



**REGENERATION AND SUSTAINABLE DEVELOPMENT CABINET
BOARD**

30 JULY 2021

**IMMEDIATELY FOLLOWING CABINET SCRUTINY COMMITTEE
FRIDAY**

VIA TEAMS

**ALL MOBILE TELEPHONES TO BE SWITCHED TO SILENT FOR THE
DURATION OF THE MEETING**

PART 1

1. Appointment of Chairperson
2. Welcome and Roll Call
3. Chair Announcements
4. Declarations of Interest
5. Minutes of Previous Meeting (*Pages 3 - 6*)
6. Environmental Health and Trading Standards – Food & Feed Law Enforcement Review 2020-2021 and Food & Feed Service Delivery Plan 2021-2022 (*Pages 7 - 66*)
7. Tenant Fee Delegations (*Pages 67 - 80*)
8. NPT Bee Friendly Scheme (*Pages 81 - 112*)
9. Consideration of Neath Port Talbot Replacement Local Development Plan (RLDP) 2021-2036 (*Pages 113 - 360*)

10. Forward Work Programme 2021/2022 (*Pages 361 - 362*)
11. Urgent Items
Any urgent items (whether public or exempt) at the discretion of the Chairman pursuant to Statutory Instrument 2001 No 2290 (as amended).

K.Jones
Chief Executive

Civic Centre
Port Talbot

24 July, 2021

Regeneration and Sustainable Development Cabinet Board
Members:

Councillors. L.Jones and A.Wingrave

EXECUTIVE DECISION RECORD

25 JUNE 2021

REGENERATION AND SUSTAINABLE DEVELOPMENT CABINET BOARD

Cabinet Members:

Councillors: A.Wingrave and P.D.Richards

Officers in Attendance:

S.Brennan, C.Morris, M.Shaw, L.Beynon, N.Headon and C.Plowman

Scrutiny Invitees:

Councillors: S.K.Hunt (Chair) and R.Taylor (Vice Chair)

1. **APPOINTMENT OF CHAIRPERSON**

Agreed that Councillor A.Wingrave be appointed Chairperson for the meeting.

2. **DECLARATIONS OF INTEREST**

No declarations of interest were received.

3. **MINUTES OF PREVIOUS MEETING**

That the minutes of the 14 May 2021 be approved.

4. **ACTIVE TRAVEL (WALES) ACT 2013: CONSIDERATION OF REQUIREMENTS FOR THE CONSULTATION DRAFT ACTIVE TRAVEL NETWORK MAP (ATNM) FOR NEATH PORT TALBOT AND THE PUBLICATION / CONSULTATION PROCEDURES TO BE IMPLEMENTED**

Decisions:

Having given due regard to the circulated first stage Integrated Impact Assessment, the following be approved:

1. The Consultation Draft ATNM, as detailed the circulated report be agreed as forming the basis of consultation.
2. The engagement and consultation arrangements as set out in the circulated report be implemented.

Reason for Decisions:

To ensure that the Council is complying with the requirements of the Active Travel (Wales) Act 2013.

Implementation of Decisions:

The decisions will be implemented after the three day call in period.

5. **FORWARD WORK PROGRAMME 2021/2022**

Decision:

That the Forward Work Programme be noted.

6. **ACCESS TO MEETINGS**

RESOLVED: That pursuant to Regulation 4(3) and (5) of Statutory Instrument 2001 No. 2290, the public be excluded for the following item of business which involved the likely disclosure of exempt information as defined in Paragraph 14 of Part 4 of Schedule 12A to the Local Government Act 1972.

7. **FORMER LIBERAL CLUB, ORCHARD STREET, NEATH (EXEMPT UNDER PARAGRAPH 14)**

Decision:

Having given due regard to the circulated first stage Integrated Impact Assessment that delegated authority be granted to the Director of Environment and Regeneration, as detailed in the private circulated report.

Reason for Decision:

The redevelopment of the former Liberal Club site becomes a financially viable project, as detailed in the private circulated report.

Implementation of Decision:

The decision will be implemented after the three day call in period.

8. **FORMER DYFFRYN LOWER SCHOOL, PORT TALBOT (EXEMPT UNDER PARAGRAPH 14)**

Decision:

Having given due regard to the circulated first stage Integrated Impact Assessment, that delegated authority be granted to the Head of Property and Regeneration, in conjunction with the Cabinet Member for Regeneration and Sustainable Development, as detailed in the private circulated report.

Reason for Decision:

To enable the sale of a surplus property and attain a capital receipt.

Implementation of Decision:

The decision will be implemented after the three day call in period.

9. **PORT TENNANT COMPANY LTD V NEATH PORT TALBOT COUNTY BOROUGH COUNCIL (EXEMPT UNDER PARAGRAPH 14)**

Decision:

Having given due regard to the circulated first stage Integrated Impact Assessment, that approval be granted to the Head of Legal and Democratic Services and the Head of Property and Regeneration to settle proceedings, as detailed in the private circulated report.

Reason for Decision:

To enable officers to settle the proceedings in the most cost effective and timely way.

Implementation of Decision:

For immediate implementation.

10. **RENEWAL OF LEASE - LONLAS VILLAGE WORKSHOPS, SKEWEN, NEATH (EXEMPT UNDER PARAGRAPH 14)**

Decision:

Having given due regard to the circulated first stage Integrated Impact Assessment, that delegated authority be granted to the Head of Property and Regeneration, as detailed in the private circulated report.

Reason for Decision:

The renewal of the lease will allow the Workshops to continue to provide a valuable regeneration source of units and small offices for starter and more established local businesses in the County Borough.

Implementation of Decision:

The decision will be implemented after the three day call in period.

CHAIRPERSON



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

Regeneration and Sustainable Development Cabinet Board

30th July 2021

Report of the Head of Planning and Public Protection

Ceri Morris

Matter for Information

Wards Affected: All

Environmental Health and Trading Standards – Food & Feed Law Enforcement Review 2020-21 and Food & Feed Service Delivery Plan 2021-22

Purpose of the Report

To provide a review of the Authority's Food & Feed Law Enforcement Review for 2020-21 and inform Members of the Food & Feed Service Delivery Plan for 2021-2022.

Executive Summary

The review for the Food & Feed Law Enforcement Service for 2020-21 illustrates the severe impact that Covid-19 has had on the delivery of the service over the period and is primarily as a result of the teams being at the forefront of the response – i.e. Contact Tracing; providing advise/support for Care Homes; and the interpretation and enforcement of the changing guidance and Regulations issued by Welsh Government to control the spread of Covid-19.

Notwithstanding these challenges, and as the Food Hygiene and Food & Feed Standards enforcement remains a priority, the service has prioritised resources in accordance with the Food Standards Agency (FSA) guidance and 'Recovery Plan'.

Food hygiene inspection resources continue to be prioritised on undertaking appropriate interventions at all high risk food premises. The national performance indicator which identifies 'broadly compliant' premises remains consistently high.

National and local food sampling initiatives were carried out throughout the year albeit at a reduced level, and the service will continue to take part and make use of sampling resources made available. The service utilises Social Media opportunities to raise awareness of current issues.

Feed/Feeding-stuffs Standards work continues to be delivered regionally, in conjunction with the City & County of Swansea (as funded directly by the FSA). The cross-border arrangements continue to be a success.

Due to the re-prioritisation of Food Hygiene, Food Safety and Feed inspections as a result of the effect of the Covid Pandemic, there is a considerable backlog of inspections required to be undertaken. The FSA Recovery Plan provides guidance for Local Authorities to assist with the consistent prioritisation of resources to areas deemed appropriate.

Food Hygiene and Food Standards resources continue to be prioritised on interventions at high risk premises. Consequently, the Food Standards service had a large number of interventions overdue at some premises (even prior to the Covid-19), demonstrating that the allocated resource for food standards delivery is insufficient and is unlikely to change due to the Forward Financial Plan requirements imposed on the service.

It is also notable that there is a national shortage of qualified and competent officers who can undertake Food Hygiene and Food/Feed Standards inspections, which results in ongoing pressures on the service, particularly when officers leave the service for any reason (e.g. maternity leave or retirement).

Background

The Food Safety Act 1990 and the Food Standards Act 1999, together with associated statutory guidance, require local authorities to make provision for the enforcement of food and animal feeding stuff safety measures and to plan for service delivery on an annual basis.

The aims and objectives of the food and feed law enforcement service are to:

- Help maintain a safe and healthy environment in the County Borough.

- Ensure food and feed produced or consumed within the area does not present a risk to health and to take action to prevent it entering or limiting its introduction to the food chain.
- Ensure the effective control of feed destined for consumption by animals entering the food chain and pet animals.
- Encourage good practices in food safety, food & feed standards and fair-trading, and to take action to discourage practices which are unfair to other traders or threaten health.
- Enforce the relevant environmental health and trading standards legislation via a variety of interventions at premises in the County Borough (e.g. sampling, intelligence led investigations and surveys), and investigation of complaints, malpractices and cases of food poisoning.
- Ensure that resources are targeted where they are most effective and address areas of highest public health risk.
- Respond to requests for advice and to seek to raise awareness of food safety and food & feed standards issues.
- Help business owners to comply with their obligations under food & feed legislation and to take appropriate action as per the enforcement policy against those who do not.

Food and Feed Law Enforcement Review 2020/21

The Authority must carry out an annual food and feed law enforcement performance review as part of the Framework Agreement (2010) with the Food Standards Agency (FSA), this review is attached at Appendix 1.

The framework agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.

The performance review considers the various requirements of “The Standard”, which include planned inspections / interventions, sampling, service requests and complaints, promotional work, training of staff and monitoring arrangements.

Food and Feed Service Delivery Plan 2021/22

The proposed Service Delivery Plan, attached as Appendix 2, sets out the way in which the Environmental Health and Trading Standards Service intends to deliver food and feed law enforcement during the period 2021-2022.

It sets the scene for the enforcement function locally, whilst recognising national priorities. It sets the hierarchy of priorities for which the service is responsible, and indicates the range of interventions which are designed to maximise the health gain and public protection from the resources available.

Impact of Covid-19

The FSA acknowledge that staff across the profession have been re-deployed from routine Food safety work to prioritise responding to the Covid Pandemic.

Within Neath Port Talbot, 50% of the Food and Health Protection team were redeployed to form the Council's Regional TTP team and remain there to this day. The remainder of the team provided health protection guidance and support to all Care Homes across the County Borough. Furthermore, officers who would ordinarily deal with Food Standards and Feed were also deployed to assist with Regional TTP and Covid Enforcement complaints and as such routine or 'business as usual' work had to be suspended as a consequence.

Financial Impacts

No implications.

Integrated Impact Assessment

There is no requirement to undertake an Integrated Impact Assessment as this report is for information purposes.

Valleys Communities Impacts

No implications.

Workforce Impacts

No implications.

Legal Impacts

No implications.

Risk Management Impacts

No implications.

Consultation

There is no requirement for externally consultation on this matter.

Recommendations

Not applicable – matter for information.

Reasons for Proposed Decision

Not applicable – matter for information.

Implementation of Decision

Not applicable – matter for information.

Appendices

Appendix 1 – Food and Feed Law Enforcement Review 2020/21.

Appendix 2 – Food and Feed Service Delivery Plan 2021/22.

List of Background Papers

None.

Officer Contact

Mark Thomas – Environmental Health and Trading Standards Manager

Tel: 01639 685612 or e-mail: m.thomas2@npt.gov.uk

APPENDIX 1

Food and Feed Law Enforcement Review 2020/21

1.0 Introduction

This document is the annual food and feed law enforcement performance review to assess compliance with the Food Enforcement Framework. It has been submitted to the Head of Planning and Public Protection for approval.

2.0 Planned Inspections / Interventions 2020/2021

2.1.0 Food Hygiene

Due to the Covid-19 pandemic, the Food Standards Agency (FSA) issued guidance regarding the unprecedented impact that was being faced by Local Authorities, and particularly Public Protection Departments, with staff resource often being redeployed away from routine food safety tasks, and accordingly acknowledged that priorities would rightly focus on the Covid response and a select range of important food safety work areas.

It was acknowledged that most proactive inspections of food premises would be suspended, both to reduce footfall in all but the most serious situations, and to free up staff resource. However, certain key reactive tasks which had public health significance or statutory imperatives were highlighted as important to maintain. Examples of which included responding to food poisoning outbreaks, food controls for import and export purposes, approved premises inspections, fishing and shellfish industries, as well as investigations of food fraud or situations which would impact significantly on public health.

FSA guidance kept pace with changing National Alert levels, and towards the end of Quarter 4 (which coincided with the wider roll out of Covid Vaccines), a move to developing strategies for recovery was commenced, both for the short term (to 30th June 2021) and the longer term (to 31st March 2023).

Consequently, the number of proactive inspections was significantly scaled back to release and re-focus (flex) resource into Covid control, particularly supporting Care Homes and taking the lead with the Regional TTP (Test, Trace and Protect) service. Additional resource was bought in from Locum EHO staff, although demand was higher than availability, both for short term and longer term assignments.

Pro-active Inspections – by Risk Band Category

RISK CATEGORY	BALANCE OF NEW / OLD INTERVENTIONS DUE / PLANNED BY 31/3/2021 (TO EXCLUDE ANY PREMISES WHICH CEASE TRADING)	NUMBER PREMISES INSPECTED / INTERVENTIONS ACHIEVED AS AT 31/3/2021	OUT-TURN ACHIEVED /
High Risk:-			
A	2 premises (due 2 visits each)	2 premises (but received 1 visit each)	50%
B	51	25	49%
C	335	23	7%
Low Risk:-			
D	62	0	0%
E	269	0	0%

Commentary

Resources were prioritised on reactive work, particularly of public health risk or significance, as well as facilitating new businesses to become registered and gain a degree of start-up advice. Where resource was available to undertake proactive inspections, this was focused towards premises in higher risk bands or where local intelligence suggested an intervention was necessary.

2.1.1 Broadly Compliant PI: (PAM009)

The out-turn PI for 2020/21 was: 95.99% (based on 959/999 premises achieving a 3/4/5 FH Rating).

2.1.2 Food Hygiene Ratings:

- 50 Food Hygiene inspections were undertaken, and Food Hygiene Ratings issued where applicable;
- 3 Food hygiene re-ratings were applied for and progressed.

Given the redeployment of resources and the reduced number of inspections undertaken, it was not always possible to provide the FSA website with regular uploads of data (at least every 28 days). However, ad-hoc uploads were undertaken to take account of batches of changes.

2.2 Food Standards: Planned Interventions

Risk Category	Number of premises carried forward	Interventions planned by 31/3/2021 (exc. ceased trading but Inc. carried forward premises)	Number of Interventions Achieved as at 31/3/2021	Completed
A	0	17	11	65%
(every 12 months)				
B	112	234	40	17%
(every 24 months)				
C	31	128	16	13%
(every 60 months)				
Unrated (not yet visited)	174	174	14	8%

The Covid-19 pandemic meant that normal intervention programmes were suspended. Trading Standards & Animal Health (TSAH) staff were redeployed to Covid-19 enforcement and the Test, Trace and Protect teams (TTP). This left a skeleton staff for TSAH and specifically food and feed.

Whilst extra staff were recruited for Covid enforcement and TS staff were released from that duty, extra TSAH staff were deployed into TTP up until January 2021.

Despite recruitment of a consultant to cover some food enforcement work, the restrictions on movement and opening of businesses and diversion of resources had a significant effect on food service delivery. Some interventions were completed, but enforcement was in the main, reactive.

Whilst the sampling programme was largely suspended, the service did carry out a sampling exercise following a successful bid for sampling from the FSA. Sampling was directed at the takeaway sector to gather intelligence, specifically on non-declared allergens and breaches of food description legislation.

Where officers were not carrying out Covid-19 related work, and unable to carry out physical inspections, they were tasked with “virtual” web-based visits and telephone interviews on targeted businesses.

Existing businesses and new start-ups reacted to the pandemic by moving online, advertising and selling via virtual shop fronts or takeaway “banners”, or social media. Other catering businesses pivoted to provide takeaway meals, delivery and mail order. This added

to the backlog of interventions and increased focus on the information that businesses are providing on-line, particularly in respect of allergens and description.

2.3 Feed Standards: Planned Inspections

Feed enforcement within Wales is funded directly by the FSA, and administered by Trading Standards Wales (TSW) – formerly Welsh Heads of Trading Standards (WHOTS). Wales is divided into regions, Neath Port Talbot and Swansea form one of those regions. Coordination across the Neath Port Talbot / Swansea area is delivered by Neath Port Talbot TSAH.

The feed inspection and sampling programme is drafted by the FSA based on the feed registers from each authority. The FSA categorises feed businesses by feed registration and approval type. These businesses are required to be inspected during the forthcoming year. Each region is expected to inspect a set number of businesses within their areas.

The inspection obligation for the region had increased significantly for the year. However, for the reasons outlined in the Food Standards section of this document, the Neath Port Talbot / Swansea region was unable to meet their feed inspection obligation for the year. However, reactive work continued as did activity on an ongoing investigation.

Feed Standards Inspection Programme			
Type of Business:	Usage code	Allocation for NPT from region	Inspected by NPT
Manufacturer	A01-08 & R10-04	0	0
Co Product Producer	R12	0	0
Mobile Mixer	R04	0	0
Importers		0	0
Stores	R09	3	0
Distributor	A01-08, R01-03 & R05	6	0
Transporter	R08	1	0
On Farm Mixer	R10 (annex II)	1	0
On Farm Mix	R11	4	0
Pet Food Manufacturer	R06	1	0
Supplier of feed materials/Surplus Food	R07	13	0

Total "Above The Line" premises (businesses that treat or supply feed)		29	0
Livestock farms R13	R13	40	4
Arable Farms	R14	1	0
Totals		53	4

The obligation for the forthcoming year has yet to be confirmed, but it is hoped that the Food Standards Agency will take the other pressures and the changes in working practices into account when drafting.

Intelligence regarding Food & Feed breaches are shared with partners, such as food hygiene team, the National Food Fraud Unit and National Trading Standards via the National intelligence database and used to identify priorities for the service.

3.0 Samples

3.1 Food Hygiene

Sampling was deferred in light of advice from FSA, and the Covid related pressures on the Food & Health Protection service.

3.2 Food Standards

The 2020-21 sampling plan was abandoned due to the pandemic and the pressures on LAs and diversion of resources.

For 2021-22 the Trading Standards Team Leader has again taken the role of chair for the Glamorgan Food Group and coordinated the drafting of the forthcoming sampling plan.

The proposed Glamorgan Group Sampling Plan:

QTR 1	Kebabs – presence of undeclared allergens (milk)
QTR 2	Fresh Meat Claims. BBQ season. Select produce from butchers claiming fresh and test for previously frozen. To include quality of meat if in a marinade.
QTR 3	Left Blank to accommodate FSA funded project (to be confirmed).
QTR 4	Vegan/Vegetarian claims. With the increased number of consumers embarking on a vegan diet, description of pre packed foods from catering establishments.

The TS service was however successful in bidding for funding for sampling for a takeaway exercise. Breaches of description, specification, allergen and colours continue to be a problem at Neath Port Talbot takeaways. No serious breaches have been detected, but with the numbers of businesses selling takeaway food and food via the internet as a result of

lockdown, it is anticipated that non declaration of allergens and misdescription will become a problem.

Sampling and any subsequent investigations are monitored by the Trading Standards Team Leader and Senior Trading Standards Officer via spot checks, annual appraisals and quarterly staff review meetings. Breaches are shared with partners, such as Food Hygiene, the National Food Fraud Unit and National Trading Standards via the National Intelligence database and used to identify priorities for the service.

3.3 Feed Standards

Again, due to the pandemic the FSA dictated that the sampling programme was suspended. However, the service took 2 samples as part of an ongoing investigation into salmonella contamination at a local pet feed producer. At the time of writing an appeal into an improvement notice issued on the business in January 2020 is being heard.

4.0 Service Requests / Reactive Work

4.1 Food Hygiene

Service requests – all types = 1,325. Of which:

- Health Protection service related (primarily Covid issues) = 713;
- Food service related = 566; and
- Miscellaneous = 46.

Also, the Food & Health Protection service received the following:

- Infectious Diseases – notifications of cases/incidents = 232 (excluding Covid work).

Target response times have been established for the main service requests categories, and analyses are undertaken to ensure that they remain relevant and commensurate with the prioritisation of resources (in accordance with lean systems principles) to ensure the best utilisation of resources, whilst managing expectations of service requestors.

4.2 Food & Feed Standards

Trading Standards Reactive work

Subject Area	Quantity	Narrative
Food Advice Requests	5	These were mainly from business start-ups with only one existing business requesting labelling advice.
Feed Advice Requests	4	One product request, the others related to business start-ups and registration.
Food Complaints	58	A broad mix of complaints, from food sold past durability date (use by and best before) to presence of undeclared allergens, foreign labelled food (safety issues in respect of ingredients and lack of allergens declarations, counterfeit alcohol and foreign bodies.
Feed Complaints	1	The sole complaint was in respect of a business that is already under investigation.

Requests for advice and complaints and patterns of food alerts are fed into the Trading Standards & Animal Health service's intervention plan and the national intelligence database which in turn leads to the identification of priorities and work areas for the forthcoming year.

Response times and investigations / advice are monitored by the Trading Standards Team Leader and Senior Trading Standards Officer via spot checks, annual appraisals and quarterly staff review meetings.

5.0 Promotional Work

5.1 Food Hygiene Promotional Work

The service was able to use various social media platforms to pass on messages relating to food safety topics, particularly the re-tweeting of information from the FSA. Unfortunately, due to pandemic pressures and diversion of resources, it was not possible to routinely tweet / promote food hygiene premises which gained a 5 rating.

5.2 Food Standards Promotional Work

Promotional work was curtailed during 2020-21. However, Trading Standards & Animal Health service used the restriction on normal enforcement activity to develop better systems for monitoring and sharing information on social media and to forge closer links with Council services that support business, such as Economic Development.

The TS service now has Twitter, Facebook and Instagram accounts, the latter is being trialled for effectiveness in reaching consumers and businesses. The Twitter account has proved to be a success.

5.3 Feed Standards Promotional Work

New feed businesses are regularly identified and contacted to ensure that they are correctly registered or approved.

6.0 Primary Authority

6.1 Food Hygiene, Food Standards and Feed Standards

The Primary Authority scheme is UK wide and each local authority must have regard to any established partnerships between businesses and regulators. Whilst currently the Authority has not embarked on any food or feed primary authority partnerships, there are many for which the services must have regard to during the inspection of premises within the County Borough. Additionally, the Trading Standards & Animal Health service is an active member of the Welsh Primary Authority Group – a forum for businesses and enforces to share knowledge and experiences of the Primary Authority system.

Where such partnerships exist and cover businesses operating with Neath Port Talbot, the service liaises with the relevant LAs to give general feedback following inspections which are subject to an agreed (UK wide) inspection plan, and specific feedback where breaches are detected.

7.0 Safety Incidents

7.1 Food Hygiene

No food safety incident reports (e.g. withdrawals) necessitated initiation by EH of NPTCBC.
All notifications of withdrawals requiring specific action are prioritised.

7.2 Food Standards & Feed

No food safety incident reports (e.g. withdrawals) necessitated initiation by TS of NPTCBC.
All notifications of withdrawals requiring specific action are prioritised.

Subject Area	Quantity	Narrative
Food Alerts	75	As usual, allergy alerts took up the bulk of the alerts. Other than notification via social media, no other action was required of the Service, and they could be dealt with by support staff.
Feed Alerts	1	A sole feed alert relating to a pet feed business not based within NPT.

8.0 Staff Development / Training / Continuing Professional Development

8.1 Food Hygiene

Staff undertook various self-study sessions as the primary way of keeping abreast of new developments and the changing guidance during the year, particularly in relation to Health Protection regulations and Covid control guidance. Team meetings were held regularly via Microsoft TEAMS to ensure consistency of understanding and consistency of approach. Officers are expected to achieve a minimum of 20 hours per year of Continuing Professional Development (CPD).

8.2 Food Standards

All remaining food qualified officers met their required 20 hours CPD in 2020, partly due to the enforced layoff from regular enforcement duties and the proliferation of online courses following the lockdown.

The Trading Standards Team Leader occupies the Trading Standards Wales Training Officer role and distributes regular training opportunity updates.

It is anticipated that training in future will be a mix of short online sessions and more involved classroom sessions.

8.3 Feed Standards

Feed Standards has a CPD requirement of 10 hours per annum. The Covid lockdown meant that training delivery was difficult, and two officers did not meet their required 10 hours CPD in 2020/21. This will be addressed in 2021/22. The Trading Standards Team Leader and Senior Trading Standards Officer will resume a programme of in-house workshops as a means of helping maintain CPD.

Two officers carry out the routine feed inspections on farms which is the bulk of the enforcement programme, these officers are required to be competent, but don't necessarily need a specific qualification. There are a smaller number of feed inspections at factories and stores that need to be carried out by the TSOs who are specifically qualified.

9.0 Monitoring

9.1 Food Hygiene Monitoring

LAEMS (Local Authority Electronic Monitoring System) data is provided annually to the FSA which gives detailed information on the key performance statistics for each Council across the UK. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; certain service requests etc.

On a quarterly basis key performance indicators are reported to Scrutiny Committee and the associated Cabinet Board, and are publicly available.

Line managers keep track of inspection targets, and the reactive workloads on a month by month basis, or more frequently when required.

9.2 Food & Feed Standards Monitoring

LAEMS data is provided annually to the FSA which gives detailed information on the key performance statistics for each Council across the UK, for submission to the EU. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; complaints etc.

Each officer's intervention programme is set at the beginning of the year. This is reviewed and updated during the relevant officer's quarterly review. Section progress is checked on a quarterly basis, key performance indicators are reported to Scrutiny Committee and the associated Cabinet board, and are publicly available.

The TS Team Leader and Senior Trading Standards Officer monitors officer inspection targets and reactive workloads formally during the quarterly review. If issues with performance are identified, this frequency is increased. Food / Feed Aide Memoires and post inspection reports are reviewed by the Trading Standards Team Leader and Senior Trading Standards Officer.

Neath Port Talbot Trading Standards coordinated the Neath Port Talbot / Swansea feed region and inspections progress is fed back to Trading Standards Wales. The Neath Port Talbot Trading Standards Team Leader and Senior Trading Standards Officer identify and address issues with performance against the inspection programme.

10.0 Review of Policies/Procedures

10.1 Food Hygiene / Food Standards / Feed Standards

The pandemic caused some disruption to the regular, planned, reviews of food, feed and enforcement policies. However, during the year, the enforcement policy and infringements reporting procedure were reviewed and amended.

Additionally, certain other policies had to be developed afresh to account for the changes in working procedures, particularly relating to working effectively from home, and complying with Covid secure working. Fortunately, both services were already familiar with remote working principles and most officers were geared up for agile working. The enforced move to agile working for all officers has had its benefits, and it has sped up development of online

and remote working systems and procedures. These continue to be fine-tuned to account for new working procedures, for example the digital forms that were used by Trading Standards have already been replaced by new forms developed during the year.

With remote working, there comes a risk of staff feeling isolated. Managers have recognised the need to maintain communications with the teams, and where possible to facilitate colleagues seeing each other “in person” to ensure officers do not feel isolated and alone in their duties.

11. Conclusions

Food hygiene, Food standards & Feed enforcement remains a priority for the service, despite the challenges of the past year.

The challenge for the forthcoming year will be how to meet demands, and how to recover, whilst still reacting to the ongoing pandemic and the extra workload that imposes.

The past year has demonstrated the ability of staff across Public Protection to flex and respond to the pandemic, but this has resulted in substantial backlogs of certain routine work. Workforce planning and recruitment present challenges to Food Hygiene, Food Standards and Feed enforcement due to a national shortage of qualified or competent Officers and ongoing Covid pressures which require the Health Protection and enforcement skills evident in these Officers.

The FSA’s proposals on risk assessments appear to mirror Trading Standards’ increasing reliance on intelligence to target problem sectors and traders. It is anticipated that, as a pilot authority for the new food standards risk assessment scheme, they will be able to develop this further. If successful, the new risk assessment scheme should allow for better use of resources in dealing with food standards issues. Similarly, continued liaison with the Food Standards Agency in respect of feed delivery should focus resources on areas of most need.

Trading Standards & Animal Health were able to participate in some National and local food sampling initiatives during the year, and both services will continue to make use of sampling resources made available.

The section will continue to exploit the regional connections that have been forged in respect of feed delivery and food standards.

Regional working and intelligence gathering should continue to be developed and there are clear priorities for the service in relation to both food and feed and these need to be addressed, but without ignoring other issues such as EU Exit.

12. Review of Report by Head of Service

I have reviewed and approve of this report.



Ceri Morris

Head of Planning and Public Protection

APPENDIX 2



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

**Environmental Health
& Trading Standards**

FOOD & FEED LAW ENFORCEMENT **SERVICE DELIVERY PLAN** **2021-2022**



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Appendices

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Neath Port Talbot Office Hours:

8.30am to 5.00pm Monday to Thursday and 8.30am to 4.30 pm Friday.

Outside of Normal Office Hours:

Emergency food & feed safety issues are currently directed to a 24 hour emergency call out service and the officer on-call has access to senior food / feed officers in an emergency.

Officers are expected to carry out enforcement work outside of normal office hours, including evening and weekends meeting the demands of the 24 hour economy

Contact Details:

Service	Trading Standards & Animal Health	Food Hygiene & Health Protection
Correspondence	The Quays, Brunel Way, Baglan. SA11 2GG	The Quays, Brunel Way, Baglan. SA11 2GG
Telephone (Complaints)	03454 04 05 06 (Citizens Advice Consumer Service)	01639 686868
Telephone (Enforcement)	01639 686877/ 01639 686868.	01639 686868
Website (business and consumer advice information & contact details)	https://www.npt.gov.uk/tradingstandards	https://www.npt.gov.uk/1182
Email	tsd@npt.gov.uk	food@npt.gov.uk
Facebook	NptEnvHealth/TradingStandards	NptEnvHealth/TradingStandards
Twitter	@NPTTradingStds	@NPTEHTS
Instagram	@NPTTradingstds	

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Purpose of the Service

Neath Port Talbot Council strives to ensure food safety from the primary producer / farm through the manufacturing, supply, retail and catering chain, to the ultimate consumer, this is known as the 'farm to fork' principle.

Local authorities are required to prepare a 'Service Delivery Plan' which details the delivery of their food safety enforcement responsibilities for the year ahead, and to undertake a review of the implementation of the previous plan.

The plan seeks to ensure that food and feed national priorities and standards are delivered locally with a balanced approach to enforcement. This is achieved by directing resources toward an inspection programme and ensuring that adequate provision is made to respond to reactive work such as complaints, food poisoning incidents, product recalls, and requests for advice from businesses and intelligence led projects.

Funding for feed enforcement comes directly from the Food Standards Agency (FSA) and is administered across Wales by Trading Standards Wales (TSW). Neath Port Talbot administers the funding for the region made up of NPT and City & County of Swansea.

1.2 Aims and Objectives

The aims and objectives of the food and feed law enforcement service are to:

- Help to maintain a safe and healthy environment in the County Borough.
- Encourage good practices in food safety, food & feed standards and fair-trading, and to take action in line with the enforcement policy to discourage practices which are unfair to other traders or threaten health.
- Ensure that resources are targeted where they are most effective and address areas of highest public health risk within the food chain.

1.3 Link to Corporate Objectives and Plans

In delivering the food and feed law enforcement service, both Food and Health Protection and Trading Standards & Animal Health continue to promote the corporate aims and objectives of the Authority and sustain the reputation of the Council. In particular the service will be delivered in a manner that is sensitive to service users and citizens' individual expectations. The emphasis will be on protecting and improving health, and promoting the economy of the County Borough. There are Local and National Performance Indicators for these services (see Paragraph 3.1.4 below). These are monitored on a quarterly basis via the corporate performance management framework.

2.0 BACKGROUND

2.1 Profile of Neath Port Talbot

Neath Port Talbot Council is a Unitary Authority, situated in South Wales and is a recognised statutory Food & Feed Authority. The towns of Neath, Port Talbot and Pontardawe are the largest settlements in the Borough. A number of other villages and settlements are dispersed throughout the remaining rural valley areas of the County Borough. The County Borough serves a population of approximately 139,800 (Census, 2011) and covers an area of 44,217 hectares. It is the seventh largest authority in terms of population in Wales. There are approximately 1,641 food/feed premises within the County Borough in which food or drink or feed is produced, manufactured, processed, stored or sold, being circa 248 feed premises and circa 1,346 Registered food premises and circa 47 food premises which are Registered by other Local Authorities, but who frequently trade within NPT (See section 2.4 for further details on premises profile).

2.2 Organisational Structure

The charts attached as appendices A, B and C illustrate the organisational structures of the sections.

The functions of Environmental Health and Trading Standards are the responsibility of the Head of Planning & Public Protection with the service part of the wider Directorate of Environment & Regeneration.

The strategic management and delivery of the service is overseen by the Environmental Health and Trading Standards Manager.

The day to day service delivery of the Food Hygiene Services are overseen by the Team Leader – Food & Health Protection. The Team Leader – Trading Standards has responsibility for Food Standards, and Feed Standards and Hygiene.

External services are provided to the section by:

Laboratories	Complaint Referrals	Partnership & Support
Public Health Wales (formerly the Public Health Laboratory Service, PHLS) at West Wales General Hospital, Carmarthen – for food examination (Microbiological).	Citizens Advice Consumer Service	Food Standards Agency
Public Analyst: Minton, Treharne & Davies Limited – for food and feed analysis (Non- microbiological).	Food Standards Agency	City & County of Swansea (feed delivery within the NPT / Swansea region)
Public Analyst Scientific Services Limited – for food & feed analysis (Non-microbiological).	Other Local Authorities	Trading Standards Wales & The Glamorgan Group – for coordinated sampling programmes and guidance
		Contractors as service demand requires and resources allow

2.3 Scope of the Food & Feed Law Enforcement Service

The Food Hygiene service is delivered by officers of the Food & Health Protection Team. The Food Standards and Feed functions are delivered by officers of the Trading Standards Team.

Other Trading Standards & Animal Health Service Functions	Other Food Hygiene & Health Protection Service Functions	Delivered via
Fair Trading	Coronavirus Enforcement	Inspection programmes
Product Safety	Health Promotion	Test purchasing programmes
Consumer Fraud	Investigation and control of communicable diseases	Provision of advice to businesses
Counterfeiting / Trademarks Enforcement		Sampling programmes
Weights & Measures / Metrology		Criminal investigations
Underage Sales		Internet / social media monitoring
Animal Welfare		Responding to national food / feed alerts and recalls
Petroleum Enforcement		Inspection of weighing & measuring equipment
Tobacco Control		Surveys & projects

When necessary, suitably competent and qualified food hygiene, food standards and feed contractors are used to cover long term sickness/maternity leave/vacant posts or project work funded by external sources, but all in accordance with service need, the resources available and with authorisation by the Head of Planning and Public Protection.

2.4 Demands on the Food & Feed Services

Table 1(a): Total Number of Food & Feed Premises within the Authority	
Food Premises	Feed Premises
<p>1,393 known food businesses of which 1,346 are Registered with NPT, and 47 are Registered elsewhere.</p> <p>Once registered they can trade in any area.</p> <p>There are traders (mainly mobile traders) who are based outside NPT but regularly trade within NPT. These can be subject to official control interventions (usually co-ordinated with their local LA).</p>	248 known businesses

See Appendix D for numbers of premises by Ward area

Table 1(b): BREAKDOWN OF REGISTERED FOOD PREMISES, BY FSA CATEGORY				
CODE	REGISTERED FOOD PREMISES (BY FSA CATEGORY)	NO. OF PREMISES (2018/19)	NO. OF PREMISES (2019/20)	NO. OF PREMISES (2021/22)
F01	Primary Producer	2	1	1
F02	Manufacturer / Packer	26	28	30
F03	Importers / Exporters (EU)	0	0	0
F04	Distributor / Transporter	10	9	10
F05	Supermarket / Hypermarket	24	23	23
F06	Small Retailer	203	197	194
F07	Retailer / Other	92	91	143
F08	Restaurant / Café / Canteen	198	185	194
F09	Hotel / Guest House	12	12	15
F10	Pub / Club	191	186	184
F11	Takeaway	140	142	163
F12	Caring Premises	207	176	171
F13	School / College	79	75	73
F14	Mobile Food Unit	53	47	50
F15	Restaurants & Caterers – Other	135	100	94
F16	Importers / Exporters (3 rd Countries)	2	2	1

Table 1(c): BREAKDOWN OF ANIMAL FEED PREMISES, BY FSA CATEGORY.					
Code	Animal Feed Premises	No. of premises (2018/19)	No. of premises (2019/20)	No. of premises (2020/21)	No. of premises (2021/22)
A	Manufacturer Using / containing additives	2	2	2	2
B	Manufacturer Not Using Additives	3	3	3	3
D	On Farm Mixer Using Additives	1	1	1	1
E	Store - In Region Distribution	3	3	1	2
G	Distributor	0	0	0	1
I	Importer - Out Of Region Distribution	1	2	2	2
J	Surplus Food Supplier, Keeps Non Feed Products	12	8	9	6
K	Surplus Food Supplier, Keeps Non Animal By products	–	–	–	2
P	Co Product Producer - In Region	2	0	0	
S	Livestock Farm	283	216	233	216
T	Arable farm	17	10	13	11
U	Any Other Business	1	0	1	0
X	Not Known	1	1	1	1
Total:		326	246	271	248

Increased feed enforcement activity has meant that the department's feed premises records are becoming more accurate. This accounts for the fluctuations in the numbers of premises over time. Furthermore, additional categories have been added to breakdown the "surplus food supplier" to better reflect the business function.

The County Borough has 3 specialist feed manufacturers requiring inspection by officers with specific qualifications and competencies.

Lower risk food and feed businesses will not necessarily be subject to a full programmed inspection, but may be dealt with via a focused survey or as part of the food sampling programme.

The Authority's food and feed enforcement activity is recorded on the Authority APP system. Food annual returns and enforcement data are exported from this system to the FSA via the Local Authority Enforcement Monitoring System (LAEMS). Feed returns are submitted via a spreadsheet.

2.5 Strengths, Weaknesses, Opportunities and Threats

The Food & Health Protection Service and the Retail section of the Trading Standards Service, share an enforcement database, exchange information on food matters, carry out joint exercises to increase awareness of the role of each service, and explore joint operation opportunities to promote stronger working relationships.

Trading Standards and Food Hygiene had already begun “agile working” prior to the Covid pandemic lockdown. Agile working is a blended system of working, where officers are generally not required to attend specified fixed desks or work locations, rather the focus is on delivering the service and outputs, and being in the right place at the right time to improve efficiency (which can include an element of working from home). There is, however, an increased dependency on ICT to communicate and record work, so the Sections were at an advantage to other Neath Port Talbot services when the Covid-19 pandemic struck. Despite this, further changes to the ways of working have needed to be established, which are under constant revision as a “new normal” emerges.

Activities that will resume, albeit in a modified form, include Food enforcement workshops, shadow visits, where Food Hygiene (FH) officers will accompany Food Standards (FS) officers on interventions, and vice versa. Shadow visits are designed to foster professional development and communication on enforcement issues that are of joint interest.

In addition to the normal workload remits, further demands will be made on the services in 2021/22, including:

- Most significantly, the Covid-19 pandemic had a direct impact on delivery from the very start of the financial year 2020/21, and disrupted planned service delivery, which remains substantially outstanding, and needs to be part of a recovery plan. Various Food Hygiene (FH) officers and Trading Standards (TS) staff were redeployed to support the Covid response. For the majority of the year, approximately half of the FH team supported the Regional TTP (Test, Trace & Protect) response and the other half of the FH team supported Care Homes with infection prevention and control (IPC) advice.
- Trading Standards personnel were given duties of Covid enforcement at retail premises, and gradually also moved to support the TTP teams, during the peak of the pandemic. This has also now ended, but backlogs of work have resulted. The inspection programme has since resumed, though it is currently not possible to meet the same rate of inspection to that prior to the pandemic.
- In consideration of the extra pressures on food authorities, the Food Standards Agency (FSA) has been developing guidance and direction for recovery of priority areas for food enforcement.
- Similarly, the FSA recognises that the extra demands on authorities mean that feed inspection programmes will need to be reviewed. The lead officers for Feed are due to meet in early July to discuss the year’s enforcement programme.

- Risk assessments and safe systems of work have been developed to allow officers to carry out certain priority enforcement visits on site. Proactive work rates will not return to pre-Covid levels for some time.
- Trading Standards had volunteered to pilot the new food standards risk assessment scheme. Neath Port Talbot are the only Welsh Authority participating. The date for launch of the pilot new risk assessment scheme has yet to be confirmed, but will take place following the review of the Food Code of Practice For Wales, at the time of writing no commencement date has been set.
- Trading Standards have been tasked with delivering the commercial Japanese Knotweed treatment service with no extra resources. The officer with this duty is food qualified, consequently it will have a direct effect on food service delivery as resources are diverted from food.
- The continuing long term impact on food safety of the Pennington Report following the public inquiry into the (fatal) South Wales E. coli outbreak and recommendations for enforcement.
- Sustaining collaboration on the operation of the mandatory Food Hygiene Rating Scheme and Food Hygiene Rating (Wales) Regulations 2013 and to provide open feedback on the compliance levels achieved by individual businesses.
- Continued promotion of the requirement for relevant Businesses to be operating to a documented Food Safety Management System, which is commensurate with their activities.
- The continued implementation of the Trading Standards intelligence protocol.
- Further development of sharing of information between food hygiene and food standards and cross boundary and regional work in the fields of food and feed, to build resilience within service delivery.
- Seeking new business partners to broaden the implementation of the 'Primary Authority' and 'Buy With Confidence' schemes within NPT.
- The implications of the UK's exit from the European Union and the effect it will have on enforcement and the economy.
- Identifying food businesses supplying "co-products" (i.e. former foodstuffs reprocessed as animal feed) and advising them of their obligations and responsibilities.
- Tackling the areas identified as local and national priorities for food & feed standards: food allergens, food supplements (particularly sold over the internet) and the adulteration and substitution of food, food containing CBD products and the growth in the raw pet food trade.
- The maintenance of the regional feed enforcement delivery model with Swansea

Trading Standards as per the agreement with the Food Standards Agency.

- Continue to meet the demands of new feed & food businesses within the county borough.
- Working with the NPT Buy Local scheme and other Local Authority initiatives to ensure a consistent and uniform approach to facilitate parity for the local economy and business.
- Accommodating service delivery in line with the identified priorities relevant to the service, in addition to NPT's Forward Financial Plan (FFP).
- To continue to monitor for the presence of illicit and/or counterfeit foodstuffs that have been detected in other authorities, utilising and analysing intelligence received from the Regional Intelligence Analyst, National Food Crime Unit, local intelligence sources and partners.
- Fostering stronger partnerships with bodies that have an interest in breaches of legislation relating to food, including the Food Standards Agency, Her Majesty's Revenue & Customs, and the Animal & Plant Health Agency.
- The revision of the Food Code of Practice (Wales) places an emphasis on competency rather than qualification of officers for certain food premises. This will have an impact on resources available.
- Maintaining and assessing competencies in line with the Food Code of Practice (Wales). The revised continuous professional development (CPD) requirements have changed from 10 hours CPD to 20 hours CPD per officer per annum.
- There is a significant risk with succession planning if/as staff leave the department. Both services are reviewing policies and resources in place to ensure continuity of the service as staff leave the department.

2.6 Regulation Policy

The department has a Member approved enforcement policy incorporating the concepts of the Enforcement Concordat, Regulatory Enforcement and Sanctions Act 2008, Primary Authority Scheme and the Food Law Code of Practice (Wales) and Feed Law Code of Practice (Wales). The enforcement policy can be found on the Council website.

Officers of the service will seek to ensure food & feed business operators comply with relevant legislation by means of:

- Providing information and advice, education & training (There is a charge of bespoke business advice),
- Raising awareness of the law and good practice associated with the legislation,
- Taking enforcement action where necessary and in line with the enforcement policy.

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding Stuffs Establishments

3.1.1 Intervention Policy

The authority will continue to implement a planned programme for food hygiene and food standards interventions and feed inspections at premises within the County Borough.

The current Food Law Code of Practice (Wales) has introduced a range of possible interventions to allow officers to use their professional judgment to apply a proportionate level of regulatory and enforcement activities to each food business.

Interventions are split into 2 categories

1. Official controls include: inspections; monitoring; surveillance; verification; audit; and sampling (where the analysis is to be carried out by an official laboratory).
2. Other interventions which do not constitute official controls include: education, advice & coaching provided at a food establishment; and information & intelligence gathering.

Interventions are applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

Feed inspections are governed by the Feed Law Code of Practice and the programme devised by Food Standards Agency Wales.

3.1.2 Coordinated Intervention Programme

Food safety interventions are managed via a coordinated food hygiene and food standards inspection programme. This is likely to need to be revised should the food standards risk assessment pilot be implemented.

Shadowing visits, joint projects and interventions were suspended during the Covid-19 Pandemic, but will resume in 2021-22.

Food Hygiene

The intervention programme is based on the intervention rating scheme contained in Annex 5 of the Food Law Code of Practice, which means that, dependent on risk, premises should be subject to a suitable intervention within a range of 6 months to 3 years.

Food Hygiene Interventions will be undertaken in accordance with the guiding themes contained within the Food Hygiene Interventions Procedure, the relevant legislation, Food Law Code of Practice and Practice Guidance and the Industry Guides. Officers will carry out food hygiene interventions to ensure that food meets the requirements of food hygiene and

safety law, including microbiological quality, absence of pathogenic micro-organisms, and safety for consumption.

During interventions, competent officers will place particular emphasis on assessing and advising food businesses on the requirement for a documented food safety management system and food hygiene training.

Following a systems review, the section has redesigned into reactive and proactive teams. Resources can flow between the two teams as required.

Table 2(a): Planned Food Hygiene Interventions due 2021/22 (as at 1st April 2021) – **Please note that due to the COVID 19 pandemic, the full number of inspections due (under the Food Law Code of Practice) will not be met, given the continued diversion of resources into the COVID response. The table below illustrates what is technically due.**

RISK CATEGORY FOR FOOD HYGIENE	(NUMBER OF PREMISES IN CATEGORY 2021/22)	NUMBER OF PREMISES CARRIED FORWARD	NUMBER OF NEW INTERVENTIONS DUE / PLANNED 2021/22	TOTAL NUMBER DUE / PLANNED 2021/22, INC BACKLOG	ESTIMATE – FOR WORK PLANNING-NUMBER DUE / PLANNED 2022/23
HIGH RISK					
A (2 interventions per year)	(3)	1	6	6	e.10
B (1 intervention per year)	(38)	22	16	38	e.50
C (1 intervention every 18 months)	(485)	284	143	427	e.350
Unrated Initially until formally inspected (prior to opening / within 28 days of opening).	---	163	---	163	---
ESTIMATE: New Businesses	---	---	---	Circa e.120 – 150	Circa e.120-150
ESTIMATE: No of premises likely to Cease Trading				Circa e.120 – 150	Circa e.120-150
LOW RISK					
D (1 intervention every 2 years)	(141)	62	72	134	e.70

E (premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection)	(557)	259	160	419	e.120
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Certain low risk premises may, at the discretion of the authority, be subject to an alternative enforcement regime as per the Code of Practice:

- Category D premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control.
- Category E premises should be subject to an intervention every 3 years, which could be part of an Alternative Enforcement Strategy.
- *Priority for interventions will always lie with Higher Risk categories, consequently, lower risk (category D & E) may be de-prioritised, where resources are capped.

In addition to the planned interventions above, any ‘newly opened / change of ownership’ food premises will be targeted for inspection / an intervention. In 2020/21, there were 409 requests for advice in relation to food premises registration and new food businesses – this was significantly up from 205 requests received in the previous year, and is quite likely due to the effect of the Covid crisis, where there was a proliferation in applications to operate a food business from home. It is estimated that with the easing of lockdown, a return to pre-Covid figures (of approx. 200 requests per annum) would be anticipated.

In addition to the planned primary inspections/interventions that are undertaken, food hygiene “revisits” are usually carried out, where Businesses are instructed to make improvement. This detailed involvement with Food Business Operators and their staff has proved to be an ideal opportunity to not only ensure improvements are made, but also to progress Best Practice standards and promote health and well-being in the wider context. It is estimated that approx. 100 revisits will be undertaken.

Premises eligible for a rating under the mandatory Food Hygiene Rating Scheme have their scores publicised on the following website: www.food.gov/ratings.

Businesses who initially fail to meet the highest standard (Food Hygiene Rating of 5), but who subsequently implement improvements are entitled to apply for a re-assessment visit. This has caused an increase in demand for resources to undertake these re-inspections, but due to the importance of implementing the scheme and the need to support businesses going forward, this area of work remains a priority. An all-Wales fee is set for this work. This Council fully supports the Food Hygiene Rating Scheme.

In regards to the Covid pandemic, the Food Standards Agency have undertaken to regularly provide updated guidance as to what Local Authorities would be recommended to focus resources on, acknowledging that the Covid response is a significant priority. Accordingly, the guidance covers/indicates that:

- Footfall in businesses should be minimised, at premises which continue to operate during the pandemic (essential food sales);
- Focus resources on local priorities and the Covid response;
- Defer certain planned inspections;
- Deal with Urgent Reactive work which indicates a potential serious risk to public health;
- Monitor (and surveillance of) new Food Businesses, and sign-post to relevant advice and guidance;
- Undertake remote interventions (by telephone, emails, electronic methods) to assess whether an on-site inspection is urgently needed;
- Tailor the operation of the Food Hygiene Rating Scheme during the pandemic;
- Prioritise Approval of premises, and Import/Export controls (including fish/shellfish).

Food Standards & Feed Standards

The inspection / intervention programme is based on the inspection rating scheme contained in Annex 5 of the Food Law Code of Practice and the Feed Law Code of Practice.

Dependent on risk, premises are due for an intervention within a range of 12 months to 5 years. Breaches are dealt with in line with the Authority's enforcement policy.

Following the pandemic the FSA had given direction on work LAs should be prioritising. Following the easing of lockdown, the FSA have revised this advice.

Ongoing investigative matters will need be pursued and high risk businesses and new businesses subject to inspection.

At the discretion of the Authority and in accordance with the Code of Practice, certain low risk food standards premises may be inspected via an alternative enforcement intervention. Though with the resources available to LAs, this may not be possible for 2021-22 and whatever resources are available will generally need to be directed to higher risk premises.

In 2021/22 Neath Port Talbot Trading Standards are set to participate in a pilot for the new food standards risk assessment scheme. This has been delayed from 2020-21 due to the pandemic and following legal advice from the Food Standards Agency that it directly contravenes the currently Food Code or Practice For Wales, which will need amendment to facilitate.

All being well, as part of the agreement to pilot the new scheme, the Trading Standards and Animal Health team (TSAH) will not be required to complete the annual food standards return to the Food Standards Agency for the years 2021-22 and 2022-23. However TSAH will need to complete a different return to gauge effectiveness of the new scheme. There is no doubt that the pandemic will affect the number of site inspections that take place.

Should the pilot not take place, then the current code of practice will continue to be implemented, but with direction and guidance from the FSA in respect of prioritising interventions. At the very least, inspections of “A” rated businesses will be carried out.

Officers undertaking food and feed standards inspections will ensure that the food or feed business is meeting the legal requirements relating to quality, description, composition, labelling, presentation and advertising of food, and of materials or articles in contact with food and feed.

The Feed Standards & Feed Hygiene inspection programme is set and funded by the Food Standards Agency and delivered regionally in conjunction with Swansea Trading Standards, coordinated by Neath Port Talbot. This is likely to be set by the end of July following the FSA’s consultation with enforcement authorities across Wales.

Animal health officers have the responsibility of inspecting feed hygiene systems on farms alongside their animal welfare duties. These officers are assessed as competent as per the Code of Practice. Feed manufacturers and retailers are inspected by Trading Standards Officers with the appropriate qualification and competencies.

Table 2(b): Food Standards Interventions as per <i>Current</i> Food Code of Practice Risk Assessment Scheme for 2021/22						
CATEGORY	(TOTAL NO. OF PREMISES IN CATEGORY 2021/22)	NO. OF PREMISES CARRIED FORWARD (BACKLOG-DUE PRIOR TO 31/3/21).	NO. OF NEW INTERVENTIONS DUE 2021/22 (IMPLEMENTATION OF NEW RISK ASSESSMENT SCHEME)	CUMULATIVE TOTAL NUMBER PLANNED BY 31/3/2022 (INCLUDING BACKLOGS) IMPLEMENTATION OF NEW RISK ASSESSMENT SCHEME	ESTIMATED NUMBER OF REVISITS 2021/22	ESTIMATE-FOR WORKLOAD PLANNING-NUMBER DUE / PLANNED 2022/23 (DEPENDENT ON IMPLEMENTATION OF THE PILOT)
A (1 intervention a year)	33	0	TBD	TBD	TBD	TBD
B (1 intervention every 2 years)	316	192	TBD	TBD	TBD	TBD
C (1 intervention every 5 years / AES)	777	121	TBD	TBD	TBD	TBD
UNRATED	300	187	TBD	TBD	TBD	TBD
Total	1426	500			TBD	TBD

*In accordance with the Framework Agreement and frequencies set in the Food Law Code of Practice (Wales):

- Food Standards Category B premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control, as long as the business is broadly compliant (COP 5.2.7.1.5.2)
- Food Standards Category C premises should be subject to an intervention every 5 years, which could be part of an Alternative Enforcement Strategy.
- Where resources are restricted, the priority is to carry out interventions at category "A" and unrated businesses.
- However, following the pandemic and an introduction of the Pilot, there will be a significant variation in the intervention programme.

Table 2(c):	Planned Feed Standards Interventions 2021/22 & estimated for 2022/23 Feed is co-ordinated on a regional basis, interventions are directed by the Food Standards Agency	
Premises Type	NPT planned 2021/22	NPT Estimated 2022/23 (for workload planning)
Manufacturer	2	2
Co Product Producer	3	3
Mobile Mixer	0	0
Importers	0	0
Feed Stores	4	4
Distributor	4	4
Transporter	2	2
On Farm Mixer (Annex II)	2	2
On Farm Mix	3	3
Pet Food Manufacturer	1	1
Supplier of feed materials/ Surplus Food	6	6
Sub Total "Above The Line"	(27)	(27)
Arable Farms	2	2
Livestock farms	95	95
Total due for inspection	124	124

This year's inspection obligation has yet to be determined. The authority should have confirmation of its work commitment by the end of July.

3.1.3 Resources for Inspections / Interventions

Food Hygiene

The following table contains the current staffing structure breakdown.

Table 3(a) – as at 1/4/2021 (expressed as FTE's- Full Time Equivalents)

	EHORB (EHO)	EHORB (Higher Risk premises)	Non-EHORB (Support Staff)	Total
Team Leader (F&HP)	1.0			
Senior EHO (F&HP)	0.92**			
EHO (F&HP)	5.24 **			
Enforcement Officer		0.86*		
Enforcement Officer		1.0**		
Support Officer			1.0	
Total as at 2021-04-01	7.16	1.86*	1.0	10.02**
*Note: 1.0 fte EO (F&HP) is currently seconded to Gen EH team				
** Note: Various officer have been Seconded to Covid Control roles, within the Regional TTP- (Test Trace Protect) service.	0.92 Senior EHO; 2.54 EHO's; 1.0 EO.			
<i>Historic Totals (trends):</i>				
<i>Total as at 2020-04-01</i>	7.16	1.86*	1.0	10.02
<i>Total as at 2019-04-01</i>	7.16	1.86* (*Note: 1.0 fte EO (F&HP) was seconded to Gen EH team).	1.0	10.02
<i>Total as at 2018-04-01</i>	6.05* (*balance: 1.0 FTE seconded)	2.86	1.0	9.91
<i>Total as at 2017-04-01</i>	6.84 (+0.22 temporary)	1.86	1.33 approx. (NB- 1 officer pursuing qualification)	10.03 (+ 0.22 temporary = 10.25)
<i>Total as at 2016-04-01</i>	6.84	1.86	1.33 approx.	10.03
<i>Total as at 2015-04-01</i>	5.2	1.0	3.9	10.1
<i>Total as at 2014-04-01</i>	5.1	1.0	3.0	9.1

All EHO's currently in post have either the B.Sc. (Hons) degree, M.Sc. or Diploma in Environmental Health and are approved by EHRB (Environmental Health Registration Board). All Enforcement Officers hold the Higher Certificate in Food Premises Inspection, or equivalent. The Table above illustrates the FTE number of staff available to work on food

hygiene law enforcement (food hygiene and associated matters) including support staff and their relevant competencies as per the Code of Practice.

In 2018, a temporarily seconded EHO post was returned to the service from General EH team, whilst a secondment of a vacant EO post was made to the General EH team for approx. 18 months, which has been extended in principle to 31/3/2022.

There is the facility to redeploy Food Hygiene qualified staff to or from other parts of the service (particularly the “General EH” team) when necessary (see Chapter 4 on Resources for fuller details on the current staffing structure). However, this might cause significant pressures within any service providing the release of staff, and often risks unintended “rips and tears” with workloads, so is always managed as sensitively as possible. Temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional resources have been needed.

Table 3(b) – Staffing Allocations (Apportionment estimates: Required & Allocated) – based on pre-Covid demands (for illustration purposes). Recovery phase has provided flexibility in regard to work expectations of the service).

Food Hygiene Resources			
	Estimate of Required Resources	Allocated prior to COVID 19 pandemic & subsequent Public Health response- which has required the significant diversion of these officers/resources.	Relative priority assigned
Food hygiene inspections: Cat A-C	3.0	3.0	High / Medium-high
Food hygiene inspections: Cat D	0.5	0.5	Medium-low
Food hygiene inspections: Cat E	0.5	0.5	Low
Food hygiene Complaints	1.2	1.2	High / Medium-high
Food hygiene Sampling	0.2	0.2	Medium
FH New Businesses & Compulsory Registrations	1.0	1.0	Medium-high
FH Advice & Promotional work	0.3	0.2	Medium / Medium-low
FH Revisits	1.0	1.0	Medium-high
FH Rating Scheme Re-Rating visits	0.2	0.2	High
FH Rating Scheme enforcement	0.1	0.0	Resources diverted when required.
FH Prosecutions	0.1	0.0	Resources diverted when required.
Food Fraud investigations and surveillance	0.1	0.0	Resources diverted when required.
Food hygiene Unrated inspections & work carried forward.	0.1	0.1	Medium
Food Related Infectious Disease control, Inc. food poisoning cases & outbreaks	1.0	1.0	High
Food hygiene Approved Premises	0.1	0.1	High

FH Import & Export; & Novel foods	None at present	0.0	Resources diverted when required.
FH Service Improvement (Monitoring, Planning, Reviews, Policies, Consultations)	0.8	0.7	High / Medium-high
Food hygiene safety alerts	0.1	0.1	Medium
Other Food hygiene work	0.2	0.0	Resources diverted when required.
Non-hypothecated / generic enforcement resource		0.22	
TOTALS (in FTE's):	10.5	10.02	

It is estimated that the required resource to deliver all aspects of the Framework Agreement and Code of Practice is 10.5 FTE.

Food Standards and Feeding stuffs

Table 4(a):

Trading Standards Staffing at 1/4/2021 devoted to Food & Feed by Full Time Equivalent of officer						
Food Standards	DTS	DCA	DCATS Qualified or equivalent	Unqualified	TS Total	EH input
TS Team Leader	0.3	0	0	0	0.3	0
Senior TSO	0	0	0.5		0.5	0
TSO	0.5	0	0.5	0	1	0
Enforcement Officer	0	0	0.8	0	0.8	0
TS Assistant	0	0	0	0.1	0.1	0
Admin	0	0	0	0.1	0.1	0
Food Hygiene staff qualified for standards	0	0	0	0	0	TBD
Total as at 1.4.2021	0.8	0	1.8	0.2	2.8	
<i>Historic Totals (trends):</i>						
<i>Total as at 1.4.2020</i>	<i>1.3</i>	<i>0</i>	<i>0.5</i>	<i>0.2</i>	<i>2.8</i>	
<i>Total as at 1.4.2019</i>	<i>1.3</i>	<i>0.5</i>	<i>0.5</i>	<i>0.2</i>	<i>2.5</i>	

Total as at 1.4.2018	1.3	0.5	1	0.2	3	
Total as at 1.4.2017	1.2	0.4	0.4	0.2	2.2	

Feed	DTS	DCA	DCATS Qualified	(Unqualified but Competent)	Total
TS Team Leader	0.1	0	0	0	0.1
Senior TSO		0	0.2	0	0.2
TSO	0.1	0	0.1	0	0.2
Enforcement Officer	0	0.0	0	0.8	0.8
TS Assistant	0	0	0	0	0
Admin	0	0	0	0.1	0.1
Total as at 1.4.2021	0.2	0.0	0.3	0.9	1.4
<i>Historic Totals (trends):</i>					
Total as at 1.4.2020	0.2	0.0	0.1	0.6	0.9
Total as at 1.4.2019	0.2	0.0	0.1	0.6	0.9
Total as at 1.4.2018	0.2	0.0	0.0	0.6	0.8
Total as at 1.4.2017	0.2	0.0	0.0	0.6	0.8

A food standards qualified enforcement officer has been instructed to carry over certain duties from his previous post (namely treatment of Japanese Knotweed) and this will affect FTE available to deliver food standards, furthermore a Trading Standards Officer (TSO) will be absent on maternity leave for a significant period of 2021-22.

For staffing structure see Appendix C.

The proportion of time spent by each officer on the feed and food functions can be seen in the tables below.

Table 4(b):

Food Standards & Feed Resources		
Food Standards Function	Estimate of Required Resources	Allocated
Food Standards Interventions	2.1	2
Food Standards Complaints	0.3	0.2
Food Standards Home Authority / Primary Authority	0.3	0.1

Food Standards Business Advice	0.3	0.1
Food Standards Sampling / Incidents	0.2	0.1
Food Hygiene Primary Production Inspections	0.1	0.1
Liaison & Promotion	0.1	0.1
Food Safety alerts	0.2	0.1
Sub-Total	3.6	2.7
<i>Estimated additional resource required for Recovery of Backlog of Food Standards Work (short term: 2 years approx.)</i>	2.1	2.1

Feed Function	Estimate of Required Resources	Allocated
Feed Standards Interventions	2	0.8
Feed Complaints	0.2	0.05
Feed Standards Home Authority / Primary Authority	0.1	0.05
Feed Standards Business Advice, Liaison & promotion,	0.1	0.05
Feed Standards Sampling / Incidents	0.1	0.05
Food Hygiene Primary Production Inspections	0.1	0.1

Feed Safety alerts	0.1	0.1
Sub- Total	2.7	1.2

At current intervention rates, to achieve inspections targets as per the current code of practice (that is, inspection of all A, B, C rated and Unrated businesses) and taking into account complaints and sampling work, the department would need to increase the number of full time equivalent qualified and competent officers to approximately 5.7 FTE to overcome the backlog, particularly unrated businesses, in a reasonable period of time (estimated as three years following the effect of the pandemic).

However these figures will need to be reassessed following the implementation of the risk assessment pilot. The FSA has recently published a recovery plan for Local Authorities to follow. Food Standards services will be expected to prioritise new businesses according to risk and “A” rated businesses, the latter of which should all have been visited by June 2022.

3.1.4 Targets and Priorities for 2021/22 (to be considered in the context of the response to the Covid pandemic)

Food Hygiene

1. To ensure a high level of Business compliance with Food Hygiene legislation. This is illustrated by the percentage of food businesses which are classed as “Broadly Compliant” when assessed against the definition provided by the National PI / Public Accountability Measure PAM 023: “The percentage of food establishments which are ‘broadly compliant’ with food hygiene standards”.
2. To undertake a suitable variety of Regulatory Interventions to promote good health and ensure legal compliance to avoid dangerous health risks. This will include the issuing of ratings and the administration of the national Food Hygiene Rating Scheme, which has been mandatory since 28th November 2013.
3. To undertake inspections / interventions at high risk premises for food hygiene. (See table 2(a) for number of inspections due). The target annually is historically based on the inspection of 100% of Category A premises; and 100% of Category B premises. With respect of Category C premises, interventions can be part of a risk based strategy. However, in light of the FSA guidance for recovery of 2020/21 work affected by the Covid pandemic, the ambition is to focus on highest priorities first and move as quickly as possible to a sustained recovered, which the FSA estimate could be for the next 2 years.
4. To inspect or otherwise assess new businesses for compliance with legal standards.
5. To respond to infectious disease incidents, complaints and enquiries within the target response time adopted by the Authority, based on Public Health Wales recommendations.

6. To promote the improved understanding and implementation of food safety management systems (FSMS, based on “HACCP” principles) for food businesses in the County Borough.
7. To further develop a cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of staff.
8. To maintain competency and training for all relevant staff.
9. To create paths of succession to develop junior staff within the department.

Food Standards and Feeding Stuffs

1. To implement the new food standards risk assessment scheme.
2. To develop new and safe means of delivering the food and feed service during the pandemic.
3. To assess businesses for compliance with basic legal standards via a variety of intervention tools.
4. To ensure that significant breaches are acted upon and proper controls are evenly applied to all businesses in a fair and equitable manner in line with the enforcement policy.
5. To complete the annual food sampling plan.
6. To complete the regional feed delivery plan.
7. To continue to implement the Intelligence Operating model across the service.
8. To maintain competency and training for all relevant staff.
9. To create paths of succession to develop junior staff within the department.
10. To promote good practice within food & feed businesses.
11. To continue to support and develop the cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of officers from both teams.

3.1.5 Possible Restrictions on Providing Service

Following the Covid-19 Pandemic new risk assessments and health & safety controls have been put in place. This means interventions and inspections are undertaken differently and generally take longer.

Due to limitations of staff resources, extended periods of absence can lead to a drop in service outputs or service provision, this issue is constantly monitored.

It is important to maintain officer competencies across a variety of disciplines to continue to remain flexible and of optimum value when emergencies occur.

The Food Hygiene Team has a number of officers on continuing secondment to the Regional TTP team. One officer has left to take on a new role within Public Health Wales.

The Trading Standards team has had little turnover of food and feed qualified personnel in the last two years.

There is a recognised shortage of qualified and competent Officers in the Environmental Health and Trading Standards professions that are able to undertake Food Hygiene and Food Standards and Feed inspections. When a member of staff does leave, it is often difficult to replace them due to the restricted availability of suitably qualified and competent officers.

Recruitment options and processes are being pursued, however there is anticipated to be a shortfall.

During the year two further full time officers are expected to be on maternity leave.

Both teams have a wide remit, but food safety and feed standards work is a high priority. Nevertheless, other priorities can take precedence and resources need to be diverted. Occasionally, projects and targets need to be re-assessed to focus on the areas of greatest need.

Through implementing the Intelligence Operation Model and utilising the intelligence led approach advocated by National Trading Standards, the department is focussing on the areas which require most attention.

The system of Food Hygiene officers undertaking limited Food Standards work to help meet demand has been suspended until after completion of the risk assessment pilot.

3.1.6 Experience of Officers and Access to Expert Information When Necessary

All relevant officers within the Section are appropriately qualified and experienced to deal with routine and many unusual matters associated with all current types of food & feed premises within the area. The EDR (Employee Development Review) and supervision review process means that officer's competency is continually monitored and training is delivered where required.

Communication, Reference and Expert Support:

The department has access to the following:

- Technical Indexes
- Police National Legal Database (PNLD)

- Knowledge Hub
- National Anti-Fraud Network (NAFN)
- RIAMS (as provided by the Food Standards Agency)
- Food Standards Agency
- IDB (The Trading Standards Intelligence Database)
- British Standards Institute (BSi) (Trading Standards & Animal Health)
- Coordinating groups and panels specialising in food and feed enforcement
- Public analyst (s) (monthly meetings between TSAH and Minton Treharne & Davies Public Analyst services)
- Email & Internet (including social media accounts)
- Trading Standards Regional Intelligence Analyst intelligence database and Local Intelligence Officer network.

Where additional expertise is required the Head of Service will be briefed and a suitable response will be formulated.

Coordinated Enforcement:

Trading Standards chairs the Glamorgan regional coordinating group for food standards, which is comprised of the 7 authorities formerly making up the old county of Glamorgan, plus representatives from two Public Analyst Laboratories.

Trading Standards participates in surveys and exercises held under the auspices of the Glamorgan Group, Trading Standards Wales (TSW) and the Food Standards Agency.

Trading Standards is an active member of Trading Standards Wales. Information received feeds into the tactical and strategic assessments carried out by TSW which helps focus resources and identifies emerging threats in the county.

Neath Port Talbot Trading Standards represent Neath Port Talbot & Swansea's interests in regional feed enforcement. Regular communication takes place between the two authorities on feed issues and delivery of feed enforcement across the Neath Port Talbot / Swansea region.

The Food Hygiene and Health Protection team work closely and liaise with the Public Health Laboratory, Public Health team of the NPHS, and the Public Analysts when expertise is required. The Authority's public analyst service is consulted during the drafting of the sampling programme for sampling subjects, costs and sampling techniques.

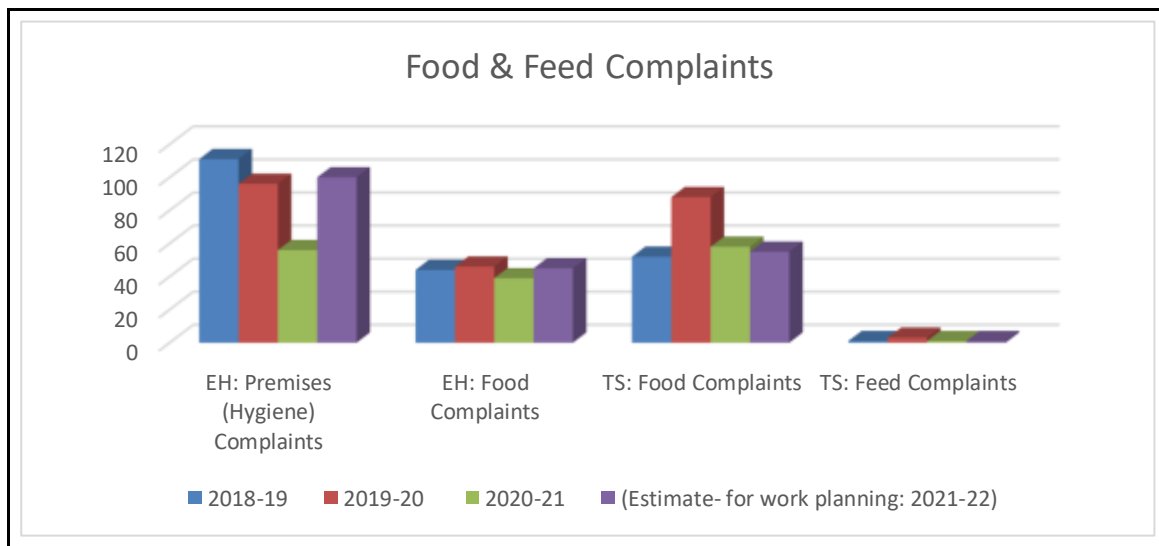
The Food Hygiene team provides representation for the Wales Food Safety Expert Panel, and the Wales Food Hygiene Rating Scheme Steering Group.

3.2 Food and Feeding-stuffs Complaints

The authority will continue to ensure that all notified complaints in relation to food and feeding stuffs are suitably investigated and dealt with promptly, consistently and as per the enforcement policy and internal policy and procedure.

The following graph illustrates number of complaints / service requests received by the department.

Table 5(a): Food and Feed Complaints / Service Requests (by Year)



The demands placed on this Reactive service are periodically reviewed, to ensure that resources for investigating food complaints are targeted on a risk basis. The available resources will need to be focused on significant food safety risks. As a consequence, certain categories of service request may receive a more streamlined response.

3.3 Primary Authority Scheme & Home Authority Principle

The authority will continue to provide advice and assistance to food businesses for which we are the originating authority and to any that may set up their decision making centre within the authority. The department has made a commitment to initiate Primary Authority partnerships, including food and feed.

The Trading Standards service had made a commitment to expand its number of partnerships. However, the pandemic has delayed this and a new approach is being developed.

The Primary Authority scheme requires UK enforcement authorities to be mindful of national inspection plans organised with multi-site businesses, to ensure consistency of approach on a nationally coordinated basis (See also our Enforcement Policy and Primary Authority Policy). Enforcing authorities are legally obliged to consult with the Primary Authority of the business under investigation.

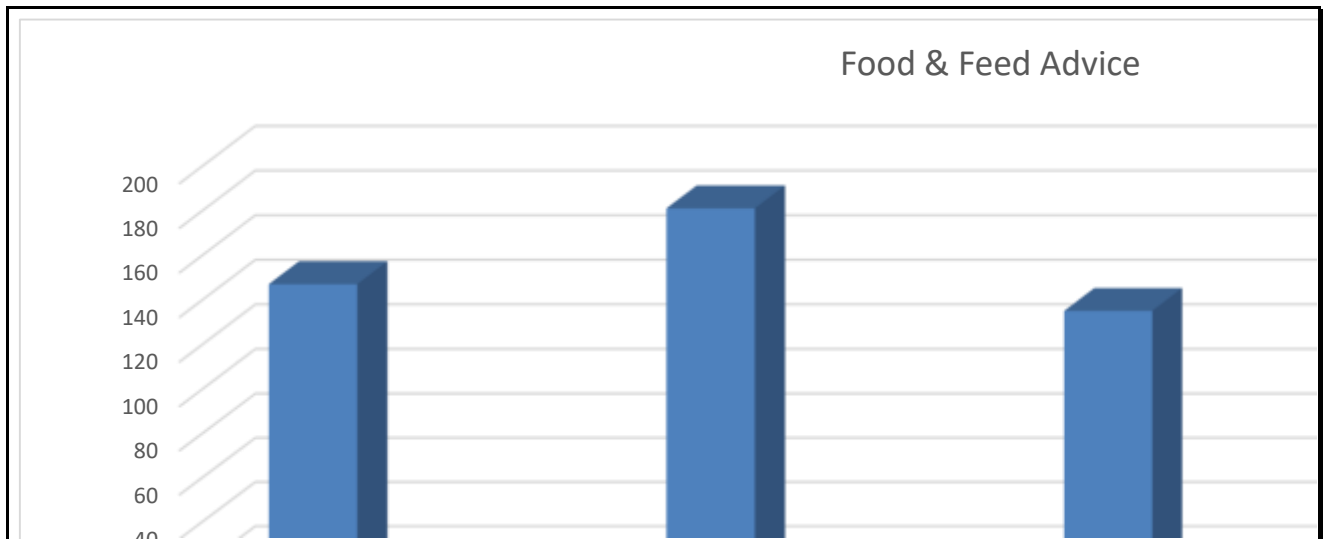
Although there is no legal obligation where a breach is detected involving a company based in another part of the UK without a Primary Authority Partner, liaison is instigated with the relevant local authority / authorities under the Home Authority principle.

Where significant food or feed breaches with a potential national or international impact occur, the department will liaise with the Food Standards Agency and relevant border inspection points / ports.

3.4 Advice to Businesses

The EH&TS department charges for the provision of “bespoke” business advice. The department will not charge for “signposting” businesses to sources of advice, but will charge for bespoke or enhanced consultancy type assistance, such as examination of products, systems and labels. The level of income from this policy is not significant.

Table 5(b): Food and Feed Advice



3.5 Food and Feed Sampling

Food sampling trends, intelligence and Food Standards Agency priorities are examined, analysed and used to inform the authority’s food sampling plan.

Priority areas for sampling are identified on the basis of safety, consumer or trade detriment, type of food or feed business and risk.

Additionally, food samples should be taken as part of a programmed intervention if deemed appropriate or in connection with enforcement investigations.

The Authority participates in various co-ordinated sampling programmes including:

- Welsh Food Microbiological Forum targeted surveys;
- The All Wales ‘Shopping Basket’ Food Sampling Survey;
- Trading Standards Wales Surveys;
- Glamorgan Trading Standards Group Surveys;
- Public analyst co-ordinated surveys;
- Food Standards Agency led surveys; and
- Food Standards Agency Funded surveys.

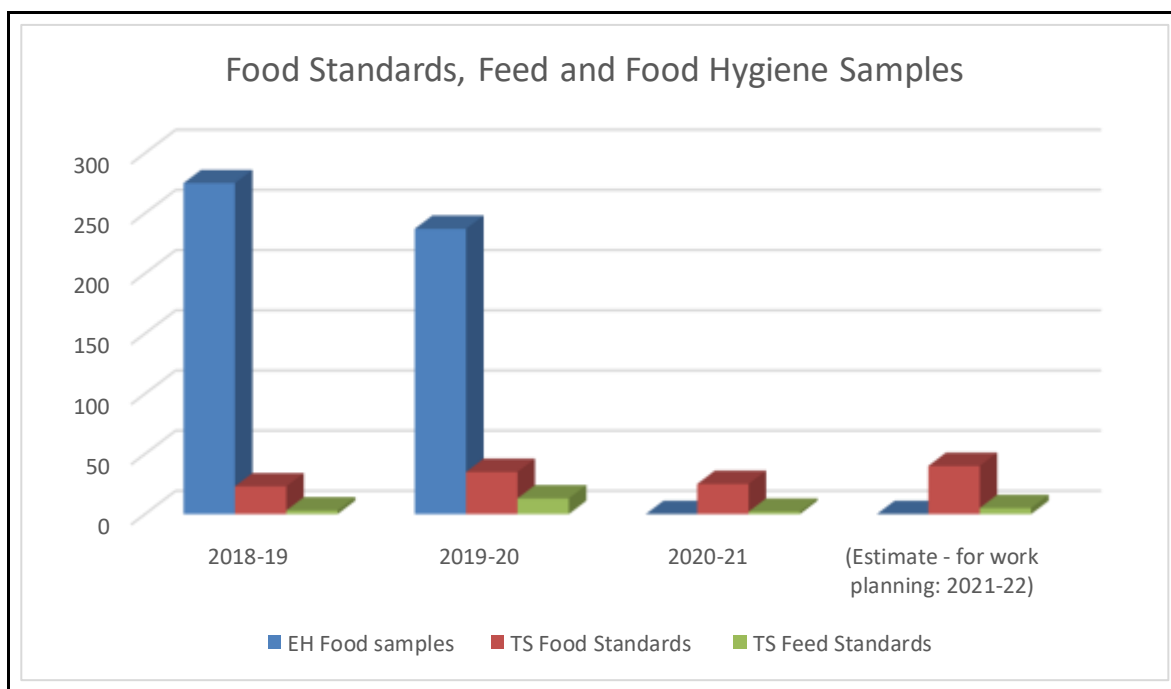
The Food Standards Agency sets and funds the regional (Welsh) feed sampling programme.

After the sampling programme was significantly curtailed last year, Trading Standards hopes to resume a complete sampling programme in 2021-22. Both the Neath Port Talbot and Glamorgan Group sampling programmes have been set and have begun.

The service aims to target problem areas such as allergens, colour additives and descriptions at takeaway outlets and to carry out sampling of manufacturers and wholesalers and imported food (following EU Exit) where it is found as part of the intervention programme.

It is anticipated that feed samples will focus on any imported feed, following the EU exit, and raw pet food which has been identified as a problem area.

Table 5(c): Numbers of Official Control Samples (by Year)



Resource Allocation:

Approximately 3 days a month are usually spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the subsequent administration. However, in light of the Pandemic, we do not envisage taking many samples, unless urgently required on public health grounds, all proactive/routine surveillance sampling will likely remain suspended.

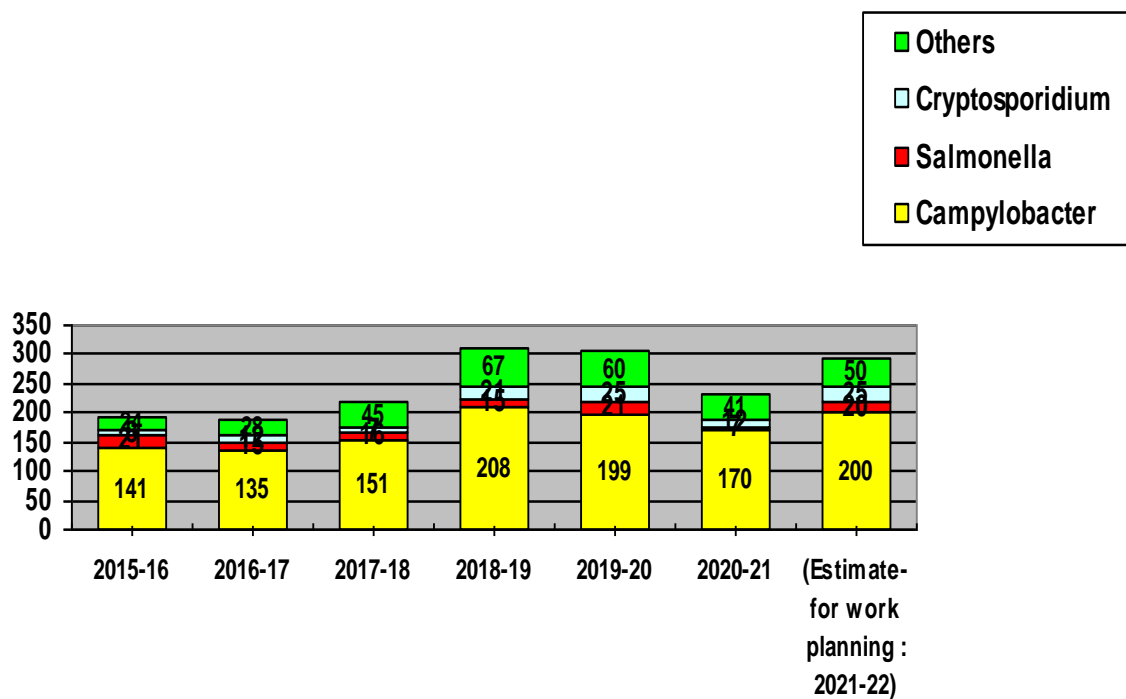
Most food standards samples are taken by qualified and competent officers. However, Trading Standards utilise the TS assistant for informal sampling surveys, with follow up action being taken by suitably qualified and authorised officers.

Samples taken are submitted to either the local Microbiology testing laboratory (PHW-Carmarthen) or Public Analyst within 24 hours of sampling.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

All formal notifications (of all types of Infectious Disease notifications) are recorded on an NHS shared platform (called TARIAN). Subsequent investigations are based on the type of organism, the number of cases, and are in accordance with the over-arching Communicable Disease Outbreak Control Plan for Wales (issued by the Chief Medical Officer – Wales). Additionally, there are various supporting infectious disease investigation procedures utilised locally by Neath Port Talbot.

Table 5(d): Graph to show Notifications of all Infectious Diseases, including Food-related



Periodically, we receive complaints from members of the public as self-referrals. These are often reported as suspected cases of food poisoning. Initially, advice is given for the case to report to their GP, but invariably these are followed up as service requests and investigated accordingly. They are also reported to the NPT Consultant in Communicable Disease Control. Workloads are consistently high in this area of work, and where Emergencies / Major Outbreaks occur, they are dealt with as top priority (owing to their medical and public health significance), with other work being re-scheduled.

The existing internal resources are usually sufficient to deal with the estimated number of food poisoning cases for the forthcoming year.

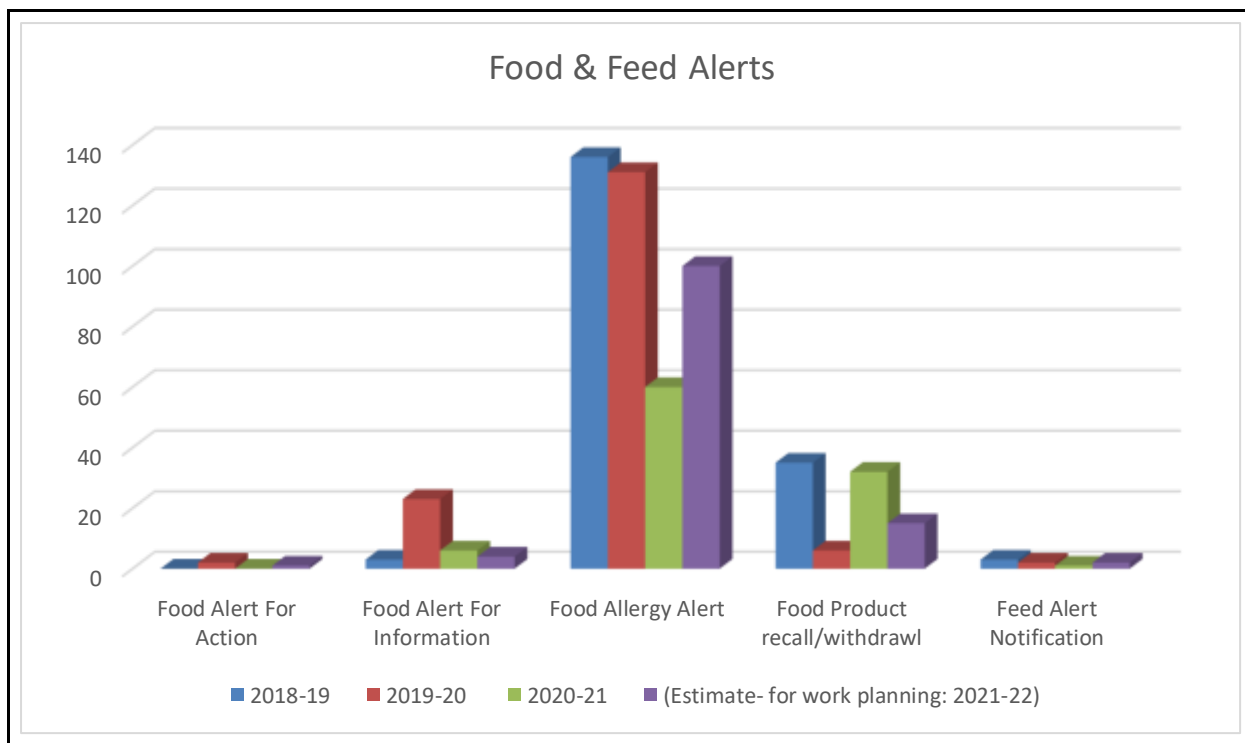
3.7 Food & Feed Safety Incidents

In line with the current Code of Practice the services have documented procedures which outline the action to be taken following the receipt of a food or feed alert. Activity is recorded on the Flare/APP database.

Alerts are received by a direct email from the Food Standards Agency Wales (FSA-W) to enforcement officers. Though fairly uncommon, the warning procedure for food incidents recognises that Alerts for Action (FAFA) are required to be dealt with quickly, and are treated as a very high priority, which means resources from other work needs to be redirected to respond to the FAFA. Food Alerts for Information or Food Allergy Alerts are more common and most food alert warnings received require only a small officer resource mainly to re-publicise risks locally, via the Services social media accounts. When necessary, directly affected businesses are contacted and advised to effect a withdrawal.

When breaches are detected in Neath Port Talbot, the Services will immediately contact the Food Standards Agency Wales via the applicable food/feed incident report form and established mechanisms, and the Services will liaise with other partners as appropriate.

Table 5(e): Food & Feed Alerts



The TSAH service receives a significant number of allergy alerts, most of these are promoted locally, through Social Media or other methods, with only a few requiring significant action. Existing internal resources are currently sufficient to deal with the estimated number of food / feed alerts incidents.

3.8 Liaison with other Organisations

The authority has a number of arrangements to ensure enforcement action is consistent with neighbouring local authorities. Officers participate in a variety of external liaison groups, which are summarised below:

Table 6: Breakdown of resource allocation for liaison with other organisations.		
GROUP	AVERAGE RESOURCE ALLOCATION	
Trading Standards & Animal Health		
Glamorgan Food Group (Chair)	4 days per year	1 Officer
NPT/Swansea Feed Region	4 days per year	1 Officer
Glamorgan Group	4 days per year	1 Officer
TSW Animal Health and Welfare Panel	4 days per year	1 Officer
TSW Group	6 days per year	1 Officer
Neath Port Talbot / Swansea Feed delivery	7 days per year	2 officers
Welsh Primary Authority User Group	2 days per year	1 officer
TSW Lead Officer for Training	4 days	1 officer
Food Hygiene & Health Protection		
WWhoEHG Food Safety (Task Group & Expert Panel)	4 days per year	1 Officer
WWhoEHG Communicable Disease (Task Group & Expert Panel)	4 days per year	1 Officer
WWhoEHG: Environmental Health Group	4 days per year	1 Officer
WWhoEHG: Food Hygiene Rating Scheme Steering Group	4 days per year	1 Officer
Welsh Food Microbiological Forum	3 days per year	1 Officer
Meetings with CCDC (Consultant in Communicable Diseases, of Public Health Wales)	Estimate 2 days per year	1 Officer
Joint		
Consultee to Building Control & Planning Department & Licensing Department.	Estimate 2 consultations per week	1 Officer
Regulatory Delivery	Estimate 2 days per year	2 Officers
National Food Crime Unit	Estimate 2 days per year	2 Officers
Ad hoc meetings with NPTCBC Education and Social Services Departments	4 days per year	1 Officer
Key: TSW = Trading Standards Wales WWhoEHG = Welsh Heads of Environmental Health Group CCDC = Consultant in Communicable Diseases		

3.9 Promotion & Intelligence

Educational and promotional activities are considered to be important aspects in the delivery of a varied and comprehensive food safety service as the following table illustrates.

Food & Feed Promotion		
Method	Trading Standards & Animal Health	Food Hygiene & Health Protection
Attendance at consumer education events.	X	
Primary Authority Scheme	X	
Active promotion of national food Safety events	X	X
Liaison with NPTCBC food delivery services	X	X
Buy with confidence	X	
Facilitating hand washing demonstrations in educational establishments and voluntary groups when requested.		X
Targeted advice to consumer groups, FBOs and FeBOs.	X	X
Targeted seminars and training sessions to FBOs & FeBOs	X	X

The Authority continues to promote food safety, food standards and feed hygiene/standards in all areas of its work. Most inspections are carried out pro-actively and officers promote “best practice” by encouraging businesses to implement systems that achieve compliance with relevant legislation. Prospective business owners are encouraged to seek the advice of the department before the food or feed business begins operations to prevent possible contraventions from occurring, however there is a charging system for the provision of bespoke advice.

The Food Hygiene team has an integrated role of health promotion, particularly for businesses they have contact with. Although there is no specific staffing resource allocated to this function, the daily contacts which the teams have with businesses are an important opportunity to positively influence the wider business community, their employed staff and customers.

Intelligence		
Method	Trading Standards & Animal Health	Food Hygiene & Health Protection
Knowledge Hub (reference and discussion site).	X	X
IDB (The Trading Standards Intelligence Database).	X	
RIAMS (as provided by the Food Standards Agency).	X	X
National Anti-Fraud Network (NAFN).	X	
Trading Standards Regional Intelligence Analyst and Local Intelligence Officer network.	X	
FSSiNet – Food Sampling Surveillance System.	X	
TARIAN.		X
Civica / APP (FLARE): Local authority enforcement database.	X	X
Coordinating groups and panels specialising in food and feed enforcement.	X	X

4.0 RESOURCES

4.1 Financial Allocation

The table below provides a summary of expenditure and income for the Food Service.

Table 7 – Budget figures	
Revenue Budget	2021 -22
Expenditure	£
Staffing- Food Hygiene	418,578
Staffing- Infectious Disease	46,509
Staffing- Food Standards	115,586
Staffing- Animal Feeding Stuffs	61,921
Transport (TS)	2,040
Transport (EH)	6,907
Equipment (EH)	2,931
Legal Fees – (TS)	0
Sampling & Analysis – Food Hygiene	1,483
Sampling and Analysis – Trading Standards – Food & Feed only	13,000
Total Expenditure	668,955
Income	
Government Grant	0
Other Income	TBC
Feed funding (estimate)	£10,000 TBC -
Total Income	TBC
Estimated Net Expenditure	678,955

4.2 Professional Development

The services are committed to staff professional development. The two services maintain separate training plans. The training and development budget for 2021/22 for the whole of the EH&TS service is initially set at approximately £8,580.

Trading Standards & Animal Health

All food standards & feed enforcement staff participate in one-to-one supervisory review with their supervisor or team leader approximately every 10-12 weeks and receive an annual appraisal.

During the pandemic Trading Standards food and feed staff have held meetings every other week day to maintain communication and to share investigation experiences.

Bi monthly meetings have recently resumed within Trading Standards and topic specific briefing sessions will resume once new working patterns have been confirmed.

Weekly briefing notes are circulated to summarise legislative and service developments, news and training opportunities.

Training is arranged locally and regionally. Training is delivered by the Food Standards Agency, trainers commissioned by Neath Port Talbot TS or by Trading Standards Wales (TSW). Distance learning and online courses have been the norm during the pandemic, although they are not a substitute for class room learning, they have at least enabled officers to maintain Continuing Professional Development (CPD). The TSW and CTSI Lead officer for training is based within NPT Trading Standards and the officer circulates a monthly collation of online training opportunities of which they have become aware.

Training needs and CPD in Food & Feed Standards is monitored via reviews and appraisals by the Senior Trading Standards Officer and the Trading Standards Team Leader. Food CPD expectations run on a calendar year basis and feed CPD runs over the financial year.

Despite working remotely, online discussion groups via Microsoft teams also encourage officers to consult with their colleagues, to discuss investigations and share information.

Food Hygiene & Health Protection

All food hygiene staff participate in one-to-one supervisory reviews with their supervisor or team leader approximately every 6-9 weeks and receive an annual appraisal.

Regular Food Hygiene Team meetings are held to discuss ongoing food and communicable disease issues, including work planning and outputs, and complex cases.

The Authority participates in the all-Wales Communicable Disease Lead Officer Training events funded by the Wales Centre for Health. All-Wales update training on food related topics is also provided by the Food Standards Agency on key issues, but is of necessity restricted to usually 2 officers per local authority, and is often free. Officers are expected to maintain their competencies, and undertake to ensure their continuing professional development (CPD) by undertaking suitable self-study or training equivalent to a minimum of 20 Hours per annum (from 1st January, annually). This is monitored by the respective service managers and discussed during the one to one reviews.

4.3 Legal Expenditure

Legal fees and costs for taking action in connection with feed, food standards and food hygiene cases have remained fairly constant over the past few years. Whilst there is no direct budget allocated for this purpose, resources are provided as needed from both the commissioning Directorate and Corporate legal services, and costs incurred by both are applied for at the conclusion of the legal action. Where there is an overspend/shortfall in resource, this is reported to the Head of Service for subsidising on an ad-hoc basis, or from central reserves. Theoretically, financial support should also be available from the Food Standards Agency, for either Trading Standards or Food Hygiene teams who face taking legal action in cases which have significance of the food sector.

Receipts from the incentivisation scheme under the Proceeds of Crime Act can be re-invested in enforcement related actions.

There has been a moderate rise within both food services of cases referred for prosecution as significant infringements have been detected. This is likely to continue to persist over the coming years as intelligence indicates that there is continued infringement of allergen, adulteration and misdescription legislation within Neath Port Talbot.

Most significantly, the Trading Standards Service is currently in litigation with a feed producer which is causing a significant drain on resources. The Food Standards Agency has yet to commit to support.

5.0 QUALITY ASSESSMENT

The quality of the food service will be regularly assessed to ensure the Service Delivery Plan and Food Standards Agency framework agreement on local authority enforcement ('The Framework Agreement Standard') is being achieved.

5.1 Management Monitoring

Under the pandemic, monitoring has been restricted. However following resumption of regular enforcement duties evaluation methods and records include:

- Monitoring of performance measures on a Quarterly basis, and reported to the relevant Member forum for scrutiny. Additionally, ad-hoc internal checks are undertaken to monitor progress towards the Business Plan priorities.
- Monitoring of inspections by supervisors and management within each section.
- Monitoring of inspection reports and records.
- Officer reviews are held approx. every 6-9 weeks (FH) or 12 weeks (TS) plus an annual appraisal, which includes a competency assessment for food and feed enforcement as appropriate.
- Accompanied visits and Peer assessments, following internal protocols. It is difficult to carry these out under pandemic conditions, but paperwork checks and interviews with officers offer a reasonable alternative as a means of assessing officers.

The Food Standards Agency (FSA) has discretion to undertake audits (full or focussed) of food authorities, and their latest full assessment was undertaken in 2014, with a follow up visit in August 2016.

A feed audit was planned for March 2020, but was postponed. There is no information on a new date at the time of writing, although the Authority can expect an audit in the near future.

6.0 REVIEW

6.1 Review against Service Plan

Strategically, the Head of Service and the Environmental Health & Trading Standards Manager has overall responsibility for the direction and performance of the service.

The Environmental Health & Trading Standards Manager is the Accountable Manager for the food hygiene, food standards and feed standards & hygiene functions.

The Manager reviews the key performance measures and service improvements contained in the plan on a quarterly basis as part of the performance management process, these are reported internally at quarterly intervals to Cabinet Board and the associated Scrutiny Committee.

6.1.1 Food Hygiene

In addition to the Corporate monitoring of performance, regular meetings are held with the food hygiene team (food and health protection). This is to ensure that on-going projects, improvements and inspection targets outlined in this service plan and the business plan are effectively monitored and managed.

Achievements for 2020/21 included:

- Staff were able to work successfully from home during the whole of the lockdown periods, building on earlier trials of Agile working, although the work undertaken quickly became focussed on the Covid response.
- Officers provided an invaluable service in supporting Care Homes within NPT to understand the Covid Control guidance issued by Public Health Wales. Care Homes were provided with a Communicable Disease control advice service to ensure plans were in place for daily health monitoring for staff and residents, and for plans to contain or segregate outbreaks.
- Staff were identified at an early stage to spearhead the Regional TTP (Test Trace Protect) service, and took on responsibilities for managing Community outbreaks of Covid-19, and have continued to have their roles expanded, as a result of their professionalism and effectiveness.
- Staff were responsible for taking the lead in managing outbreaks of Covid in Care Homes, liaising with Health professionals from Public Health Wales, Local Health Board, Social Services Commissioning teams, as well as with the Management teams with the Care Homes affected, many of whom were under immense pressure and distress.
- When resources permitted (phase 1), officers were involved in advising businesses and taking queries from the public regarding the implementation of Coronavirus Restriction Regulations.
- A small contingent of staff resource was retained for essential food safety work, including the Approval of premises, advice to New Businesses, and for dealing with complaints of public health significance.
- Locum EH staff were in scarce supply, owing to an unprecedented National demand, but when they were available for contracts, they were actively recruited and engaged- either to undertake a moderate number of inspections at higher risk premises, or otherwise incorporated into the Regional TTP team.

6.1.2 Food Standards and Feeding stuffs

Trading Standards enforcement was affected considerably during the pandemic.

Trading Standards staff were redeployed into the TTP teams and for a significant period also had Covid enforcement duties before extra staff were engaged by Environmental Health for this purpose.

Despite this, Trading Standards did manage to achieve the following:

- Took over the chair of the Glamorgan Food Sampling Group and confirmed a sampling programme following easing of lockdown.
- Continued to highlight the problem of microbiological contamination of raw pet food at a national level and continued to fight an appeal against an improvement notice issued against a raw pet food plant, working with FSA and the Animal Plant Health Agency in formulating a response to the ongoing problem with the subject area.
- Successfully applied for funding to carry out sampling exercises at takeaways for allergens and description breaches.
- Successfully delivering Covid enforcement duties at the height of the pandemic and supporting the TTP service.
- Developing and employing new systems to strengthen agile working.
- Maintained CPD for food and feed officers.
- Increased online monitoring of supply of food and feed via social media.
- Pivoted to online surveillance and monitoring whilst on lockdown and developed new methods of working and surveillance of businesses.
- Began developing a new method for paying for samples taken for analysis.
- Took the opportunity to make links with other services in the authority such as Economic development to share information on businesses.
- Assisted in the development in an Internet based NPT portal for business support and advice.

6.2 Identification of Variation from the Plan

Variations from the Service Plan will be identified annually along with reasons for the variance and whether or not they are justified.

Trading Standards has a large backlog of inspectable businesses for Food Standards purposes, this has only grown over the lockdown. Proactive inspections will continue to be subject to the same competition for resources as other work, and will be prioritised as necessary. The sampling plan was almost completely abandoned. Some “A” rated visits were inspected, as were some new businesses that were considered higher risk.

With regard to food hygiene interventions at lower risk rated premises, the previous backlog had been addressed, but will have reformed during the pandemic. However, there remains a risk that if resources are capped, priority and resources will be directed at inspections of higher risk establishments and investigation of non-compliant premises.

6.3 Areas for Improvement

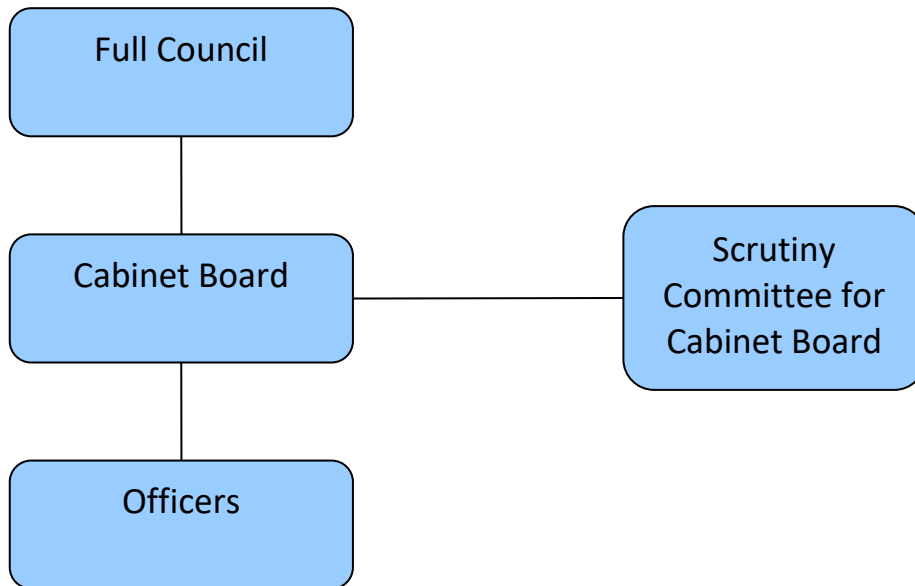
Over the past 5 years, the changes to food & feed safety legislation and the challenges faced by food & feed safety enforcement authorities have been significant. Both services are governed by the priorities set by the Food Standards Agency and the Food & Feed law codes of practice.

Additionally Trading Standards are also influenced by Office of Product Safety & Standards and National Trading Standards (NTS). Whereas the Food Hygiene service has to have regard to the enduring impact of the final report from the South Wales E.coli O157 public enquiry, and the ongoing visits from the EU Food & Veterinary Office to Welsh Authorities. However, some of the current planned improvements for 2021/22 and beyond include:

Areas for Improvement		
Improvement	Trading Standards & Animal Health	Food Hygiene & Health Protection
Reviewing out of hours provision and cover arrangements in relation to outbreaks of communicable disease and food / feed alerts.	X	X
Developing a training programme for officers involved in the investigation of outbreaks of communicable disease.		X
Undertaking suitable promotional activities / campaigns.	X	X
Consult with stakeholders and establish measures to assess the quality of the service provided.	X	X
Increasing intelligence-led enforcement of food standards and feed; and implementation of the new risk assessment scheme for food standards.	X	
Continue to develop resources for the agile working scheme including methods of data gathering and recording and to successfully seek support from NPT IT.	X	X
Continuing to improve the use of alternative enforcement strategies in relation to food and feed inspections.	X	
The challenges regarding local government financing and organisation particularly following the pandemic.	X	X
Assessing and addressing the demands on the service following EU Exit.	X	X
Addressing the demands on the service from the Food Standards Agency "Regulating Our Future" programme.	X	X

APPENDIX A

Decision Making Structure:



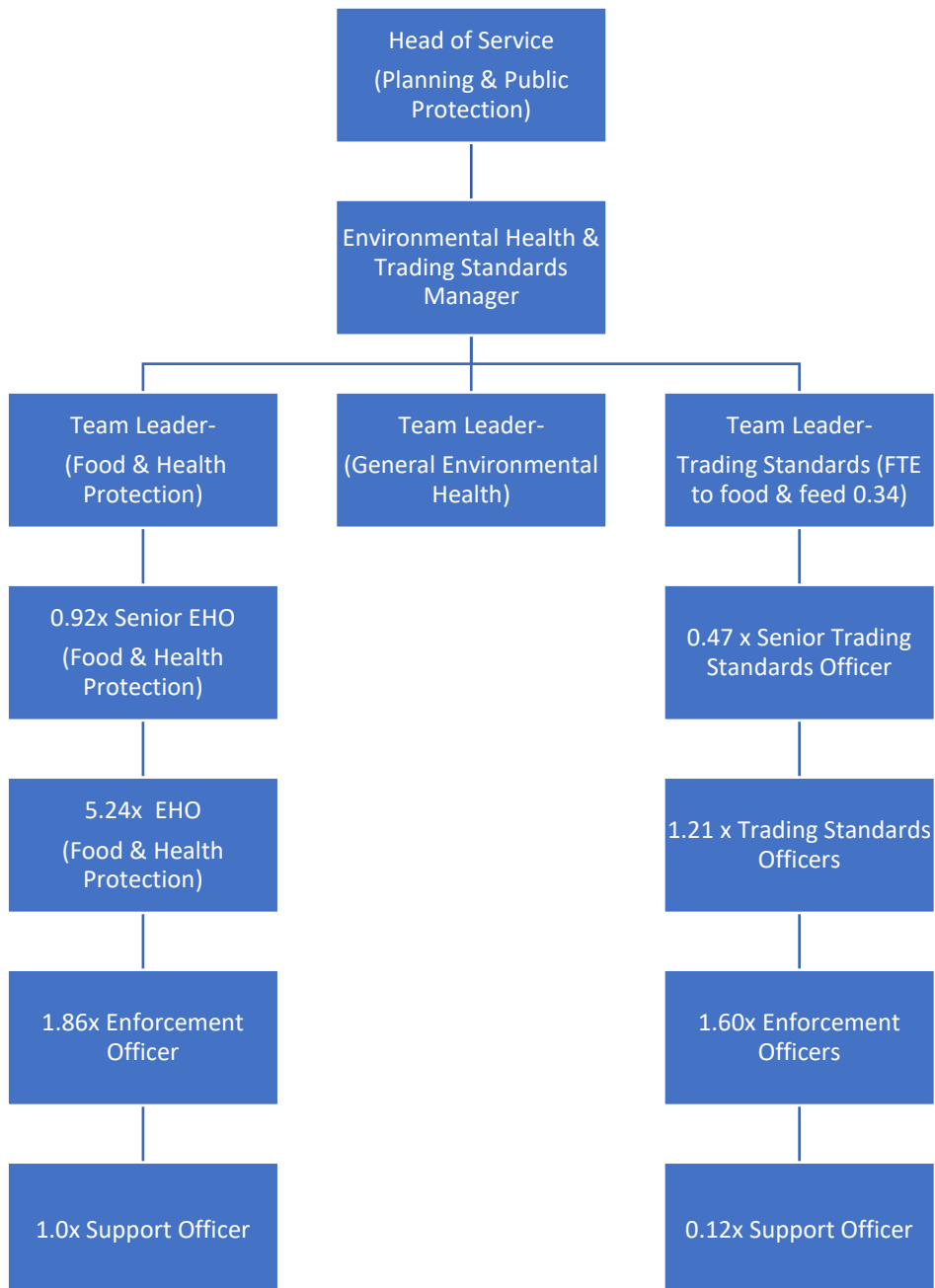
APPENDIX B

Department Structure:



APPENDIX C

Service Structure (as at 1/4/2021):



APPENDIX D

Number of Registered Food Premises by Ward (2020 & 2021)

WARDS : NEATH	(WARD CODES)	2020	2021	WARDS: PORT TALBOT	(WARD CODES)	2020	2021
Aberdulais	ABD	15	15	Aberavon	ABV	76	77
Alltwen	ALL	16	16	Baglan	BAG	40	41
Blaengwrach	BLA	17	17	Briton Ferry East	BFE	44	45
Bryncoch North	BRN	19	19	Briton Ferry West	BFW	15	15
Bryncoch South	BRS	37	37	Bryn and Cwmavon	BRY	61	62
Cadoxton	CAD	12	12	Coedffranc Central	COC	46	45
Cimla	CIM	19	19	Coedffranc North	CON	15	15
Crynant	CRY	13	13	Coedffranc West	COW	44	45
Cwmllynfell	CWM	12	12	Cymmer	CYM	31	32
Dyffryn	DYF	20	20	Glyncorrwg	GLC	7	7
Gwaun-Cae-Gurwen	GCG	28	29	Gwynfi	GWY	12	12
Glynneath	GLN	34	33	Margam	MAR	47	48
Godre'r Graig	GOD	6	6	Port Talbot	POR	79	78
Lower Brynamman	LBR	11	11	Sandfields East	SAE	49	50
Neath (East)	NEE	43	43	Sandfields West	SAW	40	41
Neath (North)	NEN	139	140	Taibach	TAI	42	41
Neath (South)	NES	19	20	Port Talbot area Total		648	654
Onllwyn	ONL	9	9				
Pelenna	PEL	10	10	Other / Out of area	xxx	0	0
Pontardawe	PON	95	93	NPT Combined Total		1340	1346
Resolven	RES	25	25				
Rhos	RHO	19	19				
Seven Sisters	SEV	19	19				
Tonna	TON	15	15				
Trebanos	TRE	11	11				
Ystalyfera	YST	29	29				
Neath area Total		692	692				

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

Regeneration and Sustainable Development Cabinet Board

30th July 2021

Report of the Head of Planning and Public Protection

Ceri Morris

Matter for Decision

Wards Affected: All

Tenant Fee Delegations

Purpose of the Report

To seek approval for delegated authority to be issued to the Director of Environment and Regeneration, the Head of Planning and Public Protection and the Environmental Health and Trading Standards Manager to undertake enforcement in respect of the Renting of Homes (Fees etc.) (Wales) Act 2019 and to provide a respective delegation to Cardiff City Council (as agents of Rent Smart Wales) to undertake such enforcement work on the part of this Council.

Background

The Renting of Homes (Fees etc.) (Wales) Act 2019 came into force on 5th May 2019. From 1st September 2019, the Act bans letting agents and landlords who manage their own properties from charging any fees before, during or after a tenancy unless specifically exempt in the Act. Such a banned payment is called a 'prohibited payment'.

Letting agents and self-managing landlords are also banned from requiring a tenant to take out a loan or enter into a contract for services.

Enforcement of these new requirements, which is undertaken by the Council and Rent Smart Wales (as the Single Licencing Authority) will contribute to more secure tenancies for private tenants.

Prohibited Payments

Welsh Government (WG) advises that any costs associated with renting in the private sector should be reasonable, affordable and transparent. This new Act was brought in to achieve this aim by enabling Local Authorities to regulate such costs through informal and formal means, as outlined below.

The Act defines permitted payments that can be required by letting agents and self-managing landlords as:

- Rent;
- Holding deposits;
- Security deposits;
- Payments in respect of utilities (e.g. Council Tax, television licence and communications services);
- Payments in default (i.e. where the tenant has done something wrong – lost keys, late payment of rent).

Any payments other than those listed above would be banned and prohibited. Where any rent payment, in one period, is greater than the amount of rent payable in any other period during the contract, the difference (a 'rent fluctuation') is also considered a prohibited payment. There is an exception where there is a 'permitted variation' agreed between the landlord and tenant.

'Holding deposits' are limited to one week's rent and must be re-paid within seven days of the contract being agreed. If the tenancy contract is not agreed, the deposit must, subject to limited exceptions, be repaid within 15 days.

There will be no change to existing legislation governing 'security deposits', but Welsh Ministers now have the power to cap them. There are no plans to legislate for a cap, but WG will be monitoring trends in deposits and will only regulate if necessary.

Failure to comply with the provisions in the Act, in the following ways, will restrict the landlord's ability to serve a valid notice of possession ("no fault", Section 21 possessions):

- A prohibited payment has been required and paid, but not re-paid by the letting agent/self-managing landlord;

- A holding deposit has not been repaid;
- This change will protect tenants by reducing financial exploitation.

Enforcement

The Council is responsible for enforcing this legislation in partnership with Rent Smart Wales (RSW). All 22 Welsh Councils have agreed to a memorandum of understanding with RSW in relation to the regulation of the private rented housing sector.

RSW will take enforcement action in place of Local Authorities in limited circumstances:

- Where RSW is undertaking an audit of an agent and find evidence of non-compliance;
- Where RSW is taking enforcement action for Housing (Wales) Act 2014 offences (e.g. not registered with RSW) and tenant fee contraventions are found. Other exceptional circumstances to be agreed on a case by case basis with the relevant Local Authority.

Local Authorities are therefore primarily responsible for enforcing the requirements and have a duty to inform the Licensing Authority (i.e. RSW) if they take enforcement action. RSW will also inform Local Authorities if they serve a fixed penalty notice or prosecute.

There are two formal enforcement options available to the Council and RSW:

- Issue of a fixed penalty notice (FPN) of £1,000, the payment of which would avoid prosecution proceedings. The fixed penalty payment receipts will be used for this enforcement function by the Environmental Health and Trading Standards department (in accordance with the Act). However, non-payment would lead to prosecution (also the only appeal mechanism).
- Prosecution for offences under the Act which could result in a fine not subject to a minimum on the standards scale of fines (except for failure to provide information required by statutory notice, in which case a fine up to level 4 on the standard scale could be imposed by a judge).

Sections 17(2) and (3) of the Renting Homes (Fees etc.) (Wales) Act 2019 enable RSW to take the above mentioned enforcement actions but it will be necessary for this authority to authorise RSW (Cardiff City Council) to do so.

The above enforcement action will be taken in accordance with the departmental enforcement policy to ensure consistency, proportionality and fairness.

Financial Impacts

The necessary resources are currently available within the Environmental Health and Trading Standards service.

Integrated Impact Assessment

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

Having had due regard to the first stage Integrated Impact Assessment, a more in-depth assessment is not required.

Valleys Communities Impacts

No implications.

Workforce Impacts

No implications.

Legal Impacts

The relevant authorised officers will be given powers to operate under the Act.

Risk Management Impacts

It is a statutory requirement to implement this legislation and failure to do so will result in a high risk of legal challenge as well as reputational damage to the Authority at a strategic and operational level.

Crime and Disorder Impacts

In undertaking the provisions of this Act, the actions of the Authority may have a positive impact upon crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment).

Consultation

There is no requirement for externally consultation on this matter.

Recommendations

That having considered the report and having due regard to the Integrated Impact Assessment, it is resolved to make the following recommendations for approval:

That the delegation arrangements in respect of the Environmental Health and Trading Standards Service which are set out in version 14.12.18 of the authority's Constitution [i.e. in Part 3 – Officer of the Council Delegation Arrangements: {c} Environmental Health and Trading Standards - Schedule 1] are amended to:

- a) Add the Renting of Homes (Fees etc.) (Wales) Act 2019 to the list of legislation [set out in the above referred to Schedule 1] delegated to the Director of Environment and Regeneration, the Head of Planning and Public Protection and the Environmental Health and Trading Standards Manager.
- b) Delegate to those officers in [a] above the authority to authorise individual competent and qualified officers to act under that legislation.
- c) Delegate to those officers in [a] above the authority to institute legal proceedings under the provisions contained in the the Renting of Homes (Fees etc.) (Wales) Act 2019 in conjunction with the Head of Legal Services [including the signing of any cautions in accordance with Home Office Guidelines] and, where an alleged offender is being held in custody in relation to an offence, to institute proceedings by way of charge.
- d) That the Head of Legal Services be authorised to seek amendment of the Constitution by the Council in due course: in order to reflect the above changes to the authority's delegation arrangements.

- e) That Members authorise Cardiff City Council, as the Single Licensing Authority for Wales (Rent Smart Wales), to exercise any function of an enforcement authority, in relation to Neath Port Talbot Council's area, for the purposes of the Renting Homes (Fees etc.) (Wales) Act 2019, including (but without limitation) taking enforcement activity and bringing criminal proceedings pursuant to section 19 of that Act.

Reasons for Proposed Decision

To enable the new legislation to be implemented quickly and efficiently. The Environmental Health and Trading Standards service, located within Planning and Public Protection, has responsibility for the enforcement of Housing and Trading Standards legislation.

To ensure that enforcement powers are also delegated to Rent Smart Wales, with whom the department work in partnership, for the enforcement of this legislation.

Implementation of Decision

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

Appendices

Appendix 1– First Stage Integrated Impact Assessment.

List of Background Papers

Renting of Homes (Fees etc.) (Wales) Act 2019.

Officer Contact

Mark Thomas – Environmental Health and Trading Standards Manager
Tel: 01639 685612 or e-mail: m.thomas2@npt.gov.uk

Appendix 1 – Integrated Impact Assessment (IIA)

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

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

Version Control

Version	Author	Job title	Date
Version 1	Mark Thomas	Environmental Health and Trading Standards Manager	4 th June 2021

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Details of the initiative

	Title of the Initiative: Tenant Fee Delegations
1a	Service Area: Environmental Health
1b	Directorate: Environment and Regeneration
1c	Summary of the initiative: The Renting of Homes (Fees etc.) (Wales) Act 2019 came into force on 5 th May 2019. From 1 st September 2019, it bans letting agents and landlords who manage their own properties from charging any fees before, during or after a tenancy unless specifically exempt in the Act. Such a banned payment is called a ‘prohibited payment’.
1d	Is this a ‘strategic decision’? No
1e	Who will be directly affected by this initiative? Landlords, tenants and Letting agents.
1f	When and how were people consulted? This is to implement Welsh Government legislation therefore none was considered necessary.
1g	What were the outcomes of the consultation? N/A

2. Evidence

What evidence was used in assessing the initiative?

N/A

3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			+	It will have no direct impact on protected characteristics.
Disability			+	
Gender reassignment			+	
Marriage & civil partnership			+	
Pregnancy and maternity			+	
Race			+	
Religion or belief			+	
Sex			+	
Sexual orientation			+	

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

NPTCBC will continue to work closely with Rent Smart Wales to regulate the private rented sector.

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

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation			+	Community activities proposed in the project are designed to be inclusive.
To advance equality of opportunity between different groups			+	
To foster good relations between different groups			+	

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What action will be taken to improve positive or mitigate negative impacts?
NPTCBC will continue to work closely with Rent Smart Wales to regulate the private rented sector.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	Positive
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome

NPTCBC will continue to work closely with Rent Smart Wales to regulate the private rented sector.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	+			Enforcement of these new requirements will contribute to more secure tenancies for private tenants.
Social Exclusion	+			Enforcement of these new requirements will contribute to more secure tenancies for private tenants.
Poverty	+			Enforcement of these new requirements will contribute to more secure tenancies for private tenants. Enforcing the requirements of the Act will ensure tenants in private rented sector properties do not have to pay banned payments to landlords and section 21 possessions cannot be pursued by landlord / letting agent in certain circumstances prescribed by the Act.

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

NPTCBC will continue to work closely with Rent Smart Wales to regulate the private rented sector.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: - people's opportunities to use the Welsh language			+	No impact.

- treating the Welsh and English languages equally			+	No impact.
--	--	--	---	------------

What action will be taken to improve positive or mitigate negative impacts?
N/A – no impact.

7. Biodiversity

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

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Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			+	It will have no effect on the biodiversity duty.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			+	It will have no effect on the biodiversity duty.

What action will be taken to improve positive or mitigate negative impacts?
N/A – no impact.

8. Well-being of Future Generations

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

Ways of Working	Details
------------------------	----------------

i. Long term – looking at least 10 years (and up to 25 years) ahead	Enforcement of these new requirements will contribute to more secure tenancies for private tenants.
ii. Prevention – preventing problems occurring or getting worse	Enforcement of these new requirements will contribute to more secure tenancies for private tenants. Enforcing the requirements of the Act will ensure tenants in private rented sector properties do not have to pay banned payments to landlords and section 21 possessions cannot be pursued by landlord / letting agent in certain circumstances prescribed by the Act.
iii. Collaboration – working with other services internal or external	The Council is responsible for enforcing this legislation in partnership with Rent Smart Wales (RSW). All 22 Welsh Councils have agreed to a memorandum of understanding with RSW in relation to the regulation of the private rented Housing sector.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	The legislation has been developed and implemented by Welsh Government.
v. Integration – making connections to maximise contribution to:	Enforcement of these new requirements, which is undertaken by the Council and Rent Smart Wales (as the Single Licencing Authority) will contribute to more secure tenancies for private tenants.
Council's well-being objectives	It is anticipated that the implementation of this legislation will lead to more secure tenancies for private tenants, support people to live active independent lives in their community and tackle poverty.
Other public bodies objectives	It is anticipated that the implementation of this legislation will lead to more secure tenancies for private tenants, support people to live active independent lives in their community and tackle poverty.

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

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

This legislation is implemented by Welsh Government, however the department will monitor compliance as it does with other such enforcement issues and will direct resources accordingly.
--

10. Assessment Conclusions

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

	Conclusion
Equalities	Continue
Socio Economic Disadvantage	Continue
Community Cohesion/ Social Exclusion/Poverty	Continue
Welsh	Continue
Biodiversity	Continue
Well-being of Future Generations	Continue

Overall Conclusion

Please indicate the conclusion reached:

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

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

Continue – Welsh Government have implemented this legislation. The Environmental Health and Trading Standards service located within Planning and Public Protection, has responsibility for the enforcement of Housing and Trading Standards legislation; and to ensure that enforcement powers are also delegated to Rent Smart Wales, with whom the department work in partnership, for the enforcement of this legislation.

11. Actions

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

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
None			

12. Sign off

	Name	Position	Date
Completed by	Mark Thomas	Environmental Health and Trading Standards Manager	4 th June 2021
Signed off by	Ceri Morris	Head of Planning and Public Protection	7 th June 2021



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

Regeneration and Sustainable Development Cabinet Board
30th July 2021

**Joint Report of the Head of Planning and Public Protection –
Ceri Morris and the Head of Streetcare – Mike Roberts**

Matter for Decision

Wards Affected All

NPT Bee Friendly Scheme

Purpose of the Report

To consider and agree the proposed 'NPT Bee Friendly Scheme'.

Executive Summary

In line with other council's across Wales, the proposed scheme aims to increase the area and extent of wildflower grassland (i.e. roadside verges and larger meadow areas which are managed to encourage wildflowers and pollinating insects) in Neath Port Talbot, in support of the Council's Biodiversity Duty Plan and the NPT Nature Recovery Action Plan.

The NPT Bee Friendly Scheme includes grassland areas in council owned/managed sites and roadside verges, and expands on the previous 'Conservation Verges Scheme', which has been in operation since 2004.

This report seeks endorsement of the NPT Bee Friendly Scheme and the adoption of procedures. Please note that there is an All Members Seminar scheduled for Thursday 22nd July at 10am to raise awareness of the scheme.

Background

The Environment (Wales) Act 2016 introduced a duty (the S6 Duty) on public authorities to maintain and enhance biodiversity, thereby promoting the resilience of ecosystems in the exercise of its functions.

The Authority manages a significant amount of land as roadside verge through mowing and there is a significant opportunity to enhance biodiversity and promote the resilience of ecosystems in the County Borough through a change in management of some of this area.

This scheme expands on the previous 'Conservation Verges Scheme' which has been in operation since 2004.

This scheme adopts the management of the sites from the Conservation Verges Scheme and proposes a change of management on additional sites to encourage wildflower grasslands to develop. The NPT Bee Friendly Scheme brings together these sites into a cohesive scheme.

NPT Bee Friendly Scheme

The proposal for the NPT Bee Friendly Scheme is included in full in **Appendix 2**. The scheme has been prepared jointly by the Neighbourhood Services and Countryside and Wildlife Teams, in consultation with other sections across the Council, with the aim of increasing the area and extent of wildflower grassland in Neath Port Talbot.

It is proposed that by 2026 all verges along adopted roads and all Council owned/managed grassland areas will be categorised and managed as Nectar Cut, Conservation Cut, Meadow Cut, Visibility Splay or Amenity Cut. Further explanations of these categorisations are available in **Appendix 2**.

Advice and guidance on implementation of the scheme will be undertaken by the joint working group of Neighbourhood Services and Countryside and Wildlife Team.

Implications

There will be a change of approach to the management of certain council managed sites and this will have certain implications on council services and operations, for example, slightly increased workloads at certain times of year and additional machinery costs. There is a phased approach to the scheme (outlined in **Appendix 2**), allowing time to adapt to changes in staff practices and to adopt a gradual process of change of machinery as replacement becomes necessary.

The public will notice a change in certain areas to a more diverse display of

wildflowers. Expectations will be managed through publication of the scheme online, which includes Frequently Asked Questions and details of species to look for.

The intended outcomes will be subject to monitoring in line with standard monitoring methodology.

Adoption and Publication Procedures

If approved, the NPT Bee Friendly Scheme would be made available on the Council's website. In accordance with the Council's Welsh Language Standards Policy, the document would be made available in Welsh.

Hard copies of the NPT Bee Friendly Scheme will also be available for purchase at a reasonable charge. In common with previous practice, it is suggested that the price be based on the cost of printing together with post and package at the prevailing cost. Electronic copies will be made available at no cost.

Financial Impacts

The scheme will be limited to ensure that it works within current Streetcare budgets or available grants. It is not anticipated that there will be a financial burden on the Council caused by the changes proposed in the initial phases of the scheme. However, this will be monitored and kept under review. As the scheme progresses sites will be added gradually in phases, with learning from the initial phases informing the suitability of adding further sites and avoiding financial burden.

External funding was secured for the purchase of one of the required cut and collect machines in 2020. Additional funding has been offered to purchase another machine in 2021. If the scheme expands in future years, it is possible that additional machinery may be required. These will be purchased through further external funding if required, or as alternative equipment to any no longer needed.

In places, it may be necessary to pay for additional machinery and operators to remove the cuttings from site (i.e. if there is nowhere to hide a compost heap). This cost will be covered by the Countryside & Wildlife Team if necessary. The benefits of any additional expenditure will be kept under review and site proposals amended as necessary.

Integrated Impact Assessment

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh

Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment (presented in **Appendix 1**) has indicated that a more in-depth assessment is not required. A summary is included below.

The NPT Bee Friendly scheme as proposed would make a positive contribution to biodiversity conservation and enhancement in NPT, which has knock on positive outcomes for people in the County Borough, particularly in relation to health and wellbeing. The scheme would contribute to helping the Council comply with its statutory duty under the Environment Wales Act and particularly contribute to the Resilient Wales Goal of the Wellbeing of Future Generations Act as well as the Council Wellbeing objectives.

Biodiversity affects all generations and all areas of society. Implementation of this scheme would be inclusive and as such would support equality and social cohesion. The scheme and any communications about it would be provided in Welsh as well as English. Through the conservation of biodiversity, the health and wellbeing of the people of NPT would benefit, particularly communities of high deprivation and health inequalities, for example, providing increased opportunities for people to connect with nature and access/see biodiverse green space.

Valleys Communities Impacts

There will be an improvement to the environment and health and wellbeing of Valleys Communities associated with this scheme, as there will be sites in the Valleys included.

Workforce Impacts

There are currently no anticipated workforce impacts associated with the initial phases of this scheme as there will be no staffing changes, albeit the balance and timing of work done by some staff may change. However, work impacts will be monitored and kept under review as the scheme progresses and further sites are added.

Legal Impacts

There is a potential failure to comply with the Biodiversity Duty under the Environment (Wales) Act 2016 if the scheme is not implemented.

Risk Management Impacts

The Council will be failing to comply with the Biodiversity Duty Plan should there be a failure to adopt the proposed scheme, which would be subject to reporting to Welsh Government.

Continued decline of biodiversity and failure to respond to the nature emergency as declared by Welsh Government on 30th June 2021.

Consultation

There is no requirement for external consultation on this item.

The scheme has been the subject of internal consultation and the scheme itself includes a mechanism for consultation on individual sites with local members.

Recommendations

Having had due consideration to the Integrated Impact Assessment, it is recommended that:

1. The NPT Bee Friendly scheme as presented in **Appendix 1** is adopted, agreeing to the proposal for changes in management to increase the extent of wildflower grasslands and published on the Council's website.

Reasons for Proposed Decision

The recommendations are needed to ensure compliance with the requirements of the Environment (Wales) Act 2016.

Implementation of Decision

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

Appendices

Appendix 1 – First Stage Integrated Impact Assessment.

Appendix 2 – NPT Bee Friendly; Our Approach to Managing Verges and Grasslands in NPT.

List of Background Papers

Environment (Wales) Act 2016.

Well-Being of Future Generations (Wales) Act 2015.

Nature Recovery Plan for Wales 2015.

Officer Contacts

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Andrew Lewis – Waste and Neighbourhood Services Manager [Tel: 01639 686021 / E-mail: a.lewis@npt.gov.uk]

Rebecca Sharp – Countryside and Wildlife Team Leader [Tel: 01639 686149 / E-mail: r.sharp@npt.gov.uk]

Appendix 1

NPT Bee Friendly Scheme
Integrated Impact Assessment (IIA)

Integrated Impact Assessment (IIA)

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

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

Version Control

Version	Author	Job title	Date
Version 1	Rose Revera	Local Nature Partnership Coordinator	15/06/2021

1. Details of the initiative

	Title of the Initiative: NPT Bee Friendly Scheme
1a	Service Area: Planning Policy, Planning and Public Protection and Streetcare Divisions
1b	Directorate: Environment and Regeneration
1c	Summary of the initiative: To consider and agree the proposed NPT Bee Friendly Scheme and the publication procedures to be implemented.
1d	Is this a 'strategic decision'? No
1e	Who will be directly affected by this initiative? Service Users, Staff, Wider Community
1f	When and how were people consulted? The scheme has been the subject of internal consultation and its final form reflects the outcome of that process.
1g	What were the outcomes of the consultation? Internal departments have produced the scheme together.

2. Evidence

What evidence was used in assessing the initiative?

This scheme is a requirement of the Biodiversity Duty Plan 2020-2023 under the Environment (Wales) Act 2016 and has been steered by the Welsh Government objectives as set out in the Nature Recovery Action Plan (2015) and The Action Plan for Pollinators in Wales.

3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Disability			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Gender reassignment			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Marriage & civil partnership			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring

				communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Pregnancy and maternity			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Race			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Religion or belief			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Sex			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Sexual orientation			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.

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

N/A

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

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
To advance equality of opportunity between different groups			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
To foster good relations between different groups			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.

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

N/A

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature.

	Research states being close to nature improves mental health and wellbeing. As such biodiversity recovery can contribute to health inequalities in deprived areas.
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome
N/A

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Social Exclusion			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.
Poverty			✓	Neutral Impact - Biodiversity affects all generations and all areas of society. The increase in area and extent of wildflower grassland will be beneficial for all ages and will bring communities closer to nature. Research states being close to nature improves mental health and wellbeing.

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

Implementation of the scheme will be inclusive and will involve the Countryside and Wildlife Team (C&WT) and Streetcare working with all staff/sections throughout the Council, the wider public and a wide range of partner organisations including those from the public, private and community/voluntary sectors.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language			✓	The scheme and associated publications will be provided in English and Welsh. As all of the technical names of species and habitats are required to be translated by the Regulations, as a result, it is felt that the opportunity for people to use and expand upon their Welsh Language vocabulary has increased providing a positive impact (albeit low) on people’s use of the Welsh language.
– treating the Welsh and English languages equally			✓	The scheme and associated publications will be provided in English and Welsh. As all of the technical names of species and habitats are required to be translated by the Regulations, as a result, it is felt that the opportunity for people to use and expand upon their Welsh Language vocabulary has increased providing a positive impact (albeit low) on people’s use of the Welsh language.

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

All public communications will be bi-lingual.

7. Biodiversity

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

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity	✓			<p>This is an action of the Biodiversity Duty Plan 2020 - 2023.</p> <ul style="list-style-type: none"> Action 6.5 Nature Conservation Sites Scheme Undertake a review of the Nature Conservation Sites Scheme to include management of all verges and of key council owned sites. <p>This action is contributing to ensure that the Authority meets its statutory duty to maintain and enhance biodiversity as set out within the Environment (Wales) 2016 Act.</p>
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.	✓			<p>This is an action of the Biodiversity Duty Plan 2020 - 2023.</p> <ul style="list-style-type: none"> Action 6.5 Nature Conservation Sites Scheme Undertake a review of the Nature Conservation Sites Scheme to include management of all verges and of key council owned sites. <p>This action is contributing to ensure that the Authority meets its statutory duty to maintain and enhance biodiversity as set out within the Environment (Wales) 2016 Act.</p> <p>Increasing the area of wildflower grassland and improving the management, as prescribed through this scheme, will directly promote ecosystem resilience by improving the diversity, extent, condition and connectivity of grassland ecosystems in NPT.</p>

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

Increasing the area of wildflower grassland and improving the management, as prescribed through this scheme, will directly promote ecosystem resilience by improving the diversity, extent, condition and connectivity of grassland ecosystems in NPT.

8. Well-being of Future Generations

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

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	Adoption of this scheme will embed biodiversity management into the council’s way of working long-term. Grassland areas will be managed for biodiversity unless there is a valid reason why they shouldn’t be (i.e. visibility splay/ amenity). Conserving and enhancing Biodiversity now will benefit the long term well-being of future generations.
ii. Prevention – preventing problems occurring or getting worse	The scheme requires regular meetings of a working group who will be able to identify and address problems early. The working group provides the mechanism to ensure the NPT Bee Friendly scheme is fit for purpose and responsive to changes in circumstances. Member consultation is key to the scheme and there is a mechanism for sites to be classified differently where necessary, allowing for problems to be prevented from occurring or getting worse.
iii. Collaboration – working with other services internal or external	This is a cross-boundary collaborative scheme between the Countryside & Wildlife Team and Neighbourhood Teams.
iv. Involvement – involving people, ensuring they reflect the diversity of the population	The scheme has arisen from a working group of Countryside & Wildlife and Neighbourhood staff, where issues are raised, information disseminated and best practice shared.

v. Integration – making connections to maximise contribution to:	
Council’s well-being objectives	Positive action on biodiversity is far reaching and all-encompassing and therefore will have a positive impact on the Council’s wellbeing objectives. A species and habitat-rich environment will ultimately improve the well-being of children, young people and all adults living in NPT and beyond.
Other public bodies objectives	

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

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

Monitoring of the scheme will be undertaken by the working group who meet regularly to ensure the scheme is fit for purpose and responsive to changes in circumstances.

10. Assessment Conclusions

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

	Conclusion
Equalities	Biodiversity affects all generations and all areas of society. Implementation of this scheme will be inclusive and will involve the Countryside and Wildlife Team working with Neighbourhood Teams as well all staff/sections

	throughout the Council, members, the wider public and at times other partner organisations including those from the public, private and community/voluntary sectors.
Socio Economic Disadvantage	Biodiversity affects all generations and all areas of society. Research states being close to nature improves mental health and wellbeing. As such biodiversity recovery, such as that which will be achieved through the scheme, can contribute to health inequalities in deprived areas.
Community Cohesion/ Social Exclusion/Poverty	Biodiversity affects all generations and all areas of society. Implementation of this scheme will be inclusive and will involve the Countryside and Wildlife Team working with Neighbourhood Teams as well all staff/sections throughout the Council, members, the wider public and at times other partner organisations including those from the public, private and community/voluntary sectors.
Welsh	All communication via the Authority's social media platforms and websites; radio broadcasts and reports etc... are translated into Welsh and the technical names of species and habitats are also translated which increases people's opportunity to use and expand upon their Welsh Language vocabulary. Any publications for the scheme will be produced in English and Welsh.
Biodiversity	<p>This scheme is an action of the Biodiversity Duty Plan 2020 - 2023.</p> <ul style="list-style-type: none"> • Action 6.5 Nature Conservation Sites Scheme Undertake a review of the Nature Conservation Sites Scheme to include management of all verges and of key council owned sites. <p>This action is contributing to ensure that the Authority meets its statutory duty to maintain and enhance biodiversity as set out within the Environment (Wales) 2016 Act.</p> <p>Increasing the area of wildflower grassland and improving the management, as prescribed through this scheme, will directly promote ecosystem resilience by improving the diversity, extent, condition and connectivity of grassland ecosystems in NPT.</p>
Well-being of Future Generations	The NPT Bee Friendly scheme embraces all five ways of working.

Overall Conclusion

Please indicate the conclusion reached:

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

- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified



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

The NPT Bee Friendly scheme will make a positive contribution to biodiversity conservation and enhancement in NPT, which have knock on positive outcomes for people in the county, particularly in relation to health and wellbeing. The scheme will contribute to helping the Council comply with its statutory duty under the Environment Wales Act and particularly contribute to the Resilient Wales Goal of the Wellbeing of Future Generations Act as well as the Council Wellbeing objectives.

Biodiversity affects all generations and all areas of society. Implementation of the scheme will be inclusive and as such will support equality and social cohesion. The plan and any communications about it will be provided in Welsh as well as English. Through the conservation of biodiversity and the health and wellbeing and other services the people of NPT will benefit, particularly communities of high deprivation and health equalities.

11. Actions

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

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?

12. Sign off

	Name	Position	Date
Completed by	Rose Revera	LNP Coordinator	15/06/21
Signed off by	Ceri Morris	Head of Service/Director	07/07/21

Appendix 2

NPT Bee Friendly Scheme
Our Approach to Managing Verges and Grasslands in NPT



Caru Gwenyn CNPT NPT Bee Friendly



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Cymraeg
Our approach to managing verges and
grasslands in NPT

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Figure 1. Orchids which appeared in a verge in Longford when mowing was paused due to COVID restrictions. June 2021.

A new approach to managing verges and grasslands in NPT

In recent years, the loss of wildflower grassland habitat and the pollinating insects they support has become an issue of public concern. NPT Council has a responsibility to address the nature and climate emergencies and is also committed to *protect, conserve and enhance our natural environment* under the terms of the Corporate Plan, Biodiversity Duty Plan, NPT Nature Recovery Action Plan and Wales Pollinator Action Plan.

A new approach to managing the verges and grasslands of NPT has been approved by the County Council's Regeneration and Sustainable Development Cabinet Board on 30th July 2021 and is being progressively implemented as resources allow.

The principles of this approach are:

- To increase the area and extent of wildflower grassland (i.e. roadside verges and larger meadow areas which are managed to encourage wildflowers and pollinating insects) in Neath Port Talbot County Borough, in support of the Council's Biodiversity Duty and the NPT Nature Recovery Action Plan.
- To favour change of management over seeding or planting where possible, in order to encourage the native seed bank to flourish without introducing non-native species or those which would not naturally occur in the area
- To classify all verges in NPT by 2026 under one of the following categories. More information on each category is provided later on in this document.
 - a. Nectar Cut
 - b. Conservation Cut
 - c. Meadow Cut
 - d. Visibility Splay
 - e. Amenity Cut
- To keep the local communities of NPT informed and updated

The NPT Bee Friendly Scheme includes grassland areas in publically owned sites and roadside verges, and expands on the previous 'Conservation Verges Scheme', which has been in operation since 2004.



Figure 2. The Harbour Way verges past TATA Steelworks

How grassland ecosystems function

High quality (i.e. high species diversity) wildflower grasslands exist naturally on low nutrient soils, where management ensures that the soil nutrients do not allow more competitive plants such as nettles and grasses to dominate. The exact nature of these grasslands depends on a number of factors, including soil type and water content. In NPT, we have a number of different grassland habitats, including neutral grassland, marshy grassland and acid grassland.

Wildflower grasslands require management, traditionally through cutting or grazing, to prevent them from becoming rank (nutrient enriched) and eventually succeeding to woodland.

In order to ensure that a wildflower grassland has high species diversity, the arisings (cut material) need to be removed following cutting to keep the soil nutrients low and the grassland needs to be left to flower for the entire flowering season until seeding is completed, usually between April and August. The arisings can be piled into compost heaps to create habitat for species such as grass snakes, made into hay or taken away for green waste recycling.



Figure 3. Neutral Grassland Maerdy Playing Fields



Figure 4. Marshy Grassland



Figure 5. Ragged Robin and Meadow Buttercup overlooked by the Steelworks

How our management is changing

Traditionally, our roadside verges in NPT are all cut every 2-3 weeks during the growing season i.e. late March to end September and the arisings are mulched and dropped on top of the grass. This fertilises the soil, encouraging further grass growth. As of 2021, at certain locations with the Streetcare Services Section, we will be changing this management and instead encouraging the growth of wildflowers and reducing the frequency of required cuts through the use of 'cut and collect' machines.



Figure 6. A Cut and Collect machine in action

Traditional 'Cut and Fly' management	'Cut and Collect' management
<ol style="list-style-type: none"> 1. Mower mulches as it mows, returning the nutrients to the soil 2. More grass grows, more quickly, outcompeting other species 3. Mowing needed again within 2-3 weeks 	<ol style="list-style-type: none"> 1. Mower collects arisings as it mows, gradually reducing the amount of nutrient that fuels grass growth 2. Grass growth is less vigorous, reducing the frequency that mowing is required and increasing the diversity of wildflowers

As well as managing grasslands on publically owned sites to encourage wildflowers, the intention is that by the end of five years, all verges in NPT will be managed in one of the following ways:

- 'Nectar Cut'

All verges where a short sward is desirable will be changed from a 2-3 weekly cycle of mowing to a four-weekly cycle, allowing short-flowering plants to complete their full flowering cycle and increasing the nectar available to insects. Where possible, the arisings will be removed to reduce the nutrient content of the soil. This is based on research by Plantlife (Plantlife No Mow May 2020NB1). Whilst this cycle will still result in short flowering species being cut, the scheme will work on the principle that there will remain a sufficient nectar source in the wider area to provide a net gain for pollinators.

- 'Conservation Cut'

Certain rural verges e.g. lanes between villages, which will not be cut inside the flowering season (April-September). We will aspire to include as many verges in this classification as possible within workforce constraints.

- 'Meadow Cut'

As conservation cut but certain sites will be cherry picked for meadow management i.e. cut using a cut-and-collect machine, arisings left in piles on site, no mowing between April and August and edge-cuts to maintain a neat appearance. Any such designation will be dependent on suitability of the verge for depositing of arisings.

- 'Visibility Splay'

Cut as regularly as required.

- 'Amenity Cut'

Verges which are used as public open space and require regular mowing.

In the first year (2021), a number of sites in each ward will be identified in order to trial this scheme. Sites are agreed between Neighbourhood Services staff and the Countryside and Wildlife Team and then approved by the local member before inclusion in the scheme.

At the end of 2021, targets will be set for increase each year, leading to the fifth year, by which time all verges will be classified and managed appropriately. Areas can be re-classified if required in response to monitoring.

The initial priority will be to increase the number of meadow cut verges and undertake trials of the Nectar Cut approach before rolling out further. We will take a phased approach to the changes, allowing time to adapt to member feedback / concern, changes in staff practices and to adopt a gradual process of change of machinery as replacement becomes necessary.

What to expect

With the adoption of a change of management to Nectar Cut, Meadow Cut or Conservation Cut, you can expect more wildflowers!

You may start to see the following wildflowers appearing in your local verge. The specific species you may see depends on factors such as soil type and time of year, and will vary across the county.



Bee Orchid
Ophrys apifera



Dandelion
Taraxacum officinale
agg



Bird's Foot Trefoil
Lotus corniculatus



Cat's-ear
Hypochaeris radicata



Black Knapweed
Centaurea nigra



Common vetch
Vicia sativa



Cowslip
Primula veris



Cuckoo Flower
Cardamine pratensis



Devil's-bit scabious
Succisa pratensis



Common fleabane
Pulicaria dysentrica



Herb-robert
Geranium robertianum



Kidney vetch
Anthyllis vulneraria



Southern marsh-orchid
Dactylorhiza
praetermissa



Ox-eye Daisy
Leucanthemum
vulgare



Teasel
Dipsacus fullonum



Yarrow
Achillea millefolium

We'd love to see what's popping up in your verges and grassland areas!

What not to expect

We will not be using seed mixes such as that pictured on the right. Whilst initially pretty to look at, these mixes have limited benefit for nature. Some of the issues with the use of these seed mixes are outlined below:



Figure 7. What not to expect- annual seed mixes

- These are annual mixes which require renewing each year, which involves repeated use of herbicide, soil disturbance and re-seeding. The use of herbicide should always be avoided when possible. This method is unsustainable in the long term.
- The large majority of the brightly coloured species in annual seed mixes are non-native species which would not naturally occur in NPT (or even in the UK!). This can displace the distinctive native wildflowers which are already in the seed bank and erode the wonderful local distinctive wildflower diversity which we are lucky enough to have in NPT. Non-native species can even become highly invasive if introduced in the wrong place, causing a significant pressure to the local biodiversity.
- Many of our special pollinators are limited in range and specially adapted to feed from specific plants. Pollinators thrive on the flowers which are native to the same region as they are i.e. those to which they are best adapted. Introducing seed mixes containing species that are not generally found in that region therefore can have little to no benefit to the native pollinators of that region.

Therefore, our aim is to encourage the native seed bank to flourish through a change in management. This is the most sustainable method of increasing the area and extent of wildflower grasslands in NPT. You will often be surprised by what pops up, such as the orchids which appeared in this verge in Longford when mowing was paused due to COVID lockdown restrictions!



Figure 8. Orchids on Heol Heddwch, Longford

The Benefits



Figure 9. The benefits of a change in management to 'Cut and Collect' i.e. Meadow Cut

a. Costs

We are hopeful that over time, this approach will free up more resources to attend to other street care needs such as litter, flytipping and sign cleaning, although there may initially be initial outlays, for example, for disposal of green waste and initial machinery purchases. We have already purchased one cut and collect machine via the Welsh Government Local Places for Nature Fund. There may also be hidden dividends from this approach through redeploying our in-house teams to other Streetcare tasks such as litter picking. Financial and workforce resource requirements will be monitored and kept under review as the scheme progresses. If ultimately it leads to a saving then all the better.

b. Improved environment

As soil nutrients decrease in a grassland ecosystem, the number of plant species that can survive increases, and the dominance of coarse grasses reduces. This produces a more diverse roadside environment for wildlife and adds to the biodiversity of the area.

This can already be seen in practice in NPT on Harbour Way and Fabian Way, where this management has been in place for a number of years under the Conservation Sites Scheme. These stretches of road are attractive to both road users and pollinators. In fact, they are also likely to support populations of the endangered Shril Carder Bee, which can be found in the coastal regions of the county.

Branding

Roadside verges and grasslands included in the NPT Bee Friendly Scheme will be marked with the following logo, featuring the endangered Shril Carder Bee.



Who manages the verges?

The NPT Bee Friendly sites are managed by our Neighbourhood Services teams with support from the Countryside and Wildlife Team, whilst policy with regard to the scheme is coordinated by the Countryside and Wildlife section and queries in relation to this scheme can be made by contacting environment@npt.gov.uk

Working with communities

We are keen to hear from any local community about how they think they can help us with the ecological approach to verge management in their area. We ask you to let us know:

- Where you think an area would benefit from less cutting or where cutting is unnecessary
- If your community would like to take on management of the verges in line with the ecological approach
- If you would like to volunteer to help us look after one of the special NPT Bee Friendly Verges
- If you know of areas in your community that we currently mow regularly that would be suitable to establish a NPT Bee Friendly Verge

Frequently Asked Questions

Do you have a question? We have done our best to answer examples of the most frequently asked questions below. If you cannot find the answer you require, please do not hesitate to get in touch.

a. *Why bother changing management, isn't it fine as it is?*

Closely mown grass unfortunately has little to no benefit for nature. Pollinators across the UK are in trouble due to pressures such as pesticide use and loss of habitat. For example, since the end of the war, 97% of wildflower meadows in the UK have been lost – a very stark statistic. We rely on pollinators for our food supply chain and we need to provide them with homes and places to feed to ensure their survival.

The council manages a significant amount of land as roadside verge through mowing and there is a significant opportunity to enhance biodiversity and provide homes for these pollinators in the county through a change of management on some of this area.

It is important to contribute to tackling the nature and climate crisis by enhancing nature where we can on public land. The council also has a duty to protect, conserve and enhance our natural environment under the terms of the Corporate Plan, Biodiversity Duty Plan, NPT Nature Recovery Action Plan and Wales Pollinator Action Plan.

Improving the extent and condition of wildflower grassland will also have benefits for wellbeing of communities, as research has proven that being close to nature improves mental health and wellbeing.



Figure 10. Common Blue butterfly feeding on buttercup

b. *Do you have to cut and collect?*

Collecting the arisings reduces nutrient levels and prevents a thick thatch from forming. This allows wildflower seeds to germinate and prevents vigorous competitive species from dominating. Over time, removing the cuttings makes verges easier to manage as reduced nutrient levels means that slower growing flower species start to replace lush grass growth.

c. *Will road safety be compromised?*

No. Safety will always come first, which means some areas will still be regularly mown as visibility splays.

d. *Is this just a cost-cutting exercise?*

Not at all. Whilst ultimately over time this approach may lead to a cost saving for NPT Council, the reduction in frequency of required mowing should allow more resources to be focused on other street care needs, such as litter removal and sign cleaning. In the short term, although there may be a reduction in cutting in some particular areas at particular times of the year, there is still a cost involved in collecting arisings, maintaining machinery and in some cases, removing arisings from site. There will be no immediate saving to the council from the scheme.

e. *Won't it look untidy?*

Nature by definition isn't neat! For some, seeing areas being left to grow longer may take some getting used to. However, we believe that we should be doing what we can to help pollinators and we will aim to maintain 'edge cuts' on some of the areas, where path and road edges will be mown to maintain a neat appearance.



Figure 11. A neat edge cut will be maintained on many of these areas

f. *Why have the flowers in an area of my community been mown?*

NPT Bee Friendly is a new scheme (since 2021) and it may just be that we are unaware of the area. Get in touch to suggest the site to us by emailing environment@npt.gov.uk

g. *Can I plant wildflower seeds in my community?*

Due to the reasons outlined in Section 5 of this document, we favour change of management over seeding or planting where possible, in order to encourage the native seed bank to flourish without introducing non-native species or those which would not naturally occur in the area.

If after three years of management through cut and collect, the area is showing no signs of increasing in wildflower diversity, we may consider assisting the establishment of wildflowers by sourcing plug plants, green hay or seeds of local origin. Please contact the Countryside and Wildlife Team for information on this or to express an interest in assisting with this if it is required.

h. *How do I know if an area in my community is included in the scheme?*

In most cases, Meadow Cut areas will be marked with the NPT Bee Friendly Logo but if this is not present, please get in touch to check if an area is included in the scheme.

i. *I'm a hay fever sufferer, will this make it worse?*

No, hay fever is mainly caused by grasses and managing with cut and collect machinery will reduce the nutrients and lead to a reduction in grasses and an increase in wildflowers. Wildflowers are pollinated by insects rather than wind, so they do not release their pollen in the same way as grasses and trees.

j. *Can I suggest an additional site?*

Of course! Just get in touch on the email address below. Please bear in mind that there are restrictions which may prevent the area from being included in the scheme, including safety or amenity reasons. Additionally, we are only able to include local authority owned land.

k. *Can I request that a site is removed from the scheme?*

Of course, if you would like to discuss this for a particular area, please get in touch.

Monitoring

We will be monitoring these areas for biodiversity benefit in line with standard methodology. Financial and staff resource requirements will also be monitored and kept under review. The results of all monitoring will inform how the scheme develops and is implemented.

Complaints & compliments

We receive varying numbers of complaints each year from the public dissatisfied with the amount or timing of grass verge maintenance we undertake. Verge management is something of a no-win situation as some feedback is of the view that the grass is cut too little whilst other feedback is concerned the grass was cut too early for wildflowers to set seed, or was not cut early enough in the season, or the grass had been cut but the arisings left behind causing a mess.

We are open to adding new verges and grassland areas to the scheme at any point and the inclusion of a particular area in the scheme will also be reviewed if a significant number of complaints are received. It is noted however that because changing verge management can effect working and resource patterns, the introduction of new verges into the scheme may need to wait to the start of the next growing season.

Contacting Us

Please contact us via environment@npt.gov.uk – Subject Title ‘NPT Bee Friendly’

Reviewing the scheme

The scheme will be reviewed every five years.

References and further sources of information

- [NPT Bee Friendly Webpage](#)
- [Plantlife Road Verge Campaign](#)
- [Plantlife No Mow May](#)- How to get more flowers in your lawn
- [Magnificent Meadows](#)



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

Regeneration and Sustainable Development Cabinet Board
30th July 2021

Report of the Head of Planning and Public Protection
Ceri Morris

Matter for Decision

Wards Affected: All Wards

Neath Port Talbot Replacement Local Development Plan (RLDP) 2021-2036 – Consideration of:

- 1. The RLDP Consultation Draft Delivery Agreement;**
- 2. The RLDP Consultation Draft Integrated Sustainability Appraisal (ISA) Scoping Report; and**
- 3. The publication / consultation procedures to be implemented.**

Purpose of the Report

To consider and agree the RLDP Consultation Draft Delivery Agreement (DA) and the RLDP Consultation Draft Integrated Sustainability Appraisal (ISA), along with the publication / consultation procedures to be implemented.

Executive Summary

The Neath Port Talbot LDP (2011-2026) sets the framework for the development and use of land up to 2026. The Council has an obligation to undertake a full review of the LDP at intervals not longer than every four years from initial adoption and the LDP Review Report was therefore published in July 2020.

The next step is to finalise the Delivery Agreement for the Replacement LDP setting out (in agreement with Welsh Government) the review timetable, the Community Involvement Scheme (CIS) (establishing how

and when the local community and other stakeholders can become engaged in the LDP process) and the resources the Council will commit to preparing the RLDP.

The formal agreement of the final DA with WG will mark the start of the plan preparation / revision process, committing the Local Planning Authority (LPA) to produce its Replacement Plan according to the stated timescales and consultation processes.

This report therefore seeks endorsement of the Consultation Draft Replacement LDP Delivery Agreement and the approval of the consultation arrangements.

The RLDP will also need to be subject to an Integrated Sustainability Appraisal (ISA) in order to give full consideration to its potential impacts on the people of Neath Port Talbot, their well-being, and the environment. The first stage of the ISA is the preparation of a Scoping Report which sets out the procedures which will be followed and the overall scope of the appraisal. This report also seeks endorsement of the draft ISA Scoping Report.

Background

The Neath Port Talbot LDP (2011-2026), formally adopted by the Council on 27th January 2016, sets the policy framework for the development and use of land up to 2026. This plan will remain part of the 'Development Plan' for the County Borough until either the Replacement LDP is adopted or the 31st December 2026, whichever is sooner.

An up-to-date LDP is an essential part of the plan-led planning system in Wales. The Council therefore has a statutory obligation to both monitor the implementation and performance of the LDP on an annual basis and to undertake a full review of the adopted Plan at intervals not longer than every four years from initial adoption.

The Covid-19 pandemic has however restricted the movement of people, accessibility to public buildings and the ability to undertake public engagement events. This has meant that the Delivery Agreement could not be finalised last year as planned. Now, however, it is considered that sufficient progress has been made in dealing with the pandemic and its implications for a realistic Delivery Agreement to be finalised.

Members will recall that the LDP Review Report was approved for publication in July 2020, constituting the first stage of the process of preparing the Replacement LDP (2021-2036).

In accordance with section 63 of the 2004 Planning and Compulsory Purchase Act, the Council must now publish and agree the RLDP Delivery Agreement with the WG. Ultimately and in accordance with LDP Regulation 9, the DA (including the CIS and timetable) must be approved by Council resolution before submission to the Welsh Government (WG). The post-consultation draft DA will therefore be presented to Council in advance of formal submission to WG.

Replacement LDP – Delivery Agreement (DA)

The Delivery Agreement comprises of:

1. The **Timetable** setting out key stages of preparing the RLDP; and
2. The **Community Involvement Scheme (CIS)**, which sets out how and when stakeholders and the community will be engaged in the plan preparation process.

The DA will be subject to a public consultation prior to being sent to WG for agreement. Whilst there is no statutory requirement to formally consult on the preparation of a DA, it is common practice across Wales to do so. A six week consultation period is therefore proposed.

The Replacement LDP Consultation Draft DA is presented in full in Appendix 2 and is structured into the following four parts:

- ***PART 1: Introduction and Background*** – setting out the structure of the DA.
- ***PART 2: RLDP Timetable and the Community Involvement Scheme (CIS)*** – setting out the stages, timeline and resources required for plan preparation and the key principles for engagement and community involvement.
- ***PART 3: Monitoring and Review*** – detailing how the DA will be kept under review.

Timetable and Resources

The timetable commits the Council to preparing its Replacement Plan within the identified timescales and has been prepared to align with WG expectations that plans should be developed and adopted within 3.5 years, with a permitted slippage of 3 months.

The timetable (refer to Section 4.1 of the DA) sets out the key dates in the plan preparation process, including statutory consultation periods and the parallel stages of the Integrated Sustainability Appraisal (ISA). The

timetable illustrates the main stages of plan preparation and is divided into the following:

- *Definitive Stages*: those stages up to the statutory Deposit stage, which the Council has control of; and
- *Indicative Stages*: those stages after the statutory Deposit stage, which are influenced by factors outside of the control of the Council.

The DA commits the Council to provide the resources necessary to deliver the RLDP within the specified timeframe including staffing levels and budgetary resources. It identifies the officers that will be dedicated to producing the RLDP and sets out the potential risks and proposed mitigation measures associated with the delivery.

The timetable estimates that the RLDP will be adopted in July 2025, which represents a realistic yet challenging timetable. The DA will need to be monitored throughout the RLDP process, to ensure that there are sufficient resources available to meet the specified timetable.

Community Involvement Scheme (CIS)

The CIS sets out how and at what stages the Council will involve the community and stakeholders.

Community involvement is a critical element in producing a robust, sound plan, to ensure the local community has ownership and have their views incorporated into the plan. The CIS sets out the importance of engagement and identifies external organisations, groups and agencies that will be consulted. The CIS list is not exhaustive and new consultees and interested parties may be added at any time throughout the process.

Integrated Sustainability Appraisal (ISA) Scoping Report

The RLDP will need to be subject to an Integrated Sustainability Appraisal (ISA) in order to give full consideration to its potential impacts on the people of Neath Port Talbot, their well-being, and the environment.

The first stage of the ISA process is to prepare the draft ISA Scoping Report. This report provides a review of other plans, policies and strategies likely to influence the LDP and ISA process and includes relevant baseline information that will inform the assessment together with the ISA Assessment Framework to be used in the appraisal of proposed RLDP policies and proposals. The draft ISA Scoping Report is attached at Appendix 3.

Members should note that the ISA is all-encompassing and incorporates the following statutory and non-statutory assessment processes:

- **Sustainability Appraisal (SA)** as required under the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') and the Development Planning (Wales) Regulations 2005 ('the 2005 Regulations').
- **Strategic Environmental Assessment (SEA)** as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations').
- Supporting the implementation of **wellbeing goals and wellbeing objectives** (and the discharge of associated duties) as required under **the Wellbeing of Future Generations (Wales) Act 2015**. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being.
- **Equalities Impact Assessment (EqIA)** under the Equality Act 2010 – covering the Public Sector Equality Duty and the Socio-economic Duty.
- **Health Impact Assessment (HIA)** – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and
- **Welsh Language Impact Assessment** as required under the 2004 Act, the Welsh Language Standards (No.1) Regulations 2015 and PPW 11th Edition.

Publication and Consultation Procedures

A **6 week** public consultation and a targeted consultation with a range of specific and general stakeholder bodies (refer to DA Appendices F & G) is proposed for the DA consultation. The consultation period will run **from 16th August 2021 to 27th September 2021**.

The draft ISA Scoping Report will be made publicly available on the LDP website during the same period, with comments invited from the public, and consultation will be undertaken with the statutory consultation bodies (Cadw and Natural Resources Wales (NRW)).

Representations received will be considered by Cabinet Board / Council together with any amendments needed to both documents prior to final publication. Following formal approval by Council, the DA will be submitted to WG, who then have one month to either agree the contents or notify the Council that they require more time to consider the document.

Once agreement has been received from WG, the DA will be published on the Council's website and the RLDP will be prepared in accordance with its contents. The finalised ISA Scoping Report will also be published at this

time, and the RLDP will be assessed in accordance with the procedures contained in the report.

In accordance with the Council's Welsh Language Standards Policy all relevant documents and publicity / communication will be bilingual or issued in both Welsh and English.

Both documents will also be available for purchase at a reasonable charge. In common with previous practice, it is suggested that the price be based on the cost of printing together with post and package at the prevailing cost. Electronic copies will be made available at no cost.

Financial Impacts

The decisions at this stage will incur expenditure in relation to the publication and consultation procedures. These costs will be accommodated within existing budgets.

The cost of the LDP Review will be met from the LDP budget and carried out by the LDP team with expert advice and evidence procured from consultants and through collaboration with neighbouring authorities as required. The resources required to prepare the Replacement LDP are set out in section 6.4 of the Consultation Draft DA.

It should also be recognised that the demands on the RLDP budget will be influenced by factors outside the control of the Council, including the number and nature of objections received, the sites put forward for development consideration, the length of the Examination in Public and whether or not issues emerge that require expert advice and evidence procured from external sources.

Integrated Impact Assessment (IIA)

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

The first stage assessment, attached at Appendix 1 has indicated that a more in-depth assessment of the DA is not required. A summary is included below:

- **Equalities** – The RLDP DA is part of a process intended to ensure that the RLDP embodies consideration of equalities issues from the start of its preparation, throughout the processes and procedures that govern its preparation and in all its resulting strategies and

policies, thereby ensuring that local planning policy within NPT fully embraces all equalities considerations.

- **Welsh Language** – The draft RLDP DA has been prepared in accordance with the Welsh Language Standards (No. 1) Regulations 2015 and the proposed consultation on its content embodies the principles of the regulations. The DA will help to ensure that the RLDP also takes into account Welsh Language requirements in its preparation and contents.
- **Biodiversity** – In itself, the RLDP DA will have a negligible effect on biodiversity, but it will help to ensure that the RLDP takes full account of all duties and requirements to maintain and enhance biodiversity and promote the resilience of ecosystems through its planning strategies and policies.
- **Well-being of Future Generation (5 ways of Working)** – the RLDP DA embraces all five ways of working. The document positively integrates with the Council's well-being objectives; involves people and collaborates with partners in its development and implementation; and ultimately will help to address any foreseeable problems in achieving the adoption of the RLDP itself.

Socio-economic Duty

Since the RLDP DA is concerned only with the timetable and procedures for community involvement for the RLDP, this report and the associated documents do not involve any strategic decision-making. Consideration of the Socio-economic Duty is therefore not applicable in this case.

Valleys Communities Impacts

The preparation of the RLDP will have significant spatial implications for the valley communities. The current LDP sets the framework for the development and use of land up to 2026, which seeks to reinvigorate the valley communities by identifying Pontardawe and the Upper Neath Valley as strategic growth areas and also presents a series of policies to provide a more flexible approach to development.

The current strategic approach to the valleys will be reassessed as part of the review of the LDP to determine if the approach remains sound and fit for purpose. Furthermore, the RLDP will need to take account of a range of contextual changes including Future Wales: The National Plan 2040 and the emergence of the Welsh Government's Valleys Task Force: Our Valleys, Our Future and more locally, the outputs of the Council's own Valleys Taskforce initiative.

Workforce Impacts

It is anticipated that the preparation of the RLDP will be accommodated mainly by utilising the existing staff structure within the Planning Policy team. This however will need to be kept under review, to ensure delivery in accordance with the DA.

Legal Impacts

Given that it is now four years since the LDP was formerly adopted, the report addresses the legal requirement for the Council to proceed with a full review of the LDP.

Risk Management Impacts

The Council will be in breach of its legal requirement to proceed with a full review of the LDP should there be a failure to implement the proposed recommendations.

Consultation

This item will be subject to external consultation.

Recommendations

Having due regard to the Integrated Impact Assessment, it is recommended that:

1. The RLDP Consultation Draft Delivery Agreement as set out in Appendix 2 be agreed for the purpose of consultation.
2. The Draft ISA Scoping Report as set out in Appendix 3 be agreed for the purpose of consultation.
3. The publication and consultation procedures as set out in the report are implemented.

Reasons for Proposed Decision

The recommendations are needed to:

1. Ensure compliance with Section 63 of the Planning and Compulsory Purchase Act 2004; The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015; the Well-being of Future Generations (Wales) Act (2015); the Equality Act (2010); the Welsh Language Standards (No.1) Regulations 2015;

Planning Policy Wales 11 (2021) and the Development Plans Manual Edition 3 (2020).

2. Authorise the consultation exercises to ensure that the RLDP final DA and the ISA Scoping Report are robust and the procedures outlined are fully justified.

Implementation of Decision

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

Appendices

Appendix 1 – Integrated Impact Assessment First Stage

Appendix 2 – Replacement LDP Delivery Agreement (Consultation Draft).

Appendix 3 – Integrated Sustainability Appraisal Scoping Report (Consultation Draft).

List of Background Papers

Legislation and Regulations:

Planning and Compulsory Purchase Act 2004.

Well-being of Future Generations (Wales) Act 2015.

Environment (Wales) Act 2016.

The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.

The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

The Conservation (Natural Habitats, &c.) Regulations 1994.

EC Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).

The Well-being of Future Generations (Wales) Act (2015);

The Equality Act (2010);

The Welsh Language Standards (No.1) Regulations 2015

Planning Policy / Guidance:

Future Wales: The National Plan 2040

Neath Port Talbot LDP (2011-2026) (January 2016).

Planning Policy Wales Edition 11 (2021).

Technical Advice Notes (TANs).

Minerals Technical Advice Notes (MTANs).

Development Plans Manual – Edition 3 (2020).

Officer Contact

Lana Beynon – Planning Policy Manager

Tel: 01639 686314 or e-mail: l.beynon@npt.gov.uk

APPENDIX 1: Integrated Impact Assessment (IIA) - First Stage

1. Details of the initiative

Initiative description and summary: Neath Port Talbot Replacement Local Development Plan draft Delivery Agreement (RLDP DA)
Service Area: Planning Policy, Planning and Public Protection
Directorate: Environment and Regeneration

2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff	✓	
Wider community	✓	
Internal administrative process only		✓

3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				The RLDP DA sets out the timetable for preparation of the RLDP together with the Community Involvement Scheme which details the ways in which involvement of stakeholders and the public will be carried out, the timing of the various stages and who will be involved. The DA could potentially affect any residents but is specifically intended to help ensure that no individual group will be impacted differently because of their particular characteristics.
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race		✓				
Religion/Belief		✓				
Sex		✓				
						Implementation of the DA will be inclusive and will involve the

Sexual orientation		✓				planning policy team working with all staff / sections throughout the Council, the wider public and a wide range of stakeholders including those from the public, private and community / voluntary sectors. This is embodied in the legislation and guidance controlling the parameters of the DA and will be checked and confirmed by it being signed off by the Welsh Government.
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4. Does the initiative impact on:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/ How might it impact?
People's opportunities to use the Welsh language			✓			The RLDP DA will not in itself have a significant impact on people's opportunities to use the Welsh Language. The RLDP DA will be published in Welsh and the consultation will be undertaken in accordance with the Welsh Language Standards (No. 1) Regulations 2015.
Treating the Welsh language no less favourably than English		✓				As above. This is embodied in the legislation and guidance controlling the parameters of the DA and will be checked and confirmed by it being signed off by the Welsh Government.

5. Does the initiative impact on biodiversity:

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity			✓			The RLDP DA will not in itself have any significant impact on the maintenance or enhancement of biodiversity since it is the draft of an agreement to be concluded between the Council and the Welsh Government about procedures for the preparation of the RLDP.
To promote the			✓			The RLDP DA will not in itself have any significant impact on the

resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.						promotion of the resilience of ecosystems since it is the draft of an agreement to be concluded between the Council and the Welsh Government about procedures for the preparation of the RLDP.
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6. Does the initiative embrace the sustainable development principle (5 ways of working):

	Yes	No	Details
Long term - how the initiative supports the long term well-being of people	✓		The RLDP DA is concerned with the delivery of the RLDP, which is a development plan covering the period from 2021 to 2036. The DA will contribute towards ensuring that the RLDP fully embraces the requirement to support the long term well-being of the people of NPT.
Integration - how the initiative impacts upon our wellbeing objectives	✓		The RLDP DA sets out the processes and procedures to be undertaken in the preparation of the RLDP to ensure and require that the new plan will be fully integrated with all other relevant plans, initiatives and strategies, working towards the same well-being objectives.
Involvement - how people have been involved in developing the initiative	✓		The draft RLDP DA has been developed in consultation with officers across the Council, elected members and the Welsh Government. This report seeks the endorsement of the draft RLDP DA for full public consultation, which will allow further involvement of the general public, other bodies and organisations and neighbouring authorities. This can then influence changes and amendments to the document prior to further consideration through the council's democratic decision making process. These procedures will give a wide ranging opportunity for involvement across the county borough and beyond.

Collaboration - how we have worked with other services/organisations to find shared sustainable solutions	✓		As above, the consultation processes undertaken during the preparation of the DA will ensure that there has been full collaboration with stakeholders and partners in the development of the final DA, including organisations from the public, private and community/voluntary sectors.
Prevention - how the initiative will prevent problems occurring or getting worse	✓		The RLDP DA is concerned with ensuring that the RLDP will be delivered within a challenging timeframe, that all legal and regulatory requirements are met, adequate resources are provided and that the final document is found to be sound and is adopted. This is necessary in order to ensure that the council's planning strategies and policies for the next fifteen years are legally adopted and implemented, aiming to help prevent a wide range of social, economic, environmental and cultural problems that would otherwise not be addressed through the planning system.

7. Declaration - based on above assessment (tick as appropriate)

A full impact assessment (second stage) is not required	✓
Reasons for this conclusion	
<p>Equalities – The RLDP DA is part of a process intended to ensure that the RLDP embodies consideration of equalities issues from the start of its preparation, throughout the processes and procedures that govern its preparation and in all its resulting strategies and policies, thereby ensuring that local planning policy within NPT fully embraces all equalities considerations.</p> <p>Welsh Language – The draft RLDP DA has been prepared in accordance with the Welsh Language Standards (No. 1)) Regulations 2015 and the proposed consultation and its content embodies the principles of the regulations. The DA will help to ensure that the RLDP also takes into account Welsh Language requirements in its preparation and contents.</p> <p>Biodiversity – In itself, the RLDP DA will have a negligible effect on biodiversity, but it will help to ensure that the RLDP takes full account of all duties and requirements to maintain and enhance biodiversity and promote the resilience of ecosystems through its planning strategies and policies.</p> <p>Well-being of Future Generation (5 ways of Working) – the RLDP DA embraces all five ways of working. The document positively</p>	

integrates with the Council's well-being objectives; involves people and collaborates with partners in its development and implementation; and ultimately will help to address any foreseeable problems in achieving the adoption of the RLDP itself.

	Name	Position	Date
Completed by	Lana Beynon	Planning Policy Manager	1 st July 2021
Signed off by	Ceri Morris	Head of Service	1 st July 2021

APPENDIX 2

Replacement LDP Delivery Agreement (Consultation Draft)

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This note explains the purpose of the Delivery Agreement (DA) and how to comment on the document. This note will not form part of the final published document.

Purpose of the Document

The Neath Port Talbot (NPT) Local Development Plan (LDP) was adopted by the Council on 27th January 2016. The LDP sets out the Council's vision and objectives, together with a series of policies and proposals for the development and use of land in the County Borough up to 2026.

The Council is required to undertake a review of the LDP at intervals not longer than every four years from initial adoption. Since the LDP is now the subject of a statutorily required four year full review, all aspects of the Plan will need to be assessed to consider if they remain sound and fit for purpose.

Following publication of the LDP Review Report, the publication of a DA is the preliminary stage in the preparation of the Replacement LDP (RLDP). The primary purpose of the DA is to set out the timetable for plan preparation, together with the Community Involvement Scheme (CIS) which sets out the processes and procedures to be undertaken in order to ensure that the local community is fully involved in the plan preparation process.

This DA therefore sets out the proposed RLDP timetable and CIS in detail, together with background information and explanation.

Consultation

The Council is seeking views on this RLDP DA, in particular in respect of the CIS contents and proposals.

The consultation period will run for 6 weeks, **starting midday on Monday 16th August 2021 and ending at midday on Monday 27th September 2021.**

How to Make Comments

Comments can be submitted:

Directly Online at: www.npt.gov.uk/ldp/consultation

Alternatively:

Note to Reader

By E-mail to: ldp@npt.gov.uk

By Post to:

Mr Ceri Morris

Head of Planning and Public Protection

Neath Port Talbot Council

The Quays

Brunel Way

Baglan Energy Park

Neath

SA11 2GG

Comments via e-mail or post will need to be submitted using the 'DA Representation Form'. Copies of the form are available on request or an editable version is available to download from the Council's website: www.npt.gov.uk/ldp

The deadline for comments is midday on Monday 27th September 2021. Comments received after the deadline will not be accepted.

This report is also available in Welsh, either to download or by request. Should you need this document in another format, then please contact the LDP team at ldp@npt.gov.uk or [01639] 686821.

PART 1 - Introduction and Background

1 . Introduction

1.0.1 The Planning and Compulsory Purchase Act 2004 requires local authorities in Wales to prepare a Local Development Plan (LDP) for their area. The current LDP was adopted in January 2016, and as the above Act and the LDP Regulations⁽¹⁾ require LDPs to be reviewed at intervals of not more than 4 years from adoption, the Council⁽²⁾ is obliged to undertake a plan review.

1.0.2 The Council has published its Review Report⁽³⁾ which outlines the broad scope of the LDP review, and is informed by the findings of the Annual Monitoring Reports (AMRs) and evidence. The Review Report concludes that a Replacement LDP (RLDP) should be prepared. When adopted, the new RLDP will supersede the existing NPT LDP and become part of the statutory development plan for the County Borough alongside Future Wales - The National Plan for 2040⁽⁴⁾ will continue to have development plan status.

1.0.3 As the first stage of preparation of the RLDP, the Council is required to prepare a **Delivery Agreement (DA)** setting out the timetable, Community Involvement Scheme (CIS) and procedures for plan delivery. This is intended to be both a public statement of commitment and a project management tool. Once formally agreed, the DA commits the Council to producing the RLDP in accordance with the timetable and CIS. This forms part of the LDP tests of soundness, which will be examined by the Planning Inspector at the Examination in Public.

1.0.4 The legislation, regulations and Welsh Government (WG) planning guidance referred to in this document are available on the WG website⁽⁵⁾. Information in respect of the RLDP can be found on the Neath Port Talbot (NPT) website⁽⁶⁾.

1 Regulation 41 [Town and Country Planning \(Local Development Plan\) \(Wales\) Regulations 2005 \(as revised by the Local Development Plan \(Wales\) Amendment Regulations 2015\)](#)

2 NPT County Borough Council is 'the Council', 'the authority' and 'the local planning authority' responsible for the preparation of the RLDP

3 <https://www.npt.gov.uk/media/13823/ldp-review-report-july-2020.pdf?v=20200709084011>

4 <https://gov.wales/future-wales-national-plan-2040>

5 www.wales.gov.uk

6 www.npt.gov.uk

2.1 Purpose of the Delivery Agreement

2.1.1 The DA is a statutory requirement of the Plan preparation process under Regulation 9 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as revised by the Local Development Plan (Wales) Amendment Regulations 2015), and must be approved by resolution of the Council and the WG. Its purpose is to set out:

- The Council’s RLDP preparation timetable outlining the various stages of plan preparation, when these will be undertaken and when engagement will take place;
- Details of the CIS, detailing who will be involved in the RLDP preparation process and how and when participation and collaboration will occur; and
- The resources the Authority will invest in plan preparation.

2.1.2 The DA has been prepared in accordance with all appropriate regulations and guidance⁽⁷⁾. It will be subject to regular review and if necessary amended in accordance with LDP Regulations (see Part 3).

2.1.3 The DA takes into consideration the LDP Regulations requirements for engaging stakeholders in the preparation of the DA and the Well Being of Future Generations (Wales) Act (WBFGA) (2015) five ways of working. The level and form of the engagement proposed is considered to suit the local context.

2.1.4 The DA has been prepared during the Covid-19 pandemic, which has had significant and on-going impacts on face-to-face meetings and the ability of public bodies to engage with consultees and the public.

2.2 Stages in Delivery Agreement Preparation

2.2.1 There are a number of stages in the preparation of a DA:

Table 2.2.1 DA Preparation Stages

	Stage	Progress
1	Prepare a draft CIS in discussion with WG	Complete
2	Consider any comments and revise as needed	Complete
3	Secure Senior Officer and Member approval of the consultation draft of the DA	Current Stage
4	Engage in public consultation on the draft DA	
5	Consider any comments received and revise as appropriate	
6	Secure Council resolution (LDP Regulation 9) to adopt the revised / final DA	

7 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015), and the Development Plans Manual, Edition 3

2 . Background

7	Submit to WG for agreement	
8	Once agreed by WG, publish the agreed DA on the RLDP website, inform relevant consultation bodies (LDP Regulation 10) and keep under review, to ensure that the Plan is prepared in accordance with it.	

2.3 Structure of the Delivery Agreement

2.3.1 This document is structured as follows:

2.3.2 Part 1 Introduction and Background: Outlines the purpose, structure and stages in the preparation of the DA and considers the form and content of the RLDP; matters which will inform the development of the RLDP; opportunities for collaborative working; Plan Examination; and preparation of Supplementary Planning Guidance (SPG).

2.3.3 Part 2 The RLDP Timetable and CIS: The timetable sets out the various stages of Plan preparation (including definitive and indicative dates), how the Council will manage the process and provides an assessment of the resources required. It considers the delivery of the timetable, and matters such as Council procedures and availability of resources and risk management. It also establishes key dates for the preparation and publication of the ISA reports and the Habitats Regulations Assessment (HRA) documents. In respect of the CIS it focuses on the key principles for engagement, the aims of the CIS, how consensus will be built and developed and considers where engagement in the Plan's preparation will be focused. It sets out who the Council will engage and consult with, including the public and stakeholders and when and how this will take place.

2.3.4 Part 3 Monitoring and Review This section outlines how the DA will be kept under review and the role of the Annual Monitoring Report (AMR).

3 . The Replacement Local Development Plan

3.0.1 The RLDP period, otherwise referred to as the 'Plan period', will be for 15 years from 2021 to 2036. Once adopted, the NPT RLDP 2021-2036 will replace the NPT LDP 2011-2026.

3.1 Preparing the Replacement Local Development Plan

3.1.1 The RLDP will have a major influence on the future shape of NPT and its individual communities. It will be required to:

- Support the National sustainable placemaking outcomes of Planning Policy Wales (PPW);
- Comply with the requirements of the WBFGA (2015), including the seven Well-being Goals and the five ways of working;
- Be in general conformity with the National Development Framework known as Future Wales - The National Plan 2040;
- Ensure that effective regional collaboration informs plan preparation;
- Ensure that the RLDP is fully integrated with and reflects other relevant plans and initiatives including the need to be in general conformity with the emerging South West Wales (SWW) Strategic Development Plan (SDP);
- Ensure that the tests of soundness are met;
- Be informed by an ISA which includes Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and Welsh Language Impact Assessment (WLIA);
- Satisfy the Socio-economic Duty under Part 1, Section 1 of the Equality Act 2010;
- Satisfy the Duty under Part 1, Section 6 of the Environment (Wales) 2016 Act to maintain and enhance biodiversity and promote the resilience of ecosystems.
- Adopt a strategic view of the spatial implications of development decisions and act as a basis for rational and consistent decisions regarding the use and development of land;
- Guide the amount and location of new development in the County Borough;
- Reflect local aspirations, based on a vision agreed by the community and stakeholders;
- Address new Policy areas and approaches (e.g. Placemaking and Green Infrastructure);
- Guide growth and change, while protecting local diversity, character and sensitive environments;
- Be based on evidence and consideration of all feasible alternatives;
- Indicate how and where change will occur over the Plan period; and
- Guide the location of new public / grant funded projects and co-ordinate the provision of new infrastructure, such as highways and schools.

3.1.2 There will be a focus on stakeholder and community engagement and collaborative working throughout the process in order to make the Plan relevant, inclusive and engaging to local communities. It is essential that the process is transparent and fully explained in order to maintain community and stakeholder confidence in the RLDP.

3 . The Replacement Local Development Plan

3.1.3 The preparation of the RLDP is regulated by detailed requirements and guidance and will be subject to a tight timetable agreed with WG. The guidance indicates that WG expects replacement plans to be prepared in 3.5 years from formal agreement of the DA (with provision for a single slippage period of 3 months only). Chapter 4 provides further information.

3.2 Replacement Local Development Plan Format and Content

3.2.1 It is anticipated that the RLDP will follow a similar format to the existing LDP although, as identified in the Review Report, a number of Policy areas will need to be reassessed and / or revised. The RLDP will need to be in general conformity with Future Wales - The National Plan for 2040⁽⁸⁾, the emerging SWW SDP and ensure compliance with National Policy requirements.

3.2.2 The draft format is as follows, and largely reflects the current Plan set up:

- **Introduction** (contextual issues and strategies and key issues to be addressed)
- **Strategy** (vision, strategic issues, key aims and objectives, growth and spatial strategies)
 - Sustainable Settlement Hierarchy
 - Key strategic policies (area and site specific embodying Placemaking principles etc.)
 - Proposed level of change/growth - spatial distribution and control mechanisms
 - Key diagram
- **Development Management Policies**
 - Succinct area-wide policies
 - Designated areas for protection, safeguarding, conservation and constraint
- **Site and Area-based policies and allocations**
 - Sites for development with policies for delivery and implementation
 - Master planning frameworks and principles
- **Succinct reasoned justification** (to explain policies and guide their implementation)
- **Monitoring Framework**
- **Housing Trajectory Appendix**
- **Implementation and Delivery Appendix**
- **Proposals map** on Ordnance Survey base.
- **Constraints Map**

3.2.3 In the Deposit Version of the RLDP, the Strategic, Development Management, Site and Area based policies will likely be grouped according to the 4 pillars of sustainability embedded in PPW & FW; Placemaking, Active and Social Places, Productive and

3 . The Replacement Local Development Plan

Enterprising Places and Distinctive and Natural Places. The key stages of RLDP preparation as required under the provisions of the LDP Regulations are outlined in Appendix B.

3.3 Replacement Local Development Plan Impact Assessments

3.3.1 The Council is required by the Planning and Compulsory Act 2004 to undertake a SA of the RLDP and to report its findings as an integral part of the Plan preparation process. In addition, separate legislation⁽⁹⁾ requires plans to be subject to SEA. In accordance with WG guidance, it is intended to integrate the SEA with the SA to inform the plan preparation process in an iterative way.

3.3.2 In addition to SA and SEA requirements, a number of other statutory and key elements will need assessment including the WBFGA (2015), Equalities Act (2010), Welsh Language and Health Impacts Assessments. It is intended to combine these assessments into a single Integrated Sustainability Appraisal (ISA) in order to avoid duplication and to ensure that all relevant aspects are considered in one document. The Socio-economic Duty under Part 1, Section 1 of the Equality Act 2010 must also be assessed and complied with. However, Habitats Regulations Assessment (HRA)⁽¹⁰⁾ will be undertaken separately in accordance with guidance, since this uses a different precautionary testing mechanism (see below).

3.3.3 The ISA will have the following main stages and reports:

- **ISA Scoping Report:** Setting out the ISA methodology and consultation proposals. The document will provide a review of other plans, policies and strategies likely to influence the LDP and ISA process and will include relevant baseline information that will inform the assessment together with the ISA Assessment Framework to be used in the appraisal of proposed RLDP policies and proposals.
- **ISA Reports:** ISA Reports will be issued to accompany the main RLDP stages and document the iterative assessment and plan preparation process that has been undertaken up to that point. The ISA will also form an integral part of the Candidate Site Assessment Methodology. ISA Reports will be issued at the Preferred Strategy stage (including assessment of RLDP Options, reasonable alternatives, strategies and strategic policies), the Deposit plan stage (including assessment of all proposed site allocations and policies), and at submission stage to incorporate changes made as a result of the deposit consultation.
- **Non-technical summary reports** will also be produced at each main stage.
- **Post RLDP adoption statement:** Published after the RLDP is adopted, explaining how the ISA findings have influenced the plan.

3.3.4 The HRA will be undertaken and reported on separately. Any plan or programme that could affect a designated Natura 2000 site (a Special Area of Conservation (SAC), Special Protection Area (SPA), or a Ramsar site) needs to be subject to the Conservation

9 The Environmental Assessment of Plans and Programmes (Wales) (The SEA Regulations) 2004

10 [Conservation of Habitats and Species Regulations 2010](#)

3 . The Replacement Local Development Plan

of Habitats and Species Regulations 2017 (as amended). A HRA will therefore be required, together with an Appropriate Assessment (AA) if necessary. The HRA process has the following main stages:

- **Stage 1 - HRA Screening:** To identify Natura 2000 sites that could be affected by provisions in the RLDP, their primary reasons for designation and any possible impacts from RLDP policies, proposals and allocations, in combination with other relevant proposals.
- **Stage 2 - Appropriate Assessment:** If any element of the RLDP is found to be likely to have any significant effects on any Natura 2000 site, a more detailed assessment will be required to determine whether the integrity of any site could be adversely affected (either alone or in combination with any other plans or projects). If such effects cannot be avoided or adequately mitigated, consideration will need to be given to changing the plan proposals.
- **Stage 3 - Consideration of alternatives:** This stage will only be required under the circumstances outlined above and when alternatives are feasible
- **Stage 4 Imperative Reasons of Overriding Public Interest:** It is unlikely that any proposals within the RLDP would be considered necessary for *Imperative Reasons of Overriding Public Interest*. This implies that if adverse effects are unavoidable, the RLDP will need to be changed to avoid such impacts.

3.3.5 Both ISA and HRA are iterative processes that will be undertaken throughout the Plan preparation process and will inform and direct the development of the Plan. It is a requirement of the Regulations that the LPA takes into account the SEA Environmental Report (i.e. the conclusions of the SEA) in decision making, showing how the results of the assessment have been taken into account, and giving the reasons for choosing the Plan as adopted in light of other reasonable alternatives. The ISA will be prepared with the participation of the Environmental Consultation Bodies (as identified in the Regulations) and public and stakeholder consultations will be undertaken in parallel with RLDP consultations.

3.3.6 The key stages involved in the preparation of the ISA and the HRA of the RLDP, together with the proposed timetable are provided in Appendices A and B.

3.4 Joint Local Development Plans and Regional Collaboration

3.4.1 Collaboration is a requirement of the WBFGA (2015) and part of the first of the three Tests of Soundness set out in the Development Plans Manual (i.e. Does the Plan Fit? - see section 3.5 below). LPAs are also required to demonstrate that all opportunities for joint working and collaboration on both plan preparation and the evidence base have been exhausted. This is particularly relevant where the LDPs of neighbouring authorities are on similar preparation timescales and where there are strong cross-boundary linkages.

3.4.2 A close working relationship has been forged with the adjoining Authorities (Swansea, Carmarthen, Powys, Bridgend and Rhondda Cynon Taff Councils and the Brecon Beacons National Park Authority) through regular programmes of meetings both at a local and regional level.

3 . The Replacement Local Development Plan

3.4.3 Additional collaborative work that will inform RLDP preparation has also been undertaken with specific neighbouring authorities, with an example being the preparation with colleagues in Swansea on the Fabian Way Innovation Corridor SPG. Future preparation of joint and shared evidence such as this, including potential Statements of Common Ground (SoCG) where shared interests exist, will be pursued wherever the opportunities arise.

3.4.4 At the present time, as detailed in the Review Report⁽¹¹⁾ there is presently no prospect of undertaking a Joint LDP with an adjoining Authority due to the timelines which each Authority is following.

3.4.5 Regionally the Former Mid and South West Wales (M&SWW) Strategic Planning Group⁽¹²⁾ has already undertaken a significant amount of collaborative working. To date, discussions and progress have centred on two key studies: a *Joint Local Housing Market Assessment* and a *Regional Viability Study*. These studies will not only inform reviews of individual LDPs but will also contribute positively as a potential baseline for future work on SDPs.

3.4.6 Over the course of preparing the RLDP there will be a need for the Council to closely consider the implications of the emerging SDP for the SWW Region. SDP related discussions are taking place on a regular basis across the SWW region to consider the resources and the scope of the work required. The SDP will be formally progressed following the establishment of a Corporate Joint Committee (CJC) for the region by February 2022. The SDP will be prepared in tandem with the NPT RLDP 2021-2036 by a team appointed by the CJC once established. The NPT RLDP will need to be in general conformity with the emerging SWW SDP.

3.4.7 The RLDP will also need to align with and reflect the policies of Future Wales⁽¹³⁾, including those specific to the SWW Region such as the Swansea Bay and Llanelli National Growth Area.

3.5 Independent Examination

3.5.1 The Council is required to submit its Deposit RLDP, associated documents and representations to WG for consideration of its “soundness” by a WG appointed independent Inspector at an “Examination in Public”. The Inspector will have regard to the evidence submitted with the Plan and the representations received at the Deposit stage in order to determine whether the Plan meets the following tests of soundness:⁽¹⁴⁾

11 <https://www.npt.gov.uk/media/13823/ldp-review-report-july-2020.pdf?v=20200709084011>

12 Future Wales has divided the M&SWW Region into the Mid Wales (MS) Region and South West Wales (SWW) Region

13 <https://gov.wales/future-wales-national-plan-2040-0>

14 [Development Plans Manual Edition 3 \(2020\)](#).

3 . The Replacement Local Development Plan

The Tests of Soundness

Preparation Requirements:

- Has preparation complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.)
- Is the plan in general conformity with the NDF⁽¹⁵⁾ and/or SDP? (when published or adopted respectively)

Test 1: Does the plan fit? (i.e. is it clear that the RLDP is consistent with other plans?)

Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)

Test 3: Will the plan deliver (i.e. is it likely to be effective?)

3.5.2 In view of the tests set out above, it is crucial that the RLDP is founded on a strong evidence base with its form and content as prescribed by the Regulations and consultation procedures.

3.5.3 Following the examination, the Inspector will produce a report recommending changes to the RLDP together with reasons for the changes. The Inspector's recommendations are binding on the Authority and if the Plan is found sound, the LPA must adopt the RLDP by resolution within 8 weeks of its receipt unless the WG intervenes.

3.6 Supplementary Planning Guidance

3.6.1 SPG are non-statutory documents and may be prepared to expand upon policies or proposals contained in the RLDP. They can relate to specific topics or policies contained within the plan or they could also take the form of local level 'Place Plans'⁽¹⁶⁾. The need to review existing SPG and prepare new SPG will be considered as part of the RLDP preparation process. The Pre-Deposit/ Preferred Strategy stage will be a key time at which any new SPG needed will be identified. Relevant stakeholders will be consulted during the production of SPG.

3.6.2 Where SPG will assist the understanding of the RLDP it will be prepared and consulted on as an intrinsic part of the process of engagement as set out in this DA.

15 Now called Future Wales

16 http://www.placeplans.org.uk/en/?page_id=4

4 . Replacement Local Development Plan Timetable

4.1 Replacement Local Development Plan Timetable Definitive and Indicative Stages

4.1.1 The timetable detailing the various stages of the RLDP process and how it will be project managed, together with the resources required for its preparation is a key part of the DA.

4.1.2 The following table outlines the proposed key stages and timetable in the RLDP preparation process required by the Planning and Compulsory Purchase Act 2004 and the LDP Regulations. A more detailed timetable is set out in Appendices A-C, including dates for the publication of the SA and AMR.

Table 4.1.1 Table detailing the stages of RLDP preparation

Key Stage	Stage of RLDP Preparation	Timescale
Definitive Stages		
1	Delivery Agreement	January 2022
2	Pre-Deposit Participation / Preparation (Regulation 14)	January 2022 - November 2023
	Call for Candidate Sites	March 2022 - May 2022
3	Pre-Deposit (Preferred Strategy) Consultation – (Regulation 15)	March 2023 - April 2023
4	Deposit Participation/ Preparation	August 2023 - February 2024
	Deposit RLDP Consultation (Regulation 17)	March 2024 - April 2024
Indicative Timetable		
5	Submission of RLDP to WG for examination (Regulation 22)	October 2024
6	Independent Examination (Regulation 23)	December 2024 - February 2025
7	Receipt & Publication of the Inspector’s Report (Regulation 24)	May 2025
8	Adoption of the RLDP (Regulation 25)	July 2025
9	Monitoring and Review	April 2026

Definitive and Indicative Stages

4.1.3 The LDP Regulations provide for a two-stage timetable – definitive stage and indicative stage.

4.1.4 Definitive stages (stages 1-4) are those up to and including the Deposit Plan stage. As these stages are under the direct control of the Council, the timescales outlined above are considered to be realistic and achievable. Every effort will be made to adhere to and avoid deviations from the (agreed) timetable.

4 . Replacement Local Development Plan Timetable

4.1.5 Indicative stages (stages 5-9) relate to those stages of the RLDP process post Deposit and up to and including Adoption. As this stage of the process is dependant on various external factors and influences, such as the number of deposit representations received, the dates are indicative. Following the closure of the statutory consultation period on the Deposit Plan and prior to submission of the plan, the Council will update the timetable with definitive timings for the remaining plan stages.

Plan Preparation Stages

4.1.6 Draft Delivery Agreement (Regulation 9)

4.1.7 The Local Planning Authority must produce a DA which is essentially the timetable for delivering the RLDP as well as a management tool to ensure progress is made to adopt the RLDP in good time. It also includes the CIS which sets out how, who and when stakeholders will be involved in the RLDP's development. Stakeholders and General Consultees will be made aware of the decision to produce a RLDP and it requires their involvement in the development of the Plan. The Draft DA will be subject to 6 week consultation to seek views on its contents.

4.1.8 Delivery Agreement (Regulations 5 - 10)

4.1.9 The first formal stage of the RLDP is the production of the DA. The new DA must be approved by resolution of the Local Planning Authority (Regulation 9) and agreed by WG (Regulation 9). Any slippage to the Plan's timetable must be agreed with WG.

4.1.10 Call for Candidate Sites (Regulation 14(2))

4.1.11 Following publication of the DA, the first formal stage of preparing the RLDP is the request for nominations for sites (Regulation 14(2)). These are known as "Candidate Sites" and all consultees and members of the general public who have expressed an interest in participating in the Plan's development will be contacted. Where the Council has up-to-date contact details, landowners, site promoters and developers of undeveloped site allocations in the existing LDP will also be contacted. A comprehensive publicity campaign will take place in the lead up and during this "Call for Candidate Sites" which will take place over a twelve week period. This will maximise awareness of the request as well as the requirements for ensuring all submitted Candidate Sites have the appropriate supporting evidence. **The publicity will stress that this is the appropriate time to submit sites for potential inclusion in the plan.** (This is not a commitment that all sites will be taken forward into the RLDP).

4.1.12 The ISA Scoping Report will be published alongside the Candidate Sites Assessment Methodology to ensure transparency in assessing candidate sites.

4.1.13 A Candidate Site Register (CSR) of all the sites received during the "Call for Candidate Sites" will be prepared and published on the Council's website and available at Deposit Venues.

4 . Replacement Local Development Plan Timetable

4.1.14 Following the publication of the Candidate Sites Register (CSR) a period of informal Community feedback will commence for approximately 9 weeks. During this period, the general public, Council members and stakeholders will be able to provide informal comments about the sites on the CSR. Whilst the Council will not be responding to any informal comments received during this period, the comments will nevertheless be used to inform the wider candidate site assessment process. This process will enable the LDP team to gather initial feedback on the sites and any issues raised in comments can subsequently be raised with the relevant stakeholders during the candidate site assessment process (e.g. concerns about sewerage treatment works capacity can be raised with Dwr Cymru Welsh Water or concerns about flooding can be raised with Natural Resources Wales). It will also give the community and stakeholders the opportunity to register their interest in any candidate site(s) and have their contact details added to our consultee database so that they can be kept up to date with the LDP preparation process in the future.

4.1.15 Pre-deposit Participation (Regulation 14 - 16)

4.1.16 In the earliest stage of plan preparation, the 'pre-deposit participation' phase, the Council will undertake the following:

- A Call for Candidate Sites;
- Press and other media publicity to alert the general public to the RLDP process carried out with the co-operation of the Council's Communication team;
- Correspondence directly to database registrants including Specific and General Consultation Bodies and members of the general public who have already expressed an interest in the process;
- Meetings of the Planning Committee, Cabinet Member and other Stakeholder Groups including representatives of the relevant consultation bodies (Specific and General as appropriate) to ascertain their expectations and aspirations for the plan and help identify issues, gather evidence and generate alternative strategies.
- More general consultation may take place to identify potential development sites to meet the aims of potential strategy options.

4.1.17 Pre deposit Public Consultation (Regulation 15 & 16)

4.1.18 A statutory consultation phase of six weeks will be undertaken on the 'pre-deposit' document containing the Council's preferred strategy (including SA/SEA Participation). Stakeholders will be advised that this is the appropriate time to make representations on the sites identified in the Preferred Strategy Document and the CSR.

4.1.19 A comprehensive publicity campaign both in the lead up and during the statutory consultation period will be undertaken to both raise awareness and encourage involvement making representations on the RLDP.

4.1.20 The Key Stakeholder Group (KSG) (see Appendix E), Cabinet Member and Members of the Planning Committee will subsequently look at the consultation responses received and suggest changes. Regeneration and Sustainable Development Cabinet Board and Full Council will consider and agree any further changes.

4 . Replacement Local Development Plan Timetable

4.1.21 Statutory Deposit of Proposals (Regulation 17 - 21)

4.1.22 A statutory consultation phase of six weeks will be undertaken for representations to be made subsequently on the Statutory Deposit of Proposals in respect of both policies and sites (including SA/SEA).

4.1.23 A comprehensive publicity campaign both in the lead up and during the statutory consultation period will be undertaken to both raise awareness and encourage involvement in making representations on the RLDP.

4.1.24 The KSG, Cabinet Member and Members of the Planning Committee will recommend a Council position on each consultation response– Regeneration and Sustainable Development Cabinet Board consideration and Full Council resolution to agree submission Document, Council position in response to each Deposit Plan consultation response and any recommended (limited) focussed changes.

4.1.25 Submission of RLDP for Examination (Regulation 22)

4.1.26 After the Deposit and subsequent consultation, the RLDP will be submitted for Examination by an independent Planning Inspector appointed by the WG.

4.1.27 Independent Examination (Regulation 23)

4.1.28 All documentation associated with the RLDP Examination will be made available as information to interested parties and the general public in addition to those directly involved in the formal proceedings. There will be an opportunity for those who made ‘duly made’ representations at Deposit to be heard by the Inspector. The Inspector’s role is to examine the RLDP in its entirety and test its ‘soundness’, to consider all relevant evidence and prepare recommendations and the reasons for those recommendations in the form of the Inspector’s Report.

4.1.29 Receipt of the Inspector’s Report (Regulation 24)

4.1.30 Following receipt, formal notification of the Inspector’s Report will be given to those persons who asked to be notified, and the Report will be published as a matter for information to participants, consultees, database registrants and to the general public, as well as to those who formally took part in the Examination In Public.

4.1.31 Adoption (Regulation 25)

4.1.32 Within 8 weeks of receipt of the Inspector’s Report, which is binding on the Local Planning Authority, if the Plan is found sound, the Plan will be reported to the Council for adoption. Following adoption the Council will publish an Adoption Notice in accordance with the regulations, and will publicise as matters of information to participants, consultees, database registrants and to the general public all relevant documents including the Council’s Adoption Statement and details of the ISA (incl. SEA) and its influence on the adopted RLDP.

4.1.33 Annual Monitoring and Review (Regulation 41)

4 . Replacement Local Development Plan Timetable

4.1.34 The Council will identify the successful implementation of policies and areas where change is necessary. It will also monitor significant effects of the RLDP against sustainability objectives and it will publish these reports annually.

4.1.35 Further detail on engagement methods through the RLDP preparation process is provided in Appendix C.

4 . Replacement Local Development Plan Timetable

Community Involvement Scheme

5.0.1 The CIS sets out who will be formally involved in the RLDP process and how and when the participation and consultation will occur.

5.0.2 The Council is fully committed to engaging with stakeholders and the local community throughout the Plan's preparation and intends to engage widely and as early as possible in order to take into consideration stakeholders views and build as much consensus as possible.

5.0.3 In preparing the CIS, the Council has given regard to:

- **Covid-19 Pandemic:** This DA has been prepared during the worldwide Covid-19 pandemic. During the preparation of the RLDP, the Council will adhere to all relevant Government Regulations regarding Covid-19 that are in force at any particular time. Including where necessary social distancing and restrictions on face to face meetings, and will seek alternative and innovative methods of consultation where possible during this time. This may involve using digital virtual meeting arrangements or other innovative methods to ensure that full engagement takes place. Should additional opportunities arise during the plan preparation process, especially where restrictions continue to be lifted, the Council will endeavour to respond to these.
- **Previous CIS:** Appendix I provides a review of the previous CIS and recommends a number of approaches for the RLDP.
- **WBFGA (2015):** The WBFGA (2015) requires public bodies to carry out sustainable development, which it defines as incorporating delivery of social, economic, environmental and cultural well-being. In order to demonstrate that the well-being goals and sustainable development principle have been fully incorporated into the decision making process, it has to be demonstrated that the *five ways of working* (involvement; collaboration; integration; prevention; and long term factors) have been adhered to. In respect of the CIS, the most significant of these are *involvement* and *collaboration*. Involvement means "involving other persons with an interest in achieving the well-being goals...", and collaboration means to consider how "collaboration could assist in meeting well-being objectives...". The authority is therefore required to ensure that stakeholders are fully *involved* in the RLDP preparation and decision making process and that there is full *collaboration* with other departments and sections within the Council and with other bodies (including neighbouring authorities, statutory undertakers and others) who could assist. Proposals for how these requirements will be met are set out below.
- **The NPT Well-Being Plan:** Following the WBFGA (2015), the NPT Well-being Plan⁽¹⁷⁾ adopts a sustainable development principal to ensure that the needs of the present residents of the County Borough are met without compromising the ability of future generations to meet their own needs. The Authority is committed to collaborate with any person or organisation that could help the Authority to meet its well-being objectives. The Authority also recognises the importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area.

5 . Community Involvement Scheme

5.1 Engagement Principles

5.1.1 The NPT Public Services Board (PSB) has established a five part NPT PSB Citizen Engagement Scheme which provides a reference for good practice in public consultation. The scheme includes a toolkit to provide a common template for procedures and documents. When engaging with the public in the preparation of the RLDP, the Authority intends to follow the principles and procedures set out in the Citizen Engagement Scheme as far as practicable and involve the Engagement and Participation Officer in order to gain the views of young people in the Authority.

5.1.2 The Council is also committed to utilising the ten National Principles for Public Engagement in Wales.⁽¹⁸⁾ These are:

- Engagement is effectively designed to make a difference;
- Encourage and enable everyone affected to be involved, if they so choose;
- Engagement is planned and delivered in a timely and appropriate way;
- Work with relevant partner organisations;
- The information provided will be jargon free, appropriate and understandable;
- Make it easier for people to take part;
- Enable people to take part effectively;
- Engagement is given the right resources and support to be effective;
- People are told of the impact of their contribution;
- Learn and share lessons to improve the process of engagement.

5.1.3 The following RLDP specific consultation principles will also be used to guide the Council's approach to involving the local community and other stakeholders in preparation of the RLDP:

- **Frontloaded:** The community will be encouraged to be involved at an early stage in the preparation of the RLDP;
- **Continued Involvement:** The community will be encouraged to be involved throughout the process of preparing the RLDP;
- **Commitment:** Opportunities will be sought for the whole community to engage at appropriate stages in the process;
- **Inclusive:** The Council will encourage the active participation of everyone who has an interest in, or who may be affected by, the RLDP;
- **Transparent:** Engagement will be undertaken in a transparent and open manner;
- **Fit for Purpose:** Engagement will be fit for purpose and capable of being resourced; and
- **Realistic:** The Council will seek to ensure that all parties involved in the process understand and remain realistic about what can be achieved within the context of relevant legislation, WG guidance, and resources available.

5.1.1 Consensus Building

5.1.1.1 A key objective of the LDP system is to build consensus from the outset. A variety of consultation methods (see below) will enable structured discussions and involvement with the aim of building as much consensus as possible. NPT Council is committed to early and effective stakeholder and community engagement in plan making as this is something that the Authority believes is essential to ensuring that the RLDP is relevant and inclusive to local communities, and critical to achieve local ownership and legitimacy for policies that will shape the future development of the County Borough.

5.1.1.2 This approach should reduce the time taken to reach adoption by reducing the number of deposit objections to policies and therefore reducing the time spent at later stages of the Plan preparation process. Consensus building will be assisted through the establishment and sharing of a common information base for the key issues from the start of the process.

5.1.1.3 Where consensus cannot be achieved, it is important that the sources of information leading to a decision are explicit and respected by all parties. In such instances, other appropriate matters such as national policy will be considered to determine any outcome. Progression may also be made on a majority basis.

5.1.2 Welsh Language

5.1.2.1 The preparation of the RLDP and all engagement with stakeholders and the public will be undertaken in accordance with the Council's Welsh language standards and the Welsh Language Standards Regulations 2015⁽¹⁹⁾.

- The Authority welcomes correspondence in Welsh or English and will deal with Welsh and English correspondence to the same standards and timescales;
- Correspondents will receive a reply in the language of the original correspondence;
- All forms, consultation documents (excluding technical documents), publicity materials and correspondence will be bilingual;
- All meetings, whether formal or informal, will be conducted bilingually where requested beforehand; and
- All consultation draft and adopted RLDP policy and supplementary guidance publications will be bilingual.

5.1.3 Role of Stakeholders and Interested Parties

5.1.3.1 In accordance with the LDP Regulations, engagement in the RLDP's preparation will focus on stakeholders and the public.

5.1.3.2 In order to ensure that specific and general consultees, agencies and other participants are able to play a full role and represent their local communities throughout the RLDP process it will be important that all stakeholders and participants have regard to the following expectations:

5 . Community Involvement Scheme

- Provide full contact details (including full name, postal address and email address) to enable full engagement and feedback (phone numbers and email addresses will be redacted from published material);
- Respond to correspondence within the prescribed timescale;
- Raise legitimate issues that can be addressed by the RLDP;
- Commit to the process by attending, contributing and helping to achieve consensus;
- Identify any gaps in information supplied and/or the RLDP evidence base;
- Where appropriate, put forward Candidate Sites early in the process as part of the Call for Candidate Sites;
- Follow all relevant guidelines and procedures;
- Provide and share information if required; and
- Understand that the RLDP Inspector's Report is binding and there can be no appeal in respect of the recommendations of the Inspector.

5.1.3.3 The General Data Protection Regulation (GDPR) requires that data protection principles, rights and obligations are applied to any personal data processing (data that we collect, hold, analyse) as part of the RLDP preparation process.

5.1.4 Petitions

5.1.4.1 Petitions are sometimes used by groups to offer their opinions on an issue. Any submitted petition should clearly state on each page the purpose of the petition, and should have a contact name and address/ e-mail.

5.1.4.2 All correspondence will be directed to the contact details given of the person organising the petition; individual acknowledgement will not be sent to individual signatories of the petition.

5.1.5 Duly Made and Late Representations

5.1.5.1 In order for a representation to be duly made, it must include all necessary information and specify the matters to which it relates. Where a representation is made at Deposit Stage it must be clear what changes are sought, the grounds upon which the representation is made and the relevant test(s) of soundness that have not been met.

5.1.5.2 The Council will only accept representations received during the prescribed consultation periods. Deadlines will be strictly adhered to and any representations received outside of these consultation periods will be deemed to be not duly made. To avoid disappointment it is advisable to submit any information with a couple of days to spare and check that it has been received.

5.1.5.3 Whilst there will be an increase in the use of social media for awareness raising to help to ensure that significant strategy considerations and development proposals can spark debate and understanding on some of the more controversial aspects of the plan. The Council cannot accept representations made directly via social media. Information will be provided as to how to make valid representations.

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5.2 Engagement Methods

5.2.1 Document Availability

5.2.1.1 All relevant documents produced as part of the RLDP preparation process will be made available to stakeholders at appropriate times to inform the plan preparation stages. These documents will be published on the RLDP website (www.npt.gov.uk/ldp). In addition, subject to current Covid restrictions, by appointment only printed copies will be available at the following offices (Deposit Venues):

- Neath Civic Centre, Neath, SA11 3QZ
- Port Talbot Civic Centre, Port Talbot, SA13 1PJ
- The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

5.2.1.2 Paper copies of documents will be available for purchase on request at a price to cover the costs of printing, postage and packaging.

5.2.2 Methods of Involvement, Participation and Consultation

5.2.2.1 Stakeholder Involvement

5.2.2.1.1 It is proposed to use a diverse range of methods to ensure effective community involvement throughout the Plan process while complying with the requirements of the Regulations. Engagement with stakeholders will be the principal on-going method of involvement during the preparation of the plan.

5.2.2.1.2 Stakeholders will be provided with information via the RLDP website (and other methods where required) and comments, observations and input will be invited at all relevant plan preparation stages. The opportunity to discuss issues with staff will be made available via electronic communication or phone, and in person if appropriate or on request, subject to any currently prevailing Covid-19 restrictions.

5.2.2.1.3 Identified key stakeholders will be involved more closely in discussions about the plan vision, objectives and strategy in key stakeholder consultation events to be held live on-line or in person as appropriate on at least two occasions prior to the Pre-Deposit consultation, enabling involvement of interested parties in the setting and definition of the plan's overall approach, desired objectives and outcomes and preferred strategy.

5.2.2.1.4 In addition, it is proposed to set up Technical Working Groups (TWGs) for specific subject or topic areas, which will comprise of Council officers and targeted key stakeholders with expertise or interest in the topic area concerned. This will enable stakeholders to be fully involved in more detailed identification of the key issues in respect of specific policy matters that face the County Borough, and development of strategies and approaches to address these as appropriate.

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5.2.2.2 Public Participation

5.2.2.2.1 In order to ensure that the plan preparation process is as open as possible and that the public is able to participate as fully as practicable, the following methods will be used:

- Relevant documents and updates will be published on the LDP/ RLDP **website** (www.npt.gov.uk/ldp) on a regular basis;
- A **FAQ section on the website** to anticipate the issues that stakeholders may find difficulty in understanding and hopefully address that confusion and encourage participation;
- **Hard copies** of relevant documents will be in the 3 deposit venues at key stages; **Libraries** will be provided with guidance notes on how to access documents on-line;
- Engagement activities and formal consultation stages will be advertised through various local **Radio** campaigns and "sound-bite" indicating what stage we are at and urging listeners to go to our website and take part;
- **On-line video conferencing** with a facilitator and producer to encourage participants to take part and the points raised are captured;
- Updates to the **Public Service Board** will be provided on a regular basis;
- Regular updates will also be given via the Council's **social media** accounts including "In the Loop" which is a Digital Magazine which goes out to approximately 4,500 employees monthly (69% of which live in NPT), a weekly SWAY (to NPT employees) which highlights important information readers may wish to be made aware of, Facebook, LinkedIn, Instagram, NPT News which is a monthly e-newsletter going out to approximately 2,000 people, and Twitter.
- **Social Media Networking Platforms** YAMMER and Facebook Workplace are currently being piloted for NPT Council Employees. The chosen platform will also be utilised.
- In the absence of a Town or Community Council in Port Talbot, contact will be made with **#VIVA Port Talbot** - the Business Improvement District (BID) in Port Talbot which is working to strengthen the voice of businesses on matters that affect the Town Centre.
- In addition the **Youth Council** and **Young Mayor** will be contacted and kept informed;
- Colleagues in Social Services will distribute information and collect responses with young people through NPT Young which is also known as **YOVO** (11 plus years old) and **Junior YOVO** (7 to 11 years old);
- **Press releases** will be issued at appropriate times. Local, regional as well as national journalists are contacted with a hope that they will carry the story at the appropriate times;
- **NPT News Room** - is a live blog that refreshes regularly on the Council's webpage;
- **QR Codes** will be created along with **pop-up banners** at locations with heavy footfall to encourage people to go to the Council's website.
- **Digital Screens** at Civic Centres, Social Housing Offices, Health Authority Sites, transport hubs and certain digital bus stops with the message to go to the Council's website being the key message;
- **Posters** (including QR codes) will be distributed to key local community facilities such as Libraries, GP surgeries, Leisure Centres and Community Notice Boards at key stages (Preferred Strategy and Deposit Consultations);

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- **Targeted Public Exhibitions (Drop in or Un-staffed)** as necessary;
- **Virtual stakeholder meetings** in each of the 8 Spatial Planning Areas at Preferred Strategy & Deposit Plan Stage;
- **Elected Members** of NPT Council will have a key role to play in ensuring that local communities are kept informed and engaged with the plan preparation process, this could include distributing information or posters;
- Full **liaison** between the LDP and the **NPT Public Service Board** will be maintained;
- Full use will be made of **Local Area Co-ordinators** to distribute and communicate information. They will know their constituencies and importantly, those who have difficulty in accessing information;
- Communication will be distributed using **Gov.Notify**.
- **LGBTQ+ Forums, Black Asian Minority Ethnic Groups**, all other relevant **seldom heard stakeholder groups** will be engaged through targeted social media campaigns and awareness raising via other appropriately tailored methods such as posters/leaflets where necessary. Documentation or consultation materials will be translated into other languages and formats when required in order to ensure maximum engagement with seldom heard groups;
- Welsh Language stakeholders will be engaged through the **medium of Welsh**. All published non-technical material will be made available in Welsh (see Welsh Language Section above).

5.3 Replacement Local Development Plan Involvement - who will be involved?

5.3.1 Community Profiling

5.3.1.1 The Development Plans Manual indicates that the Council should profile the community in order to identify the most appropriate range of interests to be involved the LDP preparation process. Full details and findings of this process are set out in Appendix I.

5.3.1.2 Taking the existing LDP stakeholder / consultation bodies lists as a starting point, in order to encourage representation from all sectors of society within NPT (as characterised in Appendix H) in an equitable way, potential stakeholders from some under-represented sectors need to be encouraged to become involved. Additional stakeholder groups have been contacted where gaps are identified in this respect, and these have been included on the General Consultation Bodies list where appropriate.

5.3.2 Specific and General Consultation Bodies

5.3.2.1 In accordance with the LDP Regulations, the Council has compiled lists of *consultation bodies*, that is organisations or groups that are likely to have an interest in or be affected by the RLDP. These comprise *Specific Consultation Bodies* (including WG, Natural Resources Wales (NRW), statutory undertakers and adjoining local authorities) and *General Consultation Bodies* (including voluntary groups and representatives of business interests). A list of *Other Consultation Bodies* has also been compiled, including organisations or bodies that do not fit into the categories set out in the Regulations, but that may have an interest or be affected. These consultation bodies lists are set out in Appendix F and G.

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5.3.2.2 In order to avoid consultation fatigue for stakeholders and to encourage structured discussion, engagement will be focussed on organisations and groups identified as Key Stakeholders. Key Stakeholders are the specific consultation bodies identified in Appendix E.

5.3.2.3 In addition, specific relevant stakeholder representation will be sought for each of the TWGs. Stakeholders who have an interest in specific topic areas will be encouraged to become involved in TWG discussions and Key Stakeholder events. These will consist of both internal officers and external stakeholders.

5.3.3 Key Stakeholder Group

5.3.3.1 During the early stages of Plan preparation, a KSG will be formed. The KSG will be involved throughout the Plan preparation period up to and including the Deposit stage. It will play a central role in identifying the Plan vision, objectives and strategy options and consider the RLDP strategy, distribution of growth, emerging site allocations and policies. Appendix E identifies the proposed KSG members.

5.3.4 Elected Members

5.3.4.1 Elected Members will be expected to act as champions for the RLDP preparation process by keeping their constituents up to date with progress. All-Member seminars will be held at appropriate times during the plan preparation process, in particular in advance of periods of public consultation. This will help to inform Council Members of the development and progress of the plan and to encourage engagement with their constituents to widen public awareness, with the intention of maximising benefits from Members' roles and the participation of the public. Members may be asked to distribute information directly to digitally excluded residents and share information via their own community social media pages.

5.3.4.2 In addition, members' of the Planning Committee will regularly receive Pre-committee Briefings to enable a direct role in the evolution of RLDP strategies and policies and to influence the plan's direction and priorities.

5.3.4.3 Council Members will also be invited to take part in pre-booked 'drop-in' sessions with officers of the LDP Team (either on-line or in person as appropriate) to facilitate communications between the public, Members, and Officers to help to spread awareness of the RLDP preparation process and emerging strategies and proposals and to enable the views of the community and wider public to be made known. These are likely to be held during the stages of informal Community feedback on the Candidate Sites Register, to give members the opportunity to share information about sites within their wards.

5.3.4.4 Liaison and briefings with the Cabinet Member for Regeneration & Sustainable Development will be held regularly throughout the RLDP preparation process.

5.3.5 Community and Town Councils

5.3.5.1 Town and Community Councils within the County Borough and in areas directly adjacent to its boundaries will play a significant role in communicating information and encouraging engagement in the RLDP process and conveying communities views.

5.3.5.2 In the absence of community Council's within Port Talbot area, VIVA Business support and organisations based in those areas will be targeted and engaged in order that the views of those areas are captured.

5.3.6 Hard to Reach and Protected Characteristics Groups

Hard to Reach Groups

5.3.6.1 The community profiling exercise has identified a number of Hard to Reach Groups within NPT. Measures will be taken to contact these groups and individuals and where possible to encourage them to participate through the processes outlined above, including forums and discussions.

5.3.6.2 In particular representatives from the following groups will be encouraged to become involved in the RLDP preparation process:

- Young people;
- Older persons;
- People with Disabilities;
- Gypsies and Travellers;
- Unpaid carers;
- Students;
- Black Asian Minority Ethnic (BAME) Groups;
- LGBTQ+ Forums

5.3.6.3 In addition there are other groups identified as significant in the community profiling who are considered to have been under represented previously in LDP preparation. This includes (but is not limited to) those seeking affordable housing in the County Borough, people on low incomes, small house builders and small and medium sized enterprises. Every effort will be made to contact and engage with these groups by utilising existing mutual points of contact wherever possible.

5.3.6.4 Appropriate representatives of the identified groups will be invited to participate at the relevant stages of the plan preparation process, in order to maximise the inputs and benefits from the participation. Examples and information will be sought from other services within the Council and associated organisations in order to identify groups and lines of communication to ensure participation.

Protected Characteristics Groups

5.3.6.5 Under the Equality Act 2010, the following characteristics are defined as *protected characteristics*:

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- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

5.3.6.6 Under the Equality Act 2010, it is against the law to discriminate against someone because of the above protected characteristics. All public bodies, including the Council are required under the Act to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations amongst and between different protected groups (known as the Public Sector Duty).

5.3.6.7 The Protected Characteristic Groups have been considered in the compilation of the consultation bodies lists and additional groups contacted and included where appropriate within the RLDP stakeholder groups.

5.3.6.8 The Council has developed a Strategic Equality Plan (SEP)⁽²⁰⁾ in line with the requirements of the Equality Act 2010 which demonstrates the Council's commitment to progressing the equality agenda in Neath Port Talbot, through providing high quality public services to all citizens. The SEP aims to:

- Remove or minimise disadvantages experienced by people due to their protected characteristics; and
- To take steps to meet the needs of people from protected groups where these are different from the needs of other people.

5.3.6.9 The Council's SEP and the 8 associated equality objectives will be fully considered and adhered to throughout the process to ensure that those with protected characteristics and other hard to reach groups have the same opportunities to engage with the active travel process, with their participation and inclusion in the process given the same weight and opportunity.

5.3.6.10 An Equality Impact Assessment (EIA) will be carried out to ensure that the impact of policies, consultations and procedures on all residents and visitors are assessed.

5.3.6.11 Council departments, existing networks and delivery partners will assist in ensuring access to all and will target specific groups. For example, the Council's Community Cohesion Officer will facilitate contact with the Black and Minority Ethnic (BAME) Community and help to share information to the community and help the community to engage in the consultation process in order to express their views.

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5.3.7 Local Development Plan Consultee Database

5.3.7.1 A comprehensive LDP consultee database has been maintained by the Council since the commencement of the preparation process for the original LDP. This has included all persons and organisations that have expressed an interest in the RLDP process or made comments on any aspect, together with anyone who has asked to be kept informed at any stage of the LDP or RLDP process.

5.3.7.2 The General Data Protection Regulations (GDPR) came into force in 2018 placing new restrictions on how organisations can hold and use personal data and defining rights and procedures in respect of the data. Given that this applies to the LDP database, in 2018 the Council wrote to all of those on the database and removed those who no longer wished for their details to be stored. Any person who wishes to be added to the consultation database should email the LDP team (ldp@npt.gov.uk) and give written consent to the Council storing their personal details.

5.3.8 Developers, Agents and Other Site Promoters

5.3.8.1 Developers, agents, landowners and any other interested persons are encouraged to submit suggestions for sites that they wish to be considered for development during the Call for Candidate Sites. Details of the Candidate Sites process, including guidance notes, will be made available on the Council's website for a significant period prior to the Call for Candidate Sites in order for developers, agents and landowners to fully understand the process, understand the potential costs of submitting a site (including the costs of obtaining supporting evidence such as the Development Viability Model) and understand where consultants and specialists may be required.

5.3.8.2 Prior to the Call for Candidate Sites, the LDP Team will invite developers, agents, landowners, other site promoters and interested community members to a workshop to inform them of the process for submitting sites. In addition, given that site allocations will not automatically be rolled forward to the RLDP, prior to the Call for Candidate Sites, the LDP Team will write to all landowners, agents and/or developers of undeveloped site allocations to inform them of the Call for Candidate Sites where we have up-to-date contact information.

5.3.8.3 Developers, agents, landowners and other interested persons will also be involved in the Housing TWG. Following the revocation of TAN1, the LDP Team will use the TAN1 steering group as the basis for the Housing TWG and invite estate agents/ lenders/ valuers etc. to extend the membership to discuss viability input assumptions for example with regards to house prices/ build costs/ developer profit etc.

5.3.9 General Public

5.3.9.1 Members of the public will be informed of RLDP progress through a range of methods. All relevant documents and information will be on the LDP website⁽²¹⁾, with details of current consultations and activity. Information will also be circulated through the Council's social media accounts including Facebook, Facebook Workplace and or Yammer

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(currently being piloted, the chosen platform will be used by Council staff), Instagram, LinkedIn, NPT News (Monthly e-news letter), NPT Young, Twitter, press releases, posters, QR Codes, pop-up banners, leaflets in certain circumstances, information on digital screens, "Find your Nearest" (a GIS based format will aid issues most relevant to stakeholders areas). Radio will also be used where appropriate to promote engagement & consultation events with the aim of targeting those who are digitally excluded.

5.3.9.2 County Borough Councillors and Town / Community Councils will play important roles as elected members and bodies in engaging with local communities and conveying issues and information. Members will be briefed on a regular basis and prior to all consultation exercises together with briefing documents being sent to Town/Community Councils and further support provided if requested.

5.3.9.3 Paper copies of key documents will be made available at the principal council offices listed above at key stages, (subject to Covid restrictions). In addition, members of the public will have the right to make formal representations and thereby influence the Plan at the formal plan preparation stages:

- The suggestion of Candidate Sites for development;
- Preferred Strategy/Pre-Deposit Plan stage;
- Deposit Plan stage.

The Citizens' Panel

5.3.9.4 The Council has established a Citizens' Panel in order to enable residents of the County Borough to contribute to policy and service development. Membership of the Citizens' Panel is open to residents of NPT County Borough aged over 16 years.

5.3.9.5 The Citizens' Panel is intended to provide a method to gauge the opinions of a cross-section of the County Borough's population. The Panel will be consulted at significant stages in the preparation of the RLDP as part of up to 12 surveys undertaken per year and through a number of focus groups. This will be predominantly in the early pre-deposit stages of plan preparation, including the identification of strategic issues, vision and options.

5.4 Collaborative Working

Collaboration within the Council

5.4.1 To ensure that all sections of the Council are fully aware of the RLDP preparation process and its progress, presentations and meetings will be held with relevant senior council officers in all affected departments. This is intended to enable discussion of all aspects and in particular to allow issues to be raised and acknowledged, fully considered and addressed.

5.4.2 For more detailed involvement, TWGs will be established to address specific policy areas such as housing (and affordable housing), employment or environmental issues, and where necessary area-based community issues. The TWGs will include Council Officers with responsibility for areas including Planning, Highways, Engineering, Drainage and

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Flood Management, Biodiversity, Economic Development, Housing, Education and Public Health, although this list is not exhaustive. As indicated above, specific relevant or interested Key stakeholders will be invited where appropriate to participate in these groups.

Collaboration with outside bodies

5.4.3 Collaboration at a sub-regional and regional level through meetings will take place to ensure there is consistency between adjoining areas. Most external bodies, authorities and infrastructure providers with an interest or input into the development of the RLDP will be included on the lists of stakeholders and are likely to be involved in stakeholder meetings and relevant TWG discussions. However, in many cases more specific collaboration will be required or will be beneficial.

5.4.4 This may include collaborating to ensure that appropriate infrastructure will be available at the right time for new development, collaboration with neighbouring authorities in preparing evidence base studies or ensuring that policies and designations are aligned, or working with statutory consultees on candidate site assessments, among other things.

5.5 Feedback Arrangements

5.5.1 The Council's website is intended to be the primary focus for engagement purposes including up-to-date information and news on the progress of the RLDP. Regular updates will be provided on the RLDP website and via other Council media sources and social media where appropriate.

5.5.2 All representations received as part of the statutory consultation stages will be acknowledged and registered on the RLDP database and will be used in the next step of the preparation of the RLDP. Consultees and correspondents will be informed of the next steps in the process where they have been asked to be kept in formed of the next steps in the process.

5.5.3 The majority of correspondence will be by e-mail. This will ensure a fast and economic method of engagement. Wherever this is not possible, then more conventional use of the mail will be called upon.

5.5.4 At all significant stages (Preferred Strategy and Deposit stages), consultation representations and the LPA's response will be reported to the Council's R&SD Cabinet Board and / or the Full Council.

5.5.5 Details of all consultation and engagement activity undertaken will be included in the Initial Consultation Report and Consultation Report which is required by the LDP Wales Regulations at the Preferred Strategy and Deposit Plan and Submission stages of the plan preparation process respectively.

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5.6 Engagement Programme

5.6.1 The engagement programme at Key Stages of plan preparation is set out in detail in Appendix C. For each stage of the plan preparation process, the table sets out engagement methods to be used, who will be involved, the timescale for the engagement and the ways by which the outcomes of the engagement will be reported and decisions will be taken.

5.6.2 The table gives an overview of all the engagement events that are currently proposed. From the start of plan preparation up to submission stage, timings and time periods are set out as specific dates to be adhered to as far as possible. After submission, the subsequent stages of the process are not directly in the control of the Council and consequently, timings post submission are indicative only and subject to change.

6.1 Decision Making and Delivery

6.1.1 Important strategy and policy decisions will need to be made at key stages of the development of the emerging RLDP. The ways in which the council will take these decisions are outlined below, together with measures to ensure that the Plan is delivered within the timescales envisaged.

6.2 Internal Reporting

6.2.1 At key stages of the RLDP preparation process, Directorate Management Team (DMT), Corporate Directors Group (CDG), Regeneration and Sustainable Development Cabinet Board (R&SDCB) and Full Council approval will be required. Generally, internal stakeholder engagement (Officers & Members) will involve discussion at the following groups:

- TWG (Including Officers);
- Members of the Planning Committee / All Member Seminar / Members Briefing;
- DMT;
- CDG;
- R&SDCB and
- Full Council.

6.2.2 Decision making on the RLDP will be by R&SDCB with key formal stages approved by R&SDCB and Full Council.

6.2.3 Agreement from R&SDCB / Council will be sought for all documents which are part of the statutory consultation stages of the RLDP (e.g. the DA, Preferred Strategy and Deposit Plan), together with the stages of RLDP preparation where consideration needs to be given to representations made as a result of the statutory consultation at the Preferred and Deposit stages.

6.3 Corporate Fit

6.3.1 The Council is committed to the delivery of its corporate aims and objectives through its strategic and policy documents. The development of a corporate relationship between such documents is central to their effective delivery, with the RLDP being fundamental in conveying land use aspirations.

6.3.2 The Council's Well-being Plan will form a key part of the evidence of the RLDP, shaping and influencing the vision, strategy and objectives of the RLDP.

6.4 Staffing and Financial Resources

6.4.1 The Council is required to identify the resources – staff and financial – required at various stages in the RLDP process in preparing the DA. The Council's Planning Policy Team will lead in the production and management of the RLDP process, including the preparation of any consultative documents, and will be charged with the management of the definitive stages (1-4, see Table 4.1.1) of the preparation process and progression to

6 . Decision Making and Delivery

Submission of the RLDP to the WG for Examination (Indicative Timetable, Stage 5) . Whilst the following officer time is currently scheduled to be dedicated to the RLDP preparation process, the position will be monitored throughout the process and additional resources requested as necessary:

6.4.2 RLDP Team:

- Planning Policy Manager x 1 (40%)
- Planning Policy Team Leader x 0.8 (80%)
- Senior Planning Policy Officers x 3.8 (85%)
- Policy Implementation and Research Officer x 0.6 (50%)
- Senior Business and Technical Support Officer x 1 (65%)
- Land Charges & GIS Statistical Analyst x 1 (20%)

6.4.3 The Head of Planning & Public Protection and the Planning Policy Manager will be responsible for overall delivery of the RLDP, with the Planning Policy Manager and Team Leader responsible for the day-to-day project management. The Planning Policy Team will lead in the preparation and delivery of the RLDP with Member engagement and political reporting at appropriate stages.

6.4.4 Officers in other Council service areas will also be involved in various aspects of the Plan preparation process as required. Where necessary, external consultants will be engaged to undertake specific pieces of work such as the preparation of technical assessments and studies, advise on particular issues and prepare documents such as the ISA and HRA. An initial assessment has been carried out of the elements of plan preparation that are likely to require external consultant input and financial resources have been secured accordingly.

6.4.5 Regional collaboration with neighbouring authorities will be fundamental to the preparation of the RLDP, where appropriate, opportunities will be sought to develop a joint evidence base with neighbouring authorities and authorities in the SWW Region.

Budget Position

6.4.6 The Council is providing a Budget of £530,830 to fund the preparation of the RLDP to adoption to 2025/26. This includes a base budget of £81,205 per annum with the balance funded from an earmarked reserve.

		2021/22	2022/23	2023/24	2024/25	2025/26
Total Available Budget		100,263	112,945	122,720	103,697	81,205
Funds available	Base Budget	81,205	81,205	81,205	81,205	81,205
	LDP Reserve	19,058	31,740	41,515	22,492	0
Total Estimated Spend		100,263	112,945	122,720	103,697	51,205

Projected costs relating to all elements of the RLDP (including the Examination in Public but excluding staff costs) is £490,830, resulting in a contingency provision of £30,000 over the 5 year period.

6.5 Risk Management

6.5.1 The definitive stage of the timetable is considered to be realistic and achievable, having regard to resource input in to the RLDP process. While the Council will seek to avoid departure from the proposed timetable, a number of risks have been identified which could result in programme slippage. The potential risks and proposed mitigation measures to address / minimise these risks are set out in Appendix D. The Council will report and justify any substantial deviation (of more than 3 months) from the proposed timetable. Section 4 identifies the procedures to be followed should the Council identify the need to amend the DA.

PART 3 - Monitoring and Review

7 . Monitoring and Review

7.1 Monitoring and Review

7.1.1 In accordance with the LDP Regulations, the Council will monitor and review progress against the DA throughout the preparation of the RLDP, in order to ensure that the aims of the CIS are being met in accordance with the proposed timetable.

7.1.2 Instances in which the DA may need to be reviewed and amended include:

- If the process fall significantly behind schedule (more than 3 months);
- If any significant changes are required to the CIS;
- If there are significant changes in the resources available to the Council;
- If new legislation, regulations or guidance should require new procedures or tasks to be undertaken;
- If there are any major changes of circumstance that materially affect the assumptions, evidence, policies or proposals contained within the emerging RLDP;
- If there are further unforeseen restrictions such as additional controls associated with Covid-19

7.1.3 If the Council identifies the need to review the DA there will be a need to re-consult with the specific consultation bodies and seek agreement with the WG in accordance with the LDP Regulations.

7.2 Annual Monitoring Reports

7.2.1 Following adoption of the RLDP, the Council will produce an Annual Monitoring Report (AMR) in accordance with guidance contained in the Development Plans Manual. The report will cover the period 1st April to 31st March each year, will be submitted to the WG by 31st October of the same year and will be made available for public inspection via the Council's website.

7.2.2 The AMR will assess how effectively the policies and proposals of the Plan are performing. If a policy is not being implemented the Council will give the reasons for this and set out the steps it intends to take to secure implementation and any intention to revise the RLDP, to replace or amend the policy.

7.2.3 The AMR will also report and monitor housing delivery. Including following the amendments made in March 2020 (including the revocation of TAN1 and the publication of the Development Plans Manual (Edition 3)), the annual level of housing completions monitored against the Anticipated Annual Build Rate (AABR) as specified in the adopted RLDP housing trajectory; the total cumulative completions monitored against the anticipated cumulative completion rate specified in the adopted RLDP housing trajectory; the level of affordable housing completions monitored against the RLDP's overarching target; and the tenure of affordable housing completions.

7.3 Review of the RLDP

7.3.1 Following adoption of the RLDP, the Council intends to undertake a full review of the RLDP at least once every four years, although the frequency and timing will depend on findings in the AMR / local circumstances. The review will be undertaken in accordance with the relevant legislation and guidance.

7 . Monitoring and Review

Appendices

Appendix B . Key Stages of the LDP, ISA and HRA

Table B.0.1 Key Stages of the RLDP, Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA)

Stage	LDP Stage	ISA Stage	HRA Stage
1	<ul style="list-style-type: none"> Review and Develop Evidence Base 	<ul style="list-style-type: none"> Initial screening Develop the ISA Scoping Report Consultation on the ISA Scoping Report 	<ul style="list-style-type: none"> Initial screening
2	<ul style="list-style-type: none"> Call for and Assessment of Candidate Sites 	<ul style="list-style-type: none"> ISA of Candidate Sites 	<ul style="list-style-type: none"> Assessing Likely Significant Effects
3	<ul style="list-style-type: none"> Preferred Strategy Preparation of Vision, Objectives, Strategic Options & Preferred Strategy Preferred Strategy Stakeholder Engagement 	<ul style="list-style-type: none"> ISA assessment of strategic options and sites Preparation of the ISA Interim Report 	<ul style="list-style-type: none"> HRA Screening
4	<ul style="list-style-type: none"> Pre-Deposit (Preferred Strategy) Consultation 	<ul style="list-style-type: none"> Consultation on ISA Interim Report 	<ul style="list-style-type: none"> Assessing Likely Significant Effects
5	<ul style="list-style-type: none"> Deposit RLDP Drafting and Stakeholder Engagement 	<ul style="list-style-type: none"> Assessment of emerging RLDP 	<ul style="list-style-type: none"> Assessing Likely Significant Effects
6	<ul style="list-style-type: none"> Deposit RLDP and Associated Documents 	<ul style="list-style-type: none"> Consultation on ISA Report 	<ul style="list-style-type: none"> Appropriate Assessment (AA) Scoping (if required) Appropriate Assessment (AA) (if required) Formal consultation on AA (if required) Record AA
7	<ul style="list-style-type: none"> Submission of RLDP to WG 	<ul style="list-style-type: none"> Submission of ISA Report with RLDP 	<ul style="list-style-type: none"> Submission of HRA Report with RLDP
8	<ul style="list-style-type: none"> Independent Examination in Public (EIP) 		
9	<ul style="list-style-type: none"> Publication of the binding Inspector's Report 		
10	<ul style="list-style-type: none"> Adoption of the RLDP Prepare Adoption Statement 	<ul style="list-style-type: none"> Preparation of ISA Statement 	<ul style="list-style-type: none"> Preparation of HRA Statement

Appendix B . Key Stages of the LDP, ISA and HRA

Stage	LDP Stage	ISA Stage	HRA Stage
11	<ul style="list-style-type: none">Monitoring and Review	<ul style="list-style-type: none">Monitoring the implementation of the RLDP against the ISA Indicators	

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.1 Preparation and Submission of DA (Regulation 9)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Draft DA	<p>To inform stakeholders that the Council is preparing a RLDP and will seek community involvement</p> <p>To set out the timetable for LDP production</p> <p>To seek the views of stakeholders and consultees on the content of the Draft DA</p> <p>To then report responses and proposed amendments to Regeneration & Sustainable Development Cabinet Board/Council for agreement</p> <p>To then submit DA & CIS to WG for formal agreement</p>	August - September 2021	<p>Specific, General & Other consultation Bodies</p> <p>Council Members</p> <p>Potential Key Stakeholder Group (KSG) Members</p> <p>Public Service Board (PSB)</p> <p>Citizens Panel</p> <p>General Public</p>	<p>Consult on Draft document on Website & place in Deposit Venues</p> <p>Inform all it is a 6 week opportunity to consider the draft DA timetable and CIS and submit a representation</p> <p>Promotion through Social Media, Press Release</p> <p>Correspondence with Potential Key Stakeholder Group Members ⁽²²⁾</p> <p>LDP Team liaison with PSB</p> <p>Engage with adjoining authorities through e-mail or officer working parties/ regional forums to establish collaborative working.</p> <p>Notify Citizen's Panel of consultation</p>	<p>Any comments will be considered and the DA amended if necessary</p> <p>Summary of comments received will be presented to Members</p>
Consultation on ISA Scoping Report	To enable environmental consultation bodies and relevant stakeholders to comment on the ISA Scoping Report	August - September 2021	<p>Environmental & Specific consultation bodies</p> <p>Other interested parties</p>	<p>Correspondence with these groups</p> <p>Virtual conferences/meetings</p> <p>Face to face meetings subject to the current Government Guidelines</p>	Consultation Report made available on the Council's website
Publication of the agreed DA	To inform stakeholders of the content and availability of the agreed DA	January 2022	<p>Specific consultation Bodies</p> <p>General consultation bodies as appropriate</p>	<p>Confirm the agreement of the DA on the Council's website and make final document available</p> <p>Inform all of the agreement with WG through Social Media, Press Release</p>	Copies of agreed DA made available at Deposit venues and on the Council's website

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
			KSG General Public	Correspondence with KSG Members Inform adjoining Authorities by e-mail/regional forums	

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.2 Pre-deposit Preparation and Participation (Regulation 14)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Start of Plan preparation	To inform stakeholders that formal preparation of the RLDP has commenced	January 2022	Specific, General & Other Consultation Bodies General Public	Place a notice on Council website	N/A
Initial screening for ISA. Developing ISA Scoping Report	To engage with environmental consultation bodies and relevant stakeholders to develop SA objectives To inform SEA screening determination To make public the SEA screening determination	January 2021 - January 2022	Environmental consultation bodies ⁽²³⁾ Other environmental consultees	Correspondence to seek an opinion on whether the Plan will have significant effects as defined under schedule 1 of the SEA Regulations Virtual conferences/meetings Face to face meetings subject to the current Government Guidelines send copy of determination to WG publish on website and press of determination within 14 days	Report on screening consultation made available at Deposit venues and on the Council's website acknowledge all comments
Call for Candidate Sites Create a Candidate Site Register	Invite stakeholders to submit candidate sites and produce a Candidate Sites Register to inform all interested parties and consultation bodies of the plan's progress to this stage	March 2022 - May 2022 June 2022	Members Specific, General & Other Consultation Bodies General Public Citizens Panel PSB	Inform all stakeholders and members of the public that have expressed an interest in participating in the "call" via e-mail Publish on website all relevant material including the Candidate Site Submission Form and Candidate Site Assessment Methodology FAQ to answer the common queries and areas of confusion	Candidate Site Register made available on the Council's website

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
				<p>Inform of the Call for Candidate Sites through all social media outlets</p> <p>Distribute posters, leaflets with QR codes where necessary</p> <p>Advertise the Call for Sites using digital screens.</p> <p>Advertise the Call for Sites through a radio campaign, radio sound bites</p> <p>Planning Committee Pre-briefing</p> <p>Briefing material sent to all libraries to enable library staff to assist</p> <p>Brief Local Area Co-ordinators</p> <p>Update PSB</p>	
Community Feedback on Candidate Sites	<p>To invite comments and views on submitted sites.</p> <p>To seek community buy-in to the candidate sites</p>	June - August 2022	General Public Members	<p>Operate a virtual Candidate Sites Register which allows comments to be submitted on-line</p> <p>Run drop surgeries for members to provide feedback on Candidate Sites</p>	Considered as part of the Candidate Sites Assessment

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
<p>Preparation Process</p> <p>Identify issues; Review and develop evidence base; Develop vision and establish RLDP objectives; Consider alternative strategies and options.</p>	<p>To understand the context, review and supplement data</p> <p>To identify the key issues the RLDP should address</p> <p>To develop a clear vision for the Plan area and objectives for the RLDP</p> <p>To generate viable options and assess each one</p> <p>To develop key policies</p>	February - October 2022	<p>Specific consultation Bodies</p> <p>General consultation bodies as appropriate</p> <p>KSG</p> <p>Spatial Planning Area based groups</p> <p>Technical Working Groups</p> <p>Members</p> <p>Citizens Panel</p>	<p>Consult with all relevant stakeholders and consultation bodies via e-mail</p> <p>Update Council's website regularly</p> <p>Hold virtual meetings/conferences in all 8 Spatial Planning Areas</p> <p>Engage with PSB</p> <p>All Member seminars</p> <p>Planning Committee Member Briefings</p> <p>Engage the Citizen's Panel</p> <p>Maintain collaborative working by hold Technical Working Group meetings & attending regional forums</p>	<p>Prepare evidence base topic papers</p> <p>Report to Regeneration & Sustainable Development Cabinet Board – made available on the Council's website</p> <p>Notify all who contributed</p>
<p>Consider the Draft Pre-deposit Plan – i.e. The draft Vision, Strategy, alternatives and Key Site Allocations</p>	<p>To agree a preferred strategy for the RLDP</p> <p>To identify areas / topics for SPG production</p> <p>To build consensus</p>	June - November 2022	<p>KSG</p> <p>Spatial Planning Area based groups</p> <p>General consultation bodies</p> <p>Members</p> <p>Citizens Panel</p>	<p>Correspondence with these groups</p> <p>Virtual meetings</p> <p>Face to face meetings subject to the current Government Guidelines</p> <p>Planning Committee Member Briefings</p> <p>Engage Citizen's Panel</p>	<p>Report to Regeneration & Sustainable Development Cabinet Board – made available on the Council's website</p>
<p>ISA and HRA Screening assessment of strategic options and sites</p>	<p>To ensure the vision, strategic options and sites are assessed against the proposed ISA and HRA Screening frameworks</p>	June - November 2022	<p>Environmental consultation bodies</p> <p>Specific consultation bodies</p> <p>Other interested Parties</p>	<p>Correspondence with these groups</p> <p>Virtual meetings</p> <p>Face to face meetings subject to the current Government Guidelines</p>	<p>Report on the assessment and Implications made available at Deposit locations and</p>

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Preparation Process					on the Council's website

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.3 Pre-deposit Consultation (Regulation 15)

Stage in the Document	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Preparation Process					
Consultation on the Pre-Deposit Plan (Preferred Strategy)	<p>To enable stakeholders to respond to the preferred strategy and suggest modifications</p> <p>To provide an opportunity to identify potential alternative sites that correspond with the preferred strategy</p> <p>To build consensus</p>	March - April 2023	<p>General public and other interested parties</p> <p>Specific & General Consultation Bodies</p> <p>KSG</p> <p>Members</p> <p>Local Area Co-ordinators</p> <p>Citizens Panel</p> <p>PSB</p> <p>Spatial Planning Area Groups</p>	<p>Inform all stakeholders and members of the public that have expressed an interest in participating via e-mail</p> <p>All information will be placed on Council's website</p> <p>FAQ to answer the common queries and areas of confusion</p> <p>Inform all through social media outlets</p> <p>Use of Pop-up banners with QR codes to remind people to go to the website</p> <p>Distribute posters, leaflets with QR codes where necessary</p> <p>Advertise consultation utilising digital screens</p> <p>Advertise through a radio campaign, radio sound bites to raise awareness</p> <p>Planning Committee Pre-briefings</p> <p>All Member Seminar</p> <p>Hard copies of all comment forms and relevant information in Deposit Venues</p> <p>Briefing material sent to all libraries to enable library staff to assist</p> <p>Drop-in events where necessary observing current Government Guidelines</p> <p>Brief Local Area Co-ordinators</p> <p>Update PSB</p>	<p>Acknowledge duly made representations by letter / email</p> <p>Summary of representations received together with the Council's response reported to Regeneration & Sustainable Development Cabinet Board and made available at Deposit locations and on the Council's website</p> <p>Preferred strategy made available at Deposit locations and on the Council's website.</p>

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
				Carry out an on-line stakeholder meeting in each of the 8 spatial planning areas	
Consultation on ISA Interim Report	To demonstrate how the RLDP complies with the ISA / HRA framework and SEA Regulations	March - April 2023	Environmental Consultation Bodies Relevant Other Stakeholders and Interested parties	Inform all stakeholders and that have expressed an interest in participating via e-mail All information will be placed on Council's website Hard copies of all comment forms and relevant information in Deposit Venues Correspondence to seek an opinion on whether the Plan will have significant effects as defined under schedule 1 of the SEA Regulations Virtual conferences/meetings Face to face meetings subject to the current Government Guidelines	Acknowledge duly made representations by letter / email Summary of representations received together with the Council's response reported to Regeneration & Sustainable Development Cabinet Board and made available at Deposit locations and on the Council's website

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.4 Deposit RLDP and Associated Documents (Regulation 17)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Prepare Deposit Plan, ISA Report and HRA Report	Develop the Deposit RLDP out of the preceding stages of the Plan process Prepare ISA Report Prepare HRA Report	August 2023 - February 2024	Technical Working Groups Specific, General & Environmental Consultation Bodies	Invite comment via e-mail Technical Working Group Virtual Meetings Attending Regional Forums	N/A
Consider the Deposit Plan (including ISA & HRA Reports)	To achieve a consensus on the content of the Plan	January - February 2024	KSG Specific, General & Environmental consultation bodies as appropriate Members	Report the Plan to Cabinet/Council KSG Virtual Meeting	Reports to Regeneration & Sustainable Development Cabinet Board to obtain Council approval for Deposit RLDP. Hold meetings where necessary to discuss representations and any amendments that they may trigger.
Place RLDP and associated documents on Deposit (including ISA & HRA Reports)	To enable stakeholders to make representations to the Deposit RLDP and associated supporting documents	March - April 2024	General public and other interested parties Specific, General & Environmental Consultation Bodies	Inform all stakeholders and members of the public that have expressed an interest in participating via e-mail All information will be placed on Council's website FAQ to answer the common queries and areas of confusion Inform all through social media outlets	Acknowledge duly made representations by letter / email Summary of representations received together with the Council's response reported to Regeneration &

Appendix C . Stages of Plan Preparation & Engagement Methods

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
			<p>Members</p> <p>Local Area Co-ordinators</p> <p>Citizens Panel</p> <p>Spatial Planning Area Groups</p> <p>PSB</p>	<p>Use pop-up banners with QR codes to remind people to go to the website</p> <p>Distribute posters, leaflets with QR codes where necessary</p> <p>Utilise digital screens</p> <p>Advertise through radio campaign & radio sound bites to raise awareness</p> <p>Planning Committee Member Pre -briefings</p> <p>All Members Seminar</p> <p>Hard copies of all comment forms and information in Deposit Venues</p> <p>Briefing material sent to all libraries to enable library staff to assist</p> <p>Drop-in events where necessary observing current Government Guidelines</p> <p>Brief Local Area Co-ordinators</p> <p>Update PSB</p> <p>Carry out 8 on-line stakeholder meetings in each Spatial Planning Area</p>	<p>Sustainable Development Cabinet Board and made available at Deposit locations and on the Council's website</p> <p>Consider representations and make amendments accordingly</p>

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.5 Submission of RLDP to the WG and Planning Inspectorate for Examination (Regulation 22)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Submission of RLDP and Associated documents including ISA, HRA & Final Consultation Reports) to the WG and Planning Inspectorate for examination Review DA	To inform stakeholders that the Council has submitted its RLDP to the WG To ensure that the Plan is sound	October 2024	All representors and any stakeholders that have requested to be informed of RLDP progress	E-mail each representor Publish on Council's website Make brief announcement on social media outlets	N/A

Table C.0.6 Independent Examination (Regulation 23)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Publication of Notice of Independent Examination	To ensure that stakeholders are advised that an Independent Examination into the RLDP will be taking place.	November 2024	All representors / any stakeholders that have requested to be informed of RLDP progress	This will be the remit of the Programme Officer	N/A
Pre-examination meeting	To allow the Independent Planning Inspector to advise on Examination procedures and format	December 2024	All representors / any stakeholders that have requested to be informed of RLDP progress	This will be the remit of the Programme Officer	N/A
Examination of the Plan (consideration of the soundness of the RLDP and all Representations made to the Plan by Independent Planning Inspector)	To provide an impartial planning view on the soundness of the Plan and the representations received in relation to it	December 2024 - February 2025	All representors and others at the invitation of the Inspector	This will be the remit of the Programme Officer	N/A

Appendix C . Stages of Plan Preparation & Engagement Methods

Table C.0.7 Publication of the Inspector's Report (Regulation 24)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Receipt/ publication of the binding Inspector's Report	To inform stakeholders of the Inspector's decisions	May 2025	All stakeholders / interested parties	Place on Council's website E-mail all those interested parties Announce on social media and radio	N/A

Table C.0.8 Adoption of the RLDP (Regulation 25)

Stage in the Document Preparation Process	Purpose	Timescale (When?)	Who? Community Involvement	How? Consultation Mechanism	Feedback / Reporting Mechanism
Formal adoption of the RLDP as The Development Plan for NPT	To advise stakeholders and interested parties of the adoption of the RLDP	July 2025	All stakeholders / interested parties	Publicise on Council's website Inform stakeholders and Examination participants Announce on social media and radio Place a hard copy of Adopted Plan in Deposit Venues	This will trigger the need for the first AMR some twelve/ possibly 18 months from adoption

Appendix D . Risk Assessment and Mitigation

Table D.0.1 Risk Management

Risk	Potential Impacts	Probability	Mitigation Measures
Additional requirements as a result of new legislation, regulations, guidance or data / projections	Additional work required causing programme slippage	Medium	Monitor emerging legislation / guidance / data and assess need for additional resources
Loss / change of staff resources	Programme slippage	Medium	Consider replacement of staff resources Monitor / advertise vacancies
Involvement in preparation of Strategic Development Plan (SDP)	Programme slippage. Resource implications and extent of input to the SDP is currently unknown.	Medium / High	Ensure sufficient resources are available with corporate support of the SDP process and timetable from the outset.
Review of RLDP resulting from a requirement to align with a Strategic Development Plan (SDP)	Programme slippage	Low	Ensure involvement in progress of regional work Continued liaison with Welsh Government
Need for additional research / consultation	Programme slippage	Low / medium	Identify / commission additional work needed as early as possible
Printing / translation delays	Programme slippage	Low	Consider additional resources
Timetable proves too ambitious due to greater than anticipated workload	Programme slippage	Medium	Realistic timetable prepared with some flexibility Consider additional resources
Significant objections from Statutory Consultation Bodies	RLDP cannot be submitted for examination without significant work	Low / Medium	Ensure views of Statutory Bodies are sought / considered as early as possible
Large volume and / or highly significant levels of objection to proposals e.g. site allocations	Programme slippage	Low / Medium	Ensure close liaison and involvement with stakeholders early in the process
Reduction and lack of financial resources	Programme slippage	Low / Medium	Sufficient funds are allocated in the RLDP reserve.
Planning Inspectorate unable to meet required timetable for examination / reporting	Examination / report delayed	Low	Liaise closely with Planning Inspectorate to ensure early warning of any potential problems

Appendix D . Risk Assessment and Mitigation

Risk	Potential Impacts	Probability	Mitigation Measures
LDP fails test of soundness	RLDP cannot progress to adoption	Low / Medium	Ensure RLDP is sound, based on robust evidence with ISA and well audited stakeholder / community involvement
Challenge with regards to accessibility of documents, website and apps.	Council found to be in breach of Equality Act 2010.	Low/ Medium	Ensure documents and website in accordance with Council guidance.
Legal challenge	Adopted RLDP is quashed / additional work needed	Low	Ensure RLDP complies with regulations, legislation etc
Delay due to need for legal opinion from Barrister or QC	Programme slippage/ additional work needed	Medium	Ensure that legal team are consulted at an early stage to ensure compliance with regulations and guidance
Direction from WG Cabinet Secretary to prepare a Joint Plan	Work on individual RLDP to-date would be abortive	Low	Ensure close liaison with WG
Delays caused by Council decision making structure	Programme slippage	Medium	Monitor progress against DA
Covid-19 Pandemic	Limit engagement and availability of hard copies of key documents	Medium	Continue to monitor lockdown and social distancing restrictions and the potential impact on engagement and conformity with LDP Regulations

Key Stakeholder Group (KSG)

E.1 Membership of the KSG may be subject to change over time as organisations are continually changing through mergers, re-branding, or disbanding. The KSG will consist of representatives from each of the following:

Table E.0.1 List of Key Stakeholder Group

- | | |
|---|--|
| • Adjoining Authorities* | • Neath Port Talbot Group of Colleges |
| • Age Connects (Concern) Neath Port Talbot | • Neath Port Talbot Hospital |
| • All Social Housing Providers (operating in Authority Area) | • Neath Port Talbot Youth Council YOVO and Junior YOVO |
| • BT Group Plc | • Neighbouring Community Councils* |
| • BT Openreach | • Network Rail Ltd |
| • Business Connect Neath Port Talbot | • Older Persons Alliance |
| • CADW | • Royal Commission on the Ancient & Historical Monuments of Wales |
| • Celtic Community Leisure | • South Wales Police |
| • Dwr Cymru Welsh Water (DCWW) | • Sports Council for Wales |
| • Federation of Small Businesses (FSB) | • Swansea Bay City Deal |
| • Glamorgan/ Gwent Archaeological Trust | • Swansea Bay University Health Board |
| • Home Builders Federation (HBF) Wales | • Tata Steel |
| • Jobcentre Plus | • Tonna Hospital |
| • Menter Iaith Castell-Nedd Port Talbot | • Town and Community Councils within NPT* |
| • Mid & West Wales Fire Service | • Transport for Wales (TfW) |
| • Natural Resources Wales (NRW) | • Viva Port Talbot (Business Improvement District for Port Talbot) |
| • Neath Port Talbot Biodiversity Forum | • Western Power |
| • Neath Port Talbot Black Asian and Minority Ethnic Community Association | • Welsh Government |

Appendix E . Key Stakeholder Group

- Neath Port Talbot Council for Voluntary Services (NPT CVS)

E.2 ADJOINING AUTHORITIES

- Brecon Beacons National Park
- Bridgend County Borough Council
- Carmarthenshire County Council
- Powys County Council
- Rhondda Cynon Taff County Council
- City and County of Swansea Council

E.3 TOWN AND COMMUNITY COUNCILS IN NPT

- Blaengwrach Community Council
- Blaenhonddan Community Council
- Briton Ferry Town Council
- Cilybebyll Community Council
- Clyne and Melincourt Community Council
- Coedffranc Town Council
- Crynant Community Council
- Cwmllynfell Community Council
- Dyffryn Clydach Community Council
- Glyneath Town Council
- Gwaun Cae Gurwen Community Council
- Neath Town Council
- Onllwyn Community Council
- Pelenna Community Council
- Pontardawe Town Council
- Resolven Community Council
- Seven Sisters Community Council
- Tonna Community Council
- Ystalyfera Community Council

E.4 NEIGHBOURING COMMUNITY COUNCILS

- Betws Community Council
- Cefn Cribwr Community Council
- Clydach Community Council
- Cornelly Town Council
- Cwmamman Town Council
- Garw Valley Community Council
- Llangynwyd Middle Community Council
- Maesteg Town Council
- Mawr Community Council
- Ogmore Valley Community Council

Appendix E . Key Stakeholder Group

- Pyle Community Council
- Quarter Bach Community Council
- Rhigos Community Council
- Ystradfelte Community Council
- Ystradgynlais Town Council

Appendix E . Key Stakeholder Group

Specific Consultation Bodies (defined in LDP Regulation 2)

F.1 LPAs must consult the following bodies in accordance with the 2004 Act and the LDP Regulations:

i. The Welsh Government -In addition to planning, the Welsh Government has responsibility for a wide range of policy matters including agriculture, economic development, education, environment, health and social services, historic environment, housing, industry, tourism, transport and Welsh language. The Welsh Government's Planning Division will co-ordinate consultations within the Welsh Government.

ii. Natural Resources Wales

iii. Network Rail Infrastructure Limited (Western & Wales - Property)

iv. Secretary of State – insofar as the Secretary of State exercises functions previously exercisable by the Strategic Rail Authority (Railways Act 2005)

v. A relevant authority (i.e. a local planning authority or a community or town council), any part of whose area is in or adjoins the area of the authority

vi. Any person to whom the electronic communications code applies by virtue of a direction given under section 106(3) of the Communications Act 2003

vii. Any person who owns or controls electronic apparatus situated in any part of the authority's area (where known)

viii. Any of the bodies from the following list which are exercising functions in any part of the authority's area:

a. a Local Health Board

b. a person to whom a license has been granted under section 6(1)(b) or (c) of the Electricity Act 1989

c. a person to whom a license has been granted under section 7(2) of the Gas Act 1986

d. a sewerage undertaker

e. a water undertaker

F.2 UK GOVERNMENT DEPARTMENTS

F.3 An authority should consult UK Government departments where aspects of a plan, or proposals for its revision or replacement, appear to affect their interests. In particular, the following should be consulted on the policy areas outlined below:

i. Department for Transport Rail, airport and maritime / port policy

ii. Department of Energy and Climate Change UK energy policy

Appendix F . Specific Consultation Bodies

iii. Home Office Civil defence matters; policies for prisons etc

iv. Ministry of Defence Matters likely to affect its land holdings and installations or where large scale disposals of MOD land may be being considered

F.4 SPECIFIC CONSULTATION BODIES

F.5 This list of consultees will be consulted at all key stages of the plan, by letter or e mail (depending on the preference) and will be given copies of all relevant documents for consideration by e mail or post.

- All Social Housing Providers (operating in Authority Area)
- Betws Community Council
- Blaengwrach Community Council
- Blaenhonddan Community Council
- Brecon Beacons National Park Authority
- Bridgend County Borough Council
- Briton Ferry Town Council
- BT Openreach HQ
- BT Group Plc
- Cadw
- Carmarthenshire County Council
- Cefn Cribwr Community Council
- Centrica Energy
- Cilybebyll Community Council
- Clydach Community Council
- Clyne & Melincourt Community Council
- Coedffranc Community Council
- Cornelly Town Council
- Crynant Community Council
- Cwmamman Town Council
- Cwmllynfell Community Council
- Department For Business Energy & Industrial Strategy (BEIS)
- Department for Transport
- Dwr Cymru Welsh Water
- Dyffryn Clydach Community Council
- E E
- Ecotricity
- EDF Energy
- Garw Valley Community Council
- Glynneath Town Council
- Good Energy
- Neath Port Talbot Youth Council YOVO and Junior YOVO
- Neath Port Talbot Public Service Board (NPTPSB)
- Neath Town Council
- Network Rail Ltd
- Network Rail Infrastructure Ltd (Western and Wales) Property O2
- Ogmore Valley Community Council
- Onllwyn Community Council
- Pelenna Community Council
- Pontardawe Town Council
- Powys County Council
- Public Health Wales
- Pyle Community Council
- Quarter Bach Community Council
- Resolven Community Council
- Rhigos Community Council
- Rhondda Cynon Taff County Borough Council
- Senedd Cymru / Welsh Parliament
- Seven Sisters Community Council
- SSE/SWALEC
- Swansea Bay University Health Board
- Swansea Council
- Tawe Uchaf Community Council
- Tesco Mobile LMT
- Tonna Community Council
- Transport for Wales (TfW)
- United Utilities
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Appendix F . Specific Consultation Bodies

- Gwaun Cae Gurwen Community Council
- Health and Safety Executive (HSE)
- Home Office
- Hutchison 3 G UK Ltd
- Llangynwyd
- Lower Community Council
- Llangynwyd Middle Community Council
- Maesteg Town Council
- Mawr Community Council
- Ministry of Defence (MOD)
- National Grid
- Natural Resources Wales (NRW)
- Utilita Energy
- Virgin Media
- Visit Wales
- Vodafone Group plc
- Wales & West Utilities Ltd
- Welsh Government
- Welsh Health Estates
- Western Power
- Ystalyfera Community Council
- Ystradfellte Community Council
- Ystradgynlais Town Council

Appendix G . General and Other Consultation Bodies

General Consultation Bodies (defined in LDP Regulation 2)

G.1 The following are the ‘general consultation bodies’ that should be consulted in accordance with an authority’s DA:

- i. Voluntary bodies, some or all of whose activities benefit any part of the authority’s area
- ii. Bodies which represent the interests of different racial, ethnic or national groups in the authority’s area
- iii. Bodies which represent the interests of different religious groups in the authority’s area
- iv. Bodies which represent the interests of disabled persons in the authority’s area
- v. Bodies which represent the interests of persons carrying on business in the authority’s area
- vi. Bodies which represent the interests of Welsh culture in the authority’s area

- Action for Children
- Adult Learning Wales
- Afan Tawe Nedd Crime Prevention Panel
- Age Connect (Concern) Neath Port Talbot
- Aggregates Industries UK Ltd
- Business in Focus
- Business Wales
- Calan D V S
- Canal and Rivers Trust
- Canolfan Maerdy
- Chamber Wales
- Children’s Commissioner For Wales
- Church in Wales
- Citizens Advice Bureau (NPT)
- Coal Authority
- Coalfields Regeneration Trust
- Coed Cymru
- Community Lives Consortium
- Confederation of British Industry
- Country Land & Business Association Ltd (CLACymru)
- Campaign for the Protection of Rural Wales (CPRW)
- Dansa Ltd
- Dewis Ltd
- Diocese of Menevia
- Neath YMCA
- New Sandfields, Aberafan and Afan-Community Regeneration
- Neath Port Talbot Biodiversity Forum
- Neath Port Talbot Black Asian and Minority Ethnic Community Association
- Older Persons’ Alliance
- Older Persons’ Commissioner for Wales
- Planning Aid Wales
- Presbyterian Church of Wales
- Princes Trust
- Private Landlords Forum
- Ramblers Association
- Royal National Institute of Blind People (RNIB) Cymru
- Royal National Institute for Deaf People (RNID) (Action for Hearing Loss)
- Race Council Cymru
- Rail Freight Group
- Renewable UK Association
- Road Haulage Association
- Royal Commission on the Ancient & Historical Monuments of Wales
- Royal Voluntary Service
- Residents and Service Users Volunteering Programme (RSVP) Wales
- RSPB Cymru

Appendix G . General and Other Consultation Bodies

- Disability Wales
- DOVE Workshops
- Ethnic Youth Support Team Wales (EYST)
- Elim Pentecostal Church
- Ethnic Minority Foundation
- Farmers' Union of Wales (FUW)
- Federation of Master Builders Cymru
- Federation of Small Business (FSB)
- Fields in Trust Cymru
- Freight Transport Association
- Friends, Families and Travellers
- Future Generations Commissioner for Wales
- Glamorgan/Gwent Archaeological Trust
- Guide Dogs
- Gypsies and Travellers Wales
- Home Builders Federation (HBF) Wales
- Keep Wales Tidy
- Local Access Forum (LAF)
- Members of Parliament (MPs) for Neath Port Talbot
- Menter Iaith Castell-Nedd Port Talbot
- Mineral Products Association
- Muslim Council of Wales
- National Farmers' Union (NFU) Cymru
- National Federation of Gypsy Liaison Groups
- National Youth Agency
- Neath and District Trades Council
- Neath & District Young Farmers Clubs (YFC)
- Neath Port Talbot Community Transport
- Neath Port Talbot Council for Voluntary Service (NPTCVS)
- Neath Port Talbot Group of Colleges
- Neath Port Talbot Methodist Circuit
- Neath Port Talbot Mind Association
- Neath Port Talbot Youth Council - YOVO and YOVO Junior
- Neath and Tennant Canals Trust
- Senedd Members (MS/AS) for NPT and the South West Region
- Scope
- Shelter Cymru
- Showmen's Guild of Great Britain (Wales)
- South Wales Police
- South Wales Police and Crime Commissioner
- South Wales Chamber of Trade
- South West Wales Economic Forum
- Sport Wales
- Stonewall Cymru
- Jobcentre Plus
- Swansea Bay City Deal
- Swansea Canal Society
- Swansea Hebrew Congregation
- Swansea University
- Tata Steel
- The Gypsy Council
- The British Ports Association
- The Catholic Church in England and Wales
- The Pontardawe Senior Citizen's Welfare Association
- Thrive Women's Aid
- Travellers Law Reform Project
- University of Wales Trinity St David (Swansea Metropolitan University)
- Viva Port Talbot (The Business Improvement District in Port Talbot)
- Wales Council For Deaf People
- Wales Council of the Blind
- Welsh Language Commissioner
- Welsh Local Government Association (WLGA)
- Welsh Women's Aid
- West Wales Exporters' Association
- Workways
- Young Enterprise (South & Mid Wales)
- Young Wales
- Youth Access
- Business Connect

- Youth Cymru
- Ystalyfera Development Trust

OTHER CONSULTATION BODIES

G.2 An authority should also consider the need to consult, where appropriate, with the following agencies and organisations, in accordance with its DA:

- Airport Operators
- British Geological Survey
- Centre for Ecology and Hydrology
- Civil Aviation Authority
- Commission for Racial Equality
- Country Land and Business Association
- Crown Estate Office
- Design Commission for Wales
- Disability Rights Commission
- Equality and Human Rights Commission
- One Voice Wales
- Police Architectural Liaison Officers
- Professional Bodies not specifically listed
- Quarry Products Association Wales
- Wales Environment Link
- Welsh Environmental Services Association (representing waste industry)
- Bus Service Operators

Below is Neath Port Talbot Council's list of Other Consultation Bodies:

- British Geological Survey
- Cardiff International Airport Ltd
- Centre for Ecology and Hydrology
- Civil Aviation Authority
- Design Commission for Wales
- Disability Rights Commission
- DJ Thomas Coaches
- Equality and Human Rights Commission Wales
- First Buses Ltd
- First Group
- General Aviation Awareness Council
- National Express
- One Voice Wales
- Quarry Products Association Wales
- Royal Institute of Chartered Surveyors Wales (RICS)
- Royal Town Planning Institute Wales (RTPI)
- Secure by Design, South Wales Police

Community Profile

H.1 The Development Plans Manual indicates that the Council should profile the community in order to identify the most appropriate range of interests to be involved in the RLDP preparation process. The bullet points below provide a summary of the main relevant characteristics of the County Borough's population. Full details and findings are summarised below.

- The most recent County Borough has a **working age population** of 86,300, of whom 6,600 are students. This is the third highest rate of all authorities in Wales (Cardiff 9.8%, Ceredigion 9.5%, NPT 7.6%). (ONS Population Estimates (2019))
- The **age profile** of NPT is in line with the average for Wales:
 - Aged 0-15: 17.5% compared to an average of 17.9% in Wales;
 - Aged 16-64: 61.5% compared to an average of 61.1% in Wales; and
 - Aged 65 and over: 20.9% compared to an average of 21.0% in Wales. (ONS Population Estimates (2019))
- Lower proportions than the Welsh average in NPT able to **speak Welsh, read Welsh, write Welsh and understand spoken Welsh**:
 - Speak Welsh: 22.5% compared to an average of 29.1% in Wales;
 - Read Welsh: 20.8% compared to an average of 26.0% in Wales;
 - Write Welsh: 18.3% compared to an average of 23.8% in Wales; and
 - Understand spoken Welsh: 27.2% compared to an average of 33.4% in Wales. (ONS Population Estimates (2019))
- With regards to **sexual orientation**, a greater proportion of residents than the average for Wales, in NPT identify as heterosexual (98.0% compared to 97.4%); gay or lesbian (1.0% compared to 0.7%); other (0.5% compared to 0.2%); and the same proportion identifying as bisexual (0.5%). (ONS Annual Population Survey (2017))
- NPT is less **ethnically diverse** than the average for Wales. NPT has:
 - A greater proportion of white residents (98.1% compared to 95.6%);
 - Fewer residents with mixed/ multiple ethnic groups (0.7% compared to 1.0%);
 - Fewer Asian/ Asian British residents (1.0% compared to 2.3%);
 - Fewer Black/ African/ Caribbean/ Black British residents (0.2% compared to 0.6%); and
 - Fewer residents with other ethnicity (0.1% compared to 0.5%). (ONS Census (2011))
- NPT has a greater proportion of residents with poorer **health** and greater **disability** than the Welsh average:
 - Fewer residents report 'very good or good health' (73.7% compared to 78.1%);
 - A greater proportion report 'bad or very bad health' (10.3% compared to 7.5%); and
 - A greater proportion have their day-to-day activities 'limited a lot' (15.7% compared to 11.5%) and 'limited a little' (11.8% compared to 10.8%). (ONS Census (2011))

Appendix H . Community Profile

- A greater proportion of residents in NPT are providing **unpaid care** than the average for Wales (14.6% compared to 12.1%) and a significantly greater proportion (41.2%) are providing more than 50 hours unpaid care a week. (ONS Census (2011))
- In terms of **economic activity**, compared to the working age resident average for Wales:
 - NPT has a lower proportion who are economically active (71.2% compared to 75.7%);
 - Similar proportions are unemployed (3.8% compared to 3.7%);
 - A lower proportion are long-term sick economically inactive (23.5% compared to 28.3%);
 - A similar proportion of economically inactive working age residents are students (26.5%); and
 - A greater proportion are economically inactive and looking after family/ home (18.0% compared to 15.2%). (ONS Annual Population Survey (2020))
- NPT has a greater proportion of **small and medium sized enterprises** than the Welsh average (10.3% compared to 8.9% and 2.0% compared to 1.4% respectively). (ONS Inter Departmental Business Register (2020))
- In terms of **income and poverty**:
 - NPT full-time equivalent gross weekly earnings is less than the average for Wales (£534 compared to £542).
 - The Welsh Index of Multiple Deprivation (WIMD) identifies a deep rooted area of deprivation around the village of Croserw in the Afan Valley (LSOA 'Cymmer 2') and more generally shows high proportions of Lower Super Output Areas (LSOAs) within deprivation. (ONS Annual Population Survey (2020))
- NPT has lower rates per 10,000 households of **homeless households**. (Welsh Government (2020))
- The most recent Census data identifies 47 **Gypsy and Traveller households** within NPT, out of a total of 1,004 in Wales (ONS Census (2011)).

Population

Table 1: Population

	Neath Port Talbot	Wales
Total Population	143,300	3,152,900
Female	50.7%	50.7%
Male	49.3%	49.3%
Area (ha)	44,200	2,073,511

Appendix H . Community Profile

Density (persons per ha)	3.2	1.5
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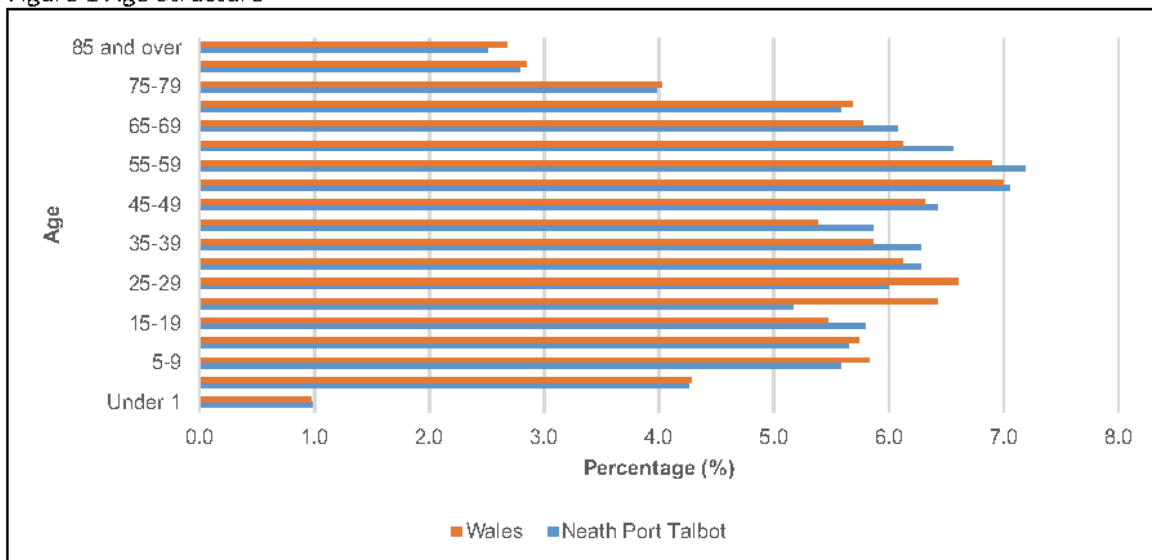
Source: ONS Population Estimates (2019)

Age Structure

Table 2: Age

Age	Neath Port Talbot	Wales
0 - 15	17.5%	17.9%
16-64	61.5%	61.1%
65 and over	20.9%	21.0%

Figure 1 Age Structure



Source: ONS Population Estimates (2019)

Welsh Language

Table 3: Welsh Language

	Neath Port Talbot	Wales
Percentage of population able to read Welsh	20.8%	26.0%
Percentage of population able to write Welsh	18.3%	23.8%
Percentage of population able to understand spoken Welsh	27.2%	33.4%
Percentage of population who speak Welsh	22.5%	29.1%
Of whom:	11.1%	16.3%
• Speak Welsh daily	4.1%	5.0%
• Speak Welsh Weekly	6.0%	6.2%
• Speak Welsh less often	1.3%	1.6%
• Speak Welsh never		

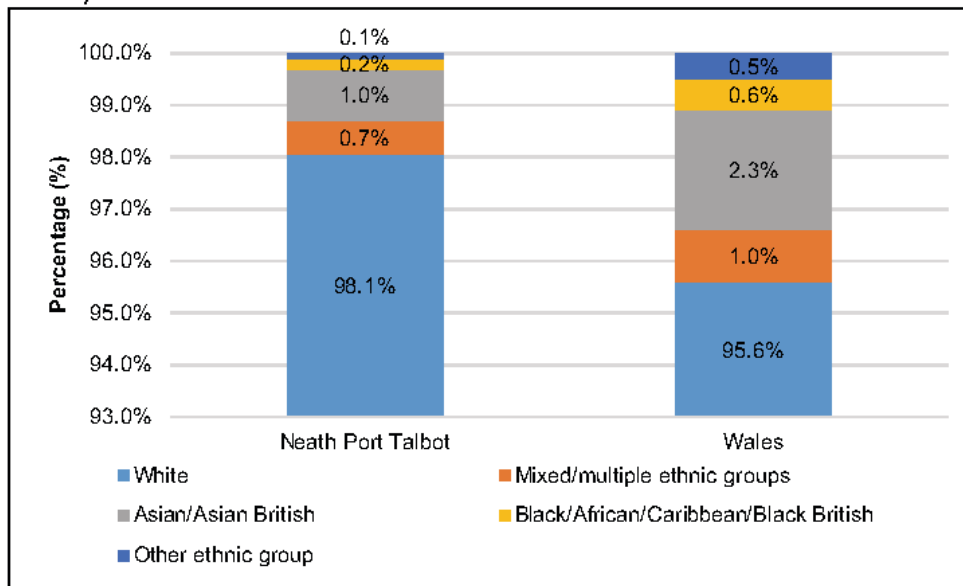
Source: ONS Annual Population Survey (2020)

Ethnicity

Table 4: Ethnicity

Ethnicity	Neath Port Talbot	Wales
White	98.1%	95.6%
Mixed / Multiple Ethnic Groups	0.7%	1.0%
Asian / Asian British	1.0%	2.3%
Black / African / Caribbean / Black British	0.2%	0.6%
Other Ethnic Group	0.1%	0.5%

Figure 2 Ethnicity



Source: ONS Census (2011)

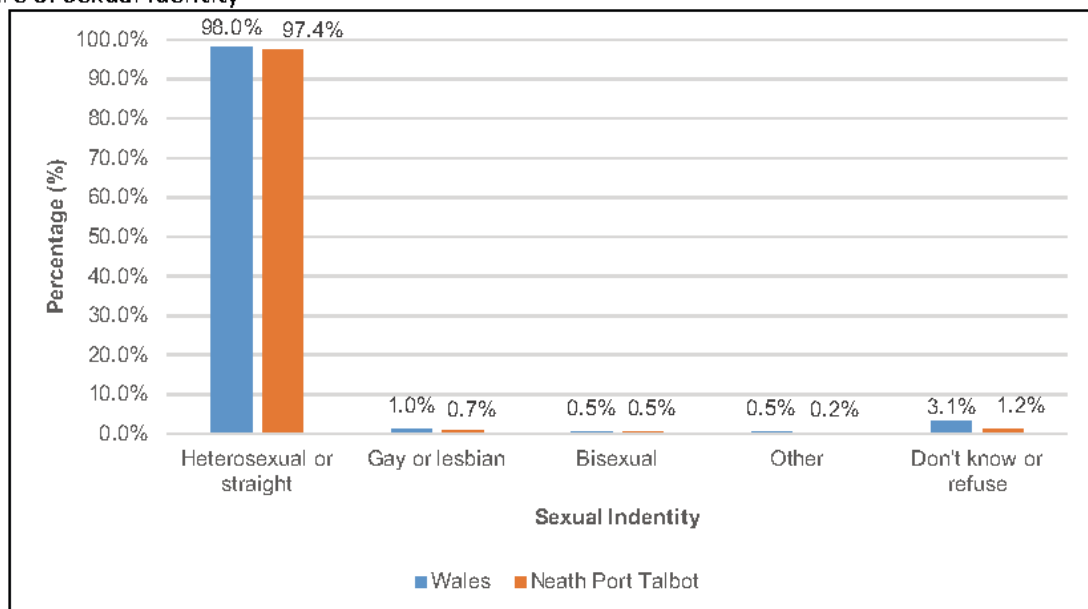
Appendix H . Community Profile

Sexual Identity

Table 5: Sexual Identity

Sexual Identity	Neath Port Talbot	Wales
Heterosexual	98.0%	97.4%
Gay or Lesbian	1.0%	0.7%
Bisexual	0.5%	0.5%
Other	0.5%	0.2%
Don't know / refuse	3.1%	1.2%

Figure 3: Sexual Identity



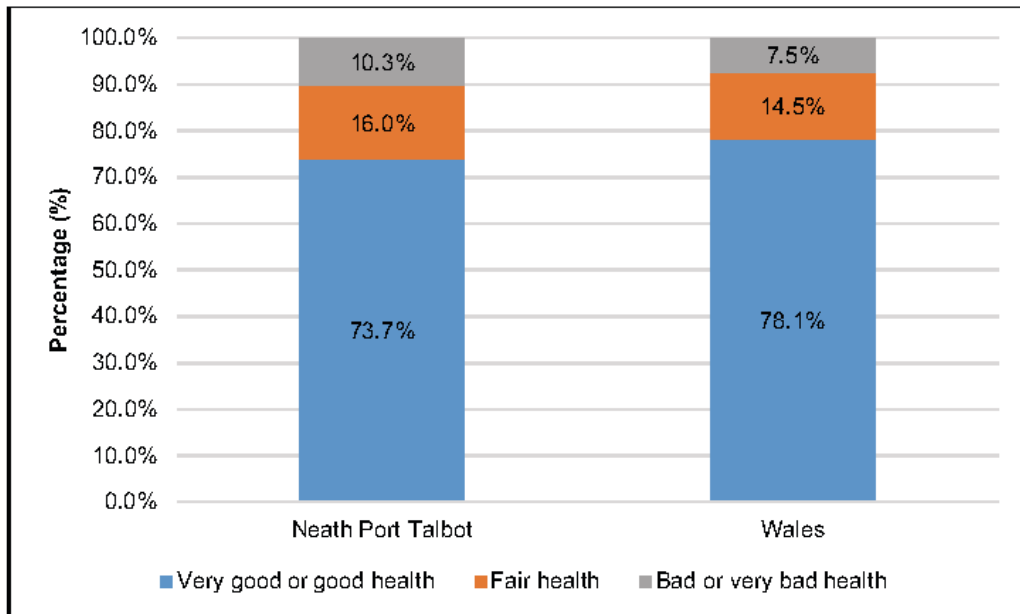
Source: ONS Annual Population Survey (2017)

Health

Table 6: Health

Health	Neath Port Talbot	Wales
Very good or good health	73.7%	78.1%
Fair health	16.0%	14.5%
Bad or very bad health	10.3%	7.5%

Figure 4: Health



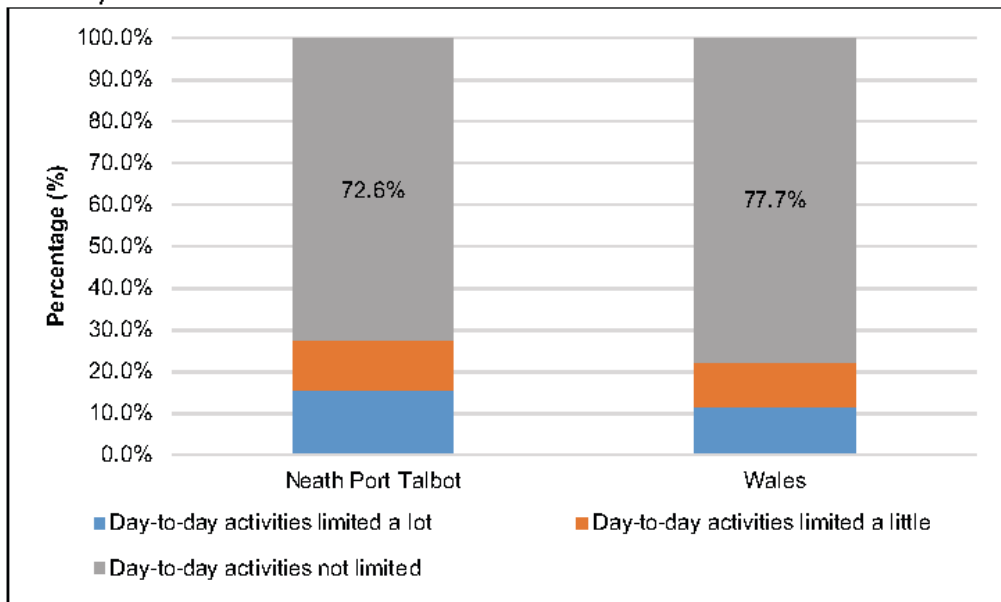
Source: ONS Census (2011)

Disability

Table 7: Disability

Disability	Neath Port Talbot	Wales
Day-to-day activities limited a lot	15.7%	11.5%
Day-to-day activities limited a little	11.8%	10.8%
Day-to-day activities not limited	72.6%	77.7%

Figure 5: Disability



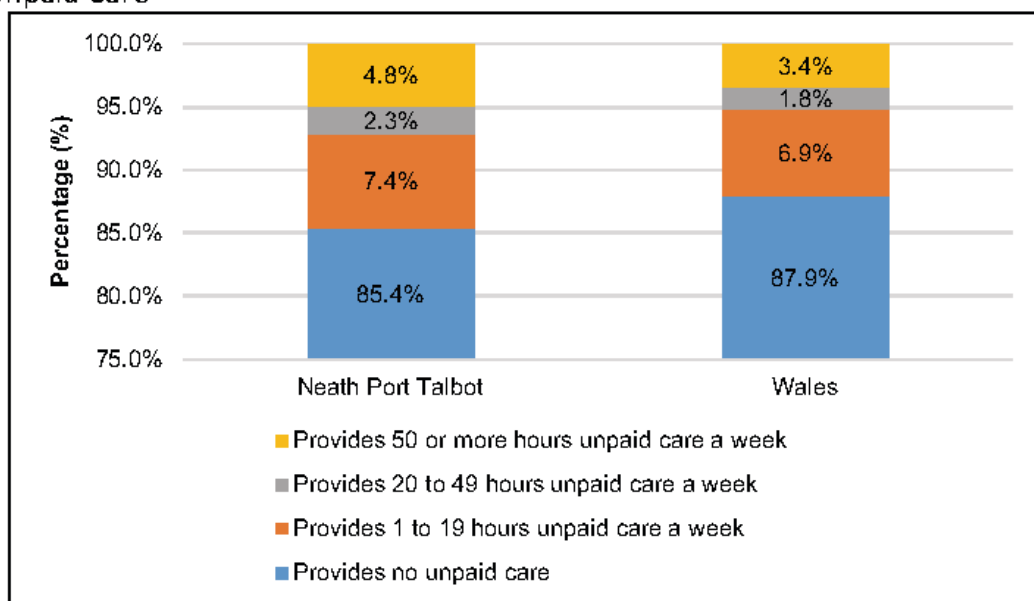
Source: ONS Census (2011)

Unpaid Care

Table 8: Unpaid Care

Unpaid Care	Neath Port Talbot	Wales
Provides no unpaid care	85.4%	87.9%
Provides 1 to 19 hours of unpaid care a week	7.4%	6.9%
Provides 20 to 49 hours of unpaid care a week	2.3%	1.8%
Provides 50 or more hours of unpaid care a week	4.8%	3.4%

Figure 6: Unpaid Care



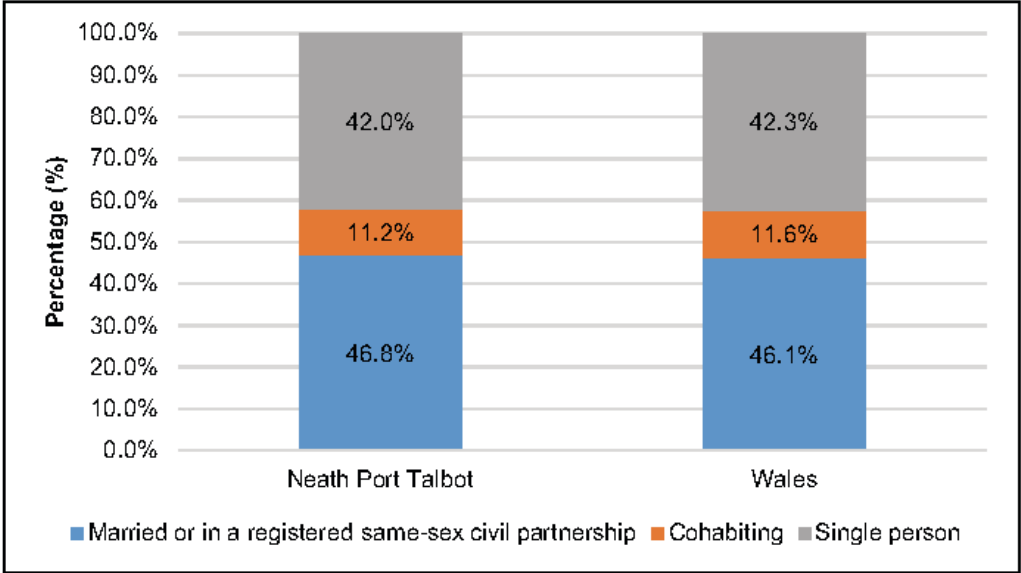
Source: ONS Census (2011)

Household Characteristics

Table 9: Household Characteristics

Household Characteristics	Neath Port Talbot	Wales
Married or in a registered same-sex civil partnership	46.8%	46.1%
Cohabiting	11.2%	11.6%
Single Person	42.0%	42.3%

Figure 7: Household Characteristics



Source: ONS Census (2011)

Lone Parent Households

Table 10: Lone Parent Households

Lone Parent Household	Neath Port Talbot	Wales
Percentage of lone parent households	12.2%	11.4%
Percentage of lone parent households with dependent children	62.5%	66.3%
Percentage of lone parent households with non-dependent children	37.5%	33.7%

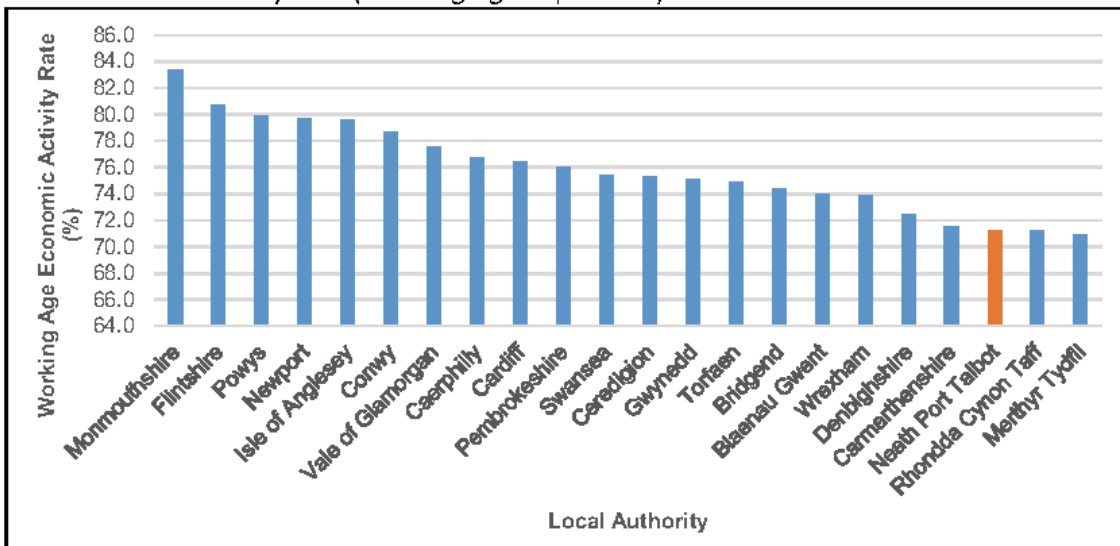
Appendix H . Community Profile

Economic Activity

Table 11: Economic Activity (Working Age Population)

	Neath Port Talbot	Wales
All People		
Economically Active	71.2%	75.7%
In Employment	69.7%	72.8%
Employees	63.8%	63.0%
Self-Employed	5.0%	9.9%
Unemployed	3.8%	3.7%
Males		
Economically Active	71.7%	78.1%
In Employment	69.6%	75.0%
Employees	62.3%	62.1%
Self-Employed	6.6%	12.4%
Unemployed	No data	3.8%
Females		
Economically Active	70.8%	73.4%
In Employment	69.8%	70.7%
Employees	65.3%	63.9%
Self-Employed	3.5%	6.2%
Unemployed	No data	3.6%

Figure 8: Economic Activity Rate (Working Age Population)



Source: ONS Annual Population Survey (2020)

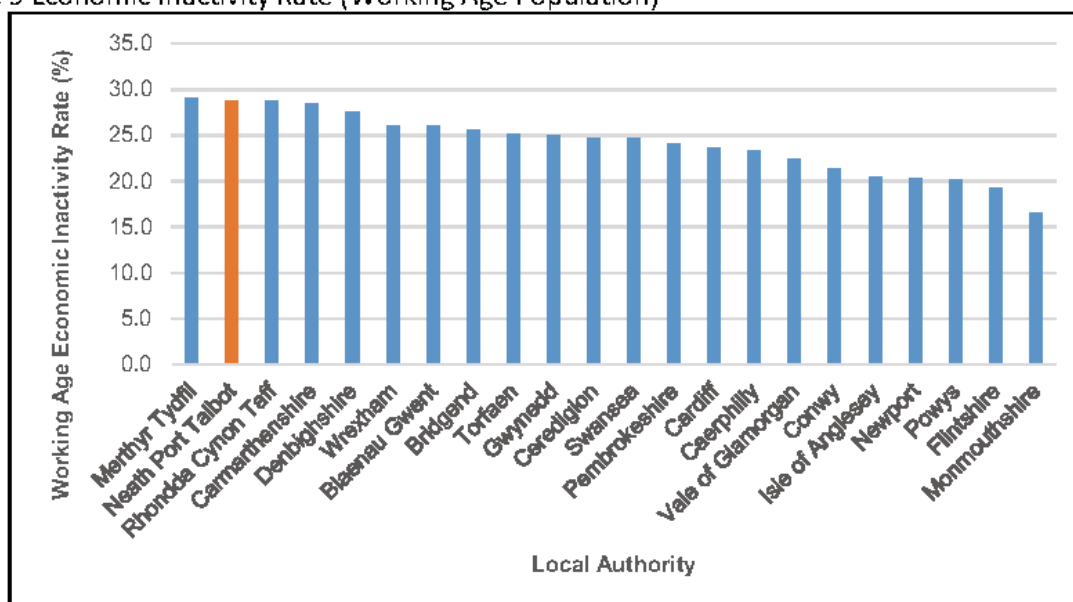
Appendix H . Community Profile

Economic Inactivity

Table 12: Economic Inactivity (Working Age Population)

	Neath Port Talbot	Wales
All	28.8%	24.3%
Student	26.5%	26.5%
Looking after family / home	18.0%	15.2%
Temporary sick	No data	2.2%
Long-term sick	23.5%	28.3%
Discouraged	No data	0.7%
Retired	14.6%	14.0%
Other	14.9%	13.1%
Wants a job	21.2%	21.6%
Does not want a job	78.8%	78.4%

Figure 9 Economic Inactivity Rate (Working Age Population)



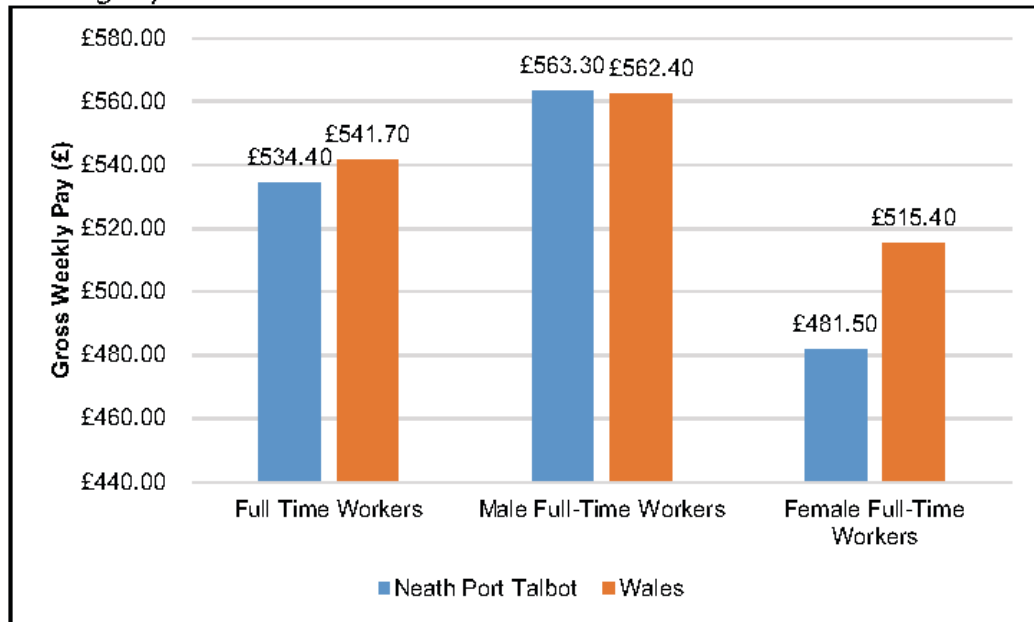
Source: ONS Annual Population Survey (2020)

Earnings by Place of Residence

Table 13: Earnings by Place of Residence

Gross Weekly Pay	Neath Port Talbot	Wales
Full-Time Workers	£534.4	£541.7
Male Full-Time Workers	£563.3	£562.4
Female Full-Time Workers	£481.5	£515.4

Figure 10: Earnings by Place of Residence



Source: ONS Annual Population Survey (2020)

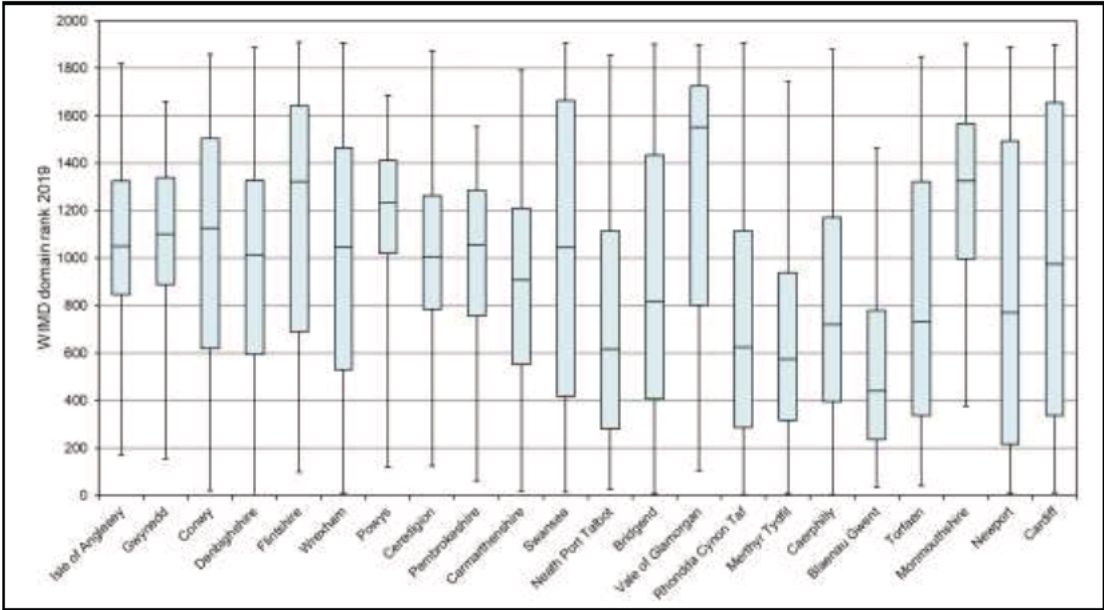
Appendix H . Community Profile

Poverty Levels and Distribution

The Welsh Index of Multiple Deprivation (WIMD) (2019) shows that NPT has:

- The fifth highest proportion of Lower Super Output Areas (LSOAs) within the 10% most deprived in Wales (15.0%);
- The third highest within the most deprived 20% (33.0%);
- The third highest within the most deprived 30% (45.0%); and
- The fourth highest within the most deprived 50% (69.0%).

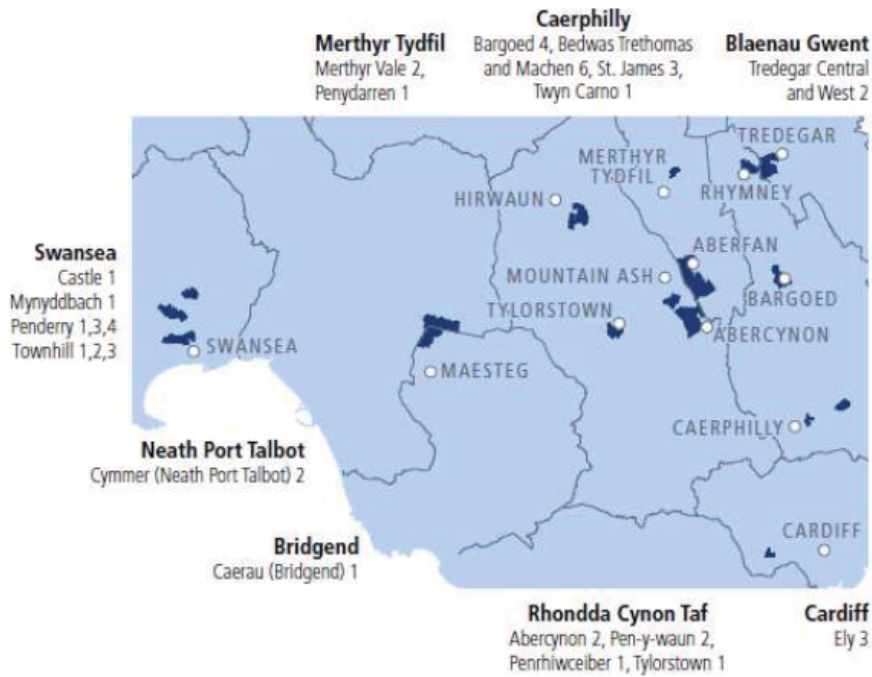
Figure 11: Box Plot of WIMD 2019 Overall Ranks, by Local Authority



Source: Welsh Government WIMD Results Report (2019)

The WIMD in particular, identifies a deep-rooted area of deprivation around the village of Croeserw in the Afan Valley (LSOA 'Cymmer 2').

Figure 12: Areas of Deep-Rooted Deprivation in South Wales

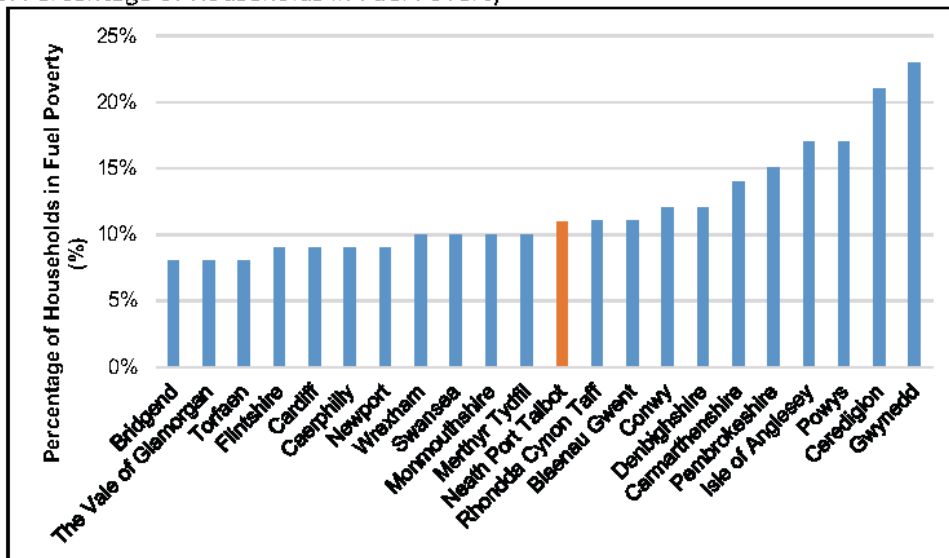


Source: Welsh Government WIMD Results Report (2019)

Table 14: Fuel Poverty

Fuel Poverty	Neath Port Talbot	Wales
Percentage of households living in fuel poverty	11.0%	12.0%

Figure 13: Percentage of Households in Fuel Poverty



Source: Welsh Government (2020)

Appendix H . Community Profile

Table 15: Homelessness

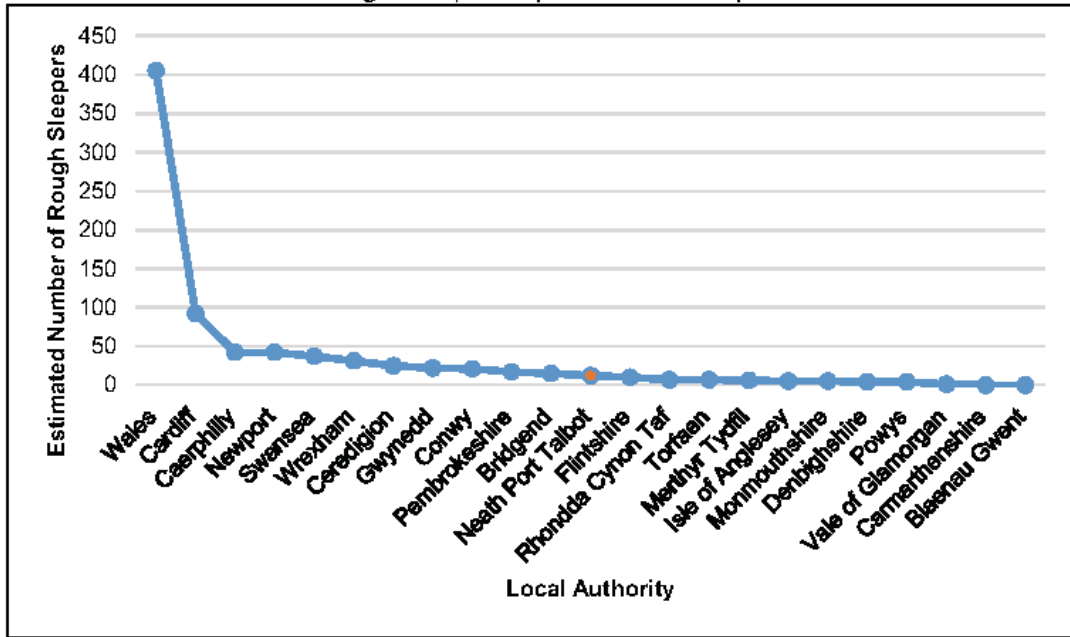
Homelessness	Neath Port Talbot	Wales
Households assessed as homeless and owed duty to secure (Section 73) Rate per 10,000 households	88.0	91.2
Households successfully relieved from homelessness (Section 73) Rates per 10,000 households	31.9	37.4
Households unintentionally homeless and in priority need (Section 75) Rates per 10,000 households	16.6	22.5
Households positively discharged from homelessness (Section 75) Rates per 10,000 households	15.6	17.6

Estimated Number of Rough Sleepers

Table 16: Rough Sleepers

Rough Sleepers	Neath Port Talbot	Wales
Estimated number of rough sleepers	12	405

Figure 14: Estimated Number of Rough Sleepers by Local Authority



Source: Welsh Government (2020)

Appendix H . Community Profile

H.2 Gypsy and Traveller Population and Accommodation

Table 17: Gypsy and Traveller Population and Accommodation

Gypsy and Traveller Population and Accommodation	Neath Port Talbot	Wales
Number of Gypsy and Traveller Households (Source: ONS Census (2011))	47	1,004
Total number of pitches (Source: Welsh Government (2020))	65	405
Total number of caravans (Source: Welsh Government (2020))	101	1,092
Number of authorised sites (Source: Welsh Government (2020))	3	102
Number of unauthorised sites (Source: Welsh Government (2020))	0	34

Appendix I . Previous Community Involvement Scheme Review

I.1 The Development Plans Manual (Paragraph 3.21) suggests that when preparing a CIS for a RLDP, consideration should be given to lessons learnt from the previous CIS.

I.2 The CIS for the first (current) NPT LDP was agreed as part of the DA for that plan in September 2008 and amended in May 2011 and July 2013.

I.3 A wide range of methods were used to engage with stakeholders and the public, many of which were successful, as shown by the amount of correspondence and number of representations received during the plan preparation process. However, there were some specific approaches that did not have the anticipated results, or that were not considered to be time or resource efficient. These are indicated below:

- In the early stages of the plan preparation process, the Authority's community magazine was used for publicity purposes. However, the magazine ceased publication as a result of financial pressures and this method of engagement is no longer available. The RLDP process will instead be promoted through:
 - 'In the Loop' which is an online magazine produced by the Council which is sent to all Council employees (approximately 4,500 staff) monthly informing them amongst other things, current consultations and how to get involved. Many Council employees reside in NPT and all others have a stake in what happens.
 - NPT News which is an on-line monthly newsletter with approximately 2,000 subscribers.
 - The Sway which is a weekly news bulletin (approximately 4,500 readers).
 - A Social media Campaign (see below for further details)
 - Posters and LCD Screen notices (see below for further details)
- As an alternative, the Authority sought to get information to every residence and business by posting out leaflets on three occasions at significant stages of the plan preparation process. However, feedback suggests that since the leaflets were delivered with other bulk mail deliveries, they tended to be discarded without being read. It is therefore not proposed to repeat this approach. Instead, promotion will be focussed around a targeted social media campaign and posters/LCD Screen Notices in key local community services and facilities such as Libraries, GP surgeries, Hospitals, Council Offices, Leisure Centres, Bus Stops, Transport Hubs and Community Notice Boards. Local Elected Members, Town and Community Council's and Local Area Co-ordinators will also be used to help distribute posters and communicate their message.
- Previously, printed copies of all documents were made available at all the public libraries across the county borough. However, this appeared to generate little interest or response and took significant resources to implement. There are also concerns that following the Covid-19 Pandemic, the public may be more reluctant to handle communal / publicly accessible hard copy documents. It is now proposed to place printed copies in the deposit venues only, in accordance with the LDP Regulations⁽²⁴⁾.

However, in absence of hard copy documents, guidance notes explaining how to view the RLDP documentation online will be provided to the Libraries.

- As part of the Candidate Sites consultation process, site notices were posted to publicise submitted sites. While this often generated significant local interest and awareness, it proved to be a source of confusion and conflict, as the notices were often taken to be publicising planning applications or approved developments, rather than plan suggestions. Again, this process was expensive in terms of resources, was not considered to be beneficial overall and it is not proposed to continue this approach. Information regarding candidate sites submitted will be made available on the Council's website (find your nearest and RLDP pages) and at deposit venues once the CSR has been published. Local Members will be the champion for their electoral ward/constituents. Feedback can be provided on the Candidate Sites as part of the Preferred Strategy consultation.

1.4 In addition to the above considerations, the Covid-19 pandemic has impacted upon engagement and consultation processes resulting in a greater focus on virtual engagement, particularly where social distancing can not be facilitated in consultation exercises. As a result, engagement and consultation during the preparation of this plan will increasingly be facilitated through the use of social media, on-line surveys and forms, and virtual meeting platforms. Those that are digitally excluded will be engaged through documentation viewing opportunities by appointment at the 3 deposit venues, posters at key local community services and facilities, and Libraries will be supplied with guidance notes on how to assist people to view documents on-line using the computer facilities they contain. Current Government Covid guidelines will be adhered to for all consultation and engagement activities undertaken. Further guidance is available here: <https://gov.wales/protect-yourself-others-coronavirus>.

1.5 There have also been a number of changes in the legislation and guidance relating to the preparation of LDPs, including the issuing of amended LDP Regulations in 2015⁽²⁵⁾, the Planning (Wales) Act 2015⁽²⁶⁾ and the revised Development Plans Manual in 2020⁽²⁷⁾. The consultation and engagement processes will need to be in accordance with the requirements of the changes in legislation and guidance. The Planning (Wales) Act 2015 introduced two new tiers of national and regional planning (National Development Framework and Strategic Development Plan. Future Wales (the National Development Framework) was published in 2021. Section 7(1) of the Planning (Wales) Act 2015 requires an LDP to be in general conformity with the National Development Framework and Strategic Development Plan.

1.6 In respect of other new legislation, the WBFGA (2015) and the subsequent NPT Well-being Plan are of significant importance. The Act in particular requires local authorities to undertake their functions in *collaboration* with others including other public bodies and to *involve* the community and interested parties in decision making. The CIS will need to embody these ways of working in order to ensure that the sustainable development principle is fully implemented.

25 The Town and Country Planning (Local Development Plan)(Wales)(Amendment) Regulations 2015

26 [Planning \(Wales\) Act 2015](#)

27 [Development Plans Manual](#)

APPENDIX 3

Integrated Sustainability Appraisal Scoping Report (Consultation Draft)



Neath Port Talbot Replacement Local Development Plan Review

Integrated Sustainability Appraisal Scoping Report

On behalf of **Neath Port Talbot Council**



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Project Ref: 43894 | Rev: E | Date: June 2021

Document Control Sheet

Project Name: Neath Port Talbot LDP Review

Project Ref: 43894

Report Title: ISA Scoping Report

Doc Ref: 43894/4501/R001i6

Date: June 2021

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Approved by:	Nick Skelton	Director: Planning & Economics	NS	29.05.2020
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
A	01.06.2020	Minor amendments in response to client comments	MO	DS	DS
B	01.07.2020	Minor amendments in response to client comments	MO	DS	DS
C	21.08.2020	Minor amendment to amend consultation/contact details	MO	DS	DS
D	11.05.2021	Updates to reflect policy developments including PPW11 and Brexit	HS	DS	DS
E	25.06.2021	Minor amendments in response to final client comments	HS	DS	NS

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Appendices

Appendix A Baseline Review
Appendix B Review of Plans and Programmes

1 Introduction

1.1 Background

- 1.1.1 Stantec UK has been commissioned by Neath Port Talbot Council (NPTC) to undertake an Integrated Sustainability Appraisal (ISA) of the NPT Local Development Plan (LDP) Review and the emerging NPT Replacement LDP (RLDP) ('the emerging RLDP').
- 1.1.2 This report is the first stage of an ISA process to identify, assess and address in an integrated manner any likely significant effects on the environment (including European Sites), sustainability, health and equalities of undertaking the NPT LDP Review (resulting in the preparation of the RLDP). The report outlines the proposed approach to undertaking the ISA process, incorporating a suite of statutory and non-statutory assessment processes:
- **Sustainability Appraisal (SA)** as required under the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') and the Development Planning (Wales) Regulations 2005 ('the 2005 Regulations');
 - **Strategic Environmental Assessment (SEA)** as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations');
 - Supporting the implementation of **wellbeing goals and wellbeing objectives** (and the discharge of associated duties) as required under **the Wellbeing of Future Generations (Wales) Act 2015**. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
 - **Equalities Impact Assessment (EqIA)** under the Equality Act 2010 – covering the Public Sector Equality Duty and the Socio-economic Duty;
 - **Health Impact Assessment (HIA)** – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,
 - **Welsh Language Impact Assessment** as required under the 2004 Act, the Welsh Language Standards (No.1) Regulations 2015 and PPW 11th Edition.

1.2 Purpose and Objectives

- 1.2.1 The purpose of this ISA process is to identify, assess and, where appropriate, address the likely significant effects from the NPT LDP Review ('the LDP Review') on the environment (including European Sites), health, equalities issues, wellbeing and the use of the Welsh language. The ISA should be viewed as a key planmaking tool and it will be used throughout the LDP Review to inform the preparation of the RLDP in order to maximise its effectiveness, rather than simply providing retrospective reporting of likely impacts.
- 1.2.2 The dual purpose of this report is to:
- Seek the views of the SEA Consultation Bodies¹ and other relevant consultees on the proposed methodology and assessment framework for undertaking a robust and legally compliant ISA of the Neath Port Talbot LDP Review in accordance with relevant statutory requirements; and in doing so; and,

¹ The SEA Consultation Bodies are defined by the SEA Regulations as Cadw and Natural Resources Wales. The Welsh Assembly Government will also be treated as a SEA Consultation Body for the purposes of this ISA.

- Seek the views of the SEA Consultation Authorities on a draft SEA screening determination to satisfy procedural requirements and to confirm that a SEA needs to be incorporated within the SA.

1.3 Overview of the Neath Port Talbot LDP Review

1.3.1 NPTC is the unitary authority responsible for local government across a 442km² area of South Wales, as shown in **Figure 1.1** NPTC is located within the South West Wales Region (as identified within the National Development Framework (NDF) - Future Wales 2040) and Strategic Development Plan area. This includes the LA areas of Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot. The neighbouring authorities are Swansea, Bridgend, Rhondda Cynon Taff, Powys and Carmarthenshire.

1.3.2 NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major projects across Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot. Since the end of May 2019, NPTC is also the host authority for the Joint Scrutiny Committee to promote and facilitate projects between authorities involved in the City Deal.

Figure 1.1 Neath Port Talbot Council Boundary



- 1.3.3 NPTC have undertaken regular monitoring since the first LDP was adopted in 2016. Between January – March 2020 NPTC consulted on a Draft LDP Review Report in accordance with statutory requirements. This Draft LDP Review Report identified that the current NPT LDP should be subject to a ‘Full Review’, to be carried out in accordance with the 2005 Regulations. The LDP Review Report was subsequently approved and published by NPTC in July 2020.
- 1.3.4 The review (‘the LDP Review’) is needed to allow NPTC to prepare and adopt a RLDP to ensure that the statutory Development Plan for the NPTC area remains up to date, taking account of Future Wales 2040 which also now forms part of the Development Plan. In particular, a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the current LDP.

1.4 Statutory Requirements

- 1.4.1 This section provides a succinct review of the range of statutory requirements which will be addressed through undertaking an ISA of the LDP Review.

LDP Preparation and Review

- 1.4.2 The publication of the Draft LDP Review Report (NPTC, 2020) has triggered a process through which a RLDP will be prepared and then adopted for the NPTC area. Statutory requirements relating to the preparation of LDPs are therefore now applicable to the LDP Review, including in respect of SA and SEA. The proposed approach, timescales and consultation arrangements for the LDP Review are set out within the Draft Neath Port Talbot LDP Delivery Agreement accompanying this ISA Scoping Report in accordance with the 2005 LDP Regulations (as amended).
- 1.4.3 This ISA Scoping Report has been prepared in the context of the consultation on the Draft LDP Review Report, including taking account of relevant consultation responses. Whilst each report fulfils separate statutory requirements, read together they provide a comprehensive and up to date evidence base of the key issues (spatial planning, sustainability, equalities, health, social, economic, cultural, etc) which all need to be addressed in the LDP Review and associated impact assessment processes.

Sustainability Appraisal

- 1.4.4 Under Section 62(6) of the 2004 Act, emerging LDPs need to be subject to Sustainability Appraisal, which is statutorily required to guide the selection and development of policies and proposals for inclusion in LDPs in terms of their potential social, environmental and economic effects. The SA presently required for the LDP Review will need to build upon the SA, incorporating SEA, prepared for the Neath Port Talbot LDP 2011-2026 (adopted January 2016). As the ‘Full Review’ procedure is being used, the LDP Review will effectively mirror the original LDP preparation process and will result in the preparation and adoption of a RLDP (rather than the existing LDP only being subject to individual changes).
- 1.4.5 When undertaking a SA, the Welsh Government asks Local Planning Authorities to consider the value and opportunities for an integrated assessment approach to preparing an LDP. Paragraph 4.5 of the Development Plans Manual Edition 3 (2020) considers that “*The integration of statutory and key elements such as WBFGA 2015 requirements, Equalities Act, Welsh language, and Health Impact Assessment (HIA) (when relevant) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals*”. Accordingly, to achieve these benefits whilst meeting applicable statutory requirements, an

ISA is to be carried out for the NPT LDP Review. This ISA Scoping Report represents the first stage of this process.

Strategic Environmental Assessment

- 1.4.6 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 as amended ('the SEA Regulations') require Responsible Authorities, including local authorities such as NPTC, to assess the likely significant environmental effects of implementing relevant plans and programmes, as defined within the regulations. The SEA Regulations also require Responsible Authorities to examine the likely significant environmental effects of reasonable alternatives to the plan or programme under consideration. Where required, the assessment is to be prepared following a staged reporting process known as Strategic Environmental Assessment (SEA).
- 1.4.7 In line with the requirements of the SEA Regulations, the following terms are used throughout this report:
- 'Environmental effects' refers to effects on all environmental factors prescribed in Schedule 2 of the SEA Regulations, including "*population*", "*health*" and "*material assets*" in the broadest sense, which therefore includes coverage of social, economic and infrastructure related issues. Cultural, including Welsh Language, issues are also covered under the cultural heritage SEA topic. This approach helps to ensure assessment proportionality and integration between SEA and other statutory assessment processes undertaken as part of this ISA; and,
 - The term 'likely significant effects' refers to all likely effects which, when assessed on an objective basis, are considered significant (as opposed to not significant) and therefore need to be reported within the context of the SEA Regulations. Such effects may also need to be reported in accordance with other relevant statutory requirements (see below).

Wellbeing of Future Generations (Wales) Act 2015

- 1.4.8 The Well-being of Future Generations (Wales) Act 2015 (WCFG Act) seeks to directly place Wales on a sustainable path to improving well-being. The WCFG Act requires that public bodies carry out sustainable development which is defined² as:
- "Sustainable development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals."
- 1.4.9 The WCFG Act prescribes seven national Wellbeing Goals to be achieved through Five Ways of Working which public bodies need to demonstrate they have carried out in undertaking their sustainable development duty (see section 5 of this report). Furthermore, it requires Public Service Boards (comprising local authorities and partner agencies) to define local wellbeing objectives.
- 1.4.10 In response to this duty, the Neath Port Talbot We Want (Well-being Plan 2018-2023) sets out the NPT Public Services Board's long-term vision for the area as well as priorities for action over the plan period. It identifies six wellbeing objectives which are to be used to guide and bring about wellbeing improvements for local people in the area. These are detailed in section 5 of this report.

² The Planning (Wales) Act 2015 Section 2 sets out the definition of sustainable development for the planning system and directly refers to the definition in the WCFG Act

- 1.4.11 Therefore, whilst there is not a specific statutory requirement to publish a WFG Assessment in respect of the LDP Review, there is a need for NPTC to demonstrate throughout the LDP Review how their emerging RLDP complies with the Section 3 duty (Well-being duty on public bodies to carry out sustainable development). In practice this means that the ISA should include specific reporting of likely effects from the emerging RLDP on wellbeing, the national wellbeing goals and local wellbeing objectives.
- 1.4.12 The Development Plans Manual 2020 (3rd Edition) requires LDPs to demonstrate how it contributes towards the achievement of the well-being goals, objectives and five ways of working, noting that these goals should be integral to the preparation of the Scoping Report and subsequent development of the final SA framework to assess the Plans growth options, objectives, policies and proposals (Para 4.10 & 4.12). Each decision-making body must demonstrate compliance with the requirements of WBFGA 2015.

Equalities Impact Assessment

- 1.4.13 Statutory requirements to avoid discrimination and to assess the likely equalities impacts of emerging policies, programmes and projects are set out in the Equality Act 2010. This legislation was enacted by the UK Parliament to consolidate previous anti-discrimination legislation and to implement the four major European Union (EU) Equal Treatment Directives³.
- 1.4.14 Insofar as LDP policies and proposals affect access to services, amenities, economic opportunities and social activities, the implementation of the LDP Review (resulting in the adoption of a RLDP) is likely to result in different impacts upon different demographic groups, persons with protected characteristics and those facing socio-economic disadvantage. It may also help to tackle intersectional inequalities and impact the delivery of other policies and organisations working to address societal inequalities. The Public Sector Equality Duty and Socio-economic Duty under the Equality Act 2010 are applicable to the LDP Review, meaning that the ISA will incorporate a proportionate equalities impact assessment (EqIA) to address the requirements of both duties.

Public Sector Equality Duty

- 1.4.15 Section 149 of the Act sets out a ‘public sector equality duty’ which requires public authorities, in exercising their functions, to “*have due regard to the need to:*
- a. *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
 - b. *advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
 - c. *foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*
- 1.4.16 The protected characteristics referenced within this duty are specified within Section 4 of the Act, namely: Age; Disability; Gender reassignment; Marriage and Civil partnership; Pregnancy and maternity; Race; Religion or belief; Sex; and Sexual orientation.

³ EU Directives 2000/78/EC, 2000/43/EC, 2006/54/EC (all enacted) and proposed Directive COM/2008/0426 final - CNS 2008/0140

Socio-economic Duty

- 1.4.17 In March 2021 the Welsh Government commenced the Socio-economic Duty under Sections 1 – 3 of the Equality Act 2010. The Socio-economic Duty places a legal responsibility on public bodies in Wales to actively consider how through their strategic decision making they can reduce inequalities of outcome caused by socioeconomic disadvantage. This differs from the Public Sector Equality Duty which considers only reducing inequalities of opportunity. However, the Socio-economic Duty identifies a need to consider both ‘communities of place’ and ‘communities of interest’ in terms of people who share an experience and are particularly impacted by socio-economic disadvantage.
- 1.4.18 Demographic groups who share one or more of the protected characteristics listed in Section 4 of the Equality Act 2010 can be considered ‘communities of interest’, meaning there is a direct link between the Socio-economic and Public Sector Equality Duties.
- 1.4.19 The Socio-economic Duty applies to the LDP Review as local authorities are prescribed bodies for implementing the duty under the Equality Act 2010 and the preparation of a RLDP clearly constitutes the making of decisions of a strategic nature by NPTC regarding their statutory functions.

Health Impact Assessment

- 1.4.20 Whilst there are no statutory requirements to undertake a health impact assessment of emerging plans or programmes, the SEA Regulations do require any likely significant effects on human health to be assessed as part of a wider environmental assessment. Any identified likely significant adverse effects on the environment, including in respect of human health, should also be addressed through the implementation of suitable mitigation where appropriate. The assessment of likely health effects is also of direct relevance to the Public Sector Equality Duty set out within the Equality Act 2010, as socio-economic inequalities are recognised to be a key determinant of health.
- 1.4.21 Paragraph 4.16-4.17 in The Development Plans Manual 2020 (3rd Edition) highlights the requirement in The Public Health (Wales) Act 2017 for a Health Impact Assessment (HIA) to be carried out by public bodies. Although there is no statutory requirement stating when a HIA should be carried out, it outlines the role of the HIA in Wales to assist policy makers to maximise potential benefits and identify/mitigate against potential negative effects on health and wellbeing. In future plan-making, LPAs must have regard to the requirement and content of a HIA as stated in further legislation and guidance once published.
- 1.4.22 This ISA will therefore incorporate a proportionate health impact assessment (HIA) in order to demonstrate compliance with SEA and EqIA requirements relating to the assessment of likely health effects from the emerging LDP Review.

Welsh Language Impact Assessment

- 1.4.23 The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:
- What effect, if any, the LDP would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
 - How the LDP could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and,

- How the LDP could be developed so that it doesn't have or reduces any adverse effects which the policy decision would have on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language.

1.4.24 In line with statutory requirements, PPW – 11th Edition and Welsh Government expectations, the ISA incorporates a proportionate assessment of likely effects on the use of the Welsh language.

Habitats Regulations Assessment

1.4.25 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 ('the HRA Regulations') requires that a HRA must be undertaken to demonstrate compliance with applicable statutory duties where a plan or project is considered likely to have significant effects on European Sites and is not directly connected with or necessary for the management of the site. Caselaw has established that HRA requirements apply to the preparation of 'local plans' prepared for town and country planning purposes including LDPs, meaning that an HRA process must be undertaken for the LDP Review.

1.4.26 Whilst there are linkages between SEA and HRA, in view of the specific assessment requirements prescribed by the HRA Regulations and associated European legislation and caselaw, the HRA for the NPT LDP Review will be reported separately from the ISA. However, at this initial stage, and in the absence of any formal HRA Scoping requirements, it is considered appropriate for this ISA Scoping Report to identify relevant European Sites for consideration in subsequent ISA and HRA processes.

1.4.27 To differentiate between effects assessed in the context of the SEA and HRA Regulations, the term "*Likely Significant Effects*" (capitalised) is used throughout this report to refer to only those effects which are considered significant in the context of Regulation 63 of the HRA Regulations.

1.5 ISA Process

1.5.1 By according with the above statutory requirements through a holistic approach, Integrated Sustainability Appraisal is one of the key methods by which plan-making can deliver sustainable development. When used in this way from the outset of the LDP process, ISA Scoping is a plan-making tool rather than simply a reporting mechanism and can be considered as 3 main steps;

- **Screening and Scoping:**

- Whereas Regulation 5(3) has the effect that a SEA will always be required in relation to the preparation of an LDP, Regulations 5(6) and 9(1) require "minor modifications" to an existing plan or programme to first be screened to determine whether the modifications are likely to have significant effects on the environment and therefore whether a full SEA needs to be undertaken. The Welsh LDP Manual 3rd Edition (2020) continues to make it clear that SEA screening is required for all LDP Reviews as in legal terms the existing LDP is simply being reviewed and this could result in "minor modifications", although the SEA Regulations do not define the scope of that term. This ISA Scoping Report sets out a draft SEA Screening Determination for the consideration of the SEA Consultation Bodies (Section 3).
- In terms of Scoping, Responsible Authorities must provide the SEA Consultation Bodies with sufficient information to enable them to consider the proposed scope, level of detail and consultation period for an 'Environmental Report' (ER) to accompany the emerging plan or programme. Where SEA is incorporated within a wider SA the term ER is interchangeable with SA Report as the latter necessarily

includes all of the information that would be required within a standalone ER. Whilst there is no specific statutory requirement to undertake Scoping in relation to EqIA, HIA, WFG Act Assessment and Welsh Language Impact Assessment, the SA Scoping process raises a similar need for 'assessment framing' to undertake proportionate assessment of these. Thus, there is a need to confirm the scope of the ISA in all respects, ensuring robustness and proportionality throughout the process. The approach taken with the ISA Scoping Report responds to all statutory requirements, with the proposed ISA Framework, ISA methodology and ISA consultation arrangements detailed in Sections 5 and 6.

- **Assessment:** As noted above, in terms of SA, Section 62(6) of the 2004 Act requires Responsible Authorities preparing LDPs in Wales to “*to carry out a sustainability appraisal of the proposals*” within it and to “*prepare a report of the findings of the appraisal*”. Given that the LDP Review will be an iterative process and in legal terms is a review of the existing LDP, an ISA Report will need to accompany each substantive element of the RLDP as it emerges, in particular the preparation of LDP Pre-Deposit and subsequently LDP Deposit Documents. Each ISA Report must be consulted on in tandem with the emerging RLDP, with the ISA Report for the final LDP Deposit Document then submitted to the Welsh Assembly Government to support an independent examination of the RLDP. Similarly, Regulation 12 of the SEA Regulations requires Responsible Authorities to prepare and consult on an ER to “*identify, describe and evaluate the likely significant effects on the environment of implementing*” each iteration of a relevant and qualifying plan, as well as the effects of its reasonable alternatives. As above, the scope, level of detail and consultation period of the ISA, fully incorporating all SEA requirements, should first be defined through screening and scoping. In line with best practice established in Development Plans Manual 3rd Edition 2020, the ISA brings together the statutory requirements under one joined-up process. This offers the opportunity to iteratively assess each stage of the emerging LDP in terms of EqIA, HIA, WFG Act Assessment (as well as Welsh Language Assessment which legally must be incorporated into SA); and,
- **Post Adoption:** By the end of the LDP Review process, a RLDP will have been adopted for the extent of the NPTC area. As detailed in **Appendix A.4**, this is required by January 2026 to avoid a planning policy vacuum. In terms of SA, once a RLDP is adopted, NPTC must prepare a statement setting out, amongst other matters, how the SEA’s environmental considerations have been taken into account in the adopted LDP, and how the likely significant effects of the LDP on the environment (as predicted through the SA/SEA) will be monitored. Whilst there is no statutory requirement to prepare a SA (as opposed to SEA) Post Adoption Statement, in practice the incorporation of SEA within SA means this is necessary to ensure that all of the SEA findings and consultation responses from previous stages of the process are addressed. Following best SA practice, the Post Adoption process will be extended incorporating the SEA post adoption requirements alongside a demonstration of how the ISA (covering all assessment undertaken) has, as a plan-making tool, informed the preparation of the NPT RLDP.

1.6 Report Structure

1.6.1 The remainder of this report is structured as follows:

- Section 2 – LDP Review Context and Proposed Content describes the context in which the LDP Review is being undertaken and outlines the proposed form of the RLDP that will result, all of which requires to be assessed through this ISA;
- Section 3 – In the context of SA/SEA only, this section consider the need for SEA (undertaken within the ISA) and provides a draft determination to explain why NPCBC considers it necessary to undertake a SEA as part of the ISA for the LDP Review. The section also provides relevant information to enable the SEA Consultation Authorities to advise on whether, at this stage, the RLDP is likely to generate significant effects. Section

3 is not a requirement for the other constituent assessments which are to be carried out through the ISA process;

- Section 4 – Environmental Information and Key Sustainability Issues summarises pertinent environmental, equalities and health issues and conditions which must be taken account of within the emerging LDP Review and therefore within this ISA. It considers the evolution of the baseline in the absence of the LDP Review and notes the relationship between the Neath Port Talbot LDP and other relevant plans and programmes. Further relevant details are provided in **Appendices A and B**;
- Section 5 – Proposed ISA Framework describes the assessment framework which will be used to identify and assess the likely significant environmental (incorporating socio-economic and cultural effects), health, wellbeing, Welsh language impact, and equalities effects from the LDP Review (i.e. the preparation of a RLDP). This section sets out a proposed ISA Framework to assess these as they emerge, including proposed ISA Objectives and guide questions;
- Section 6 – Proposed ISA Methodology and Consultation Arrangements builds upon Section 5 by detailing the proposed method of assessing the likely significant environmental (incorporating economic, social and cultural), health, wellbeing, Welsh language impact, and equalities effects, health, wellbeing, and equalities effects (and through this the broader sustainability effects) of each emerging substantive component of a RLDP. The section also outlines the proposed consultation arrangements for the SA reports which will be published in tandem with each substantive proposal for the emerging RLDP, namely the LDP Pre-Deposit and LDP Deposit Documents; and,
- Section 7 – Next Steps outlines next steps to be followed in the ISA process and confirms how comments in respect of this ISA Scoping Report should be submitted.

1.6.2 The Scoping Report is supported by two appendices:

- **Appendix A – Baseline Analysis** supports Section 4 by providing a review of relevant environmental (including social, economic and cultural) baseline characteristics. With reference to all environmental topics prescribed in Schedule 2 of the SEA Regulations (including population, health and material assets), Appendix A describes aspects of the environment likely to be significantly affected by the LDP Review and identifies relevant environmental, economic, social, and cultural issues, problems and environmental protection objectives which should be taken account of in the LDP Review and this SA process; and,
- **Appendix B – Review of Plans and Programmes** supports Section 4 by providing a review of all other plans and programmes of relevance to the LDP Review. Appendix B identifies the relationship between these other documents, the existing Neath Port Talbot LDP and the LDP Review to identify key policy issues which should be considered in both the LDP Review itself and this SA process.

2 Neath Port Talbot LDP Review Context

2.1 Introduction

2.1.1 This section provides a brief outline of the LDP Review, including its key facts, proposed form and expected content of the RLDP. This is to allow the SEA Consultation Bodies to understand the scope and purpose of the RLDP which is being subject to ISA.

2.2 Neath Port Talbot Review Key Facts

2.2.1 Planning legislation requires all local planning authorities to commence a review of a LDP not later than 4 years from the date of adoption and to consider the need for a review following the publication of the National Development Framework (Future Wales 2040 – February 2021).

2.2.2 This LDP Review is being undertaken to replace the NPTC LDP (2011-2026), adopted in January 2016. To undertake the LDP Review, Stantec UK is acting as the SEA Assessor on behalf of the Responsible Authority. The purpose of the Review is to inform the development of the new LDP for Neath Port Talbot and to update the SEA Consultation Bodies on the scope and progress of the new Plan as it progresses.

2.2.3 The Neath Port Talbot LDP Review will result in the preparation and adoption of a RLDP for the NPTC area. This will set out new detailed planning policies and proposals for the future development and the use of all land. The RLDP will set a long-term strategic planning framework, helping to tackle the key sustainability and regeneration issues and realise the main development opportunities across the NPTC area. It will cover a wide range of topics, including but not limited to housing land, economic development, regeneration, sustainable design, renewable energy, town centres, tourism, infrastructure provision and transport.

2.2.4 The expected date of adoption for the Replacement Plan is July 2025. April 2024. The Plan will cover a time period of 15-years (2021 – 2036/2036).

2.3 Proposed Form and Content of the Replacement Neath Port Talbot LDP

2.3.1 The 2004 Act stipulates the process which must be undertaken for the LDP Review, in particular the preparation of LDP Pre-Deposit and Deposit Documents by the Local Planning Authority (LPA), followed by an independent examination.

2.3.2 The 2004 Act and the 2005 Regulations prescribe the minimum content which must be included within any LDP, namely:

- The name of the area of the LPA for which the LDP is prepared;
- The date of adoption and period of the LDP;
- The LPA's objectives in relation to the development and use of land in their area;
- The LPA's general policies for the implementation of those objectives;
- A proposals map of the LPA's area showing the proposals for the development and use of land; and,
- A reasoned justification of the policies contained within the LDP.

2.3.3 In addition, LDPs typically include an overarching vision, suite of objectives and a spatial strategy, although none are specifically required under the 2004 Act or the 2005 Regulations.

- 2.3.4 In line with statutory requirements, two iterations of the emerging RLDP will be consulted on by NPTC, namely a Preferred Strategy – LDP Pre-Deposit Document and then a full LDP Deposit Plan (Deposit Document). This LDP Deposit Plan will subsequently be subject to an independent examination, following which it will be considered for formal adoption as the RLDP for the NPTC area. The ISA methodology will be applied and the findings reported within iterative ISA Reports which will accompany the Preferred Strategy (LDP Pre-Deposit) and Deposit Documents, with the ISA Report updated between these stages to reflect changes to the emerging LDP:
- The ISA Report for the Preferred Strategy will focus on assessing likely significant effect (LSE) from the proposed LDP options, spatial strategy and strategic policies; and,
 - The ISA Report for the LDP Deposit Document will identify and assess all LSE from each substantive component of the LDP Deposit Document, including all proposed site allocations and policies.
- 2.3.5 Following the completion of an independent examination of the LDP Deposit Document, all binding recommendations made by the appointed Inspector will be subject to ISA (incorporating SEA) screening to determine whether they would give rise to any new or different LSE not previously reported within the ISA Report for the LDP Deposit Document. This SEA Screening will be documented specifically within a ISA Addendum. At this stage it is envisaged that the RLDP for the NPTC area will comprise the following substantive components:
- Proposed LDP vision and LDP objectives;
 - A spatial strategy (and potential sub-area strategies) to implement the LDP vision and objectives;
 - Strategic policies to implement the spatial strategy and LDP objectives and to respond to key sustainability issues (Section 4.2 and Appendix A) and legislative requirements (Section 4.3 and Appendix B). In particular, strategic policies will need to implement specific requirements from the 2004 Act, the 2005 LDP Regulations, Planning Policy Wales Edition 11 (2021), The Neath Port Talbot We Want (Well-being Plan 2018 – 2023) and the Well-being of Future Generations (Wales) Act 2015;
 - Non-strategic policies to implement the spatial strategy and strategic policies through the development management process. This is likely to include areas based and thematic policies; and,
 - Site allocations.
- 2.3.6 The above list of intended LDP components is not exhaustive and may change through the LDP Review. Each emerging substantive component of a replacement Neath Port Talbot LDP will need to be subject to ISA, incorporating SEA, in line with the approach set out within this Scoping Report.
- 2.3.7 To comply with statutory and case law requirements, the RLDP will need to include a reasoned justification for the inclusion of each substantive component and be supported by a suite of evidence base documents. These will inform the ISA process as well as being required for plan preparation purposes.

3 Draft SEA Screening Determination

3.1 Introduction

3.1.1 As described in Section 1, this section provides relevant information which is specific to SEA only. Section 3 is required to enable the SEA Consultation Authorities to advise NPTC on whether, at this stage, significant effects on the environment are considered likely to arise from the RLDP that will result from the LDP Review, in which case a formal SEA will be required.

3.2 The Need for SEA Screening

3.2.1 The adopted NPTC LDP (January 2016) was subject to a full SEA as part of the SA since it met the mandatory SEA criteria within Regulation 5(2) of the SEA Regulations in terms of being prepared for town and country planning and land use purposes and being likely to set the framework for future consent of developments listed in Annex I or II to Council Directive 85/337/EEC as amended. However, under the SEA Regulations, all proposed “*minor modifications*” to existing plans require the Responsible Authority to first determine, in consultation with the SEA Consultation Authorities, whether a SEA is required as a result of the modification being likely to have significant effects on the environment. The Welsh LDP Manual 3rd Edition (2020) advises that as the term “*minor modification*” is not statutorily defined, any review of an existing LDP (and thus any revisions to or replacement of it) should be subject to SEA screening to determine the need for a full SEA.

3.2.2 Even at this early stage owing to the intended comprehensive nature of the LDP Review, the RLDP is likely to comprise a suite of policies and site allocations that are substantially different from those in the existing LDP and which have the potential to result in LSE on the environment. Notwithstanding any advice forthcoming from the SEA Consultation Bodies, NPTC is therefore of the view that a formal SEA should be undertaken as part of the SA for the LDP Review.

3.2.3 Of note, even if it is determined that a formal SEA is not required this would make little difference, as likely effects in relation to the environmental topics prescribed within Schedule 2 of the SEA Regulations (including population and human health) will still need to be assessed to present a robust assessment of the sustainability of the emerging RLDP, as required separately under the 2004 Act. The question of whether a formal SEA is required as part of the SA is therefore effectively a legal formality.

3.3 Draft SEA Screening Determination

3.3.1 Having regard to the Screening criteria specified in Schedule 1 of the SEA Regulations, NPTC are of the view that, at this stage, the LDP Review (which will result in the adoption of a RLDP) has the potential to generate likely significant effects on the environment which have not previously been identified through the SEA of the existing LDP or of other plans and programmes. This is on account of:

- **Geographical Coverage:** As the ‘Full Review’ procedure is being adopted for the LDP Review, it will apply to the entire NPTC area rather than only to discrete sites or sub-areas. In consequence, the LDP Review will need to consider proposals for the management of environmentally sensitive areas, including sites designated at local, national and international levels for reasons of biodiversity conservation, geological importance or architectural significance. As such, the development of the RLDP is likely to result in a range of effects in relation to these sensitive areas;

- **Statutory Requirements:** As section 38(6) of the 2004 Act requires all planning applications to be determined in accordance with the relevant adopted Development Plan unless material considerations indicate otherwise, the RLDP resulting from the LDP Review will have a high degree of influence in setting a consenting framework for all development activities within the NPTC area. This will include any projects of a type listed in Annex I or II to Council Directive 85/337/EEC (the original EIA Directive) as amended. In addition, the RLDP will be of particular importance in determining the acceptability, including in environmental terms, of the proposed location, nature, size and operating conditions of all development proposals. It is likely that the approach taken within a RLDP to plan for these factors in relation to at least some development types will differ substantially from the approach set out within the existing LDP to reflect changes in baseline conditions and in relevant higher level legislative and policy frameworks. Any such changes in policy within a RLDP could affect the distribution or key characteristics (design, physical, construction, operational characteristics, etc.) of development proposals and could give rise to new or different likely significant effects from those previously predicted to arise from existing LDP policies;
 - **New Spatial Issues and Site Allocations:** The preparation of a RLDP should directly address existing socio-economic and environmental issues affecting Neath Port Talbot, as identified in **Appendix A**, through the development of new policy approaches and site allocations. Through addressing pertinent issues and problems, the LDP Review is likely to result in LSE. For example, the Neath Port Talbot LDP Review Report (NPTC, 2020) identifies that new allocations within the Valleys and Coastal Corridor may need to be made to help enable its growth, which will include residential development, safeguard employment, cultural heritage and regeneration opportunities, while policy revisions may be required to reconsider the LDPs spatial growth strategy. Other land allocations and physical interventions may also need to be allocated within the RLDP to ensure it can appropriately respond to all identified population needs. Whilst some candidate site allocations may have previously been subject to SA in relation to the first Neath Port Talbot LDP, due to the time that has elapsed it is highly likely that a range of new candidate sites will be proposed, each of which could generate a range of significant environmental effects which have not previously been assessed;
 - **Plan Hierarchy:** As with the existing LDP, the RLDP should seek to direct particular types of development proposals to particular locations, and this may require lower level plans, for example Development Briefs, Masterplans, Regeneration Strategies or Supplementary Planning Guidance (SPG) to be prepared to provide more locally specific guidance in conformity with the LDP. The LDP Review is therefore likely to have a high degree of influence on other plans within the Welsh planning policy hierarchy and this could itself result in a range of new or different likely significant environmental effects from those arising under the existing LDP; and,
 - **Potential for LSE on European Sites:** As detailed in **Appendix A**, the NPTC area hosts three European Sites (Kenfig/Cynffig (SAC), Coedydd Nedd a Mellte (SAC) and Crymlyn Bog (also a Ramsar Site, SAC, SSSI and NNR). with an additional three European Sites identified either within 15km of or with potential connectivity to the NPTC area. This does not mean that LSE in HRA terms would necessarily occur from the LDP Review on these European Sites; indeed, in the absence of any substantive proposals or policies having been developed no evidence is yet available to indicate this. However, the possibility of the identified European Sites experiencing LSE from the LDP Review (i.e. from an emerging RLDP) cannot be ruled out at this stage and therefore requires further examination through undertaking a separate HRA process. In line with the Development Plans Manual Edition 3 (2020) an HRA Appropriate Assessment is likely to be required in respect of the RLDP Deposit Plan in due course. Under Regulation 5(3) of the SEA Regulations, this alone triggers the need for a full statutory SEA to be undertaken.
- 3.3.2 Subject to views obtained from the SEA Consultation Bodies, NPTC therefore intends to make a determination under Regulation 9(1) of the SEA Regulations that a formal SEA will be

carried out as part of the ISA for the LDP Review. This aligns with the approach advocated within the Development Plans Manual Edition 3 (2020) .

- 3.3.3 In accordance with Regulation 9(2), the SEA Consultation Bodies are invited to provide their view and associated reasons regarding the potential for LSE to arise and the need (or otherwise) to undertake a SEA. Any advice to the effect that a formal SEA is not required would need to be supported by detailed evidence, as any decision not to undertake a formal SEA could be subject to legal challenge, which in turn could affect the validity of the LDP Review.

4 Key Sustainability Issues

4.1 Introduction

4.1.1 Section 4.2 below provides a summary of baseline environmental and socio-economic conditions in order to identify a suite of key sustainability issues relevant to the LDP Review. Section 4.3 then summarises the relationship between the Neath Port Talbot LDP and other relevant plans and programmes. Each section is supported by detailed baseline and policy reviews provided in **Appendices A** and **B** respectively.

4.2 Key Sustainability Issues

4.2.1 With reference to the topics prescribed within Schedule 2 of the SEA Regulations, a summary of the key sustainability issues identified in **Appendix A** which need to be addressed within the LDP Review (including objectives associated with the Wellbeing of Future Generations Act 2015 and Equality Act 2010) is provided in **Table 4.1** below and taken account of in the associated ISA framework. This summary has also been informed by consideration of the likely evolution of baseline conditions in the absence of the LDP Review, as detailed in **Appendix A**. In short, this concludes that the absence of the LDP Review is likely to result in a planning policy vacuum within the NPTC area which could lead to development coming forward in unsustainable locations and contrary to NPTC's preferred spatial strategy simply in order to meet identified needs, principally for new housing.

4.2.2 In most cases, it is recommended that the identified sustainability issues should be addressed within the ISA through the inclusion of relevant objectives within a framework ('the ISA Framework') which will be used to assess the likely sustainability and environmental effects of the RLDP. Full details regarding the proposed ISA Framework and constituent SA Objectives are set out in Section 5.

4.2.3 The RLDP will need to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the current LDP. These can be summarised as follows:

- **Contextual Changes:** Changes deriving from economic and social fallout from the Covid-19 pandemic, the impacts of Brexit and renewed efforts to reduce societal inequalities. Evidence base changes associated with Welsh Government Population and Household projections; policy shifts through the Future Wales 2040 the regional work associated with the Swansea Bay City Deal (SBCD); and the designation of the Port Talbot Waterfront Enterprise Zone and the work of the Valleys Taskforce. Broadly, but the implementation of these economic development strategies should drive higher rates of growth;
- **Level and Spatial Distribution of Growth:** In a context of recent difficulty in achieving housing and employment development targets, the level and spatial distribution of growth needs to be reconsidered to establish the most appropriate strategic approach to land use. This will entail developing a refreshed or new spatial strategy to underpin the RLDP;
- **Housing Land Supply.** A housing land supply shortfall has emerged, albeit in the context of lower than anticipated developer demand for housebuilding. In addition, the RR has identified a shortfall in housing delivery as one of the primary issues to be addressed in the RLDP; and,
- **Strategic Regeneration Areas:** Linked to issues around demand for land for housing and economic development, and a greater policy focus on viability within PPW – 11th Edition, there will be a need to reconsider existing sites and allocate new effective sites.

Future Wales 2040 identifies Neath Port Talbot, Swansea and Llanelli to be the main existing centre of population, employment and services within the Swansea Bay and Llanelli National Growth Area, acknowledging the region's potential in decarbonisation and tourism-based diversification

4.2.4 **New Policy Areas:** PPW – 11th Edition continues a number of changes set in motion by PPW - 10th Edition including principles that will be needed to put placemaking and driving place prosperity at the heart of development. Other statutory and national policy shifts which need to be implemented via the RLDP including responding to the wellbeing objectives set out by 'The Neath Port Talbot We Want (Well-being Plan 2018-2023) for the NPTC area in accordance with the requirements of the Wellbeing of Future Generations Act 2015, namely:

- I. Improve the well-being of children and young people;
- II. Improve the well-being of all adults; and,
- III. Develop the local economy and environment.

4.2.5 In addition, the Welsh Government has commenced the Socio-economic Duty (March 2021) under the Equality Act 2010 whilst NPTC has published their second Strategic Equality Plan (2020-2024) which focuses on enhancing health, well-being, community safety and quality of life for all. The plan also seeks to also improve staff training and implement the monitoring of data and information to identify and address disadvantages experienced by NPT residents. Overall, it seeks to improve access to services and information for all.

Sustainability Performance of the Adopted NPT LDP (2016)

4.2.6 The LDP Review Report (NPTC, 2020) identifies a number of main issues which fall within the SA topics.

- **Population:** The latest 2019 'Joint Housing Land Supply Availability Study' has identified a housing land supply of 4.5 years, below the required 5 years for the first time since the plan was adopted. In addition, falling residual values and increases in build costs over the Plan has impacted housing viability and associated delivery of affordable housing and other planning obligations. In the 2020 AMR, the delivery of homes has fallen short of annual targets since 2014/15, with the latest estimations (2020) showing a shortfall of 30% from the projected 8760 homes by the end of the plan period in 2026. With regard to employment, there has been no new development on allocated employment sites in the last two years, impacting the ability of NPT to meet employment targets of 3,850 jobs in the area over the Plan period. Limited progress with regard to Strategic Regeneration Areas has also contributed to the shortfall. Indicators have also shown that there is a shortfall in the delivery of new small local retail development;
- **Climate Change:** The indicators in respect of the SA climate change objectives suggest that the LDP is not fully meeting aspirations in respect of climate change adaptation or mitigation. In particular, since Plan adoption, there have been instances where proposals have been approved within flood risk and protected areas contrary to policy; the LDP density requirements are often not being met; and the number of renewable / low carbon energy schemes has been lower than expected;
- **Natural Resources:** In respect of the SA natural resources objectives, NPT have expressed concerns that low density development has an unnecessarily large impact per unit on natural resources generally;
- **Biodiversity and Geodiversity:** Targets of preventing net loss of biodiversity are not being met, partly due to developments having adverse effects on locally designated and protected areas and partly due to a lack of biodiversity enhancement within development sites or funded through developer contributions;

- **Landscape, Townscape and Historic Character:** A small number of developments have been permitted contrary to LDP policy on landscape and green wedges, giving rise to concerns about meeting the SA objective to protect and enhance the area's landscape and townscape;
- **Community Cohesion:** Indicators showing the loss of community facilities, approvals for new 'town centre uses' in out-of-centre locations and shortfalls in delivery of new housing and affordable housing, open space, employment floorspace and small scale local retail suggest some mixed impacts in respect of the SA social cohesion objective;
- **Health and Well-being:** Indicators showing loss of community facilities, shortfalls in open space provision and decreasing levels of workplace employment and economic activity suggest some mixed or negative impacts in respect of the SA objectives concerning health and poverty; and,
- **Material Assets:** Indicators showing difficulty in regenerating major brownfield sites with market conditions favouring, easier to develop, smaller scale land opportunities.

4.2.7 In summary, these issues give rise to a number of key Sustainability Issues which have been assessed alongside a review of the baseline environmental information identified in **Appendix A**. These are set out in accordance with the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations') criteria.

Table 4.1: Key Sustainability Issues relating to the Neath Port Talbot LDP Review

SEA Topic	Key Sustainability Issues
Biodiversity, Flora & Fauna	<p>The need to conserve, protect and enhance biodiversity including important species and sites designated for reasons of biodiversity conservation or ecological importance. This relates to the protection of designated sites located within the NPTC as well as designated sites in neighbouring authorities, all of which have the potential to be affected by the LDP Review and development activity within the NPTC area.</p> <p>The need to identify areas and/or opportunities to secure the maintenance and enhancement of biodiversity and deliver a net benefit while ensuring the avoidance of adverse effects on locally designated and protected areas.</p> <p>The need to safeguard and enhance the green infrastructure network and to maintain and enhance connections between designated sites and habitats, both locally and at a landscape scale (i.e. within the NPTC area and to those in neighbouring authorities).</p> <p>The need to protect and enhance ecosystem resilience.</p> <p>In addressing the above key issues, there is also a specific need to satisfy the biodiversity and resilience of ecosystems duty as prescribed within section 6 of the Environment (Wales) Act 2016.</p>
Population (including relevant socio-economic issues)	<p>The need to maximise socio-economic benefits from the opportunities identified in the Swansea Bay and Llanelli National Growth Area and in the implementation of the Swansea Bay City Region Deal, particularly for the advancement of energy and manufacturing technologies and related employment opportunities in the NPTC area.</p> <p>The need to align with the preparation of a potential Strategic Development Plan (SDP) for South West Wales in accordance with the Welsh Government's expectations.</p> <p>The need to encourage co-operation between neighbouring authorities in Plan making to facilitate cross boundary growth and partnership working.</p> <p>The need to plan for meeting the needs of an ageing population.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to support the achievement of the NPT Local Wellbeing Objectives as part of meeting the sustainable development requirements (as set out in Section 3 of the Wellbeing of Future Generations Act 2015).</p> <p>The need to deliver a sufficient quantum of good quality and well-located new housing to meet a range of identified needs.</p> <p>The need to deliver economic growth and increase employment opportunities, including for local residents.</p> <p>The need to tackle inequality of access to educational, training and employment opportunities.</p> <p>The need to tackle deprivation, including areas with existing deprivation linked to poor accessibility to key services, facilities and economic opportunities.</p> <p>The need to ensure that community facilities and services are appropriate and accessible to users to meet the diverse needs of residents and workers.</p> <p>The need to improve the accessibility of key destinations within the NPTC area and to other key locations through enhancing the transport network.</p>
Human Health	<p>The need to enhance all aspects of the health and wellbeing of the population, including physical health, mental health, social wellbeing, safety and security.</p> <p>The need to protect and enhance access to community facilities, healthcare facilities, high quality open space provision and active travel routes for all residents.</p> <p>The need to create safe, healthy and liveable urban environments.</p> <p>The need to support the achievement of the NPT Local Wellbeing Objectives to improve the health of all NPTC residents.</p> <p>The need to address harassment and discrimination experienced by some residents with additional requirements.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to monitor data and information with regard to the improvement in health for all residents.</p>
Soil	<p>The need to encourage and/or facilitate development on previously developed brownfield land.</p> <p>The need to safeguard the best and most versatile agricultural land from development.</p> <p>The need to maximise the efficient use of available land and prioritise the redevelopment of brownfield land.</p> <p>The need to safeguard geodiversity, important soil resources and to remediate areas of known contamination, particularly at post-industrial sites.</p> <p>The need to reduce emissions and nitrate pollution from agriculture.</p> <p>The need to minimise soil erosion and the loss of soils to non-permeable surfaces.</p> <p>The need to protect, enhance and restore important soil resources, including peatlands.</p>
Water	<p>The need to protect and enhance the quality of water resources and the water environment. This extends to the protection of cross-boundary watercourses which flow through the NPTC area and to the River Neath and River Afan which flow into Swansea Bay. It also requires the protection, maintenance and enhancement of drainage infrastructure.</p> <p>The need to address impacts on water quality across the borough caused by point source pollution as a result of NPTC's industrial profile.</p> <p>The need to locate new development away from areas of flood risk, to fully mitigate potential flood risks from all sources, and to future-proof flood defences.</p>
Air	<p>The need to minimise the emissions of air pollutants.</p> <p>The need to safeguard and improve air quality, including through addressing areas with poor air quality.</p>

SEA Topic	Key Sustainability Issues
Climatic Factors	<p>The need to ensure that the built environment and infrastructure is resilient and adaptable to the effects of climate change, taking account of the coastal location of the NPTC area.</p> <p>The need to ensure that ecosystems and the natural environment are resilient and able to adapt to climate change.</p> <p>The need to mitigate climate change including through the decarbonisation of key economic sectors.</p> <p>The need to ensure that the RLDP meets aspiration in respect of climate change adaptation or mitigation. In particular, proposals contrary to policy within flood risk and protected areas and those failing to meet density requirements should not be approved.</p> <p>The need to encourage the development of renewable/low carbon energy schemes in the NPTC area.</p> <p>The need to mitigate air and water quality impacts caused by industrial uses in the borough.</p> <p>The need to mitigate and address the climate emergency declared by the Welsh Government in April 2019.</p>
Material Assets	<p>The need to maximise the efficient use of land, natural resources and existing infrastructure. This includes the need to prioritise the redevelopment of brownfield land, the re-use and recycling of materials, and the minimization of waste sent to landfill.</p> <p>The need to address socio-economic impacts in areas experiencing post-industrial decline through new development.</p> <p>The need to understand the impacts on natural resources due to footprint of development.</p>
Cultural Heritage	<p>The need to preserve, protect and enhance cultural heritage assets and their settings within the NPTC area.</p> <p>The need to safeguard and support growth in the use of the Welsh language.</p>

SEA Topic	Key Sustainability Issues
Landscape	The need to protect and enhance landscape character, townscape character, key views and visual amenity. This extends to the protection of landscapes within the Brecon Beacons National Park and in other neighbouring authorities.
Inter-related effects	<p>The need to deliver holistic improvements to wellbeing and to contribute to the delivery of sustainable development across the NPTC area, particularly with regard to the promotion of social cohesion.</p> <p>The need to promote access to services and information for all to ensure equality of access for residents with additional needs.</p>

4.3 Relationship between the LDP Review and Other Relevant Plans and Programmes

4.3.1 The following types of plans and programmes were examined for their relevance to the LDP Review and this ISA:

- International conventions and treaties;
- European Directives and associated legislation;
- Legislation enacted by the UK Parliament and the Welsh Assembly; and,
- Policy documents and strategies published at the national, regional and local levels, including by the UK Government, the Welsh Assembly Government (and its agencies), NPTC and the NPT Public Service Board (NPTPSB).

Implications of Recent Changes to Welsh National Planning Policy

4.3.2 On 24th February 2021, both Planning Policy Wales 11th Edition and Future Wales 2040 were published by the Welsh Government. The publication of Future Wales 2040, along with the LDP forms part of the statutory development plan for Wales. PPW 10th Edition, TAN1,,TAN8 and the Wales Spatial Plan are now revoked. The main implications of the publication of these documents are outlined below:

- **Future Wales 2040**
 - The implementation of a four region approach, containing three National Growth Areas and 11 Regional Growth Areas;
 - The introduction of specific climate change targets, namely that 70% of electricity consumption is to be generated from renewable energy by 2030, one gigawatt of renewable energy capacity is to be locally owned by 2030 and that new renewable energy projects to have at least an element of local ownership from 2020;
 - The removal of TAN8 and Strategic Search Areas, replaced by Pre-Assessed Areas for Wind Energy, covering c. 281,0000 hectares (from a previous 77,000 ha for SSAs) and the introduction of Priority Areas for District Heat Networks;
 - The need for preparation of Strategic Development Plans in conformity with Future Wales 2040 (of which NPT will form part of the South West Wales SDP). The SDPs should consider strategic regional issues including future growth areas, housing demand, economic development, transport and green infrastructure, responding to the Future Wales Outcomes in Chapter 3 of the NDF; and,
 - NPT is identified as part of the Swansea Bay and Llanelli National Growth Area (Policy 28) Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.
- **Planning Policy Wales 11th Edition**
 - The ability to deliver housing requirements must now be demonstrated through a housing trajectory, prepared as part of the development plan process and forming part of the plan. The housing trajectory will form part of the evidence base for the development plan Annual Monitoring Reports (AMRs) replacing Housing Land Supply and resulting in the revocation of TAN1: Joint Housing Land Availability Studies.

- 4.3.3 Strengthened commitment to renewable energies to address the Climate Emergency in support of the targets announced by Future Wales 2040A detailed review of the other plans and programmes identified as relevant to the LDP Review is provided in **Appendix B**. From this review, it is clear that the RLDP should:
- Seek to capitalise on the socio-economic opportunities presented by the Swansea Bay City Deal Project and the Swansea Bay and Llanelli National Growth Area;
 - Align with the National Development Framework (NDF) for Wales and the requirement for the preparation of a SDP for South West Wales;
 - Seek to enhance all aspects of health and wellbeing for the population of the NPTC area, including through providing high quality health infrastructure, improving physical and mental health and providing opportunities to enhance social wellbeing. In accordance with Section 3 of the WFG Act, the LDP Review (resulting in the adoption of a RLDP) should contribute to sustainable development and support the achievement of locally defined wellbeing objectives as set out within the Neath Port Talbot We Want (Well-being Plan 2018 – 2023);
 - Secure sustainable economic growth and inward investment across the NPTC area through allocating suitable sites for development and by delivering the infrastructure required to increase connectivity, improve community and social infrastructure and increase access to high quality employment and economic opportunities. It will also be important for the RLDP to set out a spatial strategy which maximises the economic competitiveness of the NPTC area and improves social wellbeing, taking account of its position on the hinterland of the Swansea City Region and its current socio-economic conditions;
 - Identify and plan to meet the needs of all residents and workers within the NPTC area, in particular with respect to the provision of adequate community infrastructure;
 - Deliver well-designed and affordable homes to meet identified housing needs, including providing a range of sizes and tenures;
 - Reduce car dependencies and improve active travel infrastructure;
 - Deliver improved and expanded transport links, public transport and enhanced communications infrastructure, both to communities within the NPTC area and to key destinations in neighbouring authorities;
 - Protect and enhance access to high quality outdoor sports facilities, parks and open spaces;
 - Conserve, preserve, protect and enhance sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance, geological importance or heritage significance, in ways appropriate to their status;
 - Develop effective community engagement techniques to respond to the views of wider communities and facilitate effective community cohesion;
 - Promote the efficient use of resources, including moving towards a low carbon economy, use of waste as a resource, energy efficient buildings, and appropriate renewable and low carbon energy;
 - Take measures to protect air quality levels and aim to mitigate any activity which could affect air quality levels across the NPTC area;

- Ensure there are no significant negative impacts on internationally and nationally designated nature sites (refer to separate Habitats Regulations Assessment Initial Screening Report for further details);
- Give full consideration to the potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management;
- Seek ways to maximise multi-functional green infrastructure coverage and ensure they provide a network of linked wildlife corridors (across a wide range of scales and increase ecosystems services including biodiversity);
- Seek ways to maximise the health benefits of green infrastructure;
- Use land efficiently by prioritising the use of previously developed land;
- Consider soil quality and agricultural land classification when assessing potential development sites;
- Recognise the different landscapes in the NPTC area and their capacity to accommodate change; and,
- Promote development that minimises landscape impacts and protects landscapes appropriate to their significance.

4.3.4 To ensure that the LDP Review addresses the key policy issues listed above, it will be necessary for them to be considered throughout the ISA. As with the identified key sustainability issues (Section 4.2 above), this will be done through the application of a holistic ISA Framework, including constituent ISA Objectives, as a core element of the ISA process. The proposed ISA Framework to support the NPT LDP Review is detailed in Section 5.

5 Proposed Neath Port Talbot RLDP ISA Framework

5.1 Introduction

- 5.1.1 This section identifies and seeks the views of the SEA Consultation Bodies and other relevant consultees regarding a proposed assessment framework ('the ISA Framework') to underpin an ISA of the LDP Review. Once finalised, this ISA Framework will be applied in accordance with the assessment methodology outlined in Section 6 to assess likely significant environmental, health, equalities, Welsh language, and wider sustainability effects from all emerging substantive components of a RLDP (and any identified reasonable alternatives) throughout the LDP Review.
- 5.1.2 Establishing an appropriate ISA Framework is central to identifying LSE as this allows the ISA to focus on key sustainability issues and to proportionately assess each substantive component as it emerges. Broadly, the ISA Framework should comprise a suite of related objectives which, when applied together, should define in objective terms the direction of travel and spatial outcomes required for the plan or programme to contribute positively to the delivery of sustainable development while meeting statutory requirements, and guidance, in relation to well-being, equalities, the protection of the Welsh Language, and health. These ISA Objectives are therefore distinct from, but should relate to, policy objectives defined at multiple spatial levels including within the emerging plan which is being subject to ISA.
- 5.1.3 To be effective tools for assessment, ISA Objectives and the overall ISA Framework must be grounded within a detailed understanding of the socio-economic, environmental and policy contexts within which a RLDP will operate. The ISA Objectives also need to be targeted towards addressing key sustainability issues of relevance to both the spatial context of the NPTC area and the proposed content of the emerging RLDP.

5.2 Summary of Existing SA Framework LDP Review

- 5.2.1 **Table 5.1** below lists the Sustainability Appraisal Objectives (SA Objectives) within the existing NPTC LDP SA Framework (2016) and considers their continuing validity. This has been carried out with a view to incorporating the SA framework within a broader ISA framework to inform the LDP Review.
- 5.2.2 The review of the existing NPT LDP SA Framework provided in **Table 5.1** indicates that whilst all components remain valid, a new ISA Framework is required to:
- Ensure the ISA and more widely the preparation of a RLDP responds to the identified key sustainability issues (**Table 4.1**);
 - Account for policy changes at all spatial scales;
 - Reflect the inclusion of wider assessment topics by changing from a 'SA' to a 'ISA';
 - Respond to points which could improve the application of the framework; and,
 - Respond to issues which the framework has not covered.

5.3 Review of the Existing Neath Port Talbot LDP SA Framework

- 5.3.1 The starting point of this ISA process is to consider whether the SA Framework devised for the SA (incorporating SEA) of the first NPTC LDP remains valid or if a revised framework is needed to allow the LDP Review ISA to proportionately and effectively respond to key

sustainability issues identified in Section 4. Temporarily leaving aside the change in scope between the SA previously reported and the ISA now being undertaken, **Table 5.1** provides a review of the existing SA Framework for the adopted NPT LDP (2016). This considers the continuing validity of the current SA Objectives, including in the context of the LDP Review now being subject to a broader ISA process.

Table 5.1: Review of the Existing NPTC LDP SA Framework

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
<p>1. Climate Change</p> <p>Goal: A community that is resilient to the likely impacts of climate change and minimises greenhouse gas production.</p>	<p>1A: Ensure that all development takes into account likely future changes resulting from climate change (Adaptation).</p>	<p>The SA objective directly addresses climate change adaptation priorities. This remains valid.</p>	<p>The overall Climate Change SA Objective clearly remains valid. Climate change effects and implications have become more evident over the course of the LDP and Government targets have been increased accordingly.</p>
	<p>1B: Achieve government targets for reducing greenhouse gas emissions (Mitigation).</p>	<p>Directly addressed the need to achieve government targets. This remains valid. Targets are now more ambitious than previously.</p>	<p>The preceding sections have demonstrated that the LDP has not fully met aspirations in respect of climate change adaptation of mitigation. But this is an issue with the application of LDP policy rather than the SA Objective itself.</p>
	<p>1C: Make the area's appropriate contribution to national energy production (Mitigation).</p>	<p>This SA Objective usefully focuses on renewable energy generation and is appropriately supportive policy framework for the development of renewable energy schemes. This remains valid.</p>	<p>The Welsh Government set a new target of reduction of 95% from 1990 levels by 2050 in 2019 and declared a climate emergency in 2019.</p> <p>However, in their current form the three objectives 1a-1c risk isolating specific aspects of climate change and, in the context of now undertaking a broader ISA, undermining assessment proportionality. A more holistic approach to achieving climate change adaptation and mitigation should therefore be adopted in a new ISA Framework. This should incorporate Objectives 1a-1c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide</p>

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
			<p>a more holistic Climate Change SA objective.</p> <p>It is recommended that one Climate Change ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 1a-1c.</p>
<p>2. Natural Resources and Waste</p> <p>Goal: A community that protects and enhances natural resources and minimises the generation of waste.</p>	<p>2A: Minimise loss or degradation of natural resources while ensuring that they are used only in a sustainable way.</p>	<p>This remains a valid element of an overall approach to the quantity of natural resources.</p>	<p>The overall SA objective on Natural Resources and Waste remains valid and there remains a strong rationale to incorporate these within one objective.</p> <p>In its current form the three objectives 2a-2c risk isolating specific aspects of the issue of natural resources and waste.</p> <p>The Environment (Wales) Act 2016 and National Natural Resources Policy (NNRP) (2017) contain policy implications – such as the principles of Sustainable Management of Natural Resources - which could be reflected in the SA Objective criteria. TAN 21 and PPW have been updated, two important outcomes are a focus on circular economy and prevention via the waste hierarchy.</p> <p>It is recommended that one natural resources and waste ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or</p>
	<p>2B: Maintain and improve the chemical and biological/ecological quality of natural resources.</p>	<p>This remains a valid element of an overall approach to the quality of natural resources.</p>	
	<p>2C: Minimise waste and reduce amounts of waste disposed of to landfill.</p>	<p>This remains a valid element of an overall approach to reducing waste and landfill.</p>	

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
			questions to guide LDP development incorporating and adding to 2a-2c.
<p>3. Biodiversity and Geodiversity</p> <p>Goal: A community where biodiversity and geodiversity are valued and a healthy and diverse natural ecosystem is nurtured, supported and enhanced.</p>	<p>3A: Prevent any further net loss of biodiversity.</p>	<p>This remains a valid element of an overall approach to protecting biodiversity, particularly in terms of providing an explicit commitment.</p>	<p>The overall SA objective on Biodiversity and Geodiversity remains valid and there remains a strong rationale to incorporate these within one objective.</p> <p>Changes in the Environment (Wales) Act 2016 and PPW have added further weight to the SA Objective, this now requires biodiversity enhancement and this should be recognised. The role of Green Infrastructure has also been heightened The Section 6 duty introduced by the Environment Act and the well-being goals set out in the Wellbeing of Future Generations Act – the importance of biodiversity in ‘resilience’ - must be key considerations cutting across SEA objectives.</p> <p>In its current form the three objectives 3a-3c risk isolating specific aspects of biodiversity and geodiversity. A more holistic approach to biodiversity and geodiversity should be taken. This should incorporate Objectives 3a-3c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide a more holistic biodiversity and geodiversity objective. Other factors including green infrastructure and</p>
	<p>3B: Exploit all reasonable opportunities to secure biodiversity enhancements.</p>	<p>This remains a valid element of an overall approach to enhancing biodiversity.</p>	
	<p>3C: Minimise adverse effects on designated geodiversity sites.</p>	<p>This remains a valid element of an overall approach to protecting geodiversity and biodiversity sites could also be explicitly addressed.</p>	

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
			<p>human-environmental relations, e.g. the provision of access to nature for all communities should also be addressed.</p> <p>The issue of soil quality protection is not included within the framework and should be included within a new Objective.</p> <p>It is recommended that one Biodiversity and Geodiversity and Soil ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 3a-3c.</p>
<p>4. Landscape, Townscape and Historic Character</p> <p>Goal: A community where the County Borough's distinctive and varied landscapes, townscapes and historic character are valued, conserved and enhanced.</p>	<p>4A: Protect and/or enhance the area's landscape and townscape.</p>	<p>This remains a valid element of an overall approach to both landscape and townscape. However, it does not specifically mention historic landscapes or assets.</p>	<p>This SA Objective succinctly identifies some key elements of landscape protection of relevance to the area but does not include historic landscapes. It therefore misses an opportunity to demonstrate compliance with Schedule 2 of the SEA Regulations with regards to the assessment of likely significant effects on "cultural heritage". This is important as cultural heritage is not explicitly addressed elsewhere in the current SA Framework.</p> <p>Changes in the Environment (Wales) Act 2016 and PPW have added further support to the validity of each element (landscape, townscape, historic character) of the SA Objective. The principles of Sustainable Management of Natural</p>
	<p>4B: Protect and/or enhance the area's historic environment including architectural and archaeological resources.</p>	<p>This remains a valid element of an overall approach to protecting and enhancing the historic environment.</p>	

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
			<p>Resources has implications. Interlinked with biodiversity and geodiversity, opportunities for species and habitat connectivity should be considered on a landscape scale. The placemaking theme introduced by PPW10 and continued in PPW11, together with TAN12 (Design) amended in 2016 means a closer link between heritage and placemaking could be made via new criteria – criteria could be focused on protection and maintaining distinctiveness.</p> <p>The preceding section has demonstrated that the LDP has not fully met aspirations in respect of landscape designation protection. Whilst this is an issue with the application of LDP policy rather than the ISA Objective itself, the ISA Objective’s criteria or questions could include specific reference to landscape designations.</p>
<p>5. Pollution (Air Quality, Noise and Light)</p> <p>Goal: A community free from significant air, noise and light pollution.</p>	<p>5A: Achieve acceptable levels (meet national/European standards) of air quality throughout the County Borough.</p>	<p>This remains a valid. Air Quality was identified as a Key Issue for the LDP Review to address.</p>	<p>Given the specific land use implications of reducing and mitigating air pollution, and its specific identification within Schedule 2 of the SEA Regulations, it is recommended that a separate Air Pollution ISA Objectives is created. Light and Noise pollution are more appropriately addressed under a holistic Health and Wellbeing objective. The relevant ISA Objectives should be supported by a</p>
	<p>5B: Achieve acceptable noise levels and protect quiet areas throughout the County Borough.</p>	<p>This remains valid.</p>	

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
	5C: Reduce light pollution.	This remains valid.	<p>series of criteria or questions to guide LDP development incorporating and adding to 5a-5c.</p> <p>Changes to PPW will need to be accounted for. PPW now refers to the need to promote appropriate soundscapes depending on context.</p>
<p>6. Community Cohesion</p> <p>Goal: A community whose culture and character are enhanced, and individuals are not limited by social exclusion.</p>	6A: Improve social cohesion and minimise the incidence of social exclusion by addressing the causes of social exclusion.	This remains a valid element of an overall approach to reducing social exclusion and promoting socio-economic equality of opportunity and outcome.	<p>Both criteria remain valid, but it is recommended that these are separated into an objective on socio-economic aspect of social inclusion opportunity and another on cultural heritage and protection including the protection of the Welsh Language. PPW 11 considers protection of the Welsh language within 'cultural considerations', alongside the historic and cultural environment and promoting cultural value and experience.</p>
	6B: Protect and enhance the culture and character of communities including cultural resources and Welsh language.	This remains valid. The importance of assessing for impacts on Welsh language have been confirmed within PPW 11 th edition, TAN20), Planning Wales Act 2015 and Development Plans Manual 3 rd edition 2020.	
<p>7. Health and Wellbeing (including poverty/deprivation)</p> <p>Goal: A community where individuals have the opportunity to realise their potential unhindered by ill health or poverty</p>	7A: Improve physical and mental health outcomes for all.	This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation.	<p>The overall SA objective on Health and Wellbeing remains valid and there remains a strong rationale to incorporate these within one SA objective.</p> <p>The preceding section has demonstrated that the LDP has not fully met aspirations for improved economic outcomes – strongly</p>
	7B: Reduce/minimise the incidence and impacts of ill	This remains a valid element of an overall approach to improving	

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
	health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.	health and wellbeing by recognising links with poverty and deprivation.	linked to health. This is not an issue with SA framework and the validity of the overall SA Objective, which takes a holistic approach to health and wellbeing remains sound overall.
	7C: Reduce/minimise the incidence and impacts of poverty by addressing the causes and consequences of poverty.	This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation.	To ensure that the ISA complies with Schedule 2 of the SEA Regulations, takes account of the Well-being of Future Generations (Wales) Act 2015 and fully incorporates the requirements of Wellbeing Assessment with the ISA, a new ISA Objective should incorporate 7a) to 7c) and be extended to include other criteria in order to promote a holistic interpretation of health and wellbeing, including physical health, mental health, social wellbeing, safety and security. As such, criteria should explicitly capture issues including mental health, educational attainment, crime prevention, residential amenity and multiple deprivation.
<p>8. Economy</p> <p>Goal: A community where the local economy is resilient to global economic, social and climatic change and creates/sustains a good quality of life for all residents within the community.</p>	8A: Develop and support a local economic infrastructure that is attractive to business and that meets the changing needs of the local and national community.	This remains a valid element of an overall approach to improving the local economy.	<p>The overall SA objective on Economy remains valid and there remains a strong rationale to incorporate these within one objective.</p> <p>The preceding section has demonstrated that the LDP has not fully met aspirations in respect of economic growth particularly in</p>

Neath Port Talbot LDP SA Objective Title and Goal	Neath Port Talbot LDP SA Objective	Assessment of Continuing Validity	Overall Assessment of Continuing Validity
	8B: Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and the use of, local resources and environmental assets.	This remains a valid element of an overall approach to improving the local economy.	terms of its spatial focus. While this is an issue with the application of LDP policy rather than the SA Objective itself, the SA Objective's criteria or questions could include specific reference to ensuring economic growth achieves regeneration aims.
	8C: Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community.	This remains a valid element of an overall approach to improving the local economy	<p>In its current form the three objectives 8a-8c risk isolating specific aspects of Economy. A more holistic approach to economic growth and resilience should be taken. This should incorporate ISA Objectives 8a-8c as criteria rather than separately.</p> <p>Regeneration strategic priorities could also be addressed through other SA Objectives regarding land use, reducing inequalities, placemaking and social wellbeing. To be more effective, a new suite of more integrated ISA Objectives focused on economic growth, regeneration, investment and employment should take account of the updated context including, the implications for NPT of the Swansea Bay City Deal , Enterprise Zone at Port Talbot, potential for the Swansea Bay Metro and the NDF. There is also the opportunity to consider the link between The Well-being of Future Generations Act which could provide an additional focus on skills and inclusion as key to sustainable economic growth.</p>

5.4 Proposed ISA Scope and Objectives for the LDP Review

5.4.1 This subsection provides an overview of the topics which need to be considered through this ISA and therefore within the ISA Framework. The scope of the ISA Framework must be sufficiently wide to enable the likely significant environmental effects and the likely equalities and health effects of the emerging LDP Review to be identified and addressed in accordance with statutory requirements (Section 1 and above at paragraph 5.3.3). From Section 4.3 it is also clear that the ISA Framework should be broader than that previously used for the NPTC LDP. Explicitly, ISA Objectives which respond to the following legal requirements need to be incorporated within the framework:

- Sustainability Appraisal (SA) as required under the Planning and Compulsory Purchase Act 2004 and the Development Planning (Wales) Regulations 2005 ('the 2005 Regulations');
- Strategic Environmental Assessment (SEA) as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations');
- Supporting the implementation of wellbeing goals and wellbeing objectives (and the discharge of associated duties) as required under the Wellbeing of Future Generations (Wales) Act 2015. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
- Equalities impact assessment (EqIA) under the Equality Act 2010;
- Health impact assessment (HIA) – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,
- Welsh Language Impact Assessment (WLIA) as required under the Welsh Language Standards (No.1) Regulations 2015 and PPW -11th Edition.

SEA/SA

5.4.2 The ISA Framework will need to address all environmental topics prescribed within Schedule 2 of the SEA Regulations (refer to Section 1.5), as there is potential for significant effect on all that cannot be scoped out at this stage and will therefore require further examination through the ISA process. The inclusion of 'population', 'human health' and 'material assets' as SEA topics provides a basis upon which to assess likely equalities and health effects using the same ISA Framework, as detailed below. In accordance with the SEA Regulations, the ISA will also assess inter-relationships between effects arising in relation to these environmental issues.

Wellbeing of Future Generations

5.4.3 The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the **WBFGA 2015**.

Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

5.4.4 The Wellbeing of Future Generations is at the heart of the planning system. Planning Policy Wales (2021) is now driven by the need for a placemaking approach at the heart of planning and is tasked with delivering the vision of the Wales as set out in the Well-being of Future Generations Act.

- 5.4.5 To achieve this, the ISA Scope and the ISA Framework must therefore demonstrate how the RLDP will maximise its contribution to the achievement of the WBFGA seven well-being goals. In the first instance, the definition of sustainable development provides a clear sustainability principle at the heart of the ISA which will have to be approached consistently within the ISA framework. The ISA framework must incorporate the seven well-being goals which public bodies are required to achieve; these are:
- 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.
- 5.4.6 These well-being goals will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce many aspects of the SEA Schedule 2 topics with a particular focus on assessing the long-term effects of the RLDP on human and population health. The ISA scope and ISA Framework will need to consider economic prosperity rather than short-term growth, this is likely to mean a focus on low carbon transition and achieving a more productive and more inclusive economy. It will need to consider how resilience can be achieved by addressing climate change, for example, and the role for and mutual benefits of biodiversity in improving human health outcomes. Health will need to be considered in terms of physical and mental wellbeing and the land use implications of this understood. The link between good health and socio-economic opportunity will need to be assessed to ensure opportunities for good growth are spread as equally as possible. The achievement of social cohesion through land use decision making, such as through investment in physical infrastructure, will therefore need to be assessed and understood. The importance of maintaining distinctiveness within NPTC area and the multiple ways in which land use decisions, in terms of their cultural, physical, linguistic, and social impacts, can impact these must be identifiable and considered. Finally, when these factors are considered together, the ISA Framework must help NPTC to identify how it will contribute to its global sustainability responsibilities.
- 5.4.7 The WBFGA 2015 identifies five ways of working which public bodies must demonstrate they have carried out when undertaking their duty to achieve sustainable development:
- Looking to the long term so that we do not compromise the ability of future generations to meet their own needs;
 - Understanding the root causes of issues to prevent them from occurring or getting worse;
 - Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;
 - Involving a diversity of the population in the decisions that affect them; and,
 - Working with others in a collaborative way to find shared sustainable solutions.
- 5.4.8 The ISA framework through its holistic approach to the RLDP appraisal, and with the Well-being Goals integrated within, will help ingrain the five-ways of working within the plan-making process.

5.4.9 To implement the WCFG Act at a local level, NPTC has produced a statutorily required Well-being Plan which shapes the approach taken to relevant Council policies, programmes, and strategies. The NPTC RLDP falls within this remit and there are clear implications for the ISA Scope and the content of the ISA Framework. The Neath Port Talbot We Want (Well-being Plan 2018-2025) identifies six local well-being objectives which the Public Services Board intend to pursue to improve the well-being of the people who live in the Neath Port Talbot area:

- Objective 1: To support children in their early years, especially children at risk of adverse childhood experiences;
- Objective 2: Create safe, confident and resilient communities, focussing on vulnerable people;
- Objective 3: Put more life into our later years - Ageing Well;
- Objective 4: Promote well-being through work and in the workplace;
- Objective 5: We value our green infrastructure and the contribution it makes to our Well-being; and,
- Objective 6: Tackling digital exclusion.

5.4.10 These well-being objectives will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce and provide a locally specific implementation mechanism of the WCFG Act within the NPTC area. Currently 30% of children in the NPTC area live in poverty. The ISA Framework will need to target the RLDP towards improving long term opportunities and outcomes for children. Housing, particularly ensuring safe housing for people with particular needs, will be a key focus for the RLDP. One key issue identified which has not been covered under the existing SA framework is that of Housing. Given the key issues identified in Section 4 and issues raised in the NPT Well-being Plan (2018-2025), it is recommended that a standalone housing objective is also identified in the ISA framework.

5.4.11 Housing is a cross cutting issue and a driver of wellbeing. It is integral to meeting the needs of an ageing population which has many implications, particularly in terms of housing and access to services to improve not just life expectancy but healthy years expectancy. Across generations, the ISA Framework will need to be geared towards ensuring better employment prospects within NPTC addressing not just employment rates but the quality of employment and access to opportunities. The ISA Framework will contain biodiversity criteria, but it is important to ensure that these reinforce the human benefits of green infrastructure. The ISA Framework will need to recognise the link between sustainable economic growth and digital connectivity. The Swansea Bay City Deal is predicated on internet-based opportunities to grow quality employment opportunities across the region and so the ISA Framework will need to demonstrate how this is supported.

Equalities Impact Assessment

5.4.12 The EqIA will be undertaken by assessing the performance of the emerging LDP Review against objectives from the ISA Framework relating to tackling inequalities and promoting equality and social inclusion. The EqIA will implement the Public Sector Equality and Socio-economic Duties under the Equality Act 2010.

5.4.13 The objectives of the EqIA process are to integrate the consideration of relevant equalities issues and impacts into the development of the RTS from the outset and, in doing so, to demonstrate compliance with the Public Sector Equality Duty and the Socio-economic Duty. These duties will be used as tools to inform and embed key equalities issues within the LDP Review from the outset. Acting together with all other statutory assessments included within the ISA, this integrated approach allows the environmental, social, and economic implications

of all strategy components to be tested at the earliest opportunity and for any uncertainties or issues identified during impact assessment processes to be addressed during the preparation of the RLDP.

- 5.4.14 Insofar as the development plan affects access to services, amenities, economic opportunities and social activities, the LDP Review (resulting in the adoption of a RLDP) is likely to result in different impacts upon different demographic groups, persons with protected characteristics and those facing socio-economic disadvantage. The EqIA component of the ISA will holistically assess the likely effects on characteristics of equality, social inclusion and population and are therefore reflected within ISA Objectives in the ISA Framework (**Table 5.2** below). At this point, due to the nature of the LDP Review, the identification of specific impacts on marriage, civil partnership and gender reassignment have been scoped out from the application of the Public Sector Equality Duty as the LDP Review cannot realistically secure objectives in relation to these protected characteristics.
- 5.4.15 To avoid duplication or assessment gaps (including in combination with the WCFG Act), the integrated approach outlined in the 'A More Equal Wales – Mapping the Duties' non-statutory guidance (2021) will be adopted in this ISA. Relevant evidence generated through applying the ISA Framework to all emerging substantive plan components will therefore be used to support specific reporting against the distinct requirements of each duty.

Health Impact Assessment

- 5.4.16 The purpose of HIA is to consider how a plan, programme or proposal will affect the key factors which can influence people's health and wellbeing. The HIA approach is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore how health and social inequalities might be reduced or widened by particular proposals. More widely it should be recognised that an individual's inherited traits interact with lifestyle, community, environmental, social and economic factors as well as a much wider range of issues to determine their health.
- 5.4.17 The WCFG aims to achieve 'a healthier Wales', and the planning system is key to ensuring places support the health and wellbeing of people and communities. The NPT Well-being Plan (2018-2025) has identified health improvement as a key priority. Clearly, within national and local policy, there is an increasing awareness of the links between the character and quality of the places where people live and work and their health and wellbeing. Social and economic factors are typically the main determinants of health, although the provision of health services and environmental factors such as pollution control and better design can play an important role. The legal and policy context should direct the RLDP towards better health outcomes. The Environment (Wales) Act has set stronger carbon reduction targets and the HIA and ISA should help to ensure that greener, healthier places and ways of living are achieved.
- 5.4.18 The HIA process provides a systematic, yet flexible and practical, framework that can be used to consider the wider effects of local and national policies or initiatives and how they, in turn, may affect people's health. The SEA Regulations require human health to be considered as part of the assessment of environmental effects. The health component of an SEA can be broadened to include both physical and mental health objectives of an HIA.
- 5.4.19 Public Health Wales has published 'Creating healthier places and spaces for our present and future generations' (2018) which focuses on six priority areas:
- The walking and cycling infrastructure;
 - Open green /blue spaces and green infrastructure ;
 - The food growing and retail environment community;
 - Health and social care services provided from local facilities;

- Low levels of air pollution; and,
- Building design.

5.4.20 The HIA element of this ISA will be undertaken firstly by assessing the performance of the emerging RLDP against objectives from the ISA Framework relating to health and wellbeing. Building on this, a second level of assessment will consider the likely impacts of the emerging RLDP as a whole specifically on identified key determinants of health within the NPTC area, taking account of the identified six priority areas.

Welsh Language

5.4.21 Supporting Welsh Language is intrinsically part of promoting national and local culture and distinctiveness. A thriving Welsh Language is a well-being goal (WBFGA) and the role for placemaking in promoting Welsh Language is set out in PPW11. As such there is a clear role for the RLDP, and within this the ISA, to ensure this is achieved. It is now a legislative requirement that the ISA must include an assessment of the likely effects of the plan on the use of Welsh Language (section 62(6A) PCPA 2004 as inserted by section 11, PWA 2015). This will be undertaken firstly by including Welsh language Guide Questions and site assessment criteria within the ISA Framework, thereby enabling a base level of assessment. Building on this, a second level of assessment will examine the likely impacts of implementing the RLDP plan as a whole on the use of the Welsh language across the NPTC area.

Habitats Regulations Appraisal (HRA)

5.4.22 As noted in Section 1, a separate HRA will be undertaken to assess the likely effects of the emerging RLDP on Natura 2000 sites ('European Sites'). There are three European Sites within the NPTC area, with a further three European Sites within 15km of the NPTC area which have the potential to be affected by the emerging RLDP proposals. Full details of all international, national or local designations are provided in Appendix A. The European sites which will be considered in the assessment are:

- Within the NPTC area: Kenfig / Cynffig (SAC), Crymlyn Bog / Cors Crymlyn (SAC & Ramsar Site) and Coedydd Nedd a Mellte (SAC); and,
- Outside the NPTC area: Cefn Cribwr Grasslands (SAC), Blaen Cynon (SAC) and Cwn Calan (SAC).

5.5 Proposed Neath Port Talbot LDP Review ISA Objectives

5.5.1 Having regard to the proposed spatial scale, form and content of the RLDP (Section 2), relevant baseline characteristics and key sustainability issues (Section 4.2 and **Appendix A**), the objectives and requirements of other relevant plans and programmes (Section 4.3 and **Appendix B**) and the need for assessment proportionality, the proposed suite of ISA Objectives to be included within a new ISA Framework for the LDP Review are detailed in **Table 5.2** below. The emphasis on implementing a holistic approach to improved wellbeing across many of the SA Objectives is intended to demonstrate compliance with the Well-being of Future Generations (Wales) Act 2015 and to align with both the PPW – 11th Edition (2021) and the Future Wales 2040 NDF.

5.5.2 The emphasis on implementing an integrated approach to improved wellbeing across many of the ISA Objectives is intended to reflect the cross-cutting nature of relevant environmental, social, economic, cultural, equalities and health issues and to provide a single focus to underpin this ISA, rather than environmental, social, economic, cultural, equalities and health issues being assessed separately.

Table 5.2: Proposed ISA Objectives for the LDP Review

No.	Proposed ISA Objective Topic	Proposed ISA Objective
1	Health and Wellbeing	Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.
2	Equality and Social Inclusion	Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.
3	Transport and Communications	Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.
4	Inclusive Economic Growth	Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base
5	Housing	Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs.
6	Air Quality	Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.
7	Climate Change	Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change.
8	Biodiversity, Geodiversity and Soil	Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.

No.	Proposed ISA Objective Topic	Proposed ISA Objective
9	Water and Flood Risk	Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.
10	Materials and Waste	Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and the provision of an adequate supply of minerals and materials for construction.
11	Sustainable Placemaking	Maximise the efficient use of land and enhance design quality to create great places for people.
12	Cultural Heritage (inc. Welsh Language)	Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.
13	Landscape	Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area.

- 5.5.3 These proposed ISA Objectives are designed to complement each other, avoid assessment duplication and relate to the specific content of the LDP Review, to underpin a proportionate and effective ISA. **Table 5.3** below demonstrates the coverage of all statutory assessment requirements through the proposed ISA Objectives.

Table 5.3: Relationship between the Proposed ISA Objectives and the SEA Regulations

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to Wellbeing of Future Generations Act Wales 2015	Relates to Health Impact Assessment	Relates to Welsh Language (Planning Wales Act 2015)
1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.	B, C	Yes	Yes	Yes	
2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.	B, J	Yes - directly	Yes	Yes	Yes
3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.	B, I, J	Yes	Yes		
4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base	B, J	Yes	Yes		Yes?
5. Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs.	B, J, C	Yes	Yes	Yes	Yes?
6. Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.	H, C	Yes	Yes	Yes	

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to Wellbeing of Future Generations Act Wales 2015	Relates to Health Impact Assessment	Relates to Welsh Language (Planning Wales Act 2015)
7. Climate Change: Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change.	I		Yes		
8. Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.	A, D, E, F		Yes		
9. Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.	G		Yes	Yes	
10. Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction.	F, J		Yes		
11. Sustainable Placemaking: Maximise the efficient use of land and enhance design quality to create great places for people.	B, J, L	Yes	Yes	Yes	
12. Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.	B, K		Yes		Yes
13. Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area.	B, L				

5.5.4 **Table 5.3** demonstrates that there is good coverage of all applicable statutory requirements within the proposed suite of ISA Objectives and that they will allow related issues to be addressed in tandem. This should ensure that any conflicts between either the ISA Objectives or the components of the emerging RLDP can be identified and resolved through the ISA process.

5.6 Proposed ISA Framework for the Neath Port Talbot LDP Review

5.6.1 To enable this ISA to be undertaken in a proportionate and targeted manner an ISA Framework will be used, comprising:

- The proposed ISA Objectives (see **Table 5.2**);
- A suite of relevant Guide Questions relating to each ISA Objective. Subject to views expressed by the relevant Consultation Bodies, this will be used in a qualitative assessment of each emerging substantive component of the RLDP, and any identified reasonable alternatives, to proportionately identify their LSE; and,
- A suite of sustainability indicators which are proposed to be considered in the assessment of candidate sites being carried out by NPTC. These indicators are designed to guide NPTC in the site assessment process. The indicators will support a legally compliant ISA that identifies statutory impacts assessment requirements. An integrated site selection and ISA site assessment process will be possible through the framework to avoid assessment duplication. Based on the proposed suite of sustainability indicators and responses to this ISA Scoping consultation, the criteria which will be applied to assess candidate sites will be confirmed within a Call for Sites Consultation Document at the outset of the RLDP Call for Sites period.

5.6.2 The proposed ISA Framework is detailed in **Table 5.4** below. During the assessment stage of the ISA, in accordance with the SEA Regulations a further suite of indicators will be developed to provide a framework for monitoring the likely significant effects on the environment (including social, economic, cultural factors), Welsh language, health, wellbeing, of implementing a RLDP once adopted. This monitoring framework will also be used by NPTC to monitor the effectiveness of the RLDP and to assess whether key targets of the RDLP are being met.

Table 5.4: Proposed ISA Framework for the LDP Review

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.</p>	<ul style="list-style-type: none"> ▪ Protect and improve access to healthcare services and facilities? ▪ Reduce health inequalities and improve the physical and mental health and wellbeing of communities? ▪ Improve accessibility to high quality open spaces and sports facilities for physical recreation, in particular for those facing structural inequalities and/or socio-economic disadvantage? ▪ Facilitate or encourage active travel for all communities? ▪ Increase access to nature? ▪ Protect against noise pollution, delivering context appropriate soundscapes? ▪ Protect against light pollution? 	<ul style="list-style-type: none"> ▪ Proximity to and the capacity of healthcare facilities; ▪ Proximity to existing active travel networks; ▪ Proximity to existing open space provision; ▪ Proximity to natural environment; ▪ Proposed provision of new or upgraded healthcare facilities, active travel networks or open space within candidate sites; ▪ Proximity to significant noise emitting land uses, such as industrial and transport infrastructure uses; and, ▪ Proximity to significant light emitting land uses such as industrial uses.
<p>2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and</p>	<ul style="list-style-type: none"> ▪ Reduce poverty and social exclusion? ▪ Result in differential impacts (beneficial or adverse) on different demographic groups or persons with protected characteristics? ▪ Result in differential impacts (beneficial or adverse) on communities (of place or interest) facing inequality of outcome due to socio-economic disadvantage? 	<ul style="list-style-type: none"> ▪ Impacts on different demographic groups, persons with protected characteristics, demographic groups vulnerable to social exclusion and/or poverty, and those facing socio-economic disadvantage; ▪ Proximity to existing community facilities, public services and key amenities; and,

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>promote community cohesion.</p>	<ul style="list-style-type: none"> ▪ Result in differential impacts (beneficial or adverse) on individuals vulnerable to social exclusion or poverty? ▪ Protect and enhance access to high quality community facilities, public services and key amenities to meet the diverse needs of different demographic groups, vulnerable members of the community and those facing socio-economic disadvantage? ▪ Help to reduce levels of absolute and relative income poverty, inequality in the distribution of household wealth, and levels of multiple deprivation affecting communities? ▪ Promote social cohesion and integration? ▪ Reduce fuel poverty? 	<ul style="list-style-type: none"> ▪ Proposed provision of new or upgraded community facilities, public services or key amenities within candidate sites.
<p>3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.</p>	<ul style="list-style-type: none"> ▪ Increase the accessibility of public services, economic opportunities and markets? ▪ Improve connectivity within the NPTC area and to other areas? ▪ Reduce car dependencies and encourage a shift to more sustainable forms of travel, including for people and freight? ▪ Support the increased uptake of active travel? ▪ Improve the accessibility, capacity and safety of the transport network? 	<ul style="list-style-type: none"> ▪ Proximity to the public transport network (bus stops and train stations); ▪ Proximity to the strategic road network (motorways and trunk roads); ▪ Proximity to existing active travel networks; ▪ Proximity to congestion pinch points; ▪ Availability and the capacity of utilities infrastructure to serve the site;

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<ul style="list-style-type: none"> ▪ Reduce traffic flows and congestion? ▪ Enhance the quality and integration of public transport? ▪ Enhance the provision of high-quality communications infrastructure? ▪ Improve utilities infrastructure to support economic growth and meet population needs? 	<ul style="list-style-type: none"> ▪ Proposed provision of new or upgraded transport or communications infrastructure within or connecting to candidate sites; and, ▪ Connectivity between relatively deprived communities (including those facing individual or intersectional inequalities) and socio-economic opportunities resulting from development.
<p>4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base.</p>	<ul style="list-style-type: none"> ▪ Enhance access to and diversify employment opportunities for local residents? ▪ Provide equal access to high equality employment opportunities, social and cultural activities, and public services and amenities for all? ▪ Improve access to employment for all demographic groups and communities, in particular for those facing structural inequalities and/or socio-economic disadvantage? ▪ Enhance opportunities for education, lifelong learning and the retention of skills within the local economy? ▪ Support the growth of further and higher education institutions? ▪ Deliver the right type of development and economic activities in the accessible locations to maximise economic competitiveness? 	<ul style="list-style-type: none"> ▪ Proximity to and the capacity of education infrastructure; ▪ Proposed provision of new or upgraded education and skills infrastructure within candidate sites; ▪ Employment capacity of the site; ▪ Site suitability for mixed use development; ▪ Proximity to existing and planned key employment locations (e.g. business parks, industrial estates and urban employment clusters); ▪ Site capability for industrial and economic uses; ▪ Adjacent land uses, including potential agglomeration benefits; and,

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<ul style="list-style-type: none"> ▪ Help to diversify and regenerate the local economy? ▪ Encourage inward investment and innovation? ▪ Promote the co-location of synergistic economic activities, industries and land uses? ▪ Provide the infrastructure and workspace required for new and existing businesses? ▪ Support the aims of the Swansea Bay City Region City Deal, including enhanced digital connectivity? 	<ul style="list-style-type: none"> ▪ Proximity to key public transport nodes and the strategic road network, supporting inclusive labour markets.
<p>5. Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs.</p>	<ul style="list-style-type: none"> ▪ Help to facilitate the increased delivery of housing to meet a range of identified needs? ▪ Improve the quality of the housing stock? ▪ Reduce homelessness and overcrowding? ▪ Increase the mix, range and affordability of housing? ▪ Provide housing that encourages a sense of community? ▪ Delivery adequate pitches and plots required for Gypsies, Travellers and Travelling Show people? 	<ul style="list-style-type: none"> ▪ Housing capacity of the site; ▪ Deliverability of affordable housing as a component of any residential development; ▪ Site suitability for mixed use development; ▪ Adjacent land uses; ▪ Proximity to COMAH (control of major accident hazards) sites; and, ▪ Proximity to European Sites vulnerable to recreational pressures.
<p>6. Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric</p>	<ul style="list-style-type: none"> ▪ Maintain or improve air quality? ▪ Reduce exposure to poor air quality? 	<ul style="list-style-type: none"> ▪ Proximity to Air Quality Management Areas (AQMA);

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
pollutants and minimise exposure to poor air quality.	<ul style="list-style-type: none"> ▪ Prevent and reduce emissions of harmful pollutants? 	<ul style="list-style-type: none"> ▪ Proximity to congestion pinch points; and, ▪ Potential operational emissions.
7. Climate Change: Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change.	<ul style="list-style-type: none"> ▪ Help to reduce greenhouse gas (GHG) emissions from key economic sectors? ▪ Support the minimisation of energy use? ▪ Support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources? ▪ Facilitate investment in and promote the use of low carbon and sustainable infrastructure? ▪ Implement adaptation measures to address the likely effects of climate change, including increased flood risks? ▪ Promote sustainable design that minimises GHG emissions and is adaptable to the effects of climate change? 	<ul style="list-style-type: none"> ▪ On-site provision or renewable or low carbon energy generation; ▪ Proximity to the public transport network; and, ▪ Capacity of the site to include climate change adaptation measures.
8. Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and	<ul style="list-style-type: none"> ▪ Ensure appropriate safeguards for the integrity and conservation objectives of sites designated at international, national or local levels for reasons of biodiversity or geodiversity value or species protection? ▪ Protect and enhance valued species and habitats? 	<ul style="list-style-type: none"> ▪ Proximity to and potential effects on sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance or geological importance;

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>species, improving green infrastructure provision and safeguarding important soil resources.</p>	<ul style="list-style-type: none"> ▪ Safeguard against habitat loss or fragmentation? ▪ Protect or enhance protected trees or important woodland areas? ▪ Improve access to nature? ▪ Remediate known contamination of land and groundwater? ▪ Safeguard the best quality and locally important agricultural land? ▪ Protect and enhance important soil resources? 	<ul style="list-style-type: none"> ▪ Proximity to designated woodlands and important trees or hedgerows; ▪ Evidence of valued habitats or species on or adjacent to the site; ▪ Potential impacts on habitat fragmentation and connectivity; ▪ Agricultural land classification; and, ▪ Soil type and quality.
<p>9. Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.</p>	<ul style="list-style-type: none"> ▪ Improve the quality of waterbodies helping to meet the objectives of the Water Framework Directive? ▪ Maintain or enhance the ecological and chemical status of the water environment? ▪ Affect the volume of surface water runoff into or abstraction from water bodies? ▪ Support improvements to water infrastructure (water supply and sewerage)? ▪ Minimise the risk of flooding from all sources of flooding to all people, property, infrastructure and environmental assets? 	<ul style="list-style-type: none"> ▪ Proximity to Flood Risk Zones; and, ▪ Proximity to waterbodies and aquifers.

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<ul style="list-style-type: none"> ■ Manage residual flood risks appropriately and avoid new flood risks? ■ Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk? ■ Promote the deployment of sustainable urban drainage systems? 	
<p>10. Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction.</p>	<ul style="list-style-type: none"> ■ Minimise the production of waste? ■ Promote the principles of circular economy? ■ Treat and process waste with minimal environmental impact? ■ Minimise the demand for raw materials and the need for minerals extraction? ■ Promote the use of local resources and minimise the importation of minerals? 	<ul style="list-style-type: none"> ■ Proximity of waste collection facilities; and, ■ Establishment of locational need for minerals extraction.
<p>11. Sustainable Placemaking: Maximise the efficient use of land and enhance design</p>	<ul style="list-style-type: none"> ■ Promote high quality architecture and design which strengthens local distinctiveness, linked to historic and cultural protections, and fosters a sense of place? 	<ul style="list-style-type: none"> ■ Previously developed brownfield land or greenfield land; and, ■ Proximity to active travel networks.

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>quality to create great places for people.</p>	<ul style="list-style-type: none"> ■ Create and maintain a safe and attractive public realm which encourages people to walk and cycle? ■ Ensure appropriate siting, scale, massing and density of development? ■ Make the best use of land, including through prioritising the redevelopment of brownfield sites and locating high footfall uses close to the public transport network? ■ Reduce opportunities for crime and antisocial behaviour through the siting and design of new development? ■ Provide public realm which feels safe to all users at all times? 	
<p>12. Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.</p>	<ul style="list-style-type: none"> ■ Increase availability and accessibility of culture, leisure and recreation activities/venues? ■ Conserve, protect and enhance the integrity, character and setting of heritage assets? ■ Protect and enhance the qualities of areas of historical or cultural significance? ■ Promote the sensitive re-use of historic or culturally important buildings? ■ Preserve and, where appropriate, enhance important archaeological resources? 	<ul style="list-style-type: none"> ■ Proximity to and potential effects on designated heritage assets and areas; ■ Proposed re-use of historic or culturally important buildings; ■ Scale and type of housing within catchment of Welsh primary schools and Welsh language sensitive areas; and, ■ Scale and type of non-residential development in Welsh language sensitive areas.

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<ul style="list-style-type: none"> ▪ Safeguard and increase the use of the Welsh language? 	
<p>13. Landscape: Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area.</p>	<ul style="list-style-type: none"> ▪ Protect and enhance landscape character? ▪ Safeguard important landscape and townscape features? ▪ Protect visual amenity and valued views? ▪ Prevent urban sprawl? 	<ul style="list-style-type: none"> ▪ Proximity to and potential effects on nationally and locally designated landscapes; ▪ Evidence of potential impacts on visual amenity or key views; and, ▪ Evidence of integration or coalescence with, or separation from, existing settlements.

6 Proposed ISA Methodology and Consultations Arrangements

6.1 Introduction

- 6.1.1 Building upon the proposed ISA Framework detailed in Section 5, this section outlines and seeks the views of the relevant Consultation Bodies (for all assessments within the ISA) regarding the proposed methodology and consultation arrangements to be adopted for the ISA of the LDP Review.
- 6.1.2 The ISA will identify potential beneficial as well as adverse effects on the full range of objectives (covering the environmental, social, economic, cultural, health and equalities issues). The ISA will help identify ways of mitigating or avoiding adverse effects of the proposed policies and schemes of the LDP. There is the potential for residual adverse effects to remain against some ISA objectives, and this must be weighed against the need to deliver much needed development in Neath Port Talbot.

6.2 Proposed ISA Reporting

Overview

- 6.2.1 Based on the intended form of the LDP Review (Section 2) it is envisaged that the ISA Framework set out in **Table 5.4** will be used to assess all proposed substantive components of the RLDP as it emerges, as well as any identified reasonable alternatives to these proposals. In general terms, the ISA will therefore need to include appraisals of a proposed RLDP vision, RLDP objectives, a spatial strategy (and potential sub-area strategies), strategic policies, development management policies and site allocations. The proposed approach to undertaking a proportionate ISA of each of these components is set out in this section.
- 6.2.2 As described in Section 5.4, the assessment methodology comprises a two-stage approach at both LDP Pre-Deposit and Deposit stages. The Framework will be applied as the main, base-level, assessment considering all likely effects on a thematic basis to provide a holistic assessment of the sustainability implications of the emerging RLDP. The second level of assessment will be reporting against the specific requirements of applicable duties and requirements (e.g. Public Sector Equality and Socio-economic Duties for EqIA). This will draw upon the findings of the ISA Framework assessment. The secondary level of assessment will take the form of a series of commentaries to report conclusions against WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.
- 6.2.3 The ISA methodology will be applied, and the findings reported within iterative ISA Reports which will be prepared in accordance with applicable statutory requirements to accompany the Preferred Strategy (RLDP Pre-Deposit Document) and RLDP Deposit Plan (Deposit Document). The ISA Report will be updated and expanded between these stages to reflect changes to the emerging LDP:
- 1 The ISA Report for the Preferred Strategy will focus on assessing effects from proposed RLDP options (including growth levels), spatial strategy (including key sites which underpin the strategy) and strategic policies; and,
 - 2 The ISA Report for the RLDP Deposit Plan will identify and assess effects from all substantive components of the RLDP Deposit Plan, including all proposed site allocations and policies.
- 6.2.4 All matrix-based detailed assessments of individual components of the emerging RLDP will be contained within appendices to the ISA report, with key findings set out within the main body

of the report. In accordance with the SEA Regulations, and other relevant best practice, a separate Non-Technical Summary (NTS) document will be prepared to provide the information prescribed within Schedule 2 of the SEA Regulations and present the key findings of the ISA, incorporating SEA, in non-technical language.

- 6.2.5 Following the completion of an independent examination of RLDP Deposit Plan, all binding recommendations made by the appointed Inspector will be subject to ISA screening to determine whether they would give rise to any new or different likely significant effects (including on the environment) not previously reported within the ISA Report for the RLDP Deposit Plan. This ISA Screening will be documented within an ISA Report Addendum.

6.3 Proposed ISA Methodology

ISA of Vision and Objectives

- 6.3.1 It is important that the vision and objectives of the RLDP are aligned with the ISA Framework and reflect the identified key sustainability issues, as all other LDP components will flow from them. The key attributes of the vision and objectives for the RLDP will therefore be assessed for their compatibility with each ISA Objective within the ISA Framework.
- 6.3.2 Owing to the high-level nature of the LDP vision and strategic objectives it is not likely to be possible to identify the significance (in the context of the SEA Regulations) of predicted effects from their implementation, nor to assess potential differential on different demographic groups or persons with protected characteristic (in the context of the Equality Act 2010). However, the assessment will seek to provide an indication of any likely significant environmental effects and effects on different demographic groups, with any uncertainties also noted. Should the proposed vision or objectives for the RLDP be judged to be incompatible with the ISA Objectives, suitable mitigation measures in the form of revised wording will be recommended.
- 6.3.3 A compatibility matrix similar to the example presented in **Table 6.1** will be used to record the first level assessment of the LDP vision and objectives within the ISA reports for the RLDP Pre-Deposit and Deposit Documents. For brevity and formatting reasons it is not proposed to reproduce the ISA Guide Questions associated with each ISA Objective (see **Table 5.4**) within the final version of the appraisal matrices in each ISA report, but they will be used where relevant to undertake the ISA. Building on the matrix, a second level assessment will comprise short commentaries to demonstrate the coverage of key issues (to provide a strategic framework for action) relevant to WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

Table 6.1: Proposed Compatibility Matrix to Assess RLDP Vision and Objectives

ISA Objective	LDP Vision	LDP Objective 1	LDP Objective 2	Etc.
1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution.				
2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.				
3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.				
4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base.				
5. Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified needs.				

ISA Objective	LDP Vision	LDP Objective 1	LDP Objective 2	Etc.
KEY	+	Compatible		
	0	Neutral		
	?	Uncertain		
	-	Incompatible		
	~	No Clear Relationship		

6.4 ISA of Proposed Spatial Strategies and Policies

- 6.4.1 At the RLDP Pre-Deposit Stage it is likely that NPTC will identify a suite of preferred high level spatial and policy options to meet identified needs (e.g. housing delivery) and challenges (e.g. the achievement of locally defined wellbeing objectives), together with potential reasonable alternatives to these options. The spatial options are likely to include potential 'growth options' and may extend to the identification of preferred strategic site allocations (see below regarding the ISA of candidate site allocations), whilst the policy options are likely to include a range of thematic policy approaches to address key issues.
- 6.4.2 Owing to the high level nature of the spatial, growth and policy options that are likely to be included within the RLDP Pre-Deposit Document, it may in some cases be necessary to adopt the same approach as for the RLDP vision and objectives (**Table 6.1**) in terms of focusing on their compatibility with the ISA Framework. However, the ISA will also seek to identify relevant sustainability issues, disproportionate effects on groups with protected characteristics or those vulnerable to social exclusion or poverty, and mitigation or enhancement measures which should be incorporated within the spatial and policy options as they are developed further for the RLDP Deposit Document. Where possible, the ISA of the proposed spatial and policy options will determine whether they are likely to result in any significant effects.
- 6.4.3 The preferred spatial and policy options will be refined to take account of representations received regarding the RLDP Pre-Deposit Document, resulting in the inclusion of a fully developed spatial strategy (potentially supported by sub-area strategies) and suite of strategic and development management policies within the RLDP Deposit Document. At this stage, these components will be subject to a first level of detailed assessment against the ISA Framework using a standard matrix and scoring system similar to that shown in **Table 6.2** and 6.3 below. For reasons of proportionality each policy grouping within the RLDP Deposit Document will be assessed together in a suite of thematic matrices.

Table 6.2: Proposed Scoring System - Spatial Strategies and Policies

Score	Description	Symbol
Significant (Major) Positive Effect	The proposed policy contributes significantly to the achievement of the ISA Objective.	++
Minor Positive Effect	The proposed policy contributes to the achievement of the ISA Objective but not significantly.	+
Neutral Effect	The proposed policy is related to but does not have any effect on the achievement of the ISA Objective.	0
Minor Negative Effect	The proposed policy detracts from the achievement of the ISA Objective but not significantly.	-
Significant (Major) Negative Effect	The proposed policy detracts significantly from the achievement of the ISA Objective. Mitigation is therefore required.	--
Uncertain Effect	The proposed policy has an uncertain relationship to the ISA Objective, or the relationship is dependent on the way in which the aspect is managed. Additionally, insufficient information may be available to enable an assessment to be made.	?
No Clear Relationship	There is no clear relationship between the proposed policy and the achievement of the ISA Objective, or the relationship is negligible.	~

- 6.4.4 The findings of the assessment will be presented within the ISA Report using matrices similar to that shown in **Table 6.3** (the example policy grouping and titles are indicative and may be subject to change). In accordance with statutory requirements, each matrix will include a commentary to:
- Justify the assessment scoring for each assessed policy;
 - Identify any likely significant environmental or other effects within the context of the SEA Regulations and other applicable statutory requirements;
 - Identify any likely different or disproportionate effects on demographic groups with protected characteristics or those vulnerable to social exclusion or poverty; and,
 - Identify any mitigation or enhancement measures considered necessary to either avoid significant adverse environmental and other effects (which would otherwise be expected to occur) or to enhance the performance of the proposed policies.
- 6.4.5 For brevity and formatting reasons it is not proposed to reproduce the Guide Questions associated with each ISA Objective (see **Table 5.4**) within the final version of these matrices in the ISA Report. However, the questions will be used to undertake this assessment and the ISA Framework will be appended to the RLDP ISA Report in full.
- 6.4.6 Building on the ISA Framework (level 1 assessment) matrices, a second level assessment will comprise short commentaries to demonstrate the relevance and appropriateness of the proposed spatial strategy and policy framework to address WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

Table 6.3: Assessment Matrix for Proposed LDP Spatial Strategies and Policies

Example Policy Grouping: Placemaking				
ISA Objective	Policy 1 Score	Policy 2 Score	Policy 3 Score	Commentary
1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution.	++	+	++	<u>Assessment of Predicted Effects</u> <u>Mitigation and Enhancement</u> <u>Assumptions</u> <u>Uncertainties</u>
2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.	+	-	--	<u>Assessment of Predicted Effects</u> <u>Mitigation and Enhancement</u> <u>Assumptions</u> <u>Uncertainties</u>
3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.	-	~	?	<u>Assessment of Predicted Effects</u> <u>Mitigation and Enhancement</u> <u>Assumptions</u> <u>Uncertainties</u>
Etc.				

6.5 ISA of Candidate Site Allocations

- 6.5.1 As noted in Section 5, an integrated site assessment process will be carried out by NPTC to satisfy ISA requirements (including SEA) and to select site allocations for inclusion in the RLDP. This will identify the strategic sites needed to deliver the RLDP Preferred Strategy.
- 6.5.2 Owing to the strategic level and nature of the candidate site allocations that are likely to be included within the LDP Pre-Deposit Document, it may in some cases be necessary to adopt the same approach as for the LDP proposed spatial strategies and policies (**Table 6.3**) in terms of focusing on their compatibility with the ISA Framework. However, the ISA will seek to identify site-specific and relevant sustainability issues, disproportionate effects on groups with protected characteristics, those vulnerable to social exclusion or poverty and those facing socio-economic disadvantage, and appropriate mitigation or enhancement measures which should be incorporated within candidate strategic site allocations as they are developed further for the RLDP Deposit Document. Where possible, the ISA of the candidate strategic site allocations will determine whether they are likely to result in any significant effects.
- 6.5.3 The assessment criteria used by NPTC will relate to the sustainability indicators listed in the third column on **Table 5.4** and thus will relate to each of the ISA Objectives within the ISA Framework. The ISA Reports accompanying the LDP Pre-Deposit and LDP Deposit Documents will demonstrate that the site assessment criteria and process adopted by NPTC satisfy statutory ISA requirements and sufficiently relate to the ISA Objectives identified within the ISA Framework for the LDP Review.
- 6.5.4 An iterative desktop-based appraisal utilising Geographical Information Systems software (GIS) and relevant assessment criteria will be undertaken of all candidate sites⁴ to determine whether their allocation would have any likely significant effects. Subject to any views expressed by the SEA Consultation Bodies, the proposed criteria listed within the third column of **Table 5.4** will be refined before being confirmed within the NPT RLDP Call for Sites Consultation Document. At this point, a transparent scoring system will be published to allow all prospective site promoters to consider the likely performance of their candidate site against the assessment criteria. All candidate sites submitted to NPT within the defined LDP Call for Sites period and not discounted due to site size will then be subject to a proportionate level of ISA using the pre-determined appraisal criteria and scoring system, with the findings detailed within the ISA Reports for the LDP Pre-Deposit and Deposit Documents.
- 6.5.5 All sites submitted to NPTC during the RLDP Call for Sites and not rejected on grounds of deliverability during the intended RLDP period will need to be treated as 'reasonable alternatives' and thus subject to an equal level of assessment up to RLDP Pre-Deposit stage. At this point the preferred RLDP Vision and Objectives will be published for consultation, meaning that any further site assessment carried out for the RLDP Deposit Document would only need to consider candidate sites which align with the RLDP Vision and Objectives (as all other sites would then be 'not reasonable').
- 6.5.6 At both LDP Pre-Deposit and Deposit stages a second level qualitative assessment will also be undertaken to test the ability of all identified reasonable alternative sites at each stage, and at Deposit stage of the combined suite of proposed site allocations, to address WBFGA 2015, Equality Act 2010, Welsh language and HIA requirements.

⁴ Excluding those discounted from further consideration owing to being below minimum site sizes, which will be confirmed within the LDP Review Candidate Sites Assessment Methodology.

6.6 Assessment of Cumulative Effects and Synergistic Effects

Cumulative and Synergistic Effects

- 6.6.1 Following from the appraisal of all individual substantive components within the LDP Pre-Deposit and Deposit Documents, a further round of ISA will be conducted to identify any likely cumulative or synergistic effects as a result of interactions between the emerging RLDP components. This will seek to demonstrate compliance with cumulative assessment requirements within the SEA Regulations, in a proportionate manner.

6.7 ISA of Reasonable Alternatives

Identification of Reasonable Alternatives

- 6.7.1 The SEA Regulations require the LSE of implementing both a plan or programme (i.e. the emerging RLDP) and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described. The SEA Regulations further state that to be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan or programmes' corresponding objectives and geographical scope. To be eligible for consideration in this ISA process, reasonable alternatives must therefore be:
- Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging RLDP and are consistent with relevant national and other policy frameworks;
 - Related to the objectives of the emerging RLDP; and,
 - Within the geographical scope of the emerging RLDP, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within the NPTC area.
- 6.7.2 Given that reasonable alternatives must relate to the objectives of the plan under consideration, it is not likely to be possible to identify any clear reasonable alternatives to the LDP vision and objective, as any alternatives would change the strategic direction of the emerging RLDP. However, the following types of reasonable alternatives will be identified where possible and subject to assessment in the same way as the corresponding preferred option or proposed component of the emerging RLDP:
- Alternative policy options, criteria and tests considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. setting higher or lower housing land requirements (to inform site allocations) or the application of a higher or lower affordable housing provision requirements (to assess planning applications);
 - Alternative spatial options considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. directing housing or employment growth to particular locations instead of others; and,
 - Alternative site allocations – as noted above, all candidate sites submitted to NPTC during the RLDP Call for Sites period and not discounted due to either deliverability or non-compatibility with the RLDP Preferred Strategy will need to be subject to the same level of ISA, regardless of whether NPTC subsequently decides to allocate the site within the emerging RLDP. To demonstrate compliance with SEA case law, the ISA Reports for the RLDP Pre-Deposit and Deposit Documents will also provide a summary justification to explain the status of each candidate site (e.g. preferred, reasonable alternative, rejected, etc.) at each stage of the LDP Review.

Approach to Identifying Uncertainties, Assumptions and Mitigation

- 6.7.3 The identification of any assumptions and uncertainties is an important element of the ISA process, as the emerging RLDP will need to be unambiguous to ensure the plan can be implemented as intended.
- 6.7.4 The proposed ISA reporting matrices (**Table 6.1** and **6.3** above) have been designed to allow uncertainties, inconsistencies and other issues which could undermine the implementation of the emerging RLDP to be identified in relation to the proposed LDP vision, objectives, spatial strategy and policies. The iterative nature of the ISA process will enable corresponding recommendations to be devised and incorporated into the emerging RLDP to address any identified issues, in particular to avoid likely significant adverse effects from occurring.
- 6.7.5 The identification of mitigation measures to avoid likely significant adverse effects from the allocation of proposed sites is also of critical importance. Such mitigation measures usually take the form of policy requirements to undertake technical assessments regarding potential environmental effects from development proposals and, depending on the outcome of these assessments, to implement mitigation, compensatory and/or offsetting measures through the implementation of any planning permission granted for the proposal. The proposed site assessment criteria listed in the third column of **Table 5.4** will enable any likely significant adverse effects from the potential allocation of each candidate site to be identified. Should the relevant candidate site be proposed for allocation, appropriate site-specific mitigation would then need to be included within the emerging RLDP such that the ISA report for the LDP Deposit Plan is able to conclude that the proposed site allocations would not result in any unmitigated likely significant adverse effects.

6.8 Presentation of ISA Key Findings

- 6.8.1 All matrix-based detailed assessments of individual components of the emerging RLDP will be contained within appendices to the ISA report, with key findings set out within the main body of the report. In accordance with the SEA Regulations, a separate Non-Technical Summary (NTS) document will be prepared to provide the information prescribed within Schedule 2 of the SEA Regulations and present the key findings of the ISA in non-technical language.

6.9 Proposed ISA Consultation Arrangements

- 6.9.1 Iterative versions of the ISA report will be published to accompany the NPT RLDP Preferred Strategy (Pre-Deposit Document) and NPT Deposit Plan (Deposit Document). Whilst the timetable for consultation on the emerging RLDP will be confirmed in the final Delivery Agreement (DA) to be published in December 2021, the draft DA outlines that consultation on the Preferred Strategy will be undertaken from January 2023-February 2023 and from February 2024-March 2024 for the Deposit Plan. Each for a period not less than (and likely exceeding) 6 weeks duration. Reflecting the broad scope of this ISA, the ISA Reports will be issued to relevant stakeholders over and above the SEA Consultation Authorities and will be publicly available on the NPT LDP Review website. Representations and comments on both the emerging RLDP and associated ISA Reports can be made via the Council's website, email, or postal addresses which will be confirmed prior to the RLDP Preferred Strategy consultation period commencing.

7 Summary and Next Steps

7.1 Overview

- 7.1.1 NPTC has recognised the value and opportunities for an integrated assessment approach to preparing the Neath Port Talbot LDP Review. The integration of SA(SEA) along with statutory and key non-statutory plan-making elements including the WBFGA 2015 requirements, Equalities Act, Welsh language, and Health Impact Assessment (HIA) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals.
- 7.1.2 The ISA will be used as a plan-making tool used iteratively at each stage of the LDP Review process. This approach will be key to ensuring that the sustainability issues identified in this ISA Scoping Report are addressed. These issues include: contextual changes which are intended to drive additional growth in NPT and wider South Wales; reconsidering the appropriate strategic approach to land use to deliver housing and economic growth; refocusing regeneration towards new opportunities and addressing problems with the existing LDP; and, responding to policy changes including PPW11 which sets out strong placemaking principles and focuses on place prosperity.
- 7.1.3 To achieve this, this ISA Scoping Report has defined a proposed ISA Framework (Section 5) and assessment methodology (Section 6) for use in undertaking the ISA in respect of the RLDP.
- 7.1.4 Subject to any comments received from the SEA Consultation Bodies and other relevant consultees, this ISA Framework and methodology will be used to assess the likely significant environmental, health, equalities and wider sustainability effects arising from the LDP Review (i.e. from the preparation of a RLDP). The assessment will be an iterative process that will include the development and refinement of policy and site options by testing the strengths, weaknesses and likely effects of all emerging substantive LDP components.

7.2 Specific Request for Comments from the SEA Consultation Authorities

- 7.2.1 In accordance with the SEA Regulations, the SEA Consultation Bodies are specifically requested to provide:
- Their view and associated reasons regarding the potential for LSE to arise from the LDP Review and the need (or otherwise) to undertake a SEA;
 - Comments regarding the proposed scope of and approach to undertaking an ISA, incorporating SEA, in respect of the LDP Review;
 - Comments regarding the proposed ISA Framework detailed in **Table 5.4**. In particular, the SEA Consultation Bodies are asked to confirm that this ISA Framework sufficiently covers all key environmental and other sustainability issues and applicable policy requirements; and,
 - Comments regarding the proposed scope of, level of detail and consultation arrangements for iterative ISA Reports to accompany each emerging component of a replacement Neath Port Talbot LDP (i.e. ISA Reports for the RLDP Preferred Strategy and RLDP Deposit Plan).
- 7.2.2 Any comments should be provided within the statutory timescales prescribed within the SEA Regulations (i.e. within 5 weeks of receiving this report) and directed to:

Duncan Smart, Associate Planner
Stantec UK Ltd
0141 343 3319
duncan.smart@stantec.com

Appendix A Baseline Review

A.1 Introduction

A.1.1 This Appendix supports Section 4 of the Neath Port Talbot LDP Review ISA Scoping Report. It provides a review of current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area.

A.1.2 In doing so this review:

- Identifies relevant baseline characteristics, including those likely to be significantly affected by the outcome of the LDP Review (i.e. the replacement Neath Port Talbot LDP). This includes the identification of sites designated at international or national levels for reasons of ecological/geological importance or heritage/landscape value which have the potential to be affected by the LDP Review;
- Identifies relevant socio-economic trends and baseline conditions, again focusing on matters likely to be significantly affected by the outcome of the LDP Review (i.e. the RNeath Port Talbot LDP); and,
- Outlines how the identified environmental and socio-economic characteristics and baseline conditions should be addressed within a replacement Neath Port Talbot LDP and considered within this ISA.

A.1.3 This evidence is then used to:

- Outline the expected evolution of baseline sustainability (including environmental) conditions in the absence of the LDP Review; and,
- Define a suite of key sustainability issues which will need to be addressed within the LDP Review and which should be considered throughout this ISA (incorporating SEA) process.

A.1.4 The purpose of this baseline review is therefore to inform both emerging proposals for the LDP Review and the content of a ISA Framework that will be used to assess all substantive components of the LDP Review (i.e. all emerging policy and site options, including reasonable alternatives to those preferred by NPTC).

A.2 Overview of Designated Sites

A.2.1 **Table A.1** identifies sites designated at international, national or local level for reasons of biodiversity conservation, geological importance, heritage or landscape value which are considered to have the potential to be affected by the LDP Review. The site-specific context of these designated sites needs to be considered when characterising the sustainability baseline position and identifying the relevance of existing issues and problems to the LDP Review, as detailed in Section A.3.

Table A.1: Designated Sites of Relevance to the Neath Port Talbot LDP Review

Relevant Sites	Designation Type	Qualifying Features / Interests	Implications for Neath Port Talbot LDP Review	Implications for ISA
Biodiversity				
International/European				
<p>Within the NPTC area:</p> <ul style="list-style-type: none"> None <p>Outwith the NPTC area:</p> <ul style="list-style-type: none"> None 	Special Protection Area (SPA)	N/A	N/A	N/A
<p>Within the NPTC area:</p> <ul style="list-style-type: none"> Kenfig/Cynffig Crymlyn Bog / Cors Crymlyn Coedydd Nedd a Mellte 	Special Area of Conservation (SAC)	Kenfig / Cynffig: Coastal sand dunes, sand beaches, machair, Tidal rivers, estuaries.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites (including possible or proposed new European Sites) in pursuit of their defined conservation objectives.	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.
		Crymlyn Bog / Cors Crymlyn: Bogs, Marshes, Fens, Broad leaved deciduous woodland.		
		Coedydd Nedd a Mellte: Broad leaved deciduous woodland, heath & scrub.		
Crymlyn Bog	Ramsar Site	Comprises a floodplain-valley mire located within a lowland coastal context and is the most extensive wetland of its type in Wales. Also, a SAC, SSSI and NNR.		
<p>Outwith the NPT Area Boundary (within 15km):</p> <ul style="list-style-type: none"> Cefn Cribwr Grasslands Blaen Cynon Cwn Calan 	Special Area of Conservation (SAC)	Cefn Cribwr Grasslands: Bogs, marshes, humid grassland, Heath, scrub, Broad leaves deciduous woodland.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites with the potential to be affected by development in the NPT area (including those in close proximity to the NPT boundary in neighbouring authorities and also including possible or proposed new European Sites) in pursuit of their defined conservation objectives.	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.
		Blaen Cynon: Humid grassland, Bogs, Marshes, Water fringed vegetation, heath, scrub, improved grassland, dry grassland, Steppes.		
		Cwn Calan: Humid grassland, bogs, marshes, water-fringed vegetation, Improved grassland, Broad leaved deciduous woodland.		
National				
<p>21 SSSIs have been designated within the NPTC area:</p> <p>Caeau Ton-Y-Fildre, Cefn Gwrhyd, Rhydyfro, Cilybebylloed Cwm Du, Cilmaengwyn, Cors Crymlyn, Crymlyn bog, Craig-Y-Llyn, Crymlyn Burrows, Cwm Gwrelych and Nant Llyn Fach Streams, Cynffig/Kenfig,</p>	Site of Special Scientific Interest (SSSI)	The identified SSSIs have been designated owing to the presence of nationally	Any RLDP resulting from this LDP Review must support the management of all nationally designated sites in	Relevant ISA objectives must afford adequate protection to national designations, taking

Relevant Sites	Designation Type	Qualifying Features / Interests	Implications for Neath Port Talbot LDP Review	Implications for ISA
Dyffrynoedd Nedd a Mellte a Moel Penderyn, Earlswood Road Cutting and Ferryboat Inn quarries, Eglwys Nunydd I Frondeg, Gorsllwyn, Onllwyn, Gwrhyd Meadows, Hafod Wennol Grasslands, Margam Moors, Mynydd Ty-Isaf, Rhondda, Pant-Y-Sais, Tairgwaith		important or rare habitat types within each.	pursuit of their defined conservation objectives.	account of their site-specific characteristics and qualifying interests.
Kenfig Pool and Dunes: Crymlyn Bog and Pant Y Sais	National Nature Reserve (NNR).	Kenfig Pool NNR hosts Glamorgan's largest lake whilst Crymlyn Bog and Pant Y Sais consists in part of the largest lowland fen in Wales.		
Local				
<p>The following SINCS are currently designated at the local level within the NPTC area:</p> <p>Catwg Wetland, Hawthorn Close, Hafodheulog Wood East Meadow, Tennant Canal, Gorsllwyn Meadows, Rolling Mill Cwmavan, Cwm Blaenpelenna , Harbourside Law Courts, Khartoum Tip, Baglan Bay, St David's Graveyard, Briton Ferry Waste Ground, Earlswood Area, Lower River Afan Estuary, The Quays Car Park Bunds, Jersey Marine Woods, Margam Country Park, Square Pond, Earlswood Grasslands, Tyle'r Waun, GCG Common, Pandy Farm, Swansea Canal, Neath Canal, Eglwys Nunydd, Caroline Street, Junction 38 Wetland Complex, Ynysdawle, Cwm du Glen & Glanrhyd Plantation, Land behind Marigold Place, Dyffryn Woods, Tiroedd Comin Cwm Amman Uchaf, Amazon Woodlands, Baglan Brownfield Slack, Lamb & Flag, Nant Y Cafn, Heol Heddwch, Baglan Panhandle, Sarn Helen, Bwlch Road Hedges, Derwydd Avenue, White Lady's Farm Orchard, Ffynnon Dawel Selar, Aberbaiden Farm Meadows, Giant's Grave, Brunel Dock Grassland, Cilfrew Meadow, Mynydd y Garth, Mynydd Gellionnen, Abernant Road Playing Field, Jaffa Land Baglan, Gelli Dochlithe, Dyffryn Cellwen, Rhos Common, Intervalley Road, Banwen, Blaendulais Marshy Grassland, Rheola Borrow Pits Grassland, Ynys Corrwg Farm, Bryn Goytre Cycleway, Cymer Tip, Treforgan, Resolven Minewater Treatment Units, Gwynfi Street, Rheola Lowland Grassland, Riverside Industrial Estate, Hafodheulog Wood North Meadow, Ynysmeudwy Molinia Meadow, Coed Hirwaun Wetland, Rhyslyn, Neath Estuary, St John's Graveyard, Nant Y Wern, Upper Melincourt Valley, Banwen Pond, Rhos Bends Bog, Glan-Yr-Afon, Gnoll Country Park, Brunel Dock Reedbed, Shelone Woods, Pen Yr Alltwen School Road, Crynant, Dan-Y-Coed, Little Warren, Preswylfa Dingle, Aberbaiden Farm Small Meadow, Fields Behind Heol Y Coedcau, Scotch Street, Meadow Row, Bryn, Parc Croeserw, Bryn Tip, Cwmavon Coal Tips, Pentreffynnon, Pant-Y-Brwyn, Garth Mor, Fabian Way Wildflower Verge, The Waun, Cimla, Bryncoch Farm, Coed Bach A'r Cwm, Floristically Diverse Forestry Verge, Betony Field, Triangular Pond, Crymlyn Burrows, Caeau Ynysgeinon, Carn Llechart, Coed Darcy Gcn Area, Bryn Gwyn, Red Jacket Fen, Adjacent to Gors Llwyn, Marden Park Baglan, Llandarcy Village Green, Cwmafan Green Corridor, Gwlyptir Mynachlog Need, Resolven Alluvial Meadows, Panasonic, Land behind Pen Y Bryn, Maerdy Playing Fields, Parc Rhiwfawr, Abernant Colliery, Onllwyn Coal Washery, Waun Sterw, Morfa Glas, Tonmawr Minewater Treatment & Surrounding Habitats, Afan Mineral Railway, Fferm Alltwenganol, Roman Way Reedbed, Aberhenwaun Uchaf, Penrhys Fawr, Resolven Minewater Treatment area OMH</p>	Sites of Importance for Nature Conservation (SINC).	The identified SINCS host a wide range of locally important habitat types and either the observed presence of or potential to support a wide range of floral and faunal species, including indicator species. A number of the SINCS overlap with higher level statutory designations.	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for biodiversity sites designated at the local level.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose.
<p>The following LNRs are currently designated at the local level within the NPTC area:</p> <p>Pant-Y-Sais, Eaglesbush Valley, Cwm Du Glen and Glanrhyd Plantation, Bryn Tip, Swansea Canal</p>	Local Nature Reserve (LNR)	LNR are sites which have interesting wildlife or geology but are also important for local residents, schools and are places where people who may have no specific interest in natural history can enjoy access to nature. NPTC's countryside team aim to make	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for nature reserves designated at the local level.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose.

Relevant Sites	Designation Type	Qualifying Features / Interests	Implications for Neath Port Talbot LDP Review	Implications for ISA
		the LNRs exemplars in the management of designated sites and green space, with the goals of conserving nature, providing opportunities for study or research and allowing access and recreation.		
Geological				
National				
Cwmgwrelych and Nant Llyn Fach Streams	Site of Special Scientific Interest (SSSI)	Geological SSSIs are designated owing to the presence of nationally important or rare geological features.	Any RLDP resulting from this LDP Review must support the management of all nationally designated sites to maintain or improve their current condition.	Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests.
Local				
2 RIGS have been designated within the NPTC area: Aberdulais Falls & Melincourt Brook	Regionally Important Geodiversity Site (RIGS)		Any RLDP resulting from this LDP Review should provide an appropriate level of protection for locally designated regionally important geodiversity sites.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose. There is also a need to assess likely effects on important geological features under the 'soil' environmental topic as prescribed within Schedule 2 of the SEA Regulations.
Cultural Heritage				
National				
97 Scheduled Monuments across the NPTC area	Scheduled Monuments (SM)	Of the 97 identified Scheduled Monuments (SM, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman. The majority are sited within Margam (15). A wide range of historic structures have been designated, including hill forts, chapels, standing stones, ironworks, castles and cairns, each of which is of historical significance and forms an important landscape feature.	Any RLDP resulting from this LDP Review must support the protection and enhancement of all nationally designated heritage assets, including their setting. The identified heritage assets benefit from statutory protection which must be taken account of within policies, proposals and guidance within the RLDP.	Relevant ISA objectives must afford adequate protection to nationally designated heritage assets, taking account of site-specific characteristics and the relevance of heritage assets to the NPTC area.

Relevant Sites	Designation Type	Qualifying Features / Interests	Implications for Neath Port Talbot LDP Review	Implications for ISA
395 Listed Buildings across the NPTC area	Listed Buildings	A wide range of structures and buildings have been listed owing to their features of architectural importance.		
There are 6 Conservation Areas within the NPTC area: Cilybebyll, Neath Town Centre, Llandarcy Village, Tonna Canal Depot, Glynneath Woolen Mill, Margam Park	Conservation Areas	The designated Conservation Areas are centred upon clusters of Listed Buildings or other structures of architectural importance.		
Landscape				
National				
There are no AONB designated within the Neath Port Talbot Area. However, the Gower AONB is approx.20 miles from the NPTC boundary, covering much of the peninsula and is renowned for its scenic quality, particularly the coastline, much of which is Heritage Coast.	Area of Outstanding Natural Beauty (AONB)	N/A	N/A	N/A
Local				
The following SLAs are currently designated at the local level within the NPTC area: Mynydd y Garth, Dulais Valley, Vale of Neath, Margam, Mynddy Gelli, & Foel Trawsant	Special Landscape Areas (SLA)	Policy ENV2 within the existing Neath Port Talbot LDP identifies these 6 Special Landscape Areas (SLAs) as being unique, exceptional or distinctive to the NPTC area.	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for landscapes designated at the local level.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose.

A.3 Environmental and Socio-economic Baseline Conditions

- A.3.1 Informed by **Table A.1**, **Table A.2** below outlines the current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area. This review also identifies associated existing environmental and socio-economic problems and issues which the LDP Review should address and which should be considered throughout this ISA process.

Table A.2: Review of Relevant Environmental Aspects, Issues and Problems

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
<p>1. Biodiversity, Fauna and Flora</p>	<p>Designated sites: As detailed in Table A.1, the NPTC area hosts a number of designated sites at European, national and local levels for reasons of biodiversity conservation and value, whilst other designated sites out with the NPTC area could also be affected by the LDP Review. At the European level the NPTC area hosts 3 SACs and 1 Ramsar site. At the national level the NPTC area hosts 21 SSSI's and 2 NNRs. At the local level, NPTC has designated 129 SINCS, 2 RIGS and 5 LNRs.</p>	<p>All identified sites are designated for specific reasons of ecological important or biodiversity conservation and have conservation objectives related to these, e.g. the protection of relevant qualifying features. Table A.1 above identifies the qualifying features of relevant European sites (SACs and Ramsar sites). There is a need to safeguard these qualifying features from adverse effects, protect the integrity of designated sites and work towards the achievement of defined conservation objectives.</p>	<p>Any proposals for development within the NPTC area could adversely impact designated sites and biodiversity through a range of direct and indirect effects, potentially including loss of roosting, foraging and other habitats, physical or noise disturbance, abstraction of river water, discharge of effluent, contamination and air pollution. As such, all proposals and policies within the emerging RLDP arising from the LDP Review must take account of relevant ecological sensitivities. This includes the need to support the management of all designated sites in relation to their status and in pursuit of their defined conservation objectives. Any RLDP must also provide an appropriate level of protection for protected species and non-designated ecological interests.</p>	<p>The ISA Framework must include objectives relating to the appropriate conservation, protection and enhancement of statutorily and non-statutorily designated sites.</p>
	<p>Priority and other notable habitats: NPTC's habitats include ancient woodlands, unimproved wet grasslands, chalk grassland, river valleys and rocky gorges, coastal sand dunes and saltmarsh. These habitats support varied flora and fauna, including many protected, rare or declining species.</p>			<p>The ISA Framework should include appropriate objectives to assess potential effects on habitats and species from proposals (including cumulative development) and policies within the emerging RLDP. This should include consideration of impacts such as habitat loss, recreational impacts, water abstraction, pollution and disturbance effects.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
<p>2. Population (including relevant socio-economic conditions)</p>	<p>Governance and Statistical Geographical Units: NPTC is the unitary authority responsible for local government across a 442km² area of South Wales. The authority hosts five lower level Town Councils and 14 Community Councils. The unitary authority contains two whole constituencies: Aberavon & Neath.</p> <p>The principal towns in the NPTC area are Neath, Port Talbot and Pontardawe. The NPTC area stretches from the coast to the borders of the Brecon Beacons National Park. A large proportion of the NPTC area is characterised by uplands/semi-uplands and forestry. The upland areas are characterised by five valleys: Vale of Neath, Dulais Valley, Afan Valley, Swansea Valley and Upper Amman Valley.</p> <p>As a unitary authority, NPTC is also the single local planning authority (LPA) for the area. The Planning (Wales) Act 2015 provides a legal framework for the preparation of Strategic Development Plans at the regional level (refer to Appendix B for further details). An SDP is expected be prepared in due course for the South West Wales Region incorporating the NPTC area. NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major</p>	<p>N/A</p>	<p>The preparation of any RLDP will need to be closely aligned with the preparation of the SDP to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues.</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, in particular with regards to the accessibility and provision of public services.</p> <p>The ISA Framework proposed for use in the ISA of the LDP Review (Section 5) should be kept under review and tested for compatibility against the SA Framework for the SDP once this has been produced.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>projects across Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot. In the NPTC area, this will result in the creation of the Centre for Excellence in Next Generation Services for start-up businesses, the ASTUTE Factory of the Future for smart technologies and a new National Steel Innovation Centre for research, testing and knowledge sharing.</p> <p>Demographics: NPTC has an estimated population of 143,000 (2018⁵), around 4.6% of the total population of Wales (3,118,600).</p> <p>2018 based projections⁶ suggest that the population will increase from 142,906 in 2018 to 143,621 by 2021, increasing to 144,238 by 2028, which equates to an increase of 1% over the ten-year period. Additionally, between 2018-2028, those aged 15 and under are expected to decline by 4.46%, while those aged 16-64 are projected to decline by 1.7%. Conversely, the proportion aged 65+ is projected to increase by 13.3% between 2018 and 2028.</p> <p>In terms of statistical units, there are 91 Lower Super Output Areas (LSOAs) within</p>	<p>Projected population ageing is likely to create issues for long term workforce replacement and increase pressures on a range of public services.</p>	<p>The LDP Review must take into account the characteristics of the resident and working populations of the NPTC area, particularly with regard to current and future predicted labour supplies, employment needs, skill levels and socio-economic factors (as detailed below).</p> <p>It will be important for the RLDP to set out coherent strategies in respect of housing land and community infrastructure provision to meet current and expected future needs. Robust evidence to identify these needs should also therefore be collated and</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, in particular with regards to the accessibility and provision of public services.</p>

⁵ NOMIS: <https://www.nomisweb.co.uk/reports/lmp/la/1946157394/report.aspx>

⁶ StatsWales: <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2018-based/populationprojections-by-localauthority-year>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>the NPTC area, representing 4.8% of the 1909 total LSOAs in Wales.</p> <p>Housing: The JHLAS (2019) indicated that NPTC had a housing land supply, assessed against the current housing requirement of the Neath Port Talbot LDP, of 4.5-years; below the five-year target. Since the previous JHLAS (2018), the current housing land supply has declined by 0.5 years. The 2020 AMR shows that the delivery of homes has fallen short of annual targets since 2014/15, with the latest estimations (2020) showing a shortfall of 30% than the projected 8760 homes by the end of the plan period. Neath Port Talbot is split into multiple housing wards. The top 5 largest number of households are in the following Wards- Neath East (3,048), Sandfields East (3,045), Baglan (2,924), Sandfields West (2,882) and Bryn & Cwmavon (2,850).</p> <p>In total there are an estimated 63,978⁷ dwellings across the NPTC area, of which approximately 69% are owner occupied, 19% are social rented, 10% private rented, 2% are living rent free and 0.2% shared ownership.</p> <p>Average house prices within NPTC increased by 7% from March 2019</p>	<p>The identification of a current housing land shortfall means that insufficient housing is likely to be delivered through the planning system to meet identified needs. However, a RLDP must be underpinned by up to date and objective calculations of housing need, which may differ from the housing land requirements set under different economic conditions in 2016 for the existing LDP.</p> <p>Alongside the ageing population, housing demand is anticipated to increase with projected increases in the number of single person/lone parent households.</p> <p>At present the overall level of demand for affordable housing is not being met</p>	<p>kept up to date throughout the LDP Review.</p> <p>The LDP Review calculates the objectively assessed housing need (OAN) level for the NPTC area over the intended period of the RLDP and set a new housing land requirement accordingly. Any RLDP resulting from this LDP Review will then need to be underpinned by a clear housing land strategy and will need to allocate a sufficient quantum and appropriate range of housing sites to satisfy the identified housing land requirement.</p>	<p>The ISA Framework should include objectives relating to housing provision to meet identified needs, both in terms of the availability and quality of the housing stock.</p>

⁷ NPTCBCBC Local Housing Strategy (2015): https://www.NPTCBC.gov.uk/media/3980/NPTCBCcbc_local_housing_strategy_2015.pdf

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>(£113,409) to March 2020 (£121,338) which is £40,346 below the average property prices for Wales at £161,684 (March 2020)⁸.</p> <p>Over the Plan period, there is an identified need for approximately 8,000 dwellings over to the year 2026. The sub-area of Neath requires approximately 4,100 of these, in contrast to Amman Valley which requires approximately 1% (or 100 homes).</p> <p>Over 2019⁹, a total of 299 housing completions were recorded in Neath Port Talbot, falling short of the 2019 target of 686 dwellings. Since the LDP base date in 2011, a total of 2,126 houses have been built, falling short of the annual cumulative target of 3,582 in the same period. This is a shortfall of 1456 units, with just 59.4% of the cumulative annual target delivered to date.</p> <p>With regards to affordable housing, over the latest monitoring period (2019), no affordable housing units were recorded as delivered through the planning system. 50 houses have been completed since the</p>	<p>across the NPTC area. Furthermore, NPTC has identified clear shortfalls in the provision of extra care housing and smaller dwellings, in particular that of two-bedroom properties, across the affordable and general-purpose housing sectors.</p>		

⁸ UK House Price Index - Wales (March 2020)

⁹ LDP Review Report, Neath Port Talbot Council (January 2020)

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	<p>LDP base rate (2011) against a target of 478 in the same period, resulting in a 10.5% delivery rate. This demonstrates a significant shortfall of affordable housing delivery across Neath Port Talbot.</p> <p>Educational Attainment/Qualifications¹⁰: In 2018 ,11% of the working age population (16 to 64yr) in the NPTC area held no qualifications, which is higher than the percentage of the population with no qualifications across Wales (8.6%). This trend was also observed each year between 2011 – 2017, although the proportion of the NPTC population with no qualifications is shrinking.</p> <p>The level of attainment achieved by the working age population with qualifications is also lower in Neath Port Talbot than across Wales: 48.5% in Neath Port Talbot are qualified to level NVQ3 or above compared with 55.1% across Wales and 29.2% are qualified to level NVQ4 or above compared with 35.4% at the national level.</p>	<p>The latest available statistics highlight that as a whole, the working age population within the NPTC area holds fewer and less advanced qualifications than across Wales, although current educational attainment amongst school aged people is similar across both geographies.</p> <p>The observed high proportion of the working age population with no qualifications. This is of concern as the limits the ability of a sizeable demographic group to be economically active and restricts local access by employers to high skilled labour.</p>	<p>The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to education infrastructure capacity and choice.</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the adequacy, quality and spatial distribution of education infrastructure provision.</p>

¹⁰ Educational attainment statistics sourced from NOMIS: Labour Market Profile – Neath Port Talbot

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	<p>Community Infrastructure: Neath Port Talbot CBC is split into multiple wards: Neath North, Neath South, Pelenna, Pontardawe, Resolven, Rhos, Sandfields West, Tonna, Trebanos, Ystalyfera, Baglan, Briton Ferry East, Bryn and Cwmavon, Margam, Onllwyn, Port Talbot, Sandfields East, Seven Sisters, Tai-bach, Aberavon, Aberdulais, Allt-wen, Blaengwrach, Briton, Ferry West, Bryn-coch North, Bryn-coch South, Cadoxton, Cimla, Coedffranc Central, Coedffranc North, Coedffranc West, Crynant, Cwmllynfell, Cymmer, Dyffryn, Glyncoirwg, Glynneath, Godre'r graig, Gwaun-Cae-Gurwen, Gwynfi, Lower Brynamman, Neath East.</p> <p><u>Educational facilities</u></p> <p>Neath Port Talbot CBC act as the education authority in the area and operate the primary and secondary schools within the County. It operates 6 infant schools, 6 junior schools, 56 primary schools, 11 secondary schools and 3 special schools.</p> <p>Further education institutions include St Joseph's Catholic School & Sixth Form Centre and Ysgol Gyfun Ystalyfera who provide sixth form opportunities. Neath Port Talbot College operates across the County Borough, with main activities</p>	<p>The Neath Port Talbot Wellbeing Assessment (2017) indicates that the NPTC area is presently served by a range of good quality community infrastructure and open spaces. However, funding shortfalls for cultural facilities may affect their availability. It will be important that these are protected and where possible enhanced and that the infrastructure is capable of meeting the changing needs of the population. In addition, further community infrastructure and open space provision will be required to support projected population growth within the NPTC area.</p>	<p>The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to outdoor sport provision, children's playing space, community halls, accessible natural open space and allotment provision.</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the provision and quality of community infrastructure.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>focused in two campuses in both Port Talbot and Neath.</p> <p>Higher education institutions in the area include Swansea University, which has a science and innovation campus in Crymlyn Burrows and the University of South Wales which has a campus located at Baglan Energy Park in Port Talbot.</p> <p><u>Community facilities</u></p> <p>There are 8 libraries managed by Neath port Talbot Libraries and 7 community managed libraries in the NPTC area.</p> <p>Four areas of Neath Port Talbot were awarded Green Flag status in 2019: Gnoll Estate Country Park, Margam Country Park, Talbot Memorial Park and Neath's Victoria Gardens. Margam Country Park is one of only seven sites in Wales to be accredited as a Green Heritage Site. The Green Flag Community Award was also given to the Amman Valley Trotting Club, Glyncorwg Ponds and Riverside Park.</p>			

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	<p>Employment¹¹: In 2019, the employment rate within the NPTC area was 74.5%, which is slightly higher than across Wales (73.5%) but lower than the average across Great Britain (75.7%). In Neath Port Talbot, the percentage of the working age population that is economically active is also higher in Neath Port Talbot (77.6%) than across Wales (76.8%).</p> <p>The official unemployment rate in the NPTC area stood at 4.3% for 2019, which was higher than the unemployment rate across Wales (4.1%) and Great Britain (3.9%).</p> <p>Related to this, in 2019 the NPTC area had a jobs density of 0.60 (ratio of jobs to resident working age population) compared with 0.78 across Wales and 0.86 for Great Britain.</p> <p>Neath Port Talbot accommodates a number of manufacturing facilities such as steel, petrochemicals, automotive engineering and apparel; most notably Port Talbot Steelworks, capable of producing almost 5 million tonnes of steel slab per annum and a key employer in the NPTC area.</p>	<p>In recent years the NPTC area has consistently experienced a higher unemployment rate than the national averages for Wales and Great Britain. This indicates either that insufficient or unsuitable employment opportunities are provided for residents of the NPTC area, taking account of education and skills levels (which, as detailed below, are also below national averages).</p>	<p>The LDP Review should develop and appropriate employment land and economic development strategy for the RLDP. It will be important for emerging policies, proposals and guidance to support the creation of a broad range of new employment opportunities which match the skill levels of the existing labour market, whilst also seeking to attract high value sectors such as energy, advanced manufacturing, logistics and ports.</p>	<p>The ISA should assess whether the RLDP will be effective in providing increased employment opportunities in appropriate locations and appropriate sectoral diversification into high value industries. The ISA Framework should therefore include objectives relating to high quality employment, economic growth, sectoral diversification and inward investment.</p>

¹¹ All data sourced from NOMIS: Labour Market Profile – Neath Port Talbot

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	<p>The largest employment sectors in Neath Port Talbot are for manufacturing (19%) and human health and social work activities (17%). Wholesale and retail trade; repair of motor vehicles and motorcycles is the third largest employer by industry in Neath Port Talbot at 12.8%. This is comparable to that of Wales overall where human health and social work activities are undertaken by 17% of the population and wholesale and retail trade; repair of motor vehicles and motorcycles at 14%.</p> <p>The range of occupations within NPTC demonstrates that those employed as managers and directors, professional, associate professional and technical occupations falls below the Welsh and United Kingdom average whilst the process plant and machine operatives proportion is higher than the Wales average.</p> <p>ONS Annual Population Survey data indicates that over the period since 2015 there has been a small shift in the industry of employment of residents of the NPTC area, as the proportion of those who work in retail and education has decreased while the proportion who worked in health,</p>			

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	<p>hotels, transport and communications increased¹².</p> <p>In 2019, full-time workers gross weekly pay in Neath Port Talbot averaged at £613.40, which was £78.40 above the Wales level and £26.90 above the average across Great Britain. Females in Neath Port Talbot received £85.30 less in their gross weekly pay than the total average.</p>			
	<p>Inequality, Social Exclusion and Deprivation: The Welsh Index of Multiple Deprivation (2019) identifies deprivation pockets throughout Wales.</p> <p>In 2019, of the 91 LSOAs in the NPTC area, 14 were in the most deprived 10% of Wales; 30 were in the most deprived 20%; 41 were in the most deprived 30% and 63 were in the most deprived 50% LSOAs¹³.</p> <p>The percentage of households that are workless in Neath Port Talbot is at 25.9%, considerable above the national average for Wales at 18.3%¹⁴. The percentage of the working age population who are claiming universal credit in NPTC is 3.4%,</p>	<p>Some parts of the NPTC area, especially in the Valley communities, are among the most deprived areas of Wales, with low levels of economic activity and access to facilities and services, particularly for children, young people and elderly populations.</p>	<p>A holistic strategy is needed to address multiple deprivation within parts of the NPTC area, including but not limited to the creation of new, high quality employment opportunities. Any RLDP resulting from this LDP should set out a clear employment land strategy to support the provision of new employment opportunities in appropriate and accessible locations. The RLDP should also include a regeneration strategy and associated policies and proposals to catalyse a range of physical,</p>	<p>The ISA Framework should include appropriate objectives relating to equality, social inclusion, access to public services, employment opportunities, access to healthcare, access to open spaces and exposure to pollution (air, water, soil, etc).</p>

¹² Business Register and Employment Survey- Neath Port Talbot (2019)

¹³ StatWales Neath Port Talbot Local Authority Analysis (2019)

¹⁴ Neath Port Talbot Public Services Board Well-being

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	<p>slightly higher than 3.1% across Wales and 3% across Great Britain.</p> <p>The level of worklessness is reflected through gross disposable household income (GDHI) per head, which is lower (£14,971) than the Wales average (£15,754). In 2014, GDHI in NPTC was £14,746.00.</p>		<p>environmental, health and socio-economic improvements within identified deprived communities.</p>	
3. Human Health	<p>Life expectancy¹⁵:</p> <p>Based on the latest figures for the NPTC area, life expectancy for males at birth is 76.4 and for females, 80.4. With regard to healthy life expectancy, males at birth can expect a healthy life expectancy of 58.9 years, while females from birth can expect a healthy life expectancy of 57 years.</p> <p>Across Wales, life expectancy for males at birth is 78.2, while for females it is 82.13. Healthy life expectancy from birth ranges from 60.9 for males to 61.5 for females.</p>	<p>It is clear to see that there are large gaps in life expectancy and healthy life expectancy between males and females in the NPTC area compared to the Welsh average.</p> <p>Measures need to be put in place to firstly tackle deprivation which should then have a positive impact on life expectancy of both males and females.</p>	<p>Any RLDP resulting from this LDP Review should take into consideration the lower life expectancy and notable health inequalities of the NPTC area resident population compared with regional and national averages. It should set out proposals, policies and guidance to safeguard and improve amenity, quality of life and health outcomes (physical and mental) for all within the NPTC area, i.e. for both the workforce and residents.</p>	<p>The ISA Framework should include objectives relating to amenity, quality of life, health outcomes, physical health, mental health, wellbeing, safety and security. These issues should be considered holistically when assessing the proposed components of the emerging RLDP.</p>

¹⁵ ONS, Life expectancy of females/males 2015-17 figures

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	<p>Physical Health/Lifestyle Choices: According to the 'Our Healthy Future Interactive Tool 2015' adults living within Neath Port Talbot undertook moderate to vigorous physical activity for 30 minutes or more on 2.1 times a week on average, this is slightly below the Wales average (2.4)¹⁶.</p> <p>The percentage of adults who reported to have eaten five or more portions of fruit and vegetables the previous day in NPTC was 27% which is slightly below the average for Wales at 33% (2013-2014). This has declined by 5% since 2009-2010¹⁷.</p> <p>Between 2010 and 2015 the proportion of those who had eaten five or more portions of fruit and vegetables the previous day for Neath Port Talbot has steadily decreased but is consistently still been below the average for Wales.</p> <p>Childhood obesity is a significant issue in NPTC with 12.4% of children aged 4-5 years being classed as obese in 2019 in comparison to all-Wales average of</p>	<p>Physical health and lifestyle choices within NPTC are under performing when compared to that for Wales. Increased education and awareness would be beneficial to the population of the County Borough.</p>		

¹⁶ NHS Wales Informatics Service, Our Healthy Future Interactive tool 2015, Average number of days of 30 mins or more moderate to vigorous physical activity (capped) reported by adults, age standardised.

¹⁷ Welsh Health Survey (WG) (2013-2014 data) Our healthy future indicators

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	<p>12%¹⁸. In Neath Port Talbot, 62% of adults are reported as being obese or overweight, in comparison to the Welsh average (58%).</p> <p>In 2015, 23% of adults in Neath Port Talbot identified as currently being a smoker compared to the 21% average across Wales.</p>			
	<p>Mental Health and Wellbeing: Neath Port Talbot's health board (Abertawe Bro Morgannwg University Health Board) recorded 136.1 deaths per 100,000 residents in 2016 which were due to mental health and behavioural issues.</p> <p>Projected numbers of residents in Neath Port Talbot who have at least one mental disorder is expected to decrease from 26,864 (2015) to 25,758 (2035).¹⁹</p>	<p>In line with the Neath Port Talbot Public Services Board The Neath Port Talbot We Want (Wellbeing Plan 2018 – 2023) there is a need to improve all aspects of the health and wellbeing of the resident population of the NPTC area, including physical health, mental health and social wellbeing.</p>		
	<p>Health Infrastructure: Healthcare facilities in the NPTC area are managed by the Abertawe Bro Morgannwg University Health Board. The Health Board has four acute hospitals: Singleton and Morriston Hospitals in Swansea, Neath Port Talbot Hospital in Port Talbot</p>	<p>Adequate health infrastructure needs to be located in accessible locations to meet the needs of existing and future populations. A range of high quality physical and</p>	<p>The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with</p>

¹⁸ Promoting healthy living among pupils in Neath Port Talbot. Available at: <https://democracy.NPTCBC.gov.uk/documents/s52366/App%201%20-%20Promoting%20Healthy%20Living%20Among%20Pupils%20in%20Neath%20Port%20Talbot%20Schools%20Task%20and%20Finish%20Gr...pdf>

¹⁹ Western Bay Population Assessment <http://www.westernbaypopulationassessment.org/en/mental-health/>

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	<p>and the Princess of Wales Hospital in Bridgend.</p> <p>The Health Board manages two practices in the Neath Port Talbot area: in the Afan Valley and Neath town centre and one in Bridgend: Nantyllyllon with several other practises operating as independent organisations. The ABM Community Health Board has 70 GP centres, over 300 General Practitioners, around 275 dentists, 125 Community Pharmacies and 60 Optometry premises as of 2019.</p>	<p>mental health facilities are required to address the changing health needs of the population, in particular given projected population ageing.</p>	<p>healthcare facilities and services.</p>	<p>regards to the adequacy, quality and spatial distribution of healthcare facilities and services.</p>
4. Soil	<p>Geological and Ground Conditions: The NPTC area has varied geological and soil characteristics. Historically, NPTC has been an area of heavy industry, particularly metal, chemical and oil-based industries. Neath Port Talbot Council last published their Contaminated Land Strategy in 2015, setting out how they will remediate contaminated land across the County Borough²⁰. A total of 34 sites have been investigated, with two of these confirmed as being contaminated: Pinetree Car Sales and the Former Briton Ferry Gas Works.</p>	<p>New development must be appropriately sited and designed to reflect the geological and soil characteristics of the NPTC area.</p>	<p>Any RLDP resulting from this LDP should set out appropriate proposals and policies to safeguard important geological characteristics and soil resources within the NPTC area, as well as a framework for remediating contaminated land.</p>	<p>The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.</p>

²⁰ Neath Port Talbot Council Contaminated Land Strategy (2015): <https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf>

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5. Water	<p>Waterbodies: The NPTC area has one groundwater body classified poor under the Water Framework Directive (WFD); Pelenna.</p> <p>A number of waterbodies within the NPTC area are at risk of having poor water quality owing to 'point source pollution'. Water quality issues within the County Borough have been attributed to abandoned mine workings and the associated discharges of acidified iron rich water. This is identified as an issue across Wales and in parts of Neath Port Talbot²¹.</p>	<p>Waterbodies across the NPTC area vary in quality, ecological value and present condition. Management of water quality is essential for improving the long-term health of populations and the environment.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to protect and enhance the water environment and water resources, including surface and groundwater quantity and quality. This should include measures to eliminate contamination sources which harm the water environment and to regulate pollution discharges from new developments into receiving watercourses.</p>	<p>The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.</p>
	<p>Flood risks: The four main watercourses in Neath Port Talbot are the Afan, Dulais, Neath and Tawe which all flow NE-SW towards Swansea Bay. There are three canals running through the County Borough: Neath Canal, Swansea Canal and Tennant Canal. Significant areas along all the main rivers, watercourses and coast of the County Borough are identified as being at risk of flooding. There is some risk of coastal and reservoir flooding in Baglan. Areas at risk of river flooding include Port Talbot and Briton Ferry.</p>	<p>Flood risk is an ongoing issue within NPTC due to the setting of the local authority. Housing developments should be restricted where possible from development on flood plains.</p>	<p>Any RLDP resulting from this LDP Review should seek to manage flood risks in a sustainable manner, including by directing development away from known flood risk areas.</p>	

²¹ Neath Port Talbot Council Contaminated Land Strategy (2015): <https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf>

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	It is estimated that 10-20% of properties throughout the NPTC area are located in Flood Zones. This equates to around 13,353 properties in areas at risk of flooding ²² .			
6. Air	Air Quality Management Areas (AQMAs) and Poor Air Quality: There is one identified AQMA (Taibach/Margam) within NPTC, covering the majority of land and properties between Tata Steel Works and the M4 Motorway.	Continued monitoring of air quality within NPTC is required with particular attention along the M4 corridor as development and industry grows within the County Borough.	Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to tackle known areas of poor air quality and the likely impacts of new development on air quality, including from traffic. Any RLDP should seek to reduce local air pollution through setting out policies and proposals to promote sustainable and active travel modes.	The ISA Framework should include objectives relating to local air quality and associated health impacts. The ISA should also recognise that changes to air quality can have an impact on ecosystem services which affect biodiversity and other environmental assets.
7. Climatic Factors	Greenhouse Gas Emissions: 2017 statistics from InfoBase Cymru ²³ show that total greenhouse gas (GHG) emissions from within NPTC (53.2) show CO2 levels per resident (tonnes) significantly above the Welsh average (7.9). When measuring kilotonnes of industry and commercial CO2, Neath Port Talbot is significantly higher than all other authorities in Wales, emitting 7018.6 kilotonnes. This accounts	Continued monitoring of GHG emissions within NPTC is required to meet climate change targets, while also avoiding or mitigating GHG emissions as a result of development in the County Borough where possible.	Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to support the transition to a low carbon economy. This should include the provision of a supportive policy framework for renewable and low carbon energy generation in appropriate locations. The RLDP should	The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation.

²² Infobase Cymru http://www.infobasecymru.net/IAS/resources/Neath_Port_Talbot.pdf

²³ InfoBase Cymru <http://www.infobasecymru.net/IAS/themes/environmentandsustainability/environment/tabular?viewId=518&geold=1&subsetId=>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>for 51% of the total industry and commercial Co2 emissions for Wales.</p> <p>In 2019, the Welsh Government published the Energy Generation in Wales (2018) Report²⁴, identifying NPTC as one of the top five local authority areas where electricity consumption is met by renewables (74%). Neath Port Talbot is identified as having the highest renewable energy generation at an estimated 1,092 Gwh.</p> <p>Across Wales, NPTC is also the local authority which has the highest biomass electrical capacity, due to the 41.8 MWe Margam Green Energy Plant installed in 2017.</p> <p>Neath Port Talbot also has the highest onshore wind capacity of all local authorities in Wales, generating 236MW from 11 projects.</p>		<p>also include policies to encourage low carbon design and should set out a sustainable transport strategy which capitalises on existing rail and port infrastructure within the NPTC area to contribute to the decarbonisation of the transport sector.</p>	
	<p>Climate Change Impacts: Climate change research predicts an increase in the severity and frequency of rainfall events. Flooding from rivers, sewers and surface water is therefore likely to increase throughout NPTC in the future. NPTC is also expected to become</p>	<p>Predicted impacts from climate change up to 2050 will place significant strain on infrastructure and available resources across the UK, including within the NPTC area. In particular,</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals and guidance which responds to predicted climate change impacts and allows communities and businesses in</p>	<p>The ISA Framework should include objectives relating to climate change adaptation and the resilience of environmental assets within the NPTC area.</p>

²⁴ Energy Generation in Wales in 2018 (2019) <https://gov.wales/sites/default/files/publications/2019-10/energy-generation-in-wales-2018.pdf>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>increasingly vulnerable to tidal flooding as sea levels rise. Coastal erosion will increase and affect coastal infrastructure. Extreme weather events will occur more frequently with greater intensity. This will impact on human health directly and upon biodiversity and food production systems.</p>	<p>the effects associated with flood risk.</p>	<p>the NPTC area to adapt to the changing climate.</p>	
<p>8. Material Assets</p>	<p>Land Use: Neath, Port Talbot and Pontardawe act as key hubs for services, employment, housing and retail developments for the surrounding communities. These towns are positioned at the top of the retail and commercial hierarchy of the County Borough. Briton Ferry, Skewen, Taibach and Glynneath play a strategic role within the County Borough as focus points for services, transport and community activity.</p> <p>NPTC has a number of historical, archaeological and architectural assets particularly Margam Country Park, playing an important role as a leisure and tourism destination.</p> <p>The existing LDP spatial strategy has sought to preserve material assets associated with land use broadly by focusing development along the coastal corridor and in the urban areas of Neath Port Talbot while providing a flexible approach to development in the Valleys.</p>	<p>There is an ongoing need to regenerate communities within the NPTC area which have experienced post-industrial decline and have high levels of multiple deprivation. There is also a need to provide suitable land uses to meet identified needs, including increased housing and employment provision, whilst protecting sensitive land uses such as agriculture.</p>	<p>Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within the NPTC area.</p> <p>Any requirements for upgraded or new infrastructure to address existing capacity constraints, decarbonise key economic sectors or to support population, employment and economic growth should be planned for through the LDP</p>	<p>The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, natural resources, climate change mitigation, connectivity and accessibility.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>Transport infrastructure:</p> <p><u>Road Network</u></p> <p>The Core Roads Network connects the NPTC area to adjacent regions. The following roads constitute the Core Roads Network in the NPTC area: M4, and A465.</p> <p>The Strategic Roads Network in NPTC connects the major settlements and population centres in the County Borough and comprises mainly the A-roads (including the Core Roads Network).</p> <p>The local highway network connects local areas of population to the major settlements and comprises mainly the B road networks and all classified unnumbered routes within the NPTC area.</p> <p><u>Public Transport</u></p> <p>Neath Station and Port Talbot Parkway are mainline stations served by both the Great Western rail services from London (Paddington) to Swansea (with connections to West Wales) and Transport for Wales regional services.</p> <p>Both Neath and Port Talbot bus stations provide comprehensive local, short and medium distance bus services, including direct services to Cardiff and Swansea.</p>	<p>At present, parts of the highway network experience congestion especially at peak times.</p> <p>The Swansea Bay Metro is at the early stages of development, it is aimed at better connecting communities across the Swansea Bay City Region by public transport, while also developing improved rail and bus links with other parts of the UK</p>	<p>Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.</p>	

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p><u>Aviation and Maritime</u></p> <p>Cardiff International Airport is located within a 40-minute journey of Port Talbot and allows access to both National and International destinations for passengers and freight.</p> <p>The four major deep-water docks in Wales (Swansea, Port Talbot, Barry and Newport) provide freight access worldwide. Port Talbot is a nationally strategic port asset one of the only harbours in the UK capable of handling cape-size vessels.</p> <p><u>Active Travel</u></p> <p>There are various active travel routes within the NPTC area²⁵ of which there are approximately 55 pedestrian routes totalling 47.143km in length and 24 existing cycling routes totalling 36.403km in length.</p> <p>Part of NPTC’s active travel routes include the All Wales Coastal Path that provides a continuous walking route around the whole of Wales, totalling 870 miles.</p>			

²⁵ Neath Port Talbot Council: Active Travel Existing Routes Map <https://www.NPTCBC.gov.uk/6489>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>Utilities infrastructure:</p> <p><u>Biomass</u></p> <p>The Margam Green Energy Plant installed in Neath Port Talbot entered commercial operation in 2019, generating renewable electricity via the grid for homes and businesses. At a cost of £160m it converts energy generated from burning waste wood before converting and exporting to the grid.</p> <p><u>Solar Energy</u></p> <p>The NPTC Planning Register²⁶ indicates that in 2019 there was 1 application for a solar energy proposal to generate up to 9.99MW of electricity.</p> <p><u>Wind Farms</u></p> <p>Neath Port Talbot has the highest onshore wind capacity of all local authorities in Wales, generating 236MW from 11 projects. Several windfarms are operational in the NPTC area, including the Pen y Cymoedd windfarm which opened in 2017 and comprises of 76 turbines with a capacity of 228 MW.</p>	<p>There is a need for continued decarbonisation of the energy generation sector across Wales to support the transition to a low carbon economy and to help mitigate climate change. At the same time, a mix of energy generation sources is required to ensure continued security of supply and to overcome intermittency issues associated with wind and solar technologies.</p>		

²⁶ Neath Port Talbot Council: Planning Register <https://planningonline.NPTCBC.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>Waste management:</p> <p>In NPTC from 2018-2019, of the total 69,990 tonnes of municipal waste generated, 42,560 tonnes were re-used, recycled or composted, 17,881 tonnes were incinerated, and 3,312 tonnes sent for other recovery. This left only 5,883 tonnes sent to landfill. Overall, 60.8% of waste was reused/recycled or composted.</p> <p>NPTC has a partnership agreement with nearby local authorities to process waste at the Materials Recovery and Energy Centre (MREC) located at Crymlyn Burrows within Neath Port Talbot.</p> <p>Natural resources: The NPTC area contains significant amounts of mineral resources; both coal and aggregate. The existing LDP described the 'whole' of the County Borough as underlain by coal resources. The coal is at its highest quality with anthracite in the north, with pockets of steam coals in the south east. Coal has been mined extensively in the NPTC area area for hundreds of years and is recognised for its positive economic contribution to the creation and sustenance of several valley communities. PPW 11th Edition states that proposals for new coal extraction will not be supported. Any such proposals must clearly demonstrate why they are needed in the</p>	<p>There is a need to continue to meet statutory targets for sustainable waste disposal in the NPTC area.</p> <p>There is a need to protect and restore landscapes with the potential to be affected by minerals extraction.</p>		

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>context of climate change emissions reductions targets and for reasons of national energy security.</p> <p>There are two major hard rock quarries in the NPTC area at Gilfach (Neath) and Cwm Nant Lleici (Pontardawe) which supply aggregates to both the regional and UK markets.</p>			
9. Cultural Heritage	<p>Historic assets: As detailed in Table A.1 above, there are 97 identified Scheduled Monuments within the NPTC area. Of these, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman. The majority are sited within Margam (15). There are also 395 listed buildings across the NPTC area, ranging from bridges to castles (e.g. Neath Castle). There are currently 260 Buildings of Local Importance' (BLIs) and Designated Canal Structures in the NPTC area.</p>	<p>The NPTC area hosts a range of designated heritage assets, each of which need to be appropriately protected from effects on their integrity and setting.</p>	<p>Any RLDP resulting from this LDP Review should set out policies and proposals to protect, conserve and enhance heritage assets across the NPTC area, including in terms of impacts on the setting of such assets and upon unknown archaeological resources.</p>	<p>The ISA Framework should include objectives relating to the preservation, conservation, protection and enhancement of the historic environment.</p>
	<p>Welsh language: NPTC's Welsh Language Strategy commits the Council to treating Welsh and English on an equal basis when carrying out public business. NPTC are additionally dedicated to helping to raise the profile of the Welsh language and culture to residents and employees.</p>	<p>There is a need to safeguard and support the increased use of the Welsh language amongst the resident population of the NPTC area.</p>	<p>Any RLDP resulting from this LDP Review should include policy provisions to support growth in the use of the Welsh language.</p>	<p>The ISA Framework should include objectives relating to the protection of the Welsh language.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	The annual population survey conducted by Office for National Statistics ²⁷ identified that 22.6% of the resident NPTC population stated that they spoke Welsh.			
10. Landscape	<p>Designated areas: As detailed within Table A.1 above there no AONBs within the NPTC area, but 2 NNRs and 6 SLAs have also been designated at a local level.</p> <p>Landscape fabric, character and capacity: NPTC covers an area of some 442 square kilometres. Neath Port Talbot has a varying landscape, ranging from sand dunes and coastal salt marsh through to upland areas of purple moor grass and ancient woodlands. There are several conifer plantations and important geological features including glaciated valleys and rock formations.</p> <p>The Valleys are comprised of river valleys separated by upland plateaus and mountains. The settlement pattern and land use reflect the typical ribbon type associated with this area.</p> <p>NPTC is seen to be traversed by the M4 motorway, A465 trunk road and the Swansea-Paddington railway line, which all influence the surrounding landscape.</p>	There is a need to provide appropriate protection for designated landscapes, important landscape features and sensitive landscape character areas. There is also a need to protect key views and safeguard visual amenity.	Any RLDP resulting from this LDP Review should set out a spatial strategy, policies and proposals which protect and enhance key landscape features, improve the quality of the local landscape character, are sensitive to relevant visual receptors and encourage local distinctiveness. The RLDP should also ensure that new developments are well integrated with existing communities to create a strong sense of place.	The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts. The SEA should assess the impacts of emerging spatial strategies, proposals, policies and guidance on these aspects to ensure that the LDP Review safeguards and where appropriate enhances the level of protection afforded to the landscape.

²⁷ StatsWales: Neath Port Talbot Council: Welsh Language speakers

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>Visual amenity:</p> <p>Visual amenity is adversely impacted in places by high levels of deprivation, resulting in buildings and infrastructure not being well maintained. Several windfarms are operational in the NPTC area, with the potential to result in visual effects.</p>			

A.4 Evolution of Baseline Conditions in the Absence of the LDP Review

A.4.1 This section responds to the requirement within the SEA Regulations to consider the likely evolution of the current state of the environment in the absence of the plan or programme under consideration, namely LDP Review.

The Need for the LDP Review

A.4.2 NPTC has determined that a review of the existing LDP (adopted January 2016) is needed to allow NPTC to prepare and adopt a RLDP prior to the end of the current LDP period in 2026. The Neath Port Talbot LDP Review Report (NPTC, 2020) concludes that the 'Full Review' procedure is needed to undertake a comprehensive review of the existing LDP and prepare a RLDP, as opposed to the 'Short Form' procedure which would only result in minor revisions (e.g. changes to the wording of individual policies or the addition of individual allocated sites) to the existing LDP. It is considered that a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adopted of the current LDP.

A.4.3 In the absence of any LDP Review taking place, NPTC would be unable to either prepare a RLDP (as proposed) or propose minor revisions to the existing LDP before the end of the current LDP period in January 2026. The Neath Port Talbot LDP Review Report (NPTC, 2020) makes clear that the absence of an up to date Development Plan for the NPTC area would be likely to be exploited by the development industry, not least due to the identified housing land supply shortfall. In these circumstances' development is likely to come forward that is not in accordance with the existing LDP's economic regeneration-led strategy and there would be significant pressure to release greenfield sites in unsustainable locations. Both outcomes would be likely to result in a range of unacceptable significant adverse effects on the environmental topics prescribed within Schedule 2 of the SEA Regulations, including:

- Biodiversity, Flora & Fauna: Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on biodiversity, including the loss and fragmentation of habitats, whilst increases in traffic and noise could disturb sensitive species;
- Population: Increased development pressure in unsustainable locations or contrary to the LDP strategy could result in a spatial mismatch between housing supply and demand for public service provision, economic opportunities and transport infrastructure. It could also result in the inability of public services and community infrastructure to meet identified population needs, including in relation to the demands of an ageing population;
- Health: The absence of a competent and up to date LDP would restrict NPTC's ability to improve the physical and mental health of the population through spatial planning policies and interventions. If significant increases in physical activity and active travel are not achieved, health issues including obesity, inactivity and poor air quality will continue to affect the population of the NPTC area, causing increases in ill-health, exacerbating health inequalities and restricting life expectancy. The absence of the LDP Review would also prevent NPTC from fully implementing the Well-being of Future Generations (Wales) Act 2015 and in particular from discharging the public sector duty under Section 3 of the Act, as there would be no mechanism available to align NPTC's planning policy framework with the objectives specified within the Neath Port Talbot We Want (Well-being Plan 2018-2023). Additionally, increased development pressure in unsustainable locations or contrary to the LDP strategy could lead to the loss of areas of open space, reducing opportunities for physical activity, with associated adverse health outcomes;
- Soil: Increased development pressure in unsustainable locations or contrary to the LDP strategy could prevent contaminated land from being remediated and result in the irreversible

loss of important soil resources (e.g. high quality peatland). In the absence of an up to date LDP spatial strategy, increased pressure for the development of new facilities, housing and employment generating uses could also lead to the loss of the best quality and locally important agricultural land;

- **Water:** Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on water resources and adversely affect the quality of the water environment;
- **Air Quality & Climatic Factors:** Dependency on private cars to access employment and services could increase if development takes places in unsustainable locations or contrary to the LDP strategy. Additionally, opportunities to pro-actively encourage transport modal shift to walking, cycling and public transport would be lost. In the absence of a major short-term shift towards the use of electric vehicles, the resulting increase in traffic would increase fossil fuel combustion, carbon emissions and local atmospheric pollution, in particular greater release of particulate matter. This would act against wider policy efforts to decarbonise key economic sectors including transport mitigate climate change. It could also lead to worsening air quality and result in NPTC requiring to designate additional Air Quality Management Areas (AQMAs) to address areas of poor air quality;
- **Material Assets:** Increased development pressure in unsustainable locations or contrary to the LDP strategy would be likely to increase pressure and capacity constraints on a range of essential infrastructure. This could itself result in a range of environmental effects as well as restricting long term housing, economic and employment growth across the NPTC area. In short, without the LDP Review it is likely that a range of infrastructure required to meet identified needs across the NPTC area would not be delivered;
- **Cultural Heritage:** Increased development pressure in unsustainable locations or contrary to the LDP strategy could add pressure to sensitive areas of historic and/or archaeological interest, as well as undermining the character of conservation areas; and,
- **Landscape:** Increased development pressure in unsustainable locations or contrary to the LDP strategy could have a significant negative impact on the landscape character of the NPTC area, especially if additional new development were to be concentrated within areas of high landscape value (e.g. within the existing 6 SLAs across the NPTC area).

A.4.4 In addition, in the absence of having a competent and up to date statutory Development Plan, NPTC's planning resources may need to be diverted away from development planning activities in pursuit of preparing a new LDP towards resisting undesirable 'planning by appeal' cases. It is therefore expedient for NPTC to undertake the LDP Review before the end of the current LDP period in 2026.

Use of the Full or Short Form LDP Review Procedure

A.4.5 In the event that the Short Form procedure was used instead of the Full Review procedure for this LDP Review, any resulting changes to the existing LDP would be limited in scope. This would prevent the LDP from fully taking account of the range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels which have emerged since January 2016. The resulting adverse environmental effects are likely to be similar to, albeit not as severe as, those listed above in relation to the potential absence of a competent statutory Development Plan for the NPTC area.

A.4.6 The LDP Review is therefore being undertaken in accordance with the 'Full Review' procedure to allow NPTC to prepare a comprehensive and up to date replacement LDP.

Appendix B Review of Plans and Programmes

B.1 Introduction

B.1.1 This Appendix supports Section 3 of the Neath Port Talbot LDP Review ISA Scoping Report by providing a review of relevant qualifying plans, programmes and strategies of relevance to the LDP Review. The main purpose of this review is to identify relevant environmental protection objectives and wider policy requirements within relevant policy documents which should be taken account of within (or otherwise inform) the LDP Review and this associated ISA process.

B.2 Review of Relevant Plans and Programmes

B.2.1 **Table B.1** below sets out a review of other plans and programmes of relevance to the LDP Review and the associated ISA process. This review will be updated as required throughout the LDP Review process to take account of emerging policy developments and it will be appended to each iteration of the Neath Port Talbot LDP Review ISA Report. Of note, **Table B.1** does not consider the implications of Welsh national planning policy documents for the LDP Review; rather, these are addressed separately within **Table B.2** given their central importance in determining the soundness of the replacement LDP which will result from the LDP Review.

B.2.2 In terms of the **possible impacts of the UK's withdrawal from the European Union as of 31st December 2020**, **Table B.1** includes all relevant international plans and programmes of relevance to the LDP Review. At this time all European legislation of indirect relevance to the NPT LDP Review has been retained within **Table B.1**. While this is subject to change over the course of the preparation of the RLDP, some idea of the direction of future change can be gathered from the National Assembly for Wales Climate Change, Environment and Rural Affairs Committee has set out Environmental principles and governance post-Brexit (October 2019). This, the Committee's second report to consider the effect of the UK's departure from the European Union on environmental principles and governance structures in Wales, set out a series of recommendations for the Welsh Government's future Bill to address environmental principles and governance gaps. In summary the Committee has recommended 'non-regression' or 'progression' as a principle of a future Bill and for the inclusion of the EU's four core environmental principles: Precautionary; Preventative; Rectification at source; and Polluter-pays principle while assessing the benefits of including other EU and international principles.

B.2.3 As of 1st January 2021, the UK Government committed to the maintaining of environmental standards and international obligations, stating that the following will remain in place:

- The UK's legal framework for enforcing domestic environmental legislation by UK regulatory bodies or court systems; and
- environmental targets currently covered by EU legislation - they are already covered in UK legislation.

B.2.4 In addition, Wales Special Protection Areas and Special Areas of Conservation (Natura 2000 sites) have been confirmed to have the same protections they had when the UK was part of the European Union.

Table B.1: Review of Other Relevant Plans, Programmes and Strategies

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
International				
Population (including relevant socio-economic issues)	United Nations (2016) Habitat III (Quinto), United Nations Economic Commission for Europe (1998) The Aarhus Convention.	These documents provide an international framework for promoting sustainable development within all decision making. National and local developments should take sustainability into account and openly share relevant information to the public.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance which furthers the delivery of sustainable development and safeguards transparency in decision making. The LDP Review process itself must also be objective, transparent, evidence based and conducted fairly.	Applied as a whole, the ISA Framework should provide a holistic suite of assessment criteria to determine the contribution of any RLDP to the delivery of sustainable development.
Human Health	United Nations (1989) UN convention on the Rights of the Child 1989, United Nations (2016) Committee on the Rights of the Child Recommendations Report, World Health Organization (1999) Guidelines for Community Noise 1999, World Health Organisation (2004) Children's Environment and Health Action Plan for Europe.	These documents provide an international framework which recognises the importance of the preservation and protection of human health when undertaking development activities.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the prevention of negative effects to human health from local developments in line with international legislations.	The ISA Framework should include objectives relating to the protection of human health.
Biodiversity, Flora & Fauna	The Ramsar Convention on Wetlands (1971), EU Biodiversity Strategy - Our Life Insurance, Our Nature Capital: An EU Biodiversity Strategy (2011), AWEA (1995) Convention on the Agreement on the Conservation of African – Eurasian Migratory Water birds (The Bonn Convention), UNESCO (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora, United Nations (1992) The Rio Convention on Biodiversity.	These documents provide an international framework to protect sites designated at the international level for reasons of biodiversity conservation and important species from harm.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the avoidance of effects on biodiversity when allocating sites for redevelopment activities.	The ISA Framework must include objectives relating to the appropriate conservation, protection and enhancement of designated sites.
Soil & Land	United Nations (2001) Stockholm Convention on Persistent Organic Pollutants.	This convention aims to reduce the production and use of persistent organic pollutants.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring that all development activities restrict the use of these pollutants.	The ISA Framework should include objectives relating to the restriction of Persistent Organic Pollutants.
Water	United Nations (1982) Convention on Law of the Sea.	This convention demonstrates the rights and responsibilities of nations for fair use of the world's oceans.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring that all development activities adhere with the conventions guidelines.	The ISA Framework should include objectives pertaining to the protection of coastal areas and the avoidance of negative effects on the sea caused by development.
Air	WHO Air Quality Guidelines, United Nations (1979) Geneva Convention on Long Range Transboundary Air Pollution.	These guidelines provide a scientific assessment of the health impacts of Air Pollution and provides guidelines applicable worldwide for various pollutants.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for acceptable levels of Air Quality and proximity of communities to developments which may cause unacceptable levels of air quality.	The ISA Framework should include objectives relating to local air quality and associated health impacts.
Climatic Factors	Kyoto Protocol to the UN Convention on Climate Change, The United Nations Framework Convention on Climate Change, United Nations (2009) The Copenhagen Accord, United Nations (2010) Cancun Adaptation Framework, United Nations (2016) Paris Agreement.	These documents provide an international framework which identifies the need for climate change mitigation and adaptation action.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the mitigation of climate change effects caused by development and meet the key requirements as outlined by the policies.	The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation within the NPTC area.
Material Assets	United Nations (1989) Basel Convention.	This convention seeks to reduce the movements of hazardous waste between nations and the amounts/toxicity of waste generated.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the reduction in toxic waste generated.	The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.
Cultural Heritage	World Cities Culture Report 2015 – measures and cultural assets, UNESCO (1972) Convention Concerning the Protection of the World Cultural and	These documents provide an international framework to identify and protect cultural heritage assets. They aim to ensure the cultural heritage assets have a function in the	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection, preservation and presentation	The ISA Framework should include objectives relating to the preservation, conservation,

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
	Natural Heritage, UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage.	community and are integrated into various planning programmes.	of cultural heritage assets as set out in international policy.	protection and enhancement of the historic environment.
Landscape	N/A			
Interrelated Effects	Johannesburg Declaration on Sustainable Development, Communication COM (2005) 666: Taking Sustainable use of resources forward, United Nations (1992) The Rio Declaration on Environment and Development, United Nations (2002) The World Summit on Sustainable Development.	Commits the sustainable use of resources and promotes sustainable development.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable development.	The ISA Framework should include guidance for achieving sustainable development goals.
European: As a result of Brexit on 31/12/20 all relevant European law has now been incorporated into domestic UK law. Limited European legislation which remains of indirect relevance is outlined below.				
Biodiversity, Flora & Fauna	Council of Europe (1981) Convention on the Conservation of European Wildlife and Natural Habitats - The Bern Convention, EU Birds Directive (Directive 2009/147/EC/ on the conservation of wild birds), EU Habitats Directive (EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (As amended by 97/62/EC)).	These documents provide a European framework to protect sites designated at the European level for reasons of biodiversity conservation and important species from harm.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity in accordance with European legislation & policy.	The ISA Framework should include appropriate objectives to assess potential habitat loss, recreational impacts, water abstraction, pollution and disturbance effects from policies, proposals, advice and guidance contained within any replacement LDP resulting from the LDP Review.
Water	EU Water Framework Directive (Directive 2000/60/EC), EU Floods Directive (Directive 2007/60/EC), European Commission (2006) Groundwater Directive 2006/118/EC, European Commission (1991) The Urban Waste Water Directive 91/271/EEC, European Commission (1998) The Drinking Water Directive 98/83/EC, European Commission (2006) The Bathing Waters Directive 2006/7/EC, European Commission (2008) Marine Strategy Framework Directive 2008/56/EC.	These documents provide a European framework which seek to protect the quality of the water environment, including through ensuring safe levels for bathing and drinking water and by promoting sustainable urban drainage.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for mitigating flood risk, protecting the drinking water supply and the protection of the community from unsafe water levels.	The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.
Climatic Factors	EU (2009) Renewable Energy Directive (2009/28/EC), A Resource Efficient Europe, United Nations (1994), European Commission (2001) National Emissions Ceiling Directive 2001/81/EC, European Commission (2007) The Integrated Climate and Energy Package, European Commission (2012) Energy Efficiency Directive (2012/27/EU), European Commission (2014) 2030 Policy Framework for Climate and Energy.	These documents provide a European framework to respond to the global challenge of climate change. Primarily, the minimisation of future climate change through mitigation and the implementation of adaptation measures are key themes.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the avoidance of contributing factors of climate change.	The ISA Framework should include objectives for the reduction of negative environmental effects from local development.
National (UK) - all legislative and policy frameworks are informed by relevant higher level European and international frameworks				
Population (including relevant socio-economic issues)	The Enterprise and Regulatory Reform Act 2013, The Plan for Growth (BIS, 2011), Equality Act 2010, Local Growth: Realising every Place's potential (BIS, 2010), HM Government (2013) Aviation Policy Framework.	These documents provide a framework at the UK level to promote strong, sustainable and balanced growth across all economies. They aim to encourage investment and create an equal opportunity environment.	Any replacement RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable growth within the NPTC area for the benefit of its resident population.	The ISA Framework should include guidelines pertaining to achieving economic growth as designated by national policy.
Human Health	The Marmot Review, The Health and Social Care Act (2012), Child Obesity Plan (2016), Health Protection Agency (2007) Children's Environment and Health Action Plan, Health Protection Agency (2008) Health Effects of Climate Change in the UK 2008 - An update of the department of Health report 2001/2002, Health Protection Agency (2009) Health Strategy for the United Kingdom 2, Health	These documents provide a framework at the UK level to reduce health inequalities and make improvements to public health while promoting active lifestyles.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for access to good quality health services as set out in International and European legislation.	The ISA Framework should include objectives relating to tackling health issues and creating adequate health and safety guidelines.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
	and Safety Executive (2009) The Health and Safety of Great Britain: Be Part of the Solution, Sustainable Development Commission (2010) Sustainable Development: The Key to Tackling Health Inequalities.			
Biodiversity, Flora & Fauna	The UK Post 2010 Biodiversity Framework (JNCC, 2012), The Protection of Badgers Act 1992, The Natural Environment White Paper (DEFRA, 2012), Natural Environment and Rural Communities Act (2006), The Conservation of Habitats and Species Regulations (The Conservation of Habitats and Species Regulations (2010) and amendments (2012)), 25 Year Environment Plan (UK Government, 2018), Defra (2007) Conserving Biodiversity the UK Approach 2007, Defra, Scottish Government, Welsh Assembly Government (2008) The Invasive and Non-Native Species Framework Strategy for Great Britain, HM Government (1981) Wildlife and Countryside Act, HM Government (1990) Environmental Protection Act, HM Government (2010) Conservation of Habitats & Species Regulations 2010 (as amended 2011), HM Government (2010) Environmental Permitting (England and Wales) Regulations, Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework, Strategic Plan for Biodiversity 2011-2020 (2010), UK National Ecosystem Assessment (2011) UK National Ecosystem Assessment: Understanding Nature's Value to Society.	These documents provide a framework at the UK level to provide protection for protected species and habitats.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for protection of protected habitats and species, including any special protection areas.	The ISA Framework should include objectives relating to national policy on the protection of Biodiversity, flora and fauna.
Soil & Land	Guiding Principles for Land Contamination, HM Government (1986) Agriculture Act (with numerous revisions) 1986.	These documents provide a framework at the UK level to identify and remediate contaminated land, as well as regarding the management of agricultural land.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of agricultural assets and land contamination policies.	The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.
Water	The Pitt Review: Learning Lessons from the 2007 Floods (2008), Flood and Water Management Act (2010), Defra (2005) Safeguarding Sea Life, Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries, Defra (2009) Our Seas – a Shared Resource: High Level Marine Objectives, Defra (2010) Adapting to Coastal Change: Developing a Policy Framework, Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status, DECC (2010) Marine Energy Action Plan, Department for Transport (2007) Ports Policy Review Interim Report, Department for Transport (2011) National Policy Statement for Ports, Environment Agency (2005) Cleaner Coasts, Healthier Seas: EA Marine Strategy, Environment Agency (2013) Groundwater Protection Policy and Practice (GP3), HM Government (1973) The Protection of Wrecks Act	These documents provide a framework at the UK level regarding flood risk management and the protection of water and coastal environments.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to coastal preservation and management and flood risk within the NPTC area.	The ISA Framework should include objectives relating to marine guidelines for cleaner oceans and provide flood risk mitigation.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
	1973, HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010), HM Government (2009) Flood Risk Regulations, HM Government (2009) The Marine and Coastal Access Act, HM Government (2010) Marine Strategy Framework Directive - putting in place the legal framework for implementation, HMG, NI Executive, Scottish Government, Welsh Assembly Government (2011) UK Marine Policy Statement, Inshore Fisheries and Conservation Authorities Bylaws (various), Natural England and JNCC (2011) Marine Conservation Zone (MCZ) Project, NERC (2010) Marine Environmental Mapping Programme (MAREMAP), UK Marine Monitoring and Assessment Strategy (2010) Charting Progress 2: The State of UK Seas.			
Air	The Air Quality Standards Regulations (2010) as amended, Air Quality Strategy for England, Scotland, Wales and Northern Ireland, UK's Air Quality Action Plan (Defra, revised January 2016), The Environment Act (1995), Defra (2010) Air Pollution: Action in a Changing Climate, Defra (2011) Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO ₂) in the UK: List of UK and National Measures.	These documents provide a framework at the UK level to implement objectives for the reduction of air pollution.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to the preservation of acceptable levels of air quality during local development in the NPTC area.	The ISA Framework should include objectives pertaining to the protection and enhancement of local air quality and the minimisation of air pollution.
Climatic Factors	The Carbon Plan (DECC, 2011), Committee on Climate Change (2008) Building a Low-Carbon Economy - the UK's Contribution to Tackling Climate, DECC (2009) UK Ports for the Offshore Wind Industry: Time to Act, DECC (2011) Carbon Plan: Delivering our Low Carbon Future., DECC (2009) Framework for the Development of Clean Coal, DECC (2011) National Policy Statements for Energy Infrastructure, DECC (2011) UK Renewable Energy Roadmap, DECC (2014) UK National Energy Efficiency Action Plan, Environment Agency (2010) Managing the Environment in a Changing Climate, HM Government (1998) Petroleum Act, HM Government (2006) The Stern Review: The Economics of Climate Change, HM Government (2008) Climate Change Act 2008, HM Government (2008) The Energy Act, HM Government (2015) Ozone-Depleting Substances Regulations 2015, HM Government (2017) UK Climate Change Risk Assessment.	These documents provide a framework at the UK level regarding the need to mitigate and adapt to climate change. In particular, the Climate Change Act 2008 sets a legally binding target of reducing the UK's GHG emissions by 80% by 2050 compared with 1990 and requires a programme of rolling carbon budgets to be set to achieve this.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible.	The ISA Framework should include objectives relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation.
Material Assets	The National Infrastructure Plan (2011), HM Treasury (2014) National Infrastructure Plan, Reducing and Managing Waste Policy (DEFRA, 2013, Waste Incineration (England and Wales) Regulations 2002, The Environmental Permitting (England and Wales) (Amendment) Regulations	These documents provide a framework at the UK level regarding infrastructure development, environmental permitting, waste management and energy generation.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the efficient use of material assets, the deployment of renewable and low carbon energy generation sources and sustainable waste management within the NPTC area.	The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.

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	2016, The Waste Electronic Equipment (Amendment) Regulations SI 2010/1155 amending The Waste Electrical and Electronic Equipment (WEEE) (Waste Management Licensing) (England and Wales) Regulations 2006, The Hazardous Waste Regulations 2005 (England and Wales), The Waste Regulations 2011 (England and Wales), Landfill Regulations 2002 (England and Wales, amended 2005), Waste and Emissions Trading Act 2003 (Amended), National Planning Policy for Waste (DCLG, 2014), Meeting the Energy Challenge: A White Paper on Energy (DECC, 2007), The UK Renewable Energy Strategy (HM Government, 2009), Defra (2012) National Policy Statement for Waste Water, HM Government (1995) Environment Act 1995.			
Cultural Heritage	Heritage Protection for the 21st Century: White Paper (DCMS, 2007), The Ancient Monuments and Archaeological Areas Act 1979, The Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979, HM Government (1996) The Treasure Act 1996.	These documents provide a framework at the UK level regarding the protection and conservation of cultural and heritage assets, including listed buildings, ancient monuments and archaeological resources.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection and promotion of cultural and heritage assets in the NPTC area.	The ISA Framework should include objectives relating to the protection, enhancement, conservation and preservation of heritage assets.
Landscape	Hedgerow Regulations 1997, Natural Environment and Rural Communities Act (2006), HM Government (1949) National Parks and Access to the Countryside Act 1949, HM Government (1967) Forestry Act 1967, HM Government (2000) Countryside and Rights of Way Act 2000, HM Government (2006) Commons Act 2006.	These documents provide a framework at the UK level regarding the protection of national parks, countryside and rural communities including rights of way and protection of forests.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of landscapes and hedgerows, including protected areas within the NPTC area.	The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts.
Interrelated Effects	The UK Sustainable Development Strategy (HM Government, 2005), National Planning Policy Framework (DCLG, 2012), Planning Practice Guidance, Defra (2011) Mainstreaming Sustainable Development, Department for Transport (2008) Delivering a Sustainable Transport System, HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (2000) Transport Act 2000, HM Government (2006) Government of Wales Act 2006, HM Government (2017) The Wales Act, Royal Town Planning Institute (2017) Digital Economy and Town Planning, Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development.	These documents provide a framework at the UK level to promote sustainable development and sustainable transport initiatives.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable development in the NPTC area.	The ISA Framework should include objectives relating to sustainable development targets.
National (Wales) - all legislative and policy frameworks are informed by relevant higher-level UK, European and international frameworks				
Population (including relevant socio-economic issues)	Well Being of Future Generations (Wales) Act 2015, Housing (Wales) Act, 2014 Growth and Competitiveness Commission (2016) Our Valleys, Our Future (July 2017), Welsh Government Future Trends Report (2017), The Strategy for Older People in Wales: Living Longer, Ageing Well (2013-2023 (Welsh Assembly Government), Social	These policies are informed by International, European and UK policies and broadly focus on progressive agendas for increasing economic growth and enhancing social wellbeing in Wales.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area.	The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner.

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	<p>Services and Well-being (Wales) Act 2014, Welsh Assembly Government (2007) One Wales – A Progressive Agenda for the Government of Wales, Welsh Assembly Government (2009) Getting On Together - a Community Cohesion Strategy for Wales, Welsh Assembly Government (2009) Improving Lives and Communities – Homes in Wales, Welsh Assembly Government (2006) Play Policy Implementation Plan, Welsh Assembly Government (2009) Farming, Food and Countryside: Building a Secure future – A New Strategy for Farming, Welsh Assembly Government (2009) Living Well Living Independent Lives, Welsh Assembly Government (2010) Economic Renewal: A New Direction, Welsh Assembly Government (2010) Food for Wales, Food from Wales 2010:2020, Welsh Assembly Government (2010) Fulfilled Lives, Supportive Communities, Welsh Assembly Government (2010) Welsh Medium Education Strategy 2010, Welsh Assembly Government (2011) Sustainable Social Services for Wales: A Framework for Action, Welsh Assembly Government (2011) Rights of Children and Young Persons (Wales) Measure 2011, Welsh Assembly Government (2013) Partnership for Growth: The Welsh Assembly Government Strategy for Tourism 2013 – 2020, Welsh Assembly Government (2013) Vibrant and Viable Places New Regeneration Framework, Welsh Assembly Government (2013) The Strategy for Older People in Wales 2013-2023, Welsh Assembly Government (2013) Framework for Action on Independent Living, Welsh Assembly Government (2014) Declaration of Rights for Older People, Welsh Assembly Government (2014) Housing (Wales) Act 2014, Welsh Assembly Government (2015) Green Growth Wales: Investing in the Future, Welsh Assembly Government (2015) Child Poverty Strategy for Wales, Welsh Assembly Government (2015) Volunteering Policy, Supporting Communities, Changing Lives, Welsh Assembly Government (2016) Strategic Equalities Plan, Welsh Assembly Government (2016) Social Services: The national outcomes framework for people who need care and support and carers who need support, Welsh Assembly Government (2016) Early Years Outcomes Framework, Welsh Assembly Government (2017) Prosperity for All :The National Strategy, Welsh Assembly Government 2015/16 Review of evidence of inequalities in Wales, Welsh Assembly Government Future Trends Report (2017), Welsh Assembly Government Population and Household Projections (2017).</p>			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
Human Health	The Active Travel (Wales) Act (2015), Children's Commissioners for Wales (2016) Annual Report 15-16, (2017) Public Health (Wales) Act 2017, NHS Wales (2011) Together for Health, Public Health Wales (2015) A Healthier, Happier and Fairer Wales, Welsh Assembly Government (2008) Designed to Add Value - a third dimension for One Wales, Welsh Assembly Government (2009) Rural Health Plan, Welsh Assembly Government (2010) Setting the Direction: Primary & Community Services Strategic Delivery Programme, Welsh Assembly Government (2006) Climbing Higher – A Strategy for Sport and Physical Activity, Welsh Assembly Government (2012) Working Differently – Working Together, Welsh Assembly Government (2012) Together for Mental Health: A Strategy for Mental Health and Wellbeing in Wales, Welsh Assembly Government (2013) A Noise Action Plan for Wales 2013-2018, Welsh Assembly Government/ NHS (2016) Measuring the health and well-being of a nation: Public Health Outcomes Framework for Wales.	These documents provide a framework at the Welsh level to improve the physical and mental health of the population.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for key health provisions and targets within the NPTC area.	The ISA Framework should include objectives relating to adequate health provisions for all communities regardless of location.
Biodiversity, Flora & Fauna	Environment (Wales) Act, 2016, (2009) Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009, Wales Biodiversity Partnership (2010) Wales Biodiversity Framework, Welsh Assembly Government (2009) Woodlands for Wales Strategy, Welsh Assembly Government (2015) The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond.	These documents provide a framework at the Welsh level to protect biodiversity interests, including designated sites and important species.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity, flora and fauna within the NPTC area.	The ISA Framework should include objectives relating to the preservation, protection and conservation efforts of biodiversity levels.
Soil & Land	Environment (Wales) Act, 2016, Joint Nature Conservation Committee (ongoing) Geological Conservation Review, Welsh Assembly (2012) Contaminated Land (Wales) (Amendment) Regulations 2012, The Nitrate Pollution Prevention (Wales) Regulations.	These documents provide a framework at the Welsh level regarding the avoidance and remediation of contaminated land and the creation of a geological profile of Wales.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for local developments which may be taking place on protected areas or contaminated land.	The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.
Water	Environment (Wales) Act, 2016, Countryside Council for Wales (now Natural Resources Wales) (2015) National Seascape Assessment for Wales, LUC, NRW, Environment Agency (2015) The Severn River Basin Management Plan, Natural Resources Wales (2015) Dee River Basin Management Plan, Natural Resources Wales (2015) Welsh Coastal Tourism Strategy (Welsh Assembly Government, 2008), Interim Marine Aggregates Dredging Policy (Welsh Assembly Government, 2007), Coastal Access Improvement Programme (Welsh Assembly Government, 2007) Making the Most of Wales' Coast: The Integrated Coastal Zone Management Strategy for Wales (Welsh Assembly Government, 2008), Wales Fisheries Strategy (Welsh Assembly Government, 2011) Strategic Policy Position on Water (Welsh Assembly Government, 2011) Marine Renewable	These documents provide a framework at the Welsh level regarding the management of coastal and river areas, marine renewable energies, surface water management and coastal tourism.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for local developments which may be affected by rising water levels, poor flood risk management or may be assisted by coastal and tourism strategies in the NPTC area.	The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.

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	Energy Strategic Framework, Welsh Assembly Government (2013) National Flood and Coastal Erosion Strategy for Wales, Welsh Assembly Government (2013) Wales Marine and Fisheries Strategic Action Plan Welsh Assembly Government (2015) The Welsh National Marine Plan, Welsh Assembly Government (2019) Water Strategy for Wales, Welsh Assembly Government (2015) Wales Marine Evidence Report, Welsh Water (2008) Surface Water Management Strategy, Welsh Water (2014) Final Water Resources Management Plan, Welsh Regional Coastal Groups, SMP 20 Lavernock Point to St Ann's Head (South Wales), The Nitrate Pollution Prevention (Wales) Regulations.			
Air	Air Quality Standards (Wales) Regulations (2010).	This document provides a framework at the Welsh level regarding the protection and improvement of air quality in accordance with limits set within European legislative.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for appropriate levels of local air quality management within the NPTC area.	The ISA Framework should include objectives relating to air quality and air pollution controls, as well as provide acceptable air quality levels for health purposes.
Climatic Factors	Environment (Wales) Act, 2016, Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales, Re-Energising Wales Project, Welsh Assembly Government (2006) Environment Strategy for Wales, Welsh Assembly Government (2010) Climate Change Strategy for Wales, Welsh Assembly Government (2010), Capturing the Potential: A Green Jobs Strategy for Wales, Welsh Assembly Government (2010), Low Carbon Revolution – the Welsh Assembly Government Energy Policy Statement, Welsh Assembly Government (2011) Policy Statement: Preparing for a Changing Climate, Welsh Assembly Government (2011) Preparing Wales for Climate Change: Adaptation Delivery Plan, Welsh Assembly Government (2012) Energy Wales: A Low Carbon Transition, Welsh Assembly Government (2014) Energy Wales: A Low Carbon Transition Delivery Plan, Welsh Assembly Government (2016) Environment (Wales) Act 2016.	These documents provide a framework at the Welsh level to respond to the need to mitigation and adapt to climate change. The framework focuses on seeking to decarbonise key economic sectors, encouraging low carbon energy generation and enhancing the reliance of the natural environment.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible.	The ISA Framework should include objectives relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation within the NPTC area.
Material Assets	HM Government (2010) Waste (Wales) Measure 2010, Natural Resources Wales (2015) LIFE Natura 2000 Programme for Wales Natural Resources Wales (2016) State of Natural Resources Report (SoNaRR), Sustainable Development Commission (2009) Low Carbon Wales, Welsh Assembly Government (2008) One Wales: Connecting the Nation, Welsh Assembly Government (2008) Wales Transport Strategy, Welsh Assembly Government (2010) Towards Zero Waste One Wales: One Planet. The Overarching Waste Strategy Document for Wales, Welsh Assembly Government (2012) Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in	These documents provide a framework at the Welsh level regarding the protection of natural resources, infrastructure development strategies and investment plans, and transport strategies and policies.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the enhancement and protection of material assets within the NPTC area.	The ISA Framework should include objectives relating to waste regulations, protection of natural resources, resource management and green growth.

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	Wales, Welsh Assembly Government (2012) Wales Infrastructure Investment Plan, Welsh Assembly Government (2013) Active Travel (Wales) Act, Welsh Assembly Government (2015) Green Growth Wales: Local Energy, Welsh Assembly Government (2016) Active Travel Action Plan for Wales, Welsh Assembly Government (2016) Energy Efficiency in Wales: A Strategy for the Next 10 years 2016-2026, Welsh Assembly Government (2017) Natural Resources Policy, Active Travel Act (Wales) 2013.			
Cultural Heritage	Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Valuing the Welsh Historic Environment Welsh Assembly Government (2010), Welsh Language (Wales) Measure 2011, Cymraeg 2050 A million Welsh speakers, Welsh Assembly Government, Welsh Assembly Government (2017), Light Springs through the Dark: A vision for culture in Wales (2016).	These documents provide a framework at the Welsh level regarding the protection of cultural heritage; including heritage assets and the use of the Welsh language.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection, preservation and presentation of cultural heritage and where possible, the inclusion of the Welsh language wherever relevant in the NPTC area.	The ISA Framework should include objections relating to the protection of cultural heritage assets.
Landscape	Environment (Wales) Act 2016, Countryside Council for Wales (now Natural Resources Wales) (2001) Register of Landscapes of Historic Interest, Natural Resources Wales (ongoing) LANDMAP Programme.	These documents provide a framework at the Welsh level regarding the protection and mapping of natural resources, protected and important landscapes of historic interest.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the preservation of protected landscapes and natural resources within the NPTC area.	The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts.
Interrelated Effects	Environment (Wales) Act, 2016, Historic Environment (Wales) Act 2016, (2015) Planning (Wales) Act 2015, Welsh Assembly Government (2008) People, Places, Future Wales 2040: The National Plan NDF (2021), Welsh Assembly Government (2009) One Wales: One Planet, A New Sustainable Development Scheme for Wales (2018), Welsh Government Future Trends Report (2017), Welsh Assembly Government (2011) Rural Development Plan for Wales (2014-2020), Welsh Assembly Government (2012) City Regions Final Report, Welsh Assembly Government (2016) Planning Policy Wales – Edition 11, Welsh Assembly Government (2016) Welsh Assembly Government Programme for government, Taking Wales Forward 2016-2021, Welsh Assembly Government: Wales We Want National Conversation, Reforming Local Government: Resilient and Renewed – Welsh Assembly Government Whitepaper (Jan 2017).	These documents provide a framework at the Welsh level regarding sustainable urban and rural development, city regional development and spatial planning.	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for adhering to sustainable development guidelines where possible within the NPTC area.	The ISA Framework should include objectives relating to sustainable development targets.
Regional (Proposed SDP Level)				
Interrelated effects	Swansea Bay City Deal (2017), Emerging Strategic South West Wales Strategic Development Plan, Regional Technical Statement (RTS) 2nd Review (2020) Natural Resources Wales - South West Wales Area Statement 2020.	The Swansea Bay City Deal is a £1.3bn investment in 11 major projects across the Swansea Bay City Region across Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea. The City Deal is being funded, subject to the approval of project business cases, by the UK Government, the Welsh Government, the public sector and the private sector.	The preparation of any RLDP will need to be closely aligned with the preparation of the South West Wales SDP and the South Wales Regional Aggregate Working Parties RTS to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues.	A separate SA/SEA process will need to be undertaken for the emerging South West Wales SDP once the lead Responsible Authority for the preparation of this plan has been determined. As with this LDP Review, SA/SEA Scoping will be needed to set an assessment framework prior to the development of substantive SPD components.

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		<p>The Swansea Bay City Deal is a £1.3 billion investment programme which aims to boost the regional economy by £1.8bn and generate up to 10,000 jobs. It is being led by the four regional local authorities: Carmarthenshire Council, Swansea Council, Neath Port Talbot Council and Pembrokeshire Council - together with the Abertawe Bro Morgannwg and Hywel DDA University Health Boards, Swansea University, the University of Wales Trinity Saint David, and private sector partners.</p> <p>It has focuses on four themes:</p> <ol style="list-style-type: none"> 1. Internet of Economic Acceleration; 2. Internet of Life Science & Wellbeing; 3. Internet of Energy; and, 4. Smart Manufacturing; <p>At the time of writing, local planning authorities have been invited to consider the development of Strategic Development Plans in addition to their own LDP reviews currently being undertaken. 4 SPDs are proposed to cover North Wales, Mid Wales, South East Wales and South West Wales.</p> <p>Under the provisions set out in Mineral Technical Advice Note 1 (MTAN1): Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) must prepare an RTS setting out how demand for aggregates will be met in the region across a 15-year period. The RTS assesses the supply and demand of aggregates in each Mineral Planning Authority (MPA) area, setting out each MPA's contribution to meeting regional demand. The SWRAWP 2nd Review was published for consultation in August 2019, setting out the demand for primary land-won aggregates in the South Wales sub regions at 12.486 mtpa. Neath Port Talbot is part of the Swansea City- Sub-Region on which calculations are based on two 'theoretical' options (i.e. only one of two options/datasets would be used to calculate demand) These are split into Option A (historical sales) and Option B (housing requirements from each LPA).</p> <p>Based on historical sales across the South Wales region (option A), 0.611 mtpa of aggregate will be required from Neath Port Talbot to meet ongoing demand.</p> <p>Based on housing requirements outlined in the existing LDP and calculated against the demand across the South Wales region, 0.347 mtpa would be required from Neath Port Talbot would be required to meet demand across the region.</p> <p>Taking into account the differences in provision of types of aggregate across all local authorities in the South Wales</p>	<p>The preparation of any RLDP will therefore need to align with the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under-provision of aggregates.</p> <p>The South West Wales Area Statement provides a collaboratively developed identification of the key environmental challenges faced in the South West Wales Area. It identifies key thematic issues which the NPT RLDP needs to consider and build into the Review. It usefully provides a clear regional understanding of the key issues faced by NPT and its neighbours in the region and provides data sources which will be updated as the RLDP process progresses.</p>	<p>The ISA Framework proposed for use in the ISA of the LDP Review (Section 5) should be kept under review and tested for compatibility against the SA Framework for the South West SPD once this has been produced.</p> <p>The South West Wales Area Statement should inform the ISA framework and be kept under review as the ISA is developed through the RLDP process.</p>

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		<p>region, Preferred Annualised Apportionment for Neath Port Talbot has been calculated at 0.305 mtpa.</p> <p>Natural Resources Wales has produced its first Area Statements (2020). Each Area Statement outlines the key challenges facing that particular locality, what we can all do to meet those challenges, and how we can better manage our natural resources for the benefit of future generations. They will be updated regularly and improved year-on-year. Viewed together, the seven Area Statements can be seen as a collaborative response to what is known as the Natural Resources Policy, published by the Welsh Government in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales' natural resources into the future.</p> <p>NPT is located within the South West Wales Area Statement. This Area Statement identifies the key risks, opportunities and priorities that we all need to address to build the resilience of our ecosystems and support sustainable management of the natural resources. It sets out actions that NRW and its partners, will take forward to address the issues they have identified.</p> <p>The themes for South West Wales are:</p> <ul style="list-style-type: none"> ▪ Reducing health inequalities - This theme aims to examine the opportunities to address health inequalities in South West Wales by using natural resources and habitats; ▪ Ensuring sustainable land management - Ensuring our land is sustainably managed for future generations; ▪ Reversing the decline of, and enhancing, biodiversity - This theme aims to explore how we can reverse the decline of biodiversity by building resilient ecological networks; and, ▪ Cross-cutting theme: Mitigating and adapting to a changing climate – This cross-cutting theme looks at how we can adapt and respond to a changing climate. 		
Local (NPTC & Neighbouring Local Authorities) - all legislative and policy frameworks are informed by relevant higher-level Welsh, UK, European and international frameworks.				
Population (including relevant socio-economic issues)	Neath Port Talbot Strategic School Improvement Programme (NPTC, 2018). The Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Aging Well in Neath Port Talbot Plan, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, Neath Port Talbot Single Integrated Plan 2013-2023, Neath Port Talbot CBC	<p>Local policies regarding socio-economic issues broadly address the following themes:</p> <ul style="list-style-type: none"> ▪ Improving quality of life for all; ▪ Protecting and enhancing the environment; 	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance relating to the wellbeing and the prosperity for the community in the NPTC area.	The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
	<p>Corporate Plan 2019-2022, Neath Port Talbot Welsh in Education Strategic Plan [WESP] 2017 – 2020, NPTC Local Housing Strategy 2015-20, NPTC Homelessness Strategy 2018-22, Swansea Bay City Region Economic Regeneration Strategy 2013-2030, Neath Port Talbot Strategic Equality Plan 2015-2019, NPTC Local Development Strategy, Port Talbot Waterfront Enterprise Zone, Neath Port Talbot Digital Strategy (2018-2022) 'Smart & Connected', Neath Port Talbot Tourism Development Action Plan, Neath Port Talbot Destination Management Plan.</p>	<ul style="list-style-type: none"> ▪ Increasing prosperity; ▪ Delivering safer and more inclusive communities; ▪ Achieving a healthier County Borough; and, ▪ Ensure good quality housing. <p>The Neath Port Talbot Public Services Board Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing affecting residents of the NPTC area, as required under the Wellbeing of Future Generations (Wales) Act 2015.</p> <p>Informed by the Wellbeing Assessment, the Neath Port Talbot We Want (Wellbeing Plan 2018-2023) identifies policy changes and actions to improve the health and wellbeing of the population within the NPTC area:</p> <ul style="list-style-type: none"> ▪ To support children in their early years, especially children at risk of adverse childhood experiences; ▪ Create safe, confident and resilient communities, focussing on vulnerable people; ▪ Put more life into our later years - Ageing Well; ▪ Promote well-being through work and in the workplace; ▪ Valuing green infrastructure and the contribution it makes to Well-being; and, ▪ Tackling digital exclusion. <p>The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,</p> <ul style="list-style-type: none"> ▪ Develop the local economy and environment. 		
Human Health	<p>Neath Port Talbot Council's Plan for Adult Social Care 2019-2022, Neath Port Talbot Active Travel 'Existing Route Map' (ERM) and Integrated Route Map (IRM), Neath Port Talbot Health, Social Care & Wellbeing Strategy, NPTC Strategic Delivery Plan for Mental Health Services (2018), The Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Aging Well in Neath Port Talbot Plan, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017.</p>	<p>The health policies relevant to NPTC address issues encompassing social inclusion, lifestyle and health and social care.</p> <p>The Neath Port Talbot Wellbeing Assessment summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the NPTC area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board 'The Neath Port Talbot We</p>	<p>Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance relating to healthcare targets set by NPTC in their LDP area.</p>	<p>The ISA Framework should include objectives relating to tackling health issues and creating adequate health and safety guidelines.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<p>Want' (Well-Being Plan 2018-2023) provides key statistics to inform future local development plans, including:</p> <ul style="list-style-type: none"> ▪ The promotion of health lifestyles including regular exercise; ▪ Addressing poor lifestyle choices and childhood poverty; ▪ Addressing health inequalities within the NPTC area, including differences in life and health life expectancy; and, ▪ Improve access to healthcare facilities. <p>The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,</p> <ul style="list-style-type: none"> ▪ Improve the well-being of children and young people; and, ▪ Improve the well-being of all adults. 		
Biodiversity, Flora & Fauna	Neath Port Talbot Biodiversity Duty Plan (2017), Neath Port Talbot Local Biodiversity Action Plan (LBAP).	The local biodiversity action plan and duty plans aim to map/quantify biodiversity and identify its importance for the NPTC area.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect biodiversity, flora and fauna and its habitats from being destroyed by local development.	The ISA Framework should include objectives relating to conservation, protection and enhancement of biodiversity interests.
Soil & Land	N/A			
Water	NPTC Flood Risk Management Strategy.	The NPTC Flood Risk Management Strategy sets out locally significant flood risk in the NPTC area. The main aim of the strategy is to reduce the social and economic impacts on the local community as a result of flooding while also reducing the overall risk of flooding.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect, prevent and mitigate adverse impacts on flood risk levels as a result of local development.	The ISA Framework should include objectives relating to the reduction of flood risk while guiding local development decisions.
Air	NPTC Air Quality Strategy 'Airwise: Clean Air for Everyone' (2017).	This Air Quality Strategy sets out NPTC's approach to tackle air quality issues in the area now and in the future.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection of air quality and the prevention of adverse impact on local, regional and national air quality standards as a result of development, including industry.	The ISA Framework should include objectives relating to tackling air quality issues.
Climatic Factors	Neath Port Talbot Decarbonisation and Renewable Energy Strategy (2020).	The Neath Port Talbot Decarbonisation and Renewable Energy Strategy sets out the framework to achieve the Council's carbon footprint reduction aspirations. It is based around three key themes: transportation, buildings and spaces; and, influencing behaviour.	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to climate change mitigation and adaptation. In particular, the LDP Review should plan for upgraded and new infrastructure to support the decarbonisation of key economic sectors within the NPTC area. The RLDP should therefore include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations The RLDP will therefore have a key role in facilitating the implementation of this overarching corporate strategy.	The ISA Framework should include objectives relating to climate change mitigation and adaptation.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
Material Assets	<p>Joint Local Transport Plan 2015-2020, Regional Waste Plan for the South West Wales Region, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want (Well-being Plan 2018 – 2023).</p>	<p>The Joint Local Transport Plan sets out the transport strategy adopted by four local authorities (Carmarthenshire, Neath Port Talbot, Swansea and Pembrokeshire), replacing original individual plans. It provides a strategic outlook on road traffic reduction, road safety, public transport, parking, managing the transportation network, and cycling and walking.</p> <p>The regional waste plan policy aims to provide a land use planning framework at the regional level. Each Local Planning Authority (LPA) shall develop which service best suits their needs and manage their own waste.</p> <p>The Neath Port Talbot Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the Neath Port Talbot area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board 'The Neath Port Talbot We Want' (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:</p> <ul style="list-style-type: none"> ▪ Promotion of a wider mix of uses on sites in existing employment areas to stimulate growth; ▪ Provision of business and management skills training in NPTC; and, ▪ Address inequalities faced by people living in the Valleys. 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the reasoned provision of transport.</p>	<p>The ISA Framework should include objectives relating to the growth of material assets.</p>
Cultural Heritage	<p>Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Neath Port Talbot Council Welsh Language Promotion Strategy.</p>	<p>The Neath Port Talbot Council Welsh Language Promotion Strategy describes how NPTC will aim to raise the profile of the Welsh language and culture with its residents and employees.</p> <p>The Neath Port Talbot Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the Neath Port Talbot area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board 'The Neath Port Talbot We Want' (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:</p> <ul style="list-style-type: none"> ▪ Work to maximise the benefit of residents of NPTC from cultural, built and natural assets understanding Welsh heritage by mapping sites and buildings, promoting the use of the 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the preservation and promotion of the Welsh language and promote the economic, environmental and social wellbeing of the NPTC area.</p>	<p>The ISA Framework should include objectives relating to the preservation of cultural heritage assets.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		Welsh language; and, promote awareness of the benefits of these assets.		
Landscape	N/A			
Interrelated Effects	Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want Well-being Plan (2018 – 2023). Neath Port Talbot Single Integrated Plan 2013-2023.	As noted above, these documents identify a wide-ranging set of socio-economic and wellbeing challenges affecting residents within the NPTC area and identify wellbeing objectives and associated measures to address these.	Any RLDP resulting from this LDP must respond to the locally identified wellbeing objectives and demonstrate compliance with the Wellbeing of Future Generations (Wales) Act 2015.	The ISA Framework should include objectives relating to all aspects of health and wellbeing, including each of the wellbeing objectives defined within the Neath Port Talbot We Want (Well-being Plan 2018 – 2023).

B.3 Review of National Planning Policy Requirements

B.3.1 **Table B.2** below presents a review of Welsh national planning policies and guidance in order to identify key policy requirements which will need to be taken account of within the LDP Review. National planning policy is presently contained within Planning Policy Wales (PPW) - 11th Edition (2021), comprising of policy themes concerning well-being goals in line with the Wellbeing of Future Generations (Wales) Act 2015 and reflecting the Welsh Assembly Government strategies and policies. Future Wales 2040 was published by the Welsh Government on 24th February, setting out the 20-year plan for Wales up to 2040, identifying nationally significant developments. Key policy requirements arising from the NDF of relevance to the LDP Review are also identified in **Table B.2**.

Future Wales 2040: The National Plan National Development Framework (February 2021)

B.3.2 In September 2020, the Minister for Housing and Local Government provided a working draft Future Wales National Development Framework (NDF), including a Schedule of Changes report, setting out the changes made since consultation was undertaken on the previous draft published in 2019. The NDF was then published by the Welsh Government on 24th February 2021 alongside Planning Policy Wales 11th Edition.

B.3.3 The NDF will be reviewed and updated every five years but provides a twenty-year spatial vision for development in Wales. The NDF provides a framework to be built upon by Strategic Development Plans (SDPs) and Local Development Plans which themselves will identify the location of infrastructure and development across the country. The Future Wales 2040 NDF (February 2021) has been reviewed, with the implications described under each SEA Objective in **Table B2**.

Implications of the Covid-19 Pandemic

B.3.4 Following the onset of the Covid-19 pandemic in early 2020, the preparation of RLDPs was impacted by changes to local authority capacity and resources, the ability to host the traditional LDP consultation events and the ability to adhere to the agreed Delivery Agreement (DA). In response, the Welsh Government released a letter on 18th March 2020 requesting all Local Planning Authorities (LPAs) to reflect on their individual circumstances ,providing guidance for LPAs at different stages of RLDP preparation.

NPTC commenced work on the preparation of the LDP Review Report at the beginning of 2020, completing the 6-week public consultation period on 16th March 2020. Following formal approval from NPTC, the LDP Review Report was submitted to the Welsh Government in July 2020. The Draft DA has now been prepared and will be consulted on in tandem with this ISA Scoping Report. The Draft DA will set out the review timetable (as required to be approved by Welsh Government), the Community Involvement Scheme (CIS) and the NPTC resources which will be committed to developing the RLDP. The finalised timescales for completion of these elements will be confirmed in the final version of the DA, expected in December 2021. month.

Implications of Brexit

B.3.5 On 31st December 2020, the United Kingdom left the European Union, with implications for legislative geographies taken under review as part of the SA of the emerging Neath Port Talbot LDP. The European Union (Withdrawl) Act 2018 which provides legal continuity, enabling the transposition of directly applicable existing EU law and converting it into UK law, creating a new category of domestic law for the United Kingdom named 'Retained EU Law'. Brexit therefore has implications of the review of European legislative undertaken for this SA which has been addressed in the main policy tables.

Table B.2: Implications of Welsh National Planning Policies for NPT LDP Review

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
Approved Policy Documents				
<p>Population (including relevant socio-economic issues)</p>	<p>Planning Policy Wales Edition 11 (2021), Future Wales 2040: The National Plan National Development Framework (2021), Technical Advice Note (TAN) 2: Planning and Affordable Housing (2006), Technical Advice Note (TAN) 4: Retail and Commercial Development, Welsh Assembly Government (2010) Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities, Welsh Assembly Government (2009) Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, Welsh Assembly Government (2014) Technical Advice Note (TAN) 23: Economic Development, Technical Advice Note (TAN) 13: Tourism, Welsh Assembly Government (2013), Welsh Government Circular (005/2018): Planning for Gypsy, Traveller and Showpeople Sites (2018), Welsh Government 'Prosperity for All': the National Strategy' (2017), Welsh Government Valleys Task Force: Our Valleys, Our Future (July 2017).</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Co-ordinate development with infrastructure provision; ■ Follow the principles of sustainable development including demonstrating an appropriate consideration to the 'five ways of working' and an improvement in the delivery of all four aspects of wellbeing: social, economic, environmental and cultural; ■ Support national, regional, and local economic policies and strategies; ■ Align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car; ■ Promote the re-use of previously developed, vacant and underused land; ■ Deliver physical regeneration and employment opportunities to disadvantaged communities; ■ Guide and control economic development to facilitate regeneration initiatives and promote environmental and social sustainability; ■ Reflect work with neighbouring authorities and other relevant stakeholders to plan strategically for employment land provision; ■ Be underpinned by an up to date and appropriate evidence base to support policy choices and land allocations for economic development; ■ Set out an evidence based economic vision for the area, including a broad assessment of anticipated employment change by broad sector and land use; ■ Provide targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development; ■ Identify strategic employment sites at regional scale by agreement amongst local authorities, giving careful consideration to the attributes of strategic employment sites to ensure they provide a differentiated offer across the region; 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area.</p>	<p>The ISA Framework should include objectives relating to socio-economic issues including economic competitiveness and economic growth, employment provision, social wellbeing, housing and open space.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<ul style="list-style-type: none"> ■ Include policies relating to future development on existing employment sites to protect them from inappropriate development: – to encourage the regeneration and re-use of sites which are still suitable and needed for employment; – to control and manage the release of unwanted employment sites to other uses; ■ Seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses; ■ Propose specific locations for those necessary industries which are detrimental to amenity and may be a source of pollution; ■ Seek to promote and facilitate development that will deliver physical regeneration; ■ Prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities; ■ Concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres; ■ Include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change; ■ Include policies on the scope for new economic development in and adjoining rural settlements and identify suitable sites. In remote rural areas and smaller settlements, a criteria-based approach should be considered; ■ Include policies encouraging farm diversification and new rural development opportunities; ■ Identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites; ■ Adopt the ‘town centres first’ principle with consideration always given to an existing centre; ■ Establish a local retail hierarchy which identifies the nature, type and strategic role to be performed by retail and commercial centres; 		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<ul style="list-style-type: none"> ■ Set out measures to reinvigorate particular centres, as appropriate, including linking to centre-wide strategies, masterplans and place plans; ■ Promote vibrant, attractive and viable retail and commercial centres; ■ Identify the boundaries of retail and commercial centres contained within the hierarchy on the proposals map; ■ Allocate sites for retail and commercial centre uses where there is assessed to be a quantitative or qualitative need and where size and scale are in accord with the retail strategy. Sites should be identified using the sequential approach and, where appropriate, assessed for their impact on other centres; ■ Include a criteria-based policy against which proposals coming forward on unallocated sites can be judged; ■ Set out policies for primary and secondary areas, where appropriate; ■ Develop policies which deal flexibly with changes to existing buildings; ■ Include policies relating to future development on existing retail sites to protect them from inappropriate development and to control and manage the release of unwanted retail sites to other uses; ■ Monitor the health of retail centres to assess the effectiveness of policies; ■ Locate new commercial, retail, education, health, leisure and public service facilities within town and city centres with good access by public transport to and from the town/city and where appropriate the wider region. . LPAs should work in partnership with the private sector to identify sites which accord with the sequential approach and are in line with the LDPs retail strategy; ■ Incorporate the new sequential search methodology for identifying housing sites (PPW (2021) paras 3.41 – 3.43); ■ Planning Authorities must use their housing trajectory as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing requirements as part of LDP AMRs and for subsequent plan review. 		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<p>The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan;</p> <ul style="list-style-type: none"> ▪ Establish a strategic framework for the protection, provision and enhancement of well-designed tourism, sport, recreation and leisure facilities in the NPTC area; ▪ Protect from development playing fields and open space that has significant amenity or recreational value to local communities; ▪ Locate facilities which may generate high levels of travel demand in or close to town centres where possible; ▪ Consider the scope to use disused land and routes as parks, linear parks or greenways in urban areas; and, ▪ Encourage the multiple use of open space and facilities, where appropriate, to increase their effective use and reduce the need to provide additional facilities. 		
Human Health	<p>Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (1997) Technical Advice Note (TAN) 11: Noise, Noise and Soundscape Action Plan (2018-2023).</p>	<p>These documents require the preparation of LDPs to take into account EU limits and target values and WHO guidelines on the detrimental effects of noise on health, including:</p> <ul style="list-style-type: none"> ▪ Taking account of the ‘Agent of Change’ principle in the consideration of adverse impacts upon human health caused by air and soundscape quality affected by proposed developments; ▪ The prioritisation of active travel modes to assist in achieving the Well-being Goals; and, ▪ Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure. 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and promotion of human health within the NPTC area.</p>	<p>The ISA Framework should include objectives relating to all aspects of human health and wellbeing.</p>
Biodiversity, Flora & Fauna	<p>Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (2009) Technical Advice Note (TAN) 5: Nature Conservation and Planning, Welsh Assembly Government (1997) Technical Advice Note (TAN) 10: Tree Preservation Orders, National Natural Resources Policy (NNRP) (2017).</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ▪ Identify all international, national and local designated sites (including potential SPAs, candidate SACs and listed Ramsar sites); ▪ Provide criteria against which a development affecting the different types of designated site will be assessed, reflecting their relative significance; 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and preservation of biodiversity, flora and fauna in accordance with national planning policy.</p>	<p>The ISA Framework should include objectives relating to biodiversity conservation.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<ul style="list-style-type: none"> ■ Include locally-specific policies for the conservation and, where appropriate, enhancement of landscape and amenity; ■ Provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity; ■ Make appropriate provision for Local Nature Reserves; ■ Include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees; ■ Clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate; ■ Provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses; ■ Recognise the potential of and encourage land uses and land management practices that help to secure carbon sinks; ■ Consider the location of fragile habitats and species; and, ■ Encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses, subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value. 		
Soil & Land	Planning Policy Wales 11 th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021).	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Take account of the physical and environmental constraints on development of land, including, for example, the level of contamination and stability; ■ Ensure new development is not undertaken without an understanding of the risks, including those associated with the previous land use, mine and 	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the safeguarding and efficient use of land and soil resources.	The ISA Framework should include objectives relating to the safeguarding and efficient use of land and soil resources.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<p>landfill gas emissions, and rising groundwater from abandoned mines;</p> <ul style="list-style-type: none"> ▪ Ensure new development does not take place without appropriate remediation; ▪ Ensure consideration is given to the potential impacts which remediation of land contamination might have upon the natural and historic environments; ▪ Ensure new development is not undertaken without an understanding of the risks, including those associated with subsidence, landslips or rock falls; ▪ Ensure development does not take place without appropriate precautions; ▪ Take account of coastal / land erosion risks; ▪ Seek to restore unstable and contaminated land; ▪ Ensure that any proposals for opencast, deep mine development (in wholly exceptional circumstances only) clearly demonstrate why they are needed in the context of climate change emissions reductions targets and for reasons of national energy security; and, ▪ Take account of the requirement to provide a Health Impact Assessment to accompany any applications for opencast coal working. 		
Water	<p>Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021) Welsh Assembly Government (1998) Technical Advice Note (TAN) 14: Coastal Planning, Welsh Assembly Government (2004) Technical Advice Note (TAN) 15: Development and Flood Risk, Implementation of Schedule 3 to the Flood and Water Management Act 2010: the Mandatory Use of Sustainable Drainage Systems (SuDS) (2019). Welsh National Marine Plan (2019).</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ▪ Take account of the key role of flooding in strategic decision making on locations for growth and new infrastructure; ▪ Take account of the physical and environmental constraints on development of land, including flood risk; ▪ Include policies relating to PPW11 (2021) 'Water and Flood Risk objectives regarding the effects of development on water supply and wastewater management; ▪ Consider the effects of development on water supply and wastewater management, development plans and water and development management and water; and, ▪ When preparing LDPs, LPAs should consult with adjacent authorities and Natural Resources Wales and ensure that, as well as not being at risk itself, 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of water quality, water resources and the water environment.</p>	<p>The ISA Framework should include objectives relating to the protection and enhancement of water quality, water resources and the water environment.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		development does not increase the risk of flooding elsewhere;		
Air	Planning Policy Wales 11 th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021).	<p>These documents require the preparation of LDPs to consider the effects of development on air quality and recognise that air quality impacts from development proposals must be assessed, including by:</p> <ul style="list-style-type: none"> ▪ Taking account of the 'Agent of Change' principle in the consideration of adverse impacts upon human health caused by air and soundscape quality affected by proposed developments. 	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to air quality.	The ISA Framework should include objectives relating to air quality.
Climatic Factors	Planning Policy Wales 11 th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), , Welsh Government 'Prosperity for All: A Low Carbon Wales' (2019).	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ▪ Align with the need to meet Wales' international commitments to address climate change targets. ▪ Align with Wales' targets for the generation of renewable energy, namely: <ul style="list-style-type: none"> ○ For 70% of consumed electricity to be generated from renewable energy by 2030; ○ For one gigawatt of renewable energy capacity to be locally owned by 2030; and, ○ For new renewable energy projects to have at least an element of local ownership from 2020. ▪ Identify opportunities and plan positively for the implementation of District Heat Networks within Priority Areas for District Heat Networks as identified in the NDF; ▪ Align with the Welsh Governments presumption in favour of large-scale wind-energy development (including repowering) within the Pre-Assessed Areas for Wind Energy as identified in the NDF; ▪ Ensure that renewable and low carbon energy proposals are in alignment with the criteria set out in Policy 17 and 18 of the NDF; ▪ Ensure that tackling the causes and consequences of climate change is taken into account in locating new development; ▪ Consider the increased risk of physical and environmental constraints as a result of climate change; 	Any RLDP resulting from this LDP needs to respond to the climate emergency and should provide policies, proposals, advice and guidance relating to climate change mitigation and adaptation, including the need to support developments which will contribute towards meeting international and national climate change targets such as the renewable energy targets set out in the NDF.	The ISA Framework should include objectives relating to climate change mitigation and adaptation.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<ul style="list-style-type: none"> ■ Policies 16-18 of the NDF note the priority areas for the development of new renewable energy (wind and solar farms and district heating networks) sites; ■ Commit to contributing towards a reduction in carbon emitting transport modes and mitigating poor air quality; ■ Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure; ■ Direct development to settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, LDP policies must ensure that the development is designed for resilience over its whole lifetime; and, ■ Consider the effects of development on the adoption of renewable and low carbon energy. 		
Material Assets	<p>Planning Policy Wales 11th Edition (2021) Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (2007) Technical Advice Note (TAN) 18: Transport, Welsh Assembly Government (2002) Technical Advice Note (TAN) 19: Telecommunications, Welsh Assembly Government (2014) Technical Advice Note (TAN) 21: Waste, Welsh Assembly Government (2009) Minerals Technical Advice Note (MTAN) Wales 2: Coal, Welsh Assembly Government (2004) Minerals Technical Advice Note (MTAN) Wales 1: Aggregates Welsh Assembly Government (2004).</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Be consistent and integrated with the strategies and policies contained in Local Transport Plans and other relevant strategies. Any LTP proposal that directly involves the development or use of land, or has land use implications, should appear as a policy or proposal in the development plan; ■ Ensure that transport centred projects undergo an assessment in accordance with the Welsh Transport Appraisal Guidance (WeITAG); ■ LDPs must support PPW (2021) objectives (promoting active travel, supporting public transport, managing traffic and parking and planning for roads, railways, airports, ports and inland waterways); ■ Take into account the land use implications of the Welsh National Marine Plan (WNMP) (2019); ■ Set out the land use/transportation strategy, addressing accessibility and the provision of strategic and integrated transport facilities, including roads, railways and interchanges; ■ Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport; 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to infrastructure development, waste management and the sustainable use of natural resources.</p>	<p>The ISA Framework should include objectives relating to infrastructure development, waste management and the sustainable use of natural resources.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for Neath Port Talbot LDP Review	Implications for ISA
		<ul style="list-style-type: none"> ■ Ensure that development sites which are highly accessible to non-car modes are used for travel intensive uses, reallocating their use if necessary; ■ Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport; ■ In rural areas, designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development; ■ Include specific measures to promote active travel in accordance with the Active Travel (Wales) Act 2013; ■ Set out policies to promote the use of public transport including new and improved interchange facilities and, where appropriate, park and ride schemes; ■ Include appropriate traffic management policies; • identify the primary road network, including trunk roads, and separately identify the core network; ■ Identify proposals for new roads and major improvements to the primary route network and the broad policy on priorities for minor improvements; ■ Include policies and proposals relating to the development of transport infrastructure other than roads; ■ Identify, and where appropriate protect, routes required for the sustainable movement of freight; ■ Protect disused transport infrastructure, including railways, rail sidings, ports, harbours and inland waterways from development that would compromise their future transport use, where re-use is a possibility; ■ Minimise the adverse impacts of transport infrastructure projects on the natural, historic and built environment and on local communities; ■ LDPs should maximise the use of existing infrastructure and should consider how the provision of different types of infrastructure can be co-ordinated; and, ■ LDPs should identify suitable locations for sustainable waste management as well as criteria for how applications for waste management development will be determined, recognising that the most appropriate locations will be those with the best potential to contribute to a broad infrastructure framework and 		

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		<p>those with the least adverse impact on the local population. LDPs should set out policies and proposals for the location of telecommunications equipment, allocating sites for major developments and including criteria-based policies to guide telecommunications developments where sites other than those identified in the plan may be proposed.</p>		
Cultural Heritage	<p>Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (2016) Technical Advice Note (TAN) 12: Design, Welsh Assembly Government (1997) Technical Advice Note (TAN) 20: Planning and the Welsh Language, Welsh Assembly Government (2017) Technical Advice Note (TAN) 24: The Historic Environment.</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Adhere to the Welsh Language (Wales) Measure (2011) to support the preservation of the Welsh language; ■ Provide a statement about how the needs and interests of the Welsh language have been taken into account; ■ If necessary, language impact assessments may be carried out in respect of large developments not allocated in the LDP which are proposed in areas of particular sensitivity or importance for the language. Any such areas should be clearly defined in the development plan; ■ Emphasis on protecting and supporting the Welsh language in policy making and in its contribution towards achieving the Thriving Welsh language well-being goal and the wider Welsh Government target of a million Welsh language speakers by 2050; ■ Provide policies relating to the protection and preservation of world heritage sites, archaeological remains, listed buildings and conservation areas, local historic assets and historic parks and gardens; ■ Identify locally specific policies in relation to the historic environment and cover those heritage assets deemed to be important considerations from a local planning perspective; ■ Consider the risk archaeological and historic sites by housing developments; and, ■ Policies must also not be introduced which encourages discrimination between individuals based on their linguistic ability or seek to control housing occupancy on linguistic grounds. 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of the historic environment and the promotion of the Welsh language.</p>	<p>The ISA Framework should include objectives relating to the protection and enhancement of the historic environment and the promotion of the Welsh language.</p>
Landscape	<p>Planning Policy Wales 11th Edition (2021), Technical Advice Note (TAN) 7 Outdoor Advertisement Control, Future Wales 2040: The National Plan National Development Framework (2021)</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Take into account designated historic landscapes in Wales and where it is appropriate, develop locally 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of</p>	<p>The ISA Framework should include objectives relating to the protection and enhancement of designated landscapes, landscape character,</p>

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		<p>specific policies which will contribute to their conservation;</p> <ul style="list-style-type: none"> ■ Consider the physical risks to landscape as a result of housing developments; ■ Support the Welsh Governments strategic framework for the enhancement of biodiversity and the resilience of ecosystems; ■ Include areas which could be protected as ecological networks for their potential importance for adaptation to climate change, habitat restoration or creation, or which provide key ecosystems services in development planning policy; ■ Support opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being; and, ■ Cumulative action towards the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning. 	<p>designated landscapes, landscape character, landscape features and visual amenity.</p>	<p>landscape features and visual amenity.</p>
<p>Interrelated Effects</p>	<p>Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Technical Advice Note (TAN) 3: Simplified Planning Zones (Welsh Assembly Government, 1996).</p>	<p>These documents require the preparation of LDPs to:</p> <ul style="list-style-type: none"> ■ Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good; ■ Maintain and improve the vitality, attractiveness and viability of town, district, local and village centres; ■ Development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land; ■ Encourage higher density and mixed-use development near public transport nodes, or near corridors well served by public transport; ■ Foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings; 	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance to support the delivery of sustainable development.</p>	<p>The ISA Framework should provide a suite of linked objectives to support the delivery of sustainable development.</p>

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		<ul style="list-style-type: none"> ■ Locate development so that it can be well serviced by existing infrastructure (including for energy supply, waste management and water; ■ Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location; ■ Locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime; ■ Contribute to the wider efforts by the planning system to respond to the behavioural changes as a result of the Covid-19 pandemic and contribute to a sustainable recovery shaping places around a vision for healthy and resilient places; and, ■ Include strategic policies on the location of potentially polluting developments and should set out criteria by which applications for such developments will be determined, but they should not exclude provision for such projects or prohibit all applications to set them up. <p>With reference to the protection of Green Belts and Green Wedges; LDPs should:</p> <ul style="list-style-type: none"> ■ Provide opportunities for access to the open countryside; ■ Provide opportunities for outdoor sport and outdoor recreation; ■ Maintain landscape/wildlife interest; ■ Retain land for agriculture, forestry, and related purposes; ■ Improve derelict land; and, ■ Provide carbon sinks and help to mitigate the effects of urban heat islands. <p>PPW (2021) also promotes the protection of agricultural land and the re-use of brownfield land alongside further sustainability guidelines. LDPs should identify opportunities to ensure higher sustainable building standards are adopted, ensure that proposed developments are evidence based and viable and encourage</p>		

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		<p>applications which reflect key principles of climate responsive developments.</p> <p>The preparation of LDPs must ensure that:</p> <ul style="list-style-type: none"> ▪ Their housing trajectory is used as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing requirements as part of LDP AMRs and for subsequent plan review. The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan; ▪ The availability of previously developed sites and empty or underused buildings and their suitability for housing use; ▪ The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; ▪ The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; ▪ The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; ▪ The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; ▪ Proposals for new settlements should be promoted through and fully justified in the LDP; ▪ LDPs must include an authority wide target for affordable housing based in the LHMA and identify the expected contributions that policy approaches identified in the LDP will make to meeting this target; ▪ LDPs should also include site thresholds or a combination of thresholds and site-specific targets including the correct proportion of affordable housing; 		

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		<ul style="list-style-type: none"> ▪ LDPs must be supported by an assessment of the accommodation needs at Gypsy/traveller sites; ▪ Quantify the housing requirement (both market and affordable housing); ▪ Set an affordable housing target; ▪ Set out a settlement strategy; ▪ Adopt the new sequential search methodology for identifying housing sites; ▪ Include clear policy criteria against which applications for development of unallocated sites will be considered; ▪ Specify the circumstances in which previously developed sites would be deemed to perform so poorly that their use would not be favoured before that of a (particular) greenfield site; ▪ Set targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development; ▪ Include clear development management policies to guide the determination of applications, including guidance on design, access, density, off-street parking and open space provision for particular areas as appropriate; ▪ Specify mechanisms to be used to monitor the take up of housing land; ▪ Include policies for affordable housing in areas where need has been identified, including any areas where exception sites will be considered; and, ▪ Include policies to indicate where developer contributions will be expected toward infrastructure, community facilities and affordable housing. 		

Regeneration and Sustainable Development Cabinet Board

Immediately following Scrutiny Committees starting at 10am

Meeting Date	Agenda Item	Type	Contact Officer
10 September 2021	Local Air Quality Management	Information	Ceri Morris / Mark Thomas
	Rural Development Plan Update	Information	Angelina Spooner-Cleverly
	Biodiversity Duty Plan	Decision	Ceri Morris / Lana Beynon
	Placemaking Charter for Wales		Ceri Morris / Lana Beynon
	Lease of 5-6 London Road, Neath (Private)	Decision	Chris Millis / Claire Jones
	Extension of the Grant agreement for the Rapid Access Prescribing Service	Decision	Claire Jones
22 October 2021	2021/22 Quarterly Performance – Quarter 1	Monitor	Simon Brennan / Ceri Morris
	Local Development Plan (LDP) Annual Monitoring Report	Information	Ceri Morris / Catherine Rylands
	Air Quality Progress Report		Ceri Morris / Mark Thomas

3 December 2021	2021/22 Quarterly Performance – Quarter 2	Monitor	Simon Brennan / Ceri Morris
	Replacement Local Development Plan (RLDP) 2021-2036 Delivery Agreement – Submission Version	Decision	Ceri Morris / Lana Beynon/ Anjuli Davies
	Active Travel – Post Consultation Report	Decision	Ceri Morris / Lana Beynon
14 January 2022			
4 March 2022	2021/22 Quarterly Performance – Quarter 3	Monitor	Simon Brennan / Ceri Morris
PRE ELECTION PERIOD STARTS MID MARCH			
8 April 2022			