b></p>
<a href="#">OS8</a>	Rhian Isaac	Natural Resources Wales	3.1		<p>The SPG should also refer to the Noise Action Plan for Wales:  <a href="http://gov.wales/topics/environmentcountrieside/epq/noiseandnuisance/environmentalnoise/noisemonitoringmapping/noise-action-plan/?lang=en">http://gov.wales/topics/environmentcountrieside/epq/noiseandnuisance/environmentalnoise/noisemonitoringmapping/noise-action-plan/?lang=en</a></p> <p>In that context the SPG should note that where developments are proposed in areas likely to be subject to man-made noise and air pollution then developers will be expected to plan greenspace provision to ameliorate the effects of noise and to use vegetation to intercept particulate air pollution.</p>	<p>Guidance in respect of noise related issues is dealt with in the Council's 'Pollution' SPG (October 2016), which was adopted following a public consultation exercise in the Summer of 2016.</p> <p>The Pollution SPG gives information about the range of pollution related issues in Neath Port Talbot (including noise) and sets out the relevant matters that will need to be taken into consideration when developments are being planned in the County Borough. Chapter 4 (Noise Pollution) specifically refers to the 'Noise Action Plan for Wales'.</p>	That there be no change to the SPG.
<a href="#">OS9</a>	Rhian Isaac	Natural Resources	3.1		The SPG should refer to the SuDS (Sustainable Drainage Systems)	The comment is noted and the role of SuDS in controlling surface water and waterborne	That there be no change to the SPG.

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		Wales			<p>Standards for Wales  <a href="http://gov.wales/topics/environmentcountry-side/epq/flooding/drainage/?lang=en">http://gov.wales/topics/environmentcountry-side/epq/flooding/drainage/?lang=en</a> and note that greenspace on developments will be expected to play a part in controlling surface water and waterborne pollution. Because greenspaces provide multiple benefits in one place at the same time then developers will be expected to make the most efficient use of space by designing multifunctional green spaces.</p>	<p>pollution is acknowledged.</p> <p>The specific role, importance and opportunities associated with SuDS is addressed in the Council's 'Design' SPG (also the subject of consultation). Section 4.9 'Drainage Systems (Criterion 9)' makes detailed reference to the fact that new developments should be designed to ensure there is no detrimental impact on water quality or flood risk (either within a site or elsewhere).</p> <p>In all cases, developers will be expected to show that sustainable drainage principles have been applied and appropriately implemented as part of the development, taking into account the topographical and hydrological context and future maintenance.</p>	
<a href="#">OS10</a>	Rhian Isaac	Natural Resources Wales	4.1	4.1.2	<p>We welcome the inclusion of the requirement for developers to provide greenspace for commercial developments. There is ample evidence that employees in greener environments are more productive, so this makes sound economic sense.</p> <p>The SPG could go further and emulate guidance from at least one London Borough which simply states that flat, or gently sloping roofs on commercial premises should be constructed as green roofs unless the developer can provide compelling reasons why they should not do so. This would support the implementation of the SUDS standards, save money on drainage systems, and provide an even more extensive area of green space to ameliorate climate change, support biodiversity and promote employee health.</p>	<p>Whilst the comment is noted, this section of the SPG addresses the policy requirement that is specifically aimed at ensuring the provision of amenity space for employees to access outdoor amenity areas close to the workplace.</p> <p>Green infrastructure assets (such as 'green roofs'), is considered to be more appropriately addressed in the Council's 'Biodiversity and Geodiversity' SPG. Work has already started on preparing this next batch of SPG with the next consultation scheduled to take place early in 2018.</p> <p>The emerging Biodiversity and Geodiversity SPG will address the importance of green infrastructure and acknowledge the fact that they are often multi-functional and can deliver a number of requirements that a development may need to consider, including green space provision, provision of biodiversity protection and enhancement, local food production, flood attenuation and water management, and provision of a resource for communities to use for health and well-being purposes.</p>	That there be no change to the SPG.
<a href="#">OS11</a>	Rhian Isaac	Natural	4.1	4.1.3.10	The SPG should again note that	This section of the SPG (Paragraphs 4.1.3.8-	That there be no change to the SPG.

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		Resources Wales			greenspaces will deliver multiple functions in the same place at the same time. Amenity greenspace can be made biodiverse and incorporate opportunities for informal play to extend its versatility. At the same time it can form part of a SUDS, ameliorate noise, intercept airborne pollutants and reduce the impact of climate change. However, such a multifunctional approach to greenspace provision will obviously not resolve conflicting uses such as sports pitches vs play areas.	<p>4.1.3.13) addresses the procedures that will be followed in the cases where financial contributions for off-site provision is necessary.</p> <p>The practical guidance provided in Chapter 5, highlights the multi-functional opportunities that may arise when retaining or creating areas of open space, particularly in respect of informal areas, multi-use spaces and greenspace.</p> <p>Furthermore, the emerging Biodiversity and Geodiversity SPG will address the importance of green infrastructure and acknowledge the fact that they are often multi-functional and can deliver a number of requirements that a development may need to consider, including green space provision, provision of biodiversity protection and enhancement, local food production, flood attenuation and water management, and provision of a resource for communities to use for health and well-being purposes.</p>	
OS3	Beth Preece	Public Health Wales	4.2		<p>Suggest adding that developers would need to consider the health impacts and demonstrate how negative health impacts will be mitigated.</p> <p>Rationale: LDP OB 2: Reduce people's exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.</p>	<p>Section 4.2 provides guidance on the implementation of LDP Policy OS2 which seeks to protect existing open space provision, setting out criteria which developers need to satisfy.</p> <p>The scope of the guidance contained within the SPG has to be consistent with the adopted policy: these policies cannot be changed through the medium of SPG.</p> <p>The policy was discussed and confirmed through the EIP process, as stated within the Inspectors' report, and included within the adopted Plan. It would not be appropriate therefore to add additional criteria / requirements for developers to satisfy.</p> <p>The details provided in the SPG seek to establish the impact of the loss of provision on a community, and ensure that any replacement facility meets local need and ensures full consideration is given to</p>	That there be no change to the SPG.

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						<p>alternative provision, its type, accessibility to the community etc. The health impacts of a loss of provision is difficult to quantify as health impacts are wide and varied, and many are affected by matters beyond the scope of open space provision. The consideration of the policy criteria offer the opportunity for the impact on a community to be fully considered, which by its very nature without being specific, impacts on people's health.</p> <p>It should be highlighted that 'health and well-being' has been embodied throughout the LDP and supporting documents, with Strategic Policy SP2 (Health) being the overarching policy in relation to health matters. The topic will therefore be addressed through a range of policies and interventions which can have positive health benefits.</p>	
OS4	Beth Preece	Public Health Wales	4.3	4.3.9	<p>Suggest taking out '<i>or the removal of the requirement to contribute to open space provision</i>'.</p> <p>Rationale: LDP OB2, 10 and Policy OS1; importance of prioritising well-being needs of residents.</p> <p>Evidence: Wide ranging evidence demonstrating benefits of open spaces on mental and physical health.</p>	<p>The Council's 'Planning Obligations' SPG (adopted in October 2016), establishes the national and local framework within which planning obligations will be addressed, identifying the number of categories which the Council will seek developer contributions.</p> <p>The financial viability of a development will be one of the key factors in determining the type and scale of obligations that could be secured through S106 and there may be occasions when not all of the identified obligations (including open space provision) can be met without compromising the overall viability of a scheme. If a scheme is not financially viable, then there is a higher risk that the scheme may not proceed.</p> <p>Consequently, Paragraph 4.3.9 appropriately refers to the negotiation that may take place with the developer in respect of the range of obligations that may be required and the viability of the scheme. For contributions to be waived, a developer would need to provide a viability report, giving a detailed financial</p>	That there be no change to the SPG.

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						appraisal of the development and its costs, which would be examined independently by the Council's Estates Section to establish the viability of the site and whether there is a case for reduced / no contributions. The format and detail which a developer would need to provide is detailed in the Section 106 obligations - Viability Assessment Guidance Note Jan 2017.	
<a href="#">OS5</a>	Beth Preece	Public Health Wales	4.3	4.3.10	Suggest taking out ' <i>or the requirement to provide open space removed</i> '.  Rationale: LDP OB2, 10 and Policy OS1: importance of prioritising wellbeing needs of residents.  Evidence: Wide ranging evidence demonstrating benefits of open spaces on mental and physical health.	The Council's 'Planning Obligations' SPG (adopted in October 2016), establishes the national and local framework within which planning obligations will be addressed, identifying the number of categories which the Council will seek developer contributions.  The financial viability of a development will be one of the key factors in determining the type and scale of obligations that could be secured through S106 and there may be occasions when not all of the identified obligations (including open space provision) can be met without compromising the overall viability of a scheme. If a scheme is not financially viable, then there is a higher risk that the scheme may not proceed.  Consequently, Paragraph 4.3.10 appropriately refers to the negotiation that may take place with the developer in respect of the range of obligations that may be required and the viability of the scheme. For contributions to be waived, a developer would need to provide a viability report, giving a detailed financial appraisal of the development and its costs, which would be examined independently by the Council's Estates Section to establish the viability of the site and whether there is a case for reduced / no contributions.	That there be no change to the SPG.
<a href="#">OS12</a>	Rhian Isaac	Natural Resources Wales	4.3	4.3.9	We are concerned that this offers a get-out clause to developers who will always attempt to prove that provision of anything other than the minimum planning obligations will reduce their profit to unacceptably low levels and imperil the	The Council's 'Planning Obligations' SPG (adopted in October 2016), establishes the national and local framework within which planning obligations will be addressed, identifying the number of categories which the Council will seek	That there be no change to the SPG.

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					<p>development.</p> <p>Our preference would be to require the entire SPG to refer to Green Infrastructure, rather than green space, and to require developers to deliver the ecosystem goods and services in the same way as other services such as power, water and foul water drainage.</p>	<p>developer contributions.</p> <p>The financial viability of a development will be one of the key factors in determining the type and scale of obligations that could be secured through S106 and there may be occasions when not all of the identified obligations (including open space provision) can be met without compromising the overall viability of a scheme. If a scheme is not financially viable, then there is a higher risk that the scheme may not proceed.</p> <p>Consequently, Paragraph 4.3.9 appropriately refers to the negotiation that may take place with the developer in respect of the range of obligations that may be required and the viability of the scheme. For contributions to be waived, a developer would need to provide a viability report, giving a detailed financial appraisal of the development and its costs, which would be examined independently by the Council's Estates Section to establish the viability of the site and whether there is a case for reduced / no contributions.</p> <p>The scope of the guidance contained within the SPG has to be consistent with the adopted policy: these policies cannot be changed through the medium of SPG. The policy was discussed and confirmed through the EIP process, as stated within the Inspectors' report, and included within the adopted Plan. It would not be appropriate therefore to change the emphasis of the SPG to green infrastructure and to require developers to deliver the ecosystem goods and services in the same way as other services.</p>	
OS2	Mr R Lanchbury	Citybebyll Community Council	4.4		<p>The Council notes the preference expressed for management and maintenance in Section 4.4 but is concerned that private management arrangements may well be put in place and be managed strategically by developers without reference to local</p>	<p>The comment is noted.</p> <p>Paragraph 4.4.7 of the SPG makes specific reference to the availability of alternative methods of delivering the management and maintenance of open space, including reference to the potential involvement of</p>	That there be no change to the SPG.

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					<p>inputs and knowledge.</p> <p>A better option might be for community councils to be given the option to take management and maintenance responsibilities, thereby assuring that local input and knowledge is factored into decisions, subject of course to the provision of commuted sums that would facilitate ongoing responsibilities. Council would welcome such a preference being expressed in the relevant paragraphs as a more realistic and more relevant way forward, given that developers rarely want to show interest in their developments once properties are sold.</p>	community councils. Consequently, the matter is considered to be adequately addressed.	
<a href="#">OS13</a>	Rhian Isaac	Natural Resources Wales	4.4		This section should be recommended to other authorities as an example of good practice.	The comment of support is noted.	Not applicable.
<a href="#">OS14</a>	Rhian Isaac	Natural Resources Wales	5		<p>We welcome the statement '<i>5.0.2 Open space should be designed as an integral part of the development, not considered as an afterthought by utilising parcels of land which are left over or difficult to develop</i>'. Developers should also be encouraged to retain trees and vegetation in '<i>awkward corners</i>', and should be given credit where those green elements provide genuine ecosystem goods and services – such as space for biodiversity.</p>	<p>The comment of support is noted.</p> <p>Specific natural features such as trees in 'awkward corners' are considered under LDP Policy EN7. This policy requires features such as trees, ponds, woodland, hedges and field boundaries to be appropriately considered and incorporated into development design. Guidance on the implementation of Policy EN7 will be set out in the Council's 'Biodiversity and Geodiversity' SPG. Work has already started on preparing this next batch of SPG with the next consultation scheduled to take place early in 2018.</p>	That there be no change to the SPG.
<a href="#">OS15</a>	Rhian Isaac	Natural Resources Wales	5	5.0.4	<p>We welcome the suggestion in 5.0.4 that landscaping can be used to promote biodiversity, and the acknowledgement that greenspace can provide multiple functions. However, this section is the ideal opportunity to discuss SUDS and other ecosystem service provision. There is a good case study from Sweden which shows just how landscaping, play and biodiversity can all be blended with SUDS to provide world-class living conditions in a former 'sink' estate: <a href="http://climate-">http://climate-</a></p>	<p>The specific role, importance and opportunities associated with SuDS is addressed in the Council's 'Design' SPG (also the subject of consultation). Section 4.9 'Drainage Systems (Criterion 9)' makes detailed reference to the fact that new developments should be designed to ensure there is no detrimental impact on water quality or flood risk (either within a site or elsewhere).</p> <p>In all cases, developers will be expected to show that sustainable drainage principles</p>	That there be no change to the SPG.

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					<a href="adapt.eea.europa.eu/metadata/case-studies/urban-storm-water-management-in-augustenborg-malmo">adapt.eea.europa.eu/metadata/case-studies/urban-storm-water-management-in-augustenborg-malmo</a> . Adoption of such an approach will require NPT to resolve the conflict over adoption of SUDS and open space in footnote 17.	have been applied and appropriately implemented as part of the development, taking into account the topographical and hydrological context and future maintenance.	
OS16	Rhian Isaac	Natural Resources Wales	5		Play for Children and Young People (5.0.5 onwards) - this section and the very helpful photographs are to be welcomed. There is a great deal of evidence of the importance of contact with nature for child development, and the provision of natural play opportunities is to be strongly encouraged.	The comment of support is noted.	Not applicable.
OS17	Rhian Isaac	Natural Resources Wales	5	5.0.14	<p>We were disappointed to see multifunctional greenspace mentioned in such sparse detail, so far down the document. We would like to see the final version of the SPG include far greater detail, far earlier in the document about how to ensure greenspace delivers multiple, planned benefits. Developers must be encouraged to discover that far from increasing the proportion of land unavailable for building, intelligent use of greenspace can pack more features into a limited amount of space, increasing the value of the development and reducing construction costs (see the link to the SUDS standards above for research showing that SUDS are always cheaper than conventional surface water drains on new developments).</p> <p>We would also like to see this subject as well illustrated with photos and diagrams as the section on play. A good case study can be found on the Wales Green Infrastructure Forum pages of NRW's website:  <a href="https://naturalresources.wales/guidance-and-advice/environmental-topics/your-neighbourhood/green-spaces/wales-green-infrastructure-forum/?lang=en">https://naturalresources.wales/guidance-and-advice/environmental-topics/your-neighbourhood/green-spaces/wales-green-infrastructure-forum/?lang=en</a> download the presentation on Parc Peulwys.</p>	<p>Whilst it is acknowledged that the sub-section on multi-functional spaces is relatively brief, the principle of such use is clearly detailed in the earlier paragraphs in Chapter 5, including informal open space and children's play. Chapter 5 is considered to be the most appropriate section to address the practicalities of the provision of the different categories of open space, as earlier chapters directly consider policy requirements.</p> <p>The wider approach to 'green infrastructure' is considered to be more appropriately addressed in the Council's 'Biodiversity and Geodiversity' SPG. Work has already started on preparing this next batch of SPG with the next consultation scheduled to take place early in 2018.</p> <p>The emerging Biodiversity and Geodiversity SPG will address the importance of green infrastructure and acknowledge the fact that they are often multi-functional and can deliver a number of requirements that a development may need to consider, including green space provision, provision of biodiversity protection and enhancement, local food production, flood attenuation and water management, and provision of a resource for communities to use</p>	<p>That the following amendment be incorporated into the SPG:</p> <p>Insert new paragraphs after Paragraph 5.0.14:</p> <p><b><i>'The provision of multi-use spaces enables a greater variety of recreational opportunities to be provided on any given parcel of land and can encompass both formal and informal open space, greenspace, amenity space, opportunities for biodiversity and social interaction.</i></b></p> <p><b><i>Innovative landscaping can improve the quality of open space and increase the visual appeal of a development by creating vibrant community spaces which offer a variety of opportunities for different sections of the community, enabling community cohesion and assisting with health and well-being. In addition, when considering the opportunities detailed in Appendix H relating to the creation of a quality play area, opportunities can be provided within multi-use spaces to create imaginative opportunities for children's play'.</i></b></p>

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						<p>for health and well-being purposes.</p> <p>Notwithstanding the above, additional wording is suggested to emphasise the importance of multi-use spaces and to cross-reference to Appendix H (Creating a Quality Play Environment).</p>	
OS19	Rhian Isaac	Natural Resources Wales	5	5.0.17	<p>NPT should adopt standards for the provision of accessible natural green space as suggested in TAN 16, and as specified in the NRW (ex-CCW) greenspace toolkit – see above. If a multifunctional green infrastructure approach is taken, then such greenspace can be combined with SUDS, play provision, biodiversity provision, noise attenuation, air pollution interception and landscaping to reduce overall land-take but to maximise the well-being of residents / employees.</p>	<p>Policy OS1 establishes standards for the following four categories of open space: outdoor sport; children's play, informal space; and allotments.</p> <p>The scope of the guidance contained within the SPG has to be consistent with the adopted policy: these policies cannot be changed through the medium of SPG. The policy was discussed and confirmed through the EIP process, as stated within the Inspectors' report, and included within the adopted Plan. It would not therefore be appropriate to add a standard for 'accessible natural greenspace' in this SPG. This could only be considered as part of a formal review of the LDP.</p> <p>The practical guidance provided in Chapter 5, highlights some of the multi-functional opportunities that may arise when retaining or creating areas of open space, particularly in respect of informal areas, multi-use spaces and greenspace.</p> <p>The approach to 'green infrastructure' is considered to be more appropriately addressed in the Council's 'Biodiversity and Geodiversity' SPG. Work has already started on preparing this next batch of SPG with the next consultation scheduled to take place early in 2018.</p> <p>The emerging Biodiversity and Geodiversity SPG will address the importance of green infrastructure and acknowledge the fact that they are often multi-functional and can deliver a number of requirements that a development</p>	That there be no change to the SPG.

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					may need to consider, including green space provision, provision of biodiversity protection and enhancement, local food production, flood attenuation and water management, and provision of a resource for communities to use for health and well-being purposes.		
OS20	Persimmon Homes	Appendix E			<p>The following paragraph should be inserted, to ensure planning decisions are made in line with national policy:</p> <p>'All planning applications will be considered on their merits and the planning obligations will be negotiated in accordance with Welsh Office Circular 13/97 and Regulations 122 and 123 of the Community Infrastructure Levy (CIL) Regulations. Pertinent sections of regulation 122 are detailed as follows:</p> <p>Regulation 122- Limitation on use of planning obligations:</p> <p>(1) This regulation applies where a relevant determination is made which results in the planning permission being granted for development</p> <p>(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is-</p> <ul style="list-style-type: none"> <li>(a) necessary to make the development acceptable in planning terms;</li> <li>(b) directly related to the development</li> <li>(c) fairly and reasonably related in scale and timing to the development</li> </ul> <p>(3) In this regulation - "planning obligation" means a planning obligation under section 106 of TCPA 1990 and includes a proposed planning obligation; and "relevant determination" means a determination made on or after 6th of April 2010 -</p> <ul style="list-style-type: none"> <li>(a) under section 70, 73, 76a or 77 of TCPA 1990 of an application for planning permission; or</li> <li>(b) under Section 79 of TCPA 1990 of an appeal.</li> </ul>	<p>The Council's overarching 'Planning Obligations' SPG (adopted in October 2016), establishes the national and local framework within which planning obligations will be addressed.</p> <p>The Planning Obligations SPG outlines the Council's approach to such agreements, setting out in some detail what a planning obligation is; when they can be applied; the types of developer contributions; who may enter into a planning obligation; the importance of establishing a consistent process; how agreements are established; and identifies the principle categories which the Council will seek developer contributions.</p> <p>The Planning Obligations SPG is appropriately referenced throughout the document and consequently, the inclusion of the additional text is not considered necessary or appropriate.</p>	That there be no change to the SPG.

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<a href="#">OS21</a>		Persimmon Homes	Appendix E		Appendix E - Tables E.0.1 (p41) & E.0.3 (p42): the reference to Children's play requiring 5.7sqm / dwelling should have a note saying 'This figure does not include any associated buffer zone' as per Table 4.1.1.1 (p12).	It is accepted that for clarity, a note be added to tables E.0.1 and E.0.3 respectively.	That the following amendment be incorporated into the SPG:  Tables E.0.1 and E.0.3 - insert note associated with the 5.7 sqm requirement for children's play: ' <b>This figure does not include any associated buffer zone</b> '.

## Renewable and Low Carbon Energy SPG

ID	Name	Organisation	Section	Paragraph	Representation	Council Response	Council Decision
<a href="#">RE1</a>	Hannah Thomas	Natural Resources Wales	3.1	3.1.6	<p>This refers to 5-25MW (medium scale) wind farms being potentially acceptable in SSAs and the intention to maximise installed turbine capacity in SSAs. It should be noted (TAN8 2.4) that not all of the land within SSAs may be technically, economically and/or environmentally suitable for major wind power proposals. The statement at 3.1.6 may need to be qualified to recognise constraints within SSAs.</p> <p>Guidance on the approach to 5-25MW wind energy developments outside SSAs appears to be lacking. It should be noted that TAN8 2.13 states that '<i>most areas outside SSAs should remain free of large wind power schemes</i>' and TAN8 Annex D 8.4 states that '<i>outside the SSAs, the implicit objective is to maintain the landscape character i.e. no significant change in landscape character from wind turbine development.</i>'</p>	<p>It is accepted that it should be clarified that constraints to development exist within the refined SSAs and an amendment to the paragraph to address this is recommended.</p> <p>Guidance on smaller wind energy developments and the approach to landscape character issues is given in Paragraph 3.17. No further guidance is therefore considered necessary.</p>	<p>That the following amendment be incorporated into the SPG:</p> <p>Paragraph 3.1.6 - amend first sentence to read: '<i>Within the refined SSAs the intention is to maximise installed wind turbine capacity taking into account relevant site constraints</i>'.</p>
<a href="#">RE2</a>	Hannah Thomas	Natural Resources Wales	3.1	3.1.8	<p>We suggest the following additions made in bold '<i>...parts of Neath Port Talbot also abut the Brecon Beacons National Park, and fall within its setting</i> . Potential effects of wind farm developments on the National Park <b>and its special qualities</b> will need to be carefully considered in the context of the purposes of the National</p>	<p>The comment is noted. The suggested amendments clarify the approach that should be taken in relation to effects on Brecon Beacons National Park.</p>	<p>That the following amendment be incorporated into the SPG:</p> <p>Paragraph 3.1.8 - amend to read: '<i>Parts of Neath Port Talbot also abut the Brecon Beacons National Park, and fall within its setting</i> . Potential</p>

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					'Park'.		effects of wind farm developments on the National Park <b>and its special qualities</b> will need to be carefully considered in the context of the purposes of the National Park'.
<a href="#">RE3</a>	Hannah Thomas	Natural Resources Wales	3.3	3.3.1	We suggest adding the words ' landscape character' in front of 'visual amenity'.	Landscape issues are covered in the following sentence and in more detail in the subsequent paragraphs. The suggested amendment is therefore not considered to be necessary.	That there be no change to the SPG.
<a href="#">RE4</a>	Hannah Thomas	Natural Resources Wales	3.3	3.3.2	This states that ' <i>...for wind farms outside the refined SSAs....the assessment of landscape and visual effects will be of primary importance</i> '. Whilst not disagreeing with this statement, it should be noted that Landscape and Visual Impact Assessment (LVIA) as part of EIA will be required for wind farms within SSAs as well and for other large scale energy developments including solar farms. It is not a foregone conclusion that any scheme within an SSA will be acceptable.	This paragraph (3.3.2) is about windfarms located outside SSAs. Paragraph 3.3.3 covers requirements for LVIA, within and outside SSAs with further information in the subsequent section. The guidelines for Landscape and Visual Assessment are covered and referenced at Paragraph 3.3.9.	That there be no change to the SPG.
<a href="#">RE5</a>	Hannah Thomas	Natural Resources Wales	3.3	3.3.3	We suggest the following additions in bold ' <i>...but should be undertaken in all cases where there is likely to be significant landscape and visual impact</i> '. Note that LVIA should be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition; Landscape Institute and Institute of Environmental Management and Assessment.	The sentence referred to relates to all types of visual impact while the suggested amendment would imply it relates only to impacts that would have both landscape and visual impacts. This is set out and clarified in the subsequent sections.	That there be no change to the SPG.
<a href="#">RE6</a>	Hannah Thomas	Natural Resources Wales	3.3	3.3.4	Bullet 2 LANDMAP: It should be noted that all 5 Aspect area layers of LANDMAP should be used in assessments. We suggest omitting the wording ' <i>wild and remote landscapes will be particularly sensitive</i> '. This is one criteria that may be used in assessing landscape sensitivity and a combination of criteria should be used. Parts of the SSAs can be described as wild and remote.	It is accepted that all 5 aspect layers of LANDMAP should be used in combination in assessments with no additional emphasis put on particular criteria.	That the following amendment be incorporated into the SPG:  Paragraph 3.3.4 (2nd Bullet Point) - delete the wording ' <i>wild and remote landscapes will be particularly sensitive</i> '.
<a href="#">RE7</a>	Hannah Thomas	Natural Resources Wales	3.3	3.3.7	We suggest omitting the wording ' <i>...which can give a spurious level of precision to an essentially subjective process</i> ' and replace	It is accepted that the wording used does not fully reflect the approach advocated in the GLVIA and that the wording of the paragraph	That the following amendment be incorporated into the SPG:

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					<p>with the GLVIA (3.2.7) wording '<i>Numerical scoring or weighting of criteria should be avoided, or at least treated with considerable caution, since it can suggest a spurious level of precision in the judgements and encourage inappropriate mathematical combining of scores</i>'. LVIA is a combination of the objective and subjective and includes professional judgement.</p> <p>The Council may also wish to consider the production of a Landscape Sensitivity and Capacity Study to Wind Turbine Development. NRW are currently working with Welsh Government on guidance on the production of Landscape Sensitivity and Capacity Studies and we advise you contact our Landscape Advisor, Olwen Maidment by emailing <a href="mailto:olwen.maidment@naturalresourceswales.gov.uk">olwen.maidment@naturalresourceswales.gov.uk</a> for further information on this.</p>	<p>should be amended.</p> <p>The suggestion about the production of a Landscape Sensitivity and Capacity Study is noted.</p>	<p>Paragraph 3.3.7 - amend to read: '<i>The overall significance judgement should be as consistent and transparent as possible, with an emphasis on written explanations of different categories of significance etc. rather than numerical scoring and tables which can give a spurious level of precision to an essentially subjective process. Numerical scoring or weighting of material should be avoided or at least treated with considerable caution, since it can suggest a spurious level of precision</i>'.</p>

## Design SPG

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DES1	Miss Jen Heal	Design Commission for Wales	General		<p>It is positive that SPG is being prepared for Design in Neath Port Talbot. For SPG of this nature to be effective the document should be locally specific, succinct, and easy to use. Whilst the current document contains lots of information on design in the built environment, it could be improved through refinement in these three areas.</p> <p>The document could be made more locally specific through the use of more plans (for example to illustrate the character areas as described on page 6), labelling existing plans to make them more useful (e.g. on pages 20 and 21) and providing more information on the qualities of the different settlement contexts e.g. town, village,</p>	<p>The comments are noted. The context setting of the area is undertaken within the LDP, which sets out a spatial strategy reflecting the character and context of the area. It is not considered there is a need to provide further detail of the character of different settlements within this document.</p> <p>The topic of 'Design' is very broad and covers a wide range of factors, from the physical appearance of buildings to impacts upon the landscape and natural resources to highway and access considerations. Where possible, annotations and images have been included, however, given the range of factors included within this document, it is inevitable that it will contain a significant amount of information.</p>	<p>That there be no change to the SPG.</p>

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					<p>coastal. More time spent understanding the character and context of different areas now will help those designing for that context and in the assessment of proposals. The document covers the key design issues but lacks local interpretation which would add value to the document over and above information and guidance that already exists elsewhere.</p> <p>More images, plans and diagrams would help to make the document shorter and easier to use. Annotating images can help to convey a matter more effectively than lots of text. Consideration should be given to how to reduce the length of the document and there may be opportunities to restructure it to remove any repetition. Currently it is too long which will limit its use.</p> <p>The draft SPG for Open Space and Green Space and Highway Technical Design Guidance are also lengthy documents. All of these are design considerations that should be addressed together through the design process. There should be some cross referencing to ensure that the documents relate well to one another and there may be the opportunity to refine the content to avoid repetition.</p>	<p>That said, the document has been structured to try to make sections focused and for users to clearly identify the sections relevant to them.</p> <p>The main purpose of the document is to provide further detail and clarity on the implementation of Policy BE1. Policy BE1 contains 10 separate criterion, with the SPG structured to reflect this. There are also sections on Key Development Areas (which cross reference to other documents) and specific types of development such as commercial. Within the appendices, sections on 'Arterial Gateways' and a 'Householder Design Guide' are provided. Given the document is broken down into these subsections, users should be able to identify relevant sections, such as the Householder Design Guide.</p> <p>The 'Open Space and Greenspace' SPG and the 'Highway Technical Design Guide' are cross referenced throughout the document where appropriate.</p>	
DES2	Miss Jen Heal	Design Commission for Wales	General		<p>Building for Life 12 Wales provides an industry standard for residential developments and could usefully be referred to in this SPG</p> <p><a href="https://dcfw.org/building-for-life-12-wales/">https://dcfw.org/building-for-life-12-wales/</a></p>	<p>The points raised are accepted and it is recommended that the document be amended to include references to the document.</p>	<p>That the following amendments be incorporated into the SPG:</p> <p>Paragraph 4.1.8 - amend to read: <i>'Further advice on these topics is available from the Planning Officers Society for Wales Design Guide, and the Welsh Government Site and Context Analysis Guide, and Building for Life 12 Wales'</i>.</p> <p>Insert new paragraph after Paragraph 4.7.14: <i>'Further advice on these topics is available within Building for Life 12 Wales'</i>.</p>

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<a href="#">DES3</a>	Miss Jen Heal	Design Commission for Wales	4.1	4.1.4	Site and context analysis is crucial for good design. Reference could be made here to the Welsh Government Guide to Site and Context Analysis.	The Welsh Government Site and Context Analysis is referenced at the end of Section 4.1 (Paragraph 4.1.8) and also within Paragraphs 4.2.2 and 4.2.31. It is considered therefore that adequate and appropriate references to the Welsh Government guide and made throughout the SPG.	That there be no change to the SPG.
<a href="#">DES7</a>		Persimmon Homes	4.1		<p>Persimmon Homes is generally supportive of the aims and objectives of the document in seeking to secure good design in all new developments. We are also supportive of the statement in paragraph 4.1.3 that the Council will seek to ensure that sites provide a distinctiveness that allows innovation and quality to be provided within the public realm and design of the buildings themselves. That said, as a volume house builder Persimmon have a standard house type portfolio that it uses, albeit tailored to the local context. Scale, massing and layout are the primary factors in large residential developments and the use of a standard house type product (tailored to the local context) does not detract from local distinctiveness.</p> <p>Through the submission of a 'Design and Access Statement' developers are required to set out how they have arrived at their layout and design and how this contributes to local distinctiveness. The SPG should recognise the vital role that volume house builders make in providing much needed new housing as well as the significant benefits that accrue to the local economy as a result of investing in the local area.</p>	<p>The points raised are acknowledged, together with the important role played by volume house builders in local economies and in the provision of housing. Para 4.1.3 however is not intended to be prescriptive but sets out the Council's aspirations in relation to locally distinctive design. This approach is considered to be reasonable and proportionate.</p>	That there be no change to the SPG.
<a href="#">DES4</a>	Miss Jen Heal	Design Commission for Wales	4.4	4.4.6	Parking courtyards work best when they serve a small number of properties. Often a mix of parking arrangements is most appropriate.	The comment is noted.	Not applicable.
<a href="#">DES5</a>	Miss Jen Heal	Design Commission for Wales	4.8	4.8.10	Care should be taken to avoid overheating. Reference could be made here to the Welsh Government Practice	The points raised are accepted and it is recommended that the paragraph be amended accordingly.	That the following amendment be incorporated into the SPG:

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					Guidance – Planning for Sustainable Buildings.		Paragraph 4.8.10 - amend to read: ' <i>Orientation of individual buildings is also important in terms of solar gain, and building layouts should be planned to ensure that this is maximised within the constraints of the site taking it into account in the design of buildings where possible, ensuring that larger windows and habitable rooms are located on southerly facing elevations if practicable. However, care should be taken to avoid overheating.</i> The potential for siting solar panels on southerly facing roofs and surfaces should also be maximised. <i>Further advice is available from the Welsh Government Practice Guidance – Planning for Sustainable Buildings'</i>
<a href="#">DES6</a>	Miss Jen Heal	Design Commission for Wales	6.2	6.2.1	Development briefs and design codes are very important for design quality and in many cases would be required for larger self-build schemes to ensure design quality and coordination.	The comments are noted. For larger residential developments, including larger self-build schemes, development briefs and design codes will be requested where appropriate, in accordance with Paragraphs 6.2.2 to 6.2.5.	That there be no change to the SPG.

## Development and the Welsh Language SPG

ID	Name	Organisation	Section	Paragraph	Representation	Council Response	Council Decision
<a href="#">WL1</a>	Mr R Lanchbury	Cilybebyll Community Council	General		<p>Council considers the emphasis being placed on Welsh Language Sensitive Areas, and whilst it appreciates that these may be a function of government policy, it considers this emphasis to be misplaced.</p> <p>Welsh Language Topic Papers have accepted that, notwithstanding the reduction in Welsh Speakers between the 2001 and 2011 Census returns, the demand for Welsh Language Education is rising. Furthermore, this demand is evident outside the Welsh Language Sensitive</p>	<p>The SPG relates only to those areas identified within designated 'language sensitive areas'.</p> <p>SPG gives guidance about the implementation of adopted LDP policy. The extent of the area covered by the SPG has to reflect the extent of the adopted LDP designation: these designations cannot be changed through the medium of SPG. The designation was discussed and confirmed through the EIP process, as stated within the Inspectors' report, and included within the adopted Plan.</p> <p>It would not be appropriate therefore to change</p>	That there be no change to the SPG.

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					<p>Areas.</p> <p>It is perverse therefore, not to apply the provisions of the SPG in those areas, to encourage use and uptake of the language where that demand exists. The emphasis should be on development of the language in all areas, not fossilising and managing decline in the sensitive areas. We would urge you, therefore, to amend the SPG and find a way of implementing the SPG requirements throughout the CBC area, and given its policy support for the language, to advocate this approach in any dealings with Welsh Government.</p>	<p>the overall extent of the designation in the SPG and apply the provisions of the policy across the County Borough.</p>	
WL2	Mr R Lanchbury	Cilybebyll Community Council	5.3	5.3.8	<p>The Council notes the reference in Paragraph 5.3.8 to what should be funded by the £500 cost per dwelling, and considers that signage, marketing and welcome packs should not be included in this cost. These should be minimum requirements imposed and other initiatives should be funded by the £500 per dwelling. There is a real risk, that having funded signage, marketing and welcome packs, there will be no funding left to deliver the more substantive support required, for example in various mechanisms for education and operational application of language initiatives, promoting ongoing use of the language.</p>	<p>The mitigation cost per unit identified in the SPG has been derived directly from the Council's 'Planning Obligations' SPG (October 2016), which was adopted following a public consultation exercise in the Summer of 2016.</p> <p>The £500 mitigation cost per dwelling is considered appropriate and has been based on evidence provided by 'Menter Iaith Castell-Nedd Port Talbot' (i.e. the actual costs of delivering measures such as the services / facilities and schemes listed within Appendix D in an effective manner over a 3 year period). 'Menter Iaith' has detailed knowledge of the local area and already provide training and activities to promote the Welsh language.</p> <p>The Council will continue to monitor the appropriateness of the mitigation cost per unit along with the delivery of mitigation as relevant, thereby ensuring delivery of appropriate schemes to protect, promote and enhance the Welsh Language.</p>	That there be no change to the SPG.
WL3		Persimmon Homes	5.3	5.3.4	<p>Paragraph 5.3.4 refers to a contribution of £500 per plot being sought on all residential developments of 10 or more units within LSAs but no justification is given as to how this amount has been derived at.</p>	<p>The mitigation cost per unit identified in the SPG has been derived directly from the Council's 'Planning Obligations' SPG (October 2016), which was adopted following a public consultation exercise in the Summer of 2016.</p> <p>The £500 mitigation cost per dwelling is</p>	That there be no change to the SPG.

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						<p>considered appropriate and has been based on evidence provided by 'Menter Iaith Castell-Nedd Port Talbot' (i.e. the actual costs of delivering measures such as the services / facilities and schemes listed within Appendix D in an effective manner over a 3 year period). 'Menter Iaith' has detailed knowledge of the local area and already provide training and activities to promote the Welsh language.</p> <p>The Council will continue to monitor the appropriateness of the mitigation cost per unit along with the delivery of mitigation as relevant, thereby ensuring delivery of appropriate schemes to protect, promote and enhance the Welsh Language.</p>	
WL4		Persimmon Homes	5.3	5.3.8	<p>The paragraph stipulates a requirement for a contribution of £500 per dwelling. We raise no specific objection in principle to providing bilingual street signs and marketing nor a 'Welcome Pack'. However, street signs, marketing and welcome packs are provided by the developer at the developer's expense as part of any development. If as stated such mitigation measures are included within the proposed £500 contribution per plot, the level of contribution should be reduced to take account these developer borne costs.</p>	<p>It is acknowledged that it is normal for the provision of street signs, marketing and welcome packs to be provided by the developer as part of any development.</p> <p>The mitigation cost per unit identified in the SPG, and what it will be used for, has been derived directly from the Council's 'Planning Obligations' SPG (October 2016), which was adopted following a public consultation exercise in the Summer of 2016.</p> <p>The £500 per unit contribution would cover the translation costs associated with the street signage, marketing and welcome packs (which would need to specifically place the language in its context and set out the local Welsh language provision) along with the specific mitigation measures identified. This figure is considered to be appropriate and has been based on evidence provided by 'Menter Iaith Castell-Nedd Port Talbot' (i.e., the actual costs of delivering measures such as the services / facilities and schemes listed within Appendix D in an effective manner over a 3 year period).</p> <p>The Council will continue to monitor the appropriateness of the mitigation cost per unit along with the delivery of mitigation as relevant.</p>	That there be no change to the SPG.

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<a href="#">WL5</a>		Persimmon Homes	5.3	5.3.8	<p>Para 5.3.6 and Appendix D refer to a list of suggested mitigation measures that should be included within the WLAP. Whilst raising no objection to the particular list of mitigation measures it should not be a requirement for the developer to action a programme of such activities given that the Council is seeking a financial contribution on a per plot basis to implement them. Notwithstanding our objection to the level of contribution suggested, if a contribution is sought from a developer the monies raised should be used by the Council to implement the suggested mitigation measures rather than what would appear from the SPG that the developer should identify and implement such schemes.</p>	<p>The WLAP (as detailed in Appendix C, in particular Section 5 Mitigation) outlines how the WLAP should address mitigation based on the analysis / assessment of the local community and the consultation / engagement undertaken.</p> <p>It is considered that the SPG is sufficiently clear in setting out that it is for the developer, as part of the consultation on the WLAP, to identify what specific mitigation measures are proposed; what it will achieve; how and over what timescale it will be delivered.</p> <p>The financial contribution provided as part of any S106 Agreement would be facilitated and overseen by the Council to be spent on the mitigation measures that will address the Welsh language needs of that particular development. Implementation of the mitigation measures will be carried out by a third party (e.g. Menter Iaith, the Urdd etc.).</p>	That there be no change to the SPG.
<a href="#">WL6</a>		Persimmon Homes	Appendix B	Figure B.0.1	<p>The flow diagram needs to be amended. Insert arrow from left side to right side; remove arrow on right side and add text in bottom box (So no need to submit a WLAP with the application).</p>	<p>It is accepted that the flow diagram needs to be amended to clarify that where a site is not located within a Language Sensitive Area, there is no requirement for the submission of a WLAP.</p>	<p>That the following amendment be incorporated into the SPG:</p> <p>Figure B.0.1 (Policy WL1 Residential Development) - amend flow diagram to clarify that where a site is not located within a Language Sensitive Area, there is no requirement for the submission of a WLAP.</p>