



# Neath Port Talbot Replacement Local Development Plan Review

**Non-Technical Summary - Integrated Sustainability Appraisal of Replacement  
Local Development Plan Pre-Deposit Document (RLDP Preferred Strategy)**

On behalf of **Neath Port Talbot Council**



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Neath Port Talbot Council

Project Ref: 332010068 | Rev: 1 | Date: October 2024

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## Document Control Sheet

**Project Name:** Neath Port Talbot LDP Review

**Project Ref:** 332010068

**Report Title:** Non-Technical Summary - ISA of Replacement Local Development Plan Pre-Deposit Document

**Doc Ref:** v1.0

**Date:** December 2024

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Revision	Date	Description	Prepared	Reviewed	Approved

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<b>List of Abbreviations</b>	
AMR	Annual Monitoring Report
DPM	Development Plans Manuals
EqIA	Equalities Impact Assessment
EIA	Environmental Impact Assessment
ER	Environmental Report
EU	European Union
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
ISA	Integrated Sustainability Appraisal
LA	Local Authority
LDP	Local Development Plan
LPA	Local Planning Authority
LSE	Likely significant effect
NGA	National Growth Area
NNR	National Nature Reserve
NPTCBC	Neath Port Talbot County Borough Council'
NPTC	Neath Port Talbot Council
NRW	Natural Resources Wales
NPTPSB	NPT Public Service Board
PCPA	Planning and Compulsory Purchase Act
PPW	Planning Policy Wales
PWA	The Planning (Wales) Act

<b>List of Abbreviations</b>	
REN	Resilient ecological networks
RGA	Regional Growth Areas
RLDP	Replacement Local Development Plan
RR	Review Report
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SBCD	Swansea Bay City Deal
SEA	Strategic Environmental Assessment
SDP	Strategic Development Plan
SoNaRR	Second State of Natural Resources Report
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SSA	Strategic Search Areas
SSSI	Sites of Special Scientific Interest
TAN	Technical advice notes
TAN 20	Technical Advice Note 20: Planning and the Welsh Language
WBFGA	Wellbeing of Future Generations (Wales) Act
WFG	Wellbeing of Future Generations
WLIA	Welsh Language Impact Assessment
WG	Welsh Government

# 1 Introduction

## 1.1 Background

- 1.1.1 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 Neath Port Talbot Council (NPTC) area. Statutory requirements relating to the preparation of (Local Development Plans) LDPs are therefore now applicable to the LDP Review, including in respect of SA and SEA.
- 1.1.2 NPTC started work on its Replacement Local Development Plan (RLDP) in 2021. Preliminary findings from the 2022 'Call for Sites', alongside information obtained from the Annual Monitoring Reports, and growth projections indicates that there was a requirement for additional housing land to be identified and existing infrastructure and viability matters that require more time to overcome.
- 1.1.3 Given this, the Council decided to stop the preparation of the RLDP, and to start the process again. A Draft Delivery Agreement (DA) was approved by Council on the 4<sup>th</sup> October 2023, and following consultation was submitted to the Welsh Government (WG).
- 1.1.4 The DA was subsequently approved by WG on the 26<sup>th</sup> October 2023, and allows NPT Council to formally commence preparation of the RLDP. The DA sets out a 3.5-year process to anticipated adoption of an RLDP in April 2027, with a plan end date of 2038.
- 1.1.5 Under Section 62(6) of the Planning and Compulsory Purchase Act 2004 (2004 Act), emerging LDPs need to be subject to Sustainability Appraisal (SA), 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.
- 1.1.6 The SA presently required for the LDP Review will need to build upon the SA, incorporating SEA, prepared for the NPT 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).
- 1.1.7 When undertaking a SA, the WG asks LPAs to consider the value and opportunities for an integrated assessment approach to preparing an LDP. Paragraph 4.5 of the DPM Edition 3 (2020) considers that "The integration of statutory and key elements such as Wellbeing of Future Generations (Wales) Act (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.

## 1.2 The NPT LDP Preferred Strategy

- 1.2.1 In accordance with statutory requirements, the NPT LDP Preferred Strategy is being published to inform the emerging NPT RLDP ('the emerging RLDP'). The RLDP Preferred Strategy sets out a proposed strategic framework to underpin the emerging RLDP, comprising an Vision, Strategic Objectives and Growth Strategy, supported by proposed Key Sites and Strategic Policies. These strategic elements will be subject to further development to take account of the findings of this SA and all representations submitted in respect of the NPT LDP Pre-Deposit Documents, with the final proposed content of the emerging RLDP confirmed within the NPT LDP Deposit Documents (expected Autumn 2025).

## 2 Overview of the NPT LDP Review

2.1.1 NPTC is the unitary authority responsible for local government across a 442km<sup>2</sup> area of South Wales, as shown in **Figure NTS-2.1**. NPTC is located within the South West Wales Region (as identified within Future Wales: The National Plan 2040 framework 'Future Wales') alongside the Local Authority (LA) areas of Carmarthenshire, Pembrokeshire and Swansea. The neighbouring authorities are Swansea, Bridgend, Rhondda Cynon Taff, Powys and Carmarthenshire.

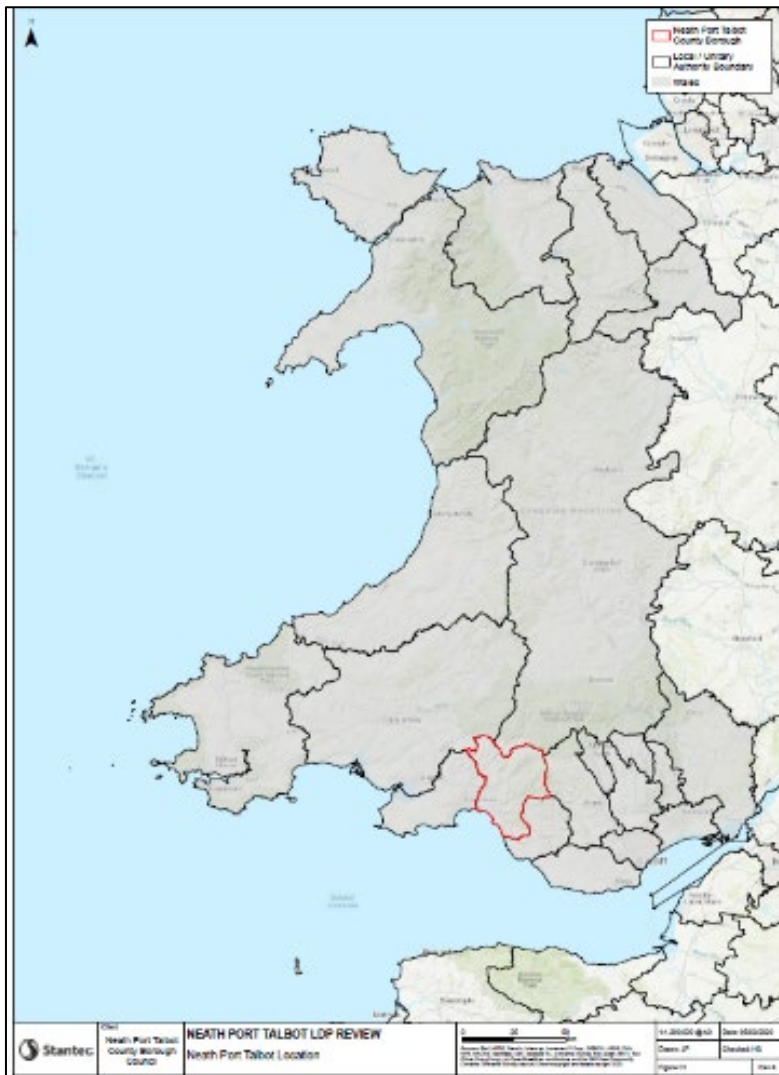


Figure NTS-2.1 NPT Council Boundary

## **3 Environmental and Policy Context**

### **3.1 Key Sustainability Issues**

- 3.1.1 A summary of the key sustainability issues which need to be considered within the emerging RLDP and the associated SA is provided in **Table NTS 2.1** below. Both the emerging RLDP and this SA are focused towards addressing these sustainability issues.



**Table NTS-3.1:** Key Sustainability Issues relating to the NPT 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 NPT 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 NPT.</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 landscape and biodiversity connections between designated sites and habitats, both locally and at a landscape scale (i.e. within NPT and to those in neighbouring authorities).</p> <p>The need to protect and enhance ecosystem resilience and safeguard resilient ecological networks (RENs).</p> <p>The need to fully consider the implications of the nature emergency. 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 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 WBFGA 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. 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>

SEA Topic	Key Sustainability Issues
	<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 NPT 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 NPT residents.</p> <p>The need to support the aims of the South West Wales Area Statement in relation to the 'Reducing Health Inequalities' theme.</p> <p>The need to address harassment and discrimination experienced by some residents with additional requirements.</p> <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 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>

SEA Topic	Key Sustainability Issues
	<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> <p>The need to support the aims of the South West Wales Area Statement in protecting, enhancing and restoring important soil resources in relation to the 'Ensuring Sustainable Land Management theme'.</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 NPT and to the River Neath and River Afan which flow into Swansea Bay. It also requires the protection, maintenance and enhancement of drainage infrastructure. This includes the consideration of opportunities for integrated water catchment management as set out in the Swansea Bay 'Opportunity Catchment Areas' described in the third cycle River Basin Management Plans (RBMP) (2021-2027).</p> <p>The need to address impacts on water quality across the borough caused by point source pollution as a result of NPT'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> <p>The need to address the poor air quality that resulted in the announcement of a public health crisis declared by Public Health Wales, particularly with regard to ammonia.</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 NPT.</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 NPT.</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 WG in April 2019.</p> <p>The need to support the aims of the South West Wales Area Statement in mitigating and adapting to climate change in relation to the aims of the 'Mitigating and Adapting to a Changing Climate' theme.</p> <p>The need to mitigate and address the nature emergency declared by the WG in June 2021.</p> <p>The need to support the aims of Shoreline Management Plans (SMPs) in addressing coastal erosion.</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>

SEA Topic	Key Sustainability Issues
	<p>The need to understand the impacts on natural resources due to footprint of development.</p> <p>The need to identify opportunities for action to create healthy places for people as set out in the DISRUPT framework in the Second State of Natural Resources Report (SoNaRR 2020).</p>
Cultural Heritage	<p>The need to preserve, protect and enhance historic assets and their settings within NPT.</p> <p>The need to safeguard and support growth in the use of the Welsh language.</p>
Landscape	<p>The need to protect and enhance landscape character, townscape character, key views, and visual amenity. This extends to the protection of landscapes in the parts of NPT within the Bannau Brycheiniog National Park and in other neighbouring authorities, as well as seascape character including heritage coasts and marine character areas.</p> <p>The need to protect tranquillity and address light pollution issues as set out in the Technical advice Note (TAN) 11: Noise and TAN 12: Design</p>
Inter-related effects	<p>The need to deliver holistic improvements to wellbeing and to contribute to the delivery of sustainable development across NPT, 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>

3.1.2 The key sustainability issues listed in **Table NTS-3.1** are evidenced within relevant Background and Topic Papers prepared for the LDP Review and reflected in the substantive proposals set out within the RLDP Preferred Strategy. In overall terms, this helps to ensure that the direction of travel for the emerging RLDP responds to key sustainability issues as identified through the SA process. However, it is still necessary to examine each emerging substantive component of the emerging RLDP individually and in combination to determine their likely significant effects and to what extent they contribute to the achievement of sustainable development.

### **3.2 Relationship between the LDP Review and Other Relevant Plans and Programmes**

3.2.1 The following types of plans and programmes were examined for their relevance to the LDP Review and the ISA:

- International conventions and treaties;
- European Directives and associated legislation;
- Legislation enacted by the UK Parliament and the WG; and,
- Policy documents and strategies published at the national, regional and local levels, including by the UK Government, the WG (and its agencies), NPTC and the NPT Public Service Board (NPTPSB).

3.2.2 A detailed review of the other plans and programmes identified as relevant to the LDP Review is provided in **Appendix B of the ISA Report**. From this review, it is clear that the RLDP should:

- Align with relevant national planning policy requirements as set out within PPW – 12<sup>th</sup> Edition (February 2024).
- 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 (NGA);
- Align with Future 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 NPT, 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 WBFGA, 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 NPT Well-being Plan 2023 – 2028.
- Secure sustainable economic growth and inward investment across NPT 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 NPT 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 NPT, 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 NPT 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 NPT;
- Ensure there are no significant negative impacts on internationally and nationally designated nature sites (refer to separate HRA 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.

### **3.3 Evolution of Baseline Conditions in the Absence of the LDP Review**

- 3.3.1 NPTC has determined that a review of the existing LDP (2011-2026, adopted January 2016) is needed to allow NPTC to prepare and adopt a RLDP prior to the end of the current LDP period. The NPT 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.

- 3.3.2 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 December 2026. The timetable in the draft DA (October 2023) has adoption of the RLDP scheduled for April 2027, which would leave a period of several months where there would be no adopted LDP in place. The NPT LDP Review Report (NPTC, 2020) references, in the absence of an up-to-date Development Plan, the potential for there to be pressure from the development industry to try and bring sites forward that are not in accordance with the existing LDP's economic regeneration-led strategy. At present, there is limited demand for house building in NPT, with housing targets not being achieved, therefore, it is not anticipated that in the short period that the Council would be without an adopted Development Plan there would be significant pressure for development, however, there is a potential risk that there could be pressure to release greenfield sites in unsustainable locations. Whilst this demand could be limited, if it did occur, it could result in a range of unacceptable adverse effects on the environmental topics prescribed within Schedule 2 of the SEA Regulation.



## 4 The Sustainability Appraisal Process

### 4.1 SA Project Team

- 4.1.1 The SA of the emerging RLDP is being undertaken independently by Stantec UK on behalf of NPTC.
- 4.1.2 The independence of the consultant team involved in carrying out this SA helps to ensure the objectivity of the SA and to identify components requiring improvement throughout its development. This allows independent mitigation and enhancement recommendations to be developed and implemented as the emerging RLDP evolves in order to improve its effectiveness.

### 4.2 Previous SA and SEA Reporting

- 4.2.1 In September 2023 an ISA Scoping Report, incorporating SEA screening, was consulted on with the SEA Consultation Bodies.
- 4.2.2 The dual purpose of the ISA Scoping Report was to provide relevant information to enable the SEA Consultation Bodies to consider the need for SEA and to form a view on the consultation period and scope/level of detail appropriate for ISA Report(s) to accompany each substantive component of the emerging RLDP. A key objective of the ISA Scoping Report was to identify an evidence-based SA Framework to assess in a systematic way the likely sustainability effects from substantive components of the emerging RLDP. The SA Framework comprises:
- The proposed ISA Objectives (see **Table C1 of Appendix C in ISA Report**);
  - A suite of relevant Guide Questions relating to each ISA Objective (**Table C2 of Appendix C2 in ISA Report**). 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. These are detailed in **Table C2 and C3 of Appendix C in ISA Report**.

### 4.3 Informal Consultation on Key Issues, Vision, Objectives, Growth and Spatial options

- 4.3.1 As part of the evidence base for the RLDP, NPTC held an informal consultation on the Key issues, Vision, Objectives, Growth and Spatial Options from 14<sup>th</sup> May 2024 to 5<sup>th</sup> June 2024.
- 4.3.2 Comments received during this informal consultation have helped to inform the RLDP's Preferred Strategy.

### 4.4 Engagement with SEA Consultation Bodies

- 4.4.1 Statutory consultees (Natural Resources Wales and Cadw) were consulted on the Draft (Amended) Integrated Sustainability Assessment Scoping Report (ISASR) for a five-week period between 19<sup>th</sup> September 2023 and 24<sup>th</sup> October 2023. No responses were received from the statutory consultees during the consultation period.

## 4.5 Preparation of this ISA Report

4.5.1 Building upon previous ISA reporting, the ISA Report has been prepared to accompany the LDP Pre-Deposit Documents, i.e. the LDP Preferred Strategy and associated Background Papers. This ISA Report presents the findings of an appraisal carried out to identify, assess and evaluate the LSEs of the substantive proposals contained within the LDP Preferred Strategy. In doing so, each substantive component or proposal, together with any identified reasonable alternatives (see below), have been subject to assessment against the 13 SA Objectives defined within the finalised NPT LDP Review ISA Framework (**Appendix C of ISA Report**). The findings of this SA are documented in this report.

### Consideration of Reasonable Alternatives

4.5.2 The SEA Regulations require the LSEs of implementing 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 SA process (incorporating SEA), 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.
- 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 NPT area.

4.5.3 Reflecting the content of the LDP Preferred Strategy, reasonable alternatives at this point could be in respect of strategic framework elements (Vision, Objectives or Growth and Spatial Strategy) or strategic implementation mechanisms (Key Strategic Sites and Strategic Policies):

- **Vision and Objectives:** as reasonable alternatives must relate to the objectives of the plan under consideration, no reasonable alternatives to the proposed LDP Vision or Objectives contained within the Preferred Strategy could be identified, as any alternatives would change the strategic direction of the emerging RLDP. However, recommendations to further improve the effectiveness of these components have been identified and proposed.
- **Growth and Spatial Strategy:** The options, which can be considered as reasonable alternatives, were subject to informal consultation as reported in the Growth and Spatial Options Background paper, accompanying the Preferred Strategy. In accordance with Regulations 12.3(d) of the SEA Regulations, these reasonable alternatives to the proposed strategic framework elements of the LDP Preferred Strategy do not need to be re-assessed and no new reasonable alternatives have been identified.
- **Key Sites:** Three Call for Site exercises have been undertaken by NPTC: the first in Spring 2022 which elicited 229 candidate site responses, the second in Autumn/ Winter 2023 which elicited 77 Candidate Sites, and the third, a call for urban capacity sites in Autumn/ Winter 2023 which elicited 167 sites.
- As reported in Key Sites Paper, 10 sites have been identified by NPT as Key Sites. These are sites which provide either over 250 homes, or infrastructure, or employment of a certain scale. All Candidate Sites have been filtered according to whether they are able to deliver 10 dwellings and fundamental constraints. Sites successfully filtered, and urban capacity sites, have been considered as potentially being reasonable alternatives and subject to an

equal level of site assessment using criteria aligned with the NPT LDP Review ISA Framework (**Appendix C of the ISA Report**).

- **Strategic Policies:** the rationale for the development of individual proposed strategic policies is explained fully within the LDP Preferred Strategy. In all cases, the strategic policy is considered necessary either to implement higher level statutory and national policy requirements or otherwise to address identified key sustainability issues. The identified need for each policy combined with their high-level nature and the absence of detailed implementation criteria (which will follow at LDP Deposit stage) means that at this stage it has not been possible to identify specific reasonable alternatives to the proposed strategic policies. However, as detailed in **Section 5 of the ISA Report**, a series of recommendations have been developed to improve the effectiveness and clarity of the proposed strategic policies at LDP Deposit Document stage. By definition, the implementation of these recommendations would alter the strategic policies and improve their sustainability performance.

## 5 SA Findings

### 5.1 SA of Proposed LDP Strategic Framework

- 5.1.1 The Vision, Strategic Objectives and Growth and Spatial Strategy components of the RLDP Preferred Strategy seek to provide an overarching strategic framework to underpin all other components of the emerging RLDP including policies and site allocations. As such it is vital that the RLDP Vision and Objectives include sufficient and unambiguous coverage of all key sustainability issues to allow them to be addressed in more detail through other, non-strategic components of the RLDP.

#### Vision

- 5.1.2 The RLDP Preferred Strategy sets out a Vision for the growth of NPT over the RLDP period to 2038. The vision set out the aspirations for the county borough and expectations for how change and development should be accommodated over the plan period. The plan vision should be influenced by and be aligned with other similar visions set out in other relevant plans and strategies. Visions taken into account as part of this process include the first NPT LDP Vision, the Future Wales Outcomes, and the NPT Well-being Objectives.
- 5.1.3 Future Wales and the NPT Corporate Plan and Well-being Plan all express their visions as a series of desired outcomes, and a similar approach is proposed for the RLDP, identifying a desired outcome for each of the Key Issues /topic areas, as set out below.
- 5.1.4 Full details of the process of developing the Vision, including stakeholder input, are set out in the Key Issues, Vision and Objectives Background Paper. In total, 14 RLDP draft outcomes have been identified.
- 5.1.5 During the preparation of the RLDP, SA of a draft RLDP Vision was conducted and it was considered that the RLDP Vision provided good coverage and compatibility across the sustainability topics. Some further suggestions were proposed to include placemaking issues and the support of resilient ecological networks. An amended RLDP Vision was therefore devised through the SA process and consulted in May 2024. Building upon this previous work, the LDP Preferred Strategy now sets out a fuller version of the RLDP Vision previously consulted on. The SA of the RLDP is given in Table D1 of Appendix D in ISA Report.

#### Objectives

- 5.1.6 The RLDP Objectives are intended to set out what the plan is aiming to achieve in respect of each of the topics, in order to meet the outcomes contained in the vision. The objectives are therefore aligned to both the key issues and the outcomes.
- 5.1.7 During the preparation of the RLDP, suggestions were made to draft LDP objectives.
- 5.1.8 The proposed LDP Vision is supported by a set of 14 Objectives which indicate how the vision will be achieved. As with the Key Issues and Vision, these have taken into account stakeholder engagement and full details of the development process are set out in the Key Issues, Vision and Objectives Background Paper.
- 5.1.9 A detailed assessment of the compatibility and coverage of the proposed LDP Strategic Objectives against the SA Objectives from the NPT LDP Review SA Framework (**Appendix C in the ISA Report**) is provided in **Table D1 of Appendix D in ISA report**. As with the proposed RLDP Vision, the proposed Strategic Objectives are aspirational and generally compatible with achieving beneficial sustainability outcomes. Additionally, the appraisal provided in **Table D1 of Appendix D** demonstrates that, read as a whole, the suite of proposed Strategic Objectives has good coverage of most of the SA Objectives within the NPT LDP SA Framework.

## Growth and Spatial Strategy

5.1.10 In accordance with statutory requirements, the RLDP Preferred Strategy sets out a new growth and spatial strategy for NPT ('the new strategy') over the RLDP period to 2038. This new strategy presented in the RLDP Preferred Strategy builds upon the previous development of a series of contrasting growth and spatial options (growth level options, spatial distribution options and a settlement hierarchy). Details of different growth and spatial strategies shall refer to the Growth and Spatial Options Background Paper. These options, which for the purposes of this SA (incorporating SEA) can be considered as reasonable alternatives, were all subject to informal consultation and detailed SA during plan preparation

### Growth Level

- 5.1.11 NPTC has developed a number of growth options which explore the level of housing and economic need which could arise in NPT over the 15-year plan period 2023-2038.
- 5.1.12 An Economic and Housing Growth Assessment (EHGA) has been prepared which developed options considering demographics, past trends and policy-based factors as well as the inter-relationship between housing and the local economy. The evidence uses the WG's official population and household projections along with other demographic data from the Census and Mid-year estimates as well as an economic forecast from a leading forecast house and takes into consideration a number of contextual changes including the successful Celtic Freeport bid, and the significant economic restructuring currently taking place associated with the TATA steelworks transition. Further detail on all of the growth options considered is provided within the Growth & Spatial Options background paper.
- 5.1.13 All of the growth options considered were streamlined to those considered to be realistic and deliverable options, following which, the 7 growth options were subject to informal public consultation during 14<sup>th</sup> May- 5<sup>th</sup> June 2024.
- 5.1.14 Analysis of the growth options considered is provided in the Growth and Spatial Options background paper. The SA of the growth options is presented in **Table D2** of **Appendix D** in **ISA report**.
- 5.1.15 Following the analysis, along with the ISA, informal public consultation and stakeholder engagement, **Option 3** the Adjusted Supplementary scenario is considered to be the most appropriate growth option to take forward as the preferred level of growth for the RLDP for the following reasons:
- It will promote an achievable but ambitious housing build rate considering past trends.
  - It takes into consideration the current homelessness levels in the Authority.
  - Younger, hidden households as a result of low levels of house building in recent years are taken into account by the application of a Household Membership Rate (HMR) adjustment.
  - It is reflective of the unique economic context given the Tata Steelworks transition, yet supports the ambition for economic recovery supported by the Celtic Freeport and other planned investments including Global Centre of Rail Excellence and Afan Valley Adventure Resort.

### Spatial Distribution

5.1.16 Deciding on where development should be distributed across NPTC is a key consideration for the Preferred Strategy. This is an important task as it will have a major influence on the future of our communities. It is necessary that land is released not only to meet the preferred level of growth but to also address the key issues identified above. Within the Development Plans Manual, the spatial strategy is deemed to underpin all elements of the plan.

- 5.1.17 Each spatial option considered will need to have regard to legislation, national planning policy, local and regional strategies. Furthermore, each spatial option must take account of the specific characteristics, assets and issues within NPTC and seek to guide development in the way that respond to this.
- 5.1.18 In order to ensure that the spatial strategy is deliverable, it has to meet the needs of the local communities and also be viable so that public and private sectors are able and willing to invest in the identified areas. There are some key planning policy issues that need to be considered in the formation of the spatial strategy, as they are an integral part of any strategy. These include:
- Utilising previously developed land before greenfield sites in the first instance;
  - Addressing climate change through mitigation and adaptation;
  - Promoting placemaking principles;
  - Promoting sustainable transport;
  - Promoting the Welsh Language;
  - Maximising opportunities for green infrastructure enhancement; and
  - Responding to the nature emergency through biodiversity net benefit.
- 5.1.19 Additionally, this spatial strategy must assist in the delivery of the Vision and Objectives.
- 5.1.20 In determining how growth should be distributed spatially across the authority, a number of options were considered and consulted upon. As NPTC already has an adopted LDP, the existing LDP Strategy has been assessed alongside five other alternative strategies to determine whether it remains appropriate within the current policy context.
- 5.1.21 A complete analysis of the six spatial options is contained in the Growth and Spatial Options Background Paper, where the key the advantages and disadvantages of each spatial option is considered. Each of the strategy options have also been considered as part of the ISA (**Table D3 of Appendix D in ISA report**).
- 5.1.22 Following an analysis of the options, coupled with the informal consultation event and the output of stakeholder engagement sessions, the hybrid approach, Option F (**Figure NTS-5.1**) is the most appropriate as it best aligns with the policy requirements of Future Wales, Planning Policy Wales and Llwybr Newydd- the Wales Transport Strategy.
- 5.1.23 Option F will provide the majority of growth in the Coastal Corridor and National Growth Area where there will be a co-location of jobs and homes, which will reduce commuting. The majority of development and investment will continue to follow market forces with housing, employment and commercial development focused across the Coastal Corridor and National Growth Areas. This will enable development to be located close to the main centres of population (ensuring affordable housing is targeted in the areas of greatest need) and support the facilities and services in the town centres.
- 5.1.24 Neath and Port Talbot are identified within Transport for Wales' Swansea Bay and West Wales Metro. By promoting these areas, this will be bringing forward key benefits of the Metro, the existing transport network as well as Active Travel routes, and will assist in providing residents of the Coastal Corridor and National Growth Area with different forms of travel other than the private car. In the Valleys Opportunity Area, new and existing Active Travel routes will be implemented. The use of existing infrastructure will be maximised.

5.1.25 This option also maximises the benefits that the Port, Freeport and Swansea Bay City Deal aspirations will bring on both a national and local scale. It recognises that significant economic restructuring is currently taking place following the announcement by Tata Steel in September 2023 to replace the existing two blast furnaces at Port Talbot with an electric arc furnace. It will also bring forward proposed regeneration in the Valley Opportunity Area by maximising the key heritage, tourism and employment opportunities that are coming forward. In order to supplement this, modest growth that is proportionate to the role, function and tier of the settlement, will be required in the Valley's communities. The employment strategy will encourage tourism and smaller scale enterprises to maximise the potential from tourism opportunities and to meet the needs of local communities.

5.1.26 Additionally, as part of the Valleys Opportunity Area, Pontardawe and its surrounding and Glynneath will be identified as valley hubs

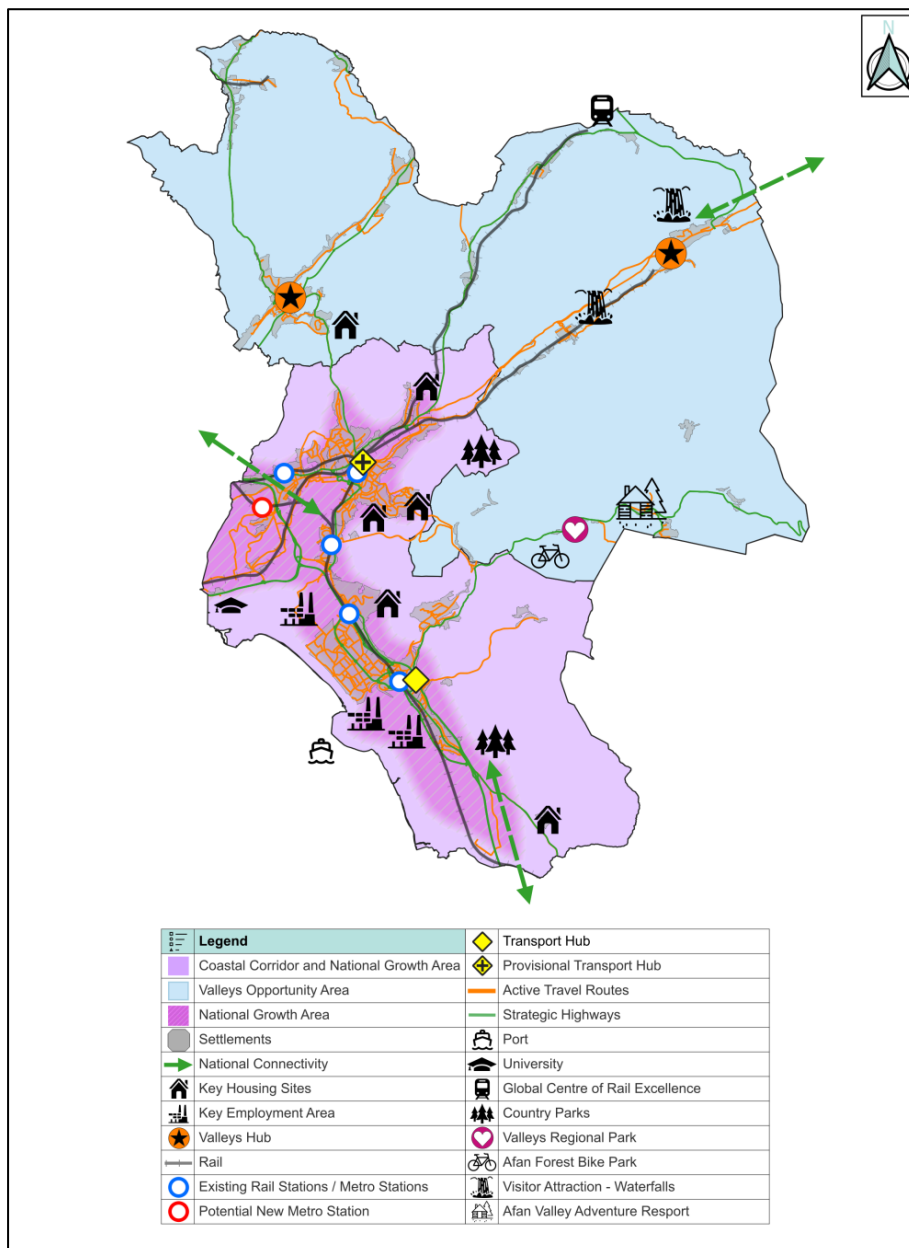


Figure NTS-5.1 Preferred Spatial Strategy (i.e Option F)

## 5.2 SA of Strategic Sites

- 5.2.1 An integrated site assessment process has been carried out by NPTC to satisfy ISA requirements (including SEA) and to select site allocations for inclusion in the RLDP. This has identified the strategic sites needed to deliver the RLDP Preferred Strategy. The methodology is summarized in Candidate Sites Assessment Methodology (Nov 2023).
- 5.2.2 The Call for Candidate Sites is the first formal stage in the preparatory stages of the RLDP following the agreement and publication of the DA. Through the Call for Candidate Sites, the Council has invited developers, landowners, site promoters, public bodies, service providers and others with an interest in land to submit sites which they wish to be considered as a potential allocation for either development or protection. The call for sites exercise was undertaken three times. A first call for sites was undertaken in Spring 2022 and elicited 229 candidate site responses; a second call for sites was undertaken in Autumn/ Winter 2023 and elicited 77 candidate sites, and a third call for urban capacity sites was undertaken in Autumn/ Winter 2023 and elicited 167 sites.
- 5.2.3 The Council has then undertaken a Stage 1 Initial Candidate Sites Assessment with the following three stage desk-based assessment of all submitted sites: (1) Site Size Filter; (2) Fundamental Constraints Filter and (3) Deliverability Filter. GIS software has been used to filter sites according to whether they have any of the fundamental constraints. If the constraint forms part of the site boundary, further consideration has been given to whether the impact of the development could be mitigated. A summary of the findings has been reported in the Candidate Sites Register published as part of the Preferred Strategy consultation.
- 5.2.4 A Stage 2 Candidate Sites Assessment has been undertaken of all filtered sites. The Stage 2 Candidate Sites Assessment involves (1) Viability appraisal; (2) ISA assessment (qualitative and quantitative) and Candidate Site Suitability assessment; and (3) Engagement with infrastructure providers. The Council has reviewed the information submitted and initially complete a high-level review of the appropriateness of the information submitted, using the agreed regional Candidate Site Financial Viability Appraisal High-Level Review. Afterwards, the Council has then undertaken detailed ISA and Candidate Site Suitability Assessment of all filtered sites. Finally, the infrastructure providers were engaged to identify infrastructure constraints. A summary of the findings is reported in the Candidate Sites Register published as part of the Preferred Strategy consultation.
- 5.2.5 Based on above assessment, 9 sites have been defined as housing and employment sites which are likely to be able to make a very good contribution towards placemaking objectives, are in line with the RLDP's vision, and help to achieve the spatial strategy. The 10 sites include:
- Coed Hirwaun
  - Land east of Rhos
  - Land adjacent to Blaenbaglan
  - Fforest Farm
  - Port Talbot Port
  - Port Talbot Steelworks
  - Baglan Energy Park
  - GCRE
  - Afan Valley Adventure Resort



### 5.3 SA of Strategic Policies

- 5.3.1 The detailed appraisal of predicted effects from the strategic policies is provided in **Appendix E of ISA Report**. The assessment has been undertaken by policy grouping, corresponding with each chapter of strategic policies contained within the RLDP Preferred Strategy. This enabled a proportionate assessment to be undertaken of each policy and of the cumulative effects of each policy grouping, focusing on the sustainability issues most relevant to the policy or policies being assessed.
- 5.3.2 In general, most strategic policies are predicted to have major positive or positive beneficial effect on the SA Objectives. None of the proposed strategic policies are predicted to have negative (i.e. adverse) effects on the SA Objectives. However, as detailed in **Appendix E** of the **ISA Report**, several strategic policies have no clear relationship or neutral effect with some SA Objectives. Uncertainties and issues have been identified which presently limit the contribution of some assessed strategic policies to the SA Objectives.

### 5.4 Assessment of Cumulative Effects and Synergistic Effects

- 5.4.1 Following from the appraisal of all individual substantive components. ISA has been conducted to identify any likely cumulative or synergistic effects as a result of interactions between the emerging RLDP components. **Table NTS-5.1 and NTS-5.2** summarize findings for the appraisal of the RLDP.
- 5.4.2 **Appendix F, G and H** of the **ISA report** summarize the proportionate Equality, Health and Welsh Language impact appraisal on the RLDP.

#### Construction Phase

**Table NTS-5.1:** ISA Summary of the Preferred Strategy for Construction Phase

ISA Topic	Likely Residual Significant Effect
1 <b>Health and Wellbeing:</b> 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.	0
2. <b>Equality and Social Inclusion:</b> Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.	+
3. <b>Transport and Communications:</b> 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. <b>Inclusive Economic Growth:</b> 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	+

ISA Topic	Likely Significant Effect	Residual Effect
5. <b>Housing:</b> Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified needs.		~
6. <b>Air Quality:</b> Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality		0
7. <b>Climate Change:</b> Adopt appropriate mitigation and adaptation measures to reduce and respond to the impacts of climate change.		-
8. <b>Biodiversity, Geodiversity and Soil:</b> Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.		0
9. <b>Water and Flood Risk:</b> Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.		0
10. <b>Material assets and Waste:</b> 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.		-
11. <b>Sustainable Placemaking:</b> Maximise the efficient use of land and infrastructure and enhance design quality to create great places for people.		~
12. <b>Cultural Heritage:</b> Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language		0
13. <b>Landscape:</b> Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area.		?

Key to Scoring:

Score	Symbol
Significant (Major) Positive Effect	++
Minor Positive Effect	+
Neutral Effect	0
Minor Negative Effect	-
Significant (Major) Negative Effect	--
Uncertain Effect	?
No Clear Relationship	~

- 5.4.3 It is anticipated that environmental pollution control and traffic mitigation measures will be implemented during construction phase. For large scale projects, environmental impact assessment and traffic impact assessment will be conducted. Adverse residual environmental and traffic impacts are not anticipated. Hence, it is considered neutral for the Health and Wellbeing objective, Air Quality objective, Biodiversity, Geodiversity and Soil Objective, Water and Flood Risk and Cultural Heritage Objective.
- 5.4.4 Construction will boost the local economy and engage construction workers. Given the transient effect of construction, minor positive benefits are considered for Inclusive Economic Growth Objective and Equality and Social Inclusion Objective.
- 5.4.5 During construction, materials will be transported to site, there will be residual waste arisings to be reused or recycled elsewhere, fuel will also be used for the operation of the construction equipment and there will be carbon embodied also in the building materials. Given the transient nature of construction, minor negative impacts are considered for Climate Change Objective and Material Asset and Waste Objective.
- 5.4.6 Depending on location, construction sites and activities will cause landscape and visual impact. Nevertheless, the impact is transient and can be reduced with mitigation measures. Hence, uncertain / not known is considered for Landscape Objective.

**Operational Phase**

**Table NTS-5.2:** ISA Summary of the Preferred Strategy for Operational Phase

ISA Topic	Likely Residual Significant Effect
1 <b>Health and Wellbeing:</b> 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. <b>Equality and Social Inclusion:</b> Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic	++

ISA Topic	Likely Significant Effect	Residual Effect
disadvantage, tackle social exclusion and promote community cohesion.		
3. <b>Transport and Communications:</b> 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. <b>Inclusive Economic Growth:</b> 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. <b>Housing:</b> Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified needs.		++
6. <b>Air Quality:</b> Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality		+
7. <b>Climate Change:</b> Adopt appropriate mitigation and adaptation measures to reduce and respond to the impacts of climate change.		+
8. <b>Biodiversity, Geodiversity and Soil:</b> Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.		+
9. <b>Water and Flood Risk:</b> Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.		+
10. <b>Material assets and Waste:</b> 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.		+
11. <b>Sustainable Placemaking:</b> Maximise the efficient use of land and infrastructure and enhance design quality to create great places for people.		++
12. <b>Cultural Heritage:</b> Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.		+
13. <b>Landscape:</b> Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area.		?

Key to Scoring:

Score	Symbol
Significant (Major) Positive Effect	++
Minor Positive Effect	+
Neutral Effect	0
Minor Negative Effect	-
Significant (Major) Negative Effect	--
Uncertain Effect	?
No Clear Relationship	~

- 5.4.7 The Preferred Strategy performs positively against the majority of ISA objectives, including. In particular against the Health and Well-being, Sustainable Placement, Equality and Social Inclusion, Inclusive Economic Growth, Transport and Communications and Housing ISA objectives with significant long-term positive effects, through :
- supporting sustainable development that embeds placemaking principles;
  - supporting sustainable transport options;
  - encouraging healthier and more active lifestyles;
  - supporting future economic development;
  - providing a planning framework that balances the delivery of new homes and jobs;
  - fostering new investment, employment opportunities;
  - providing and associated community infrastructure to meet the needs of communities.
- 5.4.8 These bring along with focusing growth at the Coastal Corridor and National Growth Area and the Valleys Opportunity Area with greater accessibility to services/ facilities and the use of sustainable transport modes (including active travel), which will have a minor positive effect in terms of Climate Change and Air Quality objectives.
- 5.4.9 The Strategy would conserve and safeguard mineral resources, reserves and infrastructure while making an appropriate and a proportionate contribution to the supply of minerals to meet local, regional and national need.
- 5.4.10 In addition, the strategy enables NPT to make an appropriate contribution to renewable and low carbon energy generation while encouraging all appropriate steps to be taken to reduce energy demand and improve efficiency across all sectors. Since the extent and local of the developments are unknown, minor positive benefit is considered for the Material Asset and Waste objectives.

- 5.4.11 The Strategy requires that the quality of the environment will be safeguarded and enhanced and potential adverse impacts of existing or anticipated environmental problems will be addressed de-risking approaches.
- 5.4.12 The Strategy also requires development to adopt the green infrastructure led approach and to achieve biodiversity net benefit. Given the extent and location of the green infrastructure are unknown, minor positive benefits were considered for Biodiversity, Geodiversity and Soil objective and Water and Flood Risk objective.
- 5.4.13 The strategy will also seek to promote and protect the heritage, including Welsh language. Given the extent and location of the heritage are unknown, minor positive benefit is considered for the Cultural Heritage objective.
- 5.4.14 Please note that there is an element of uncertainty for some ISA objectives given the strategic nature of the Preferred Strategy and that the precise location of development is not known at this stage. This is particularly the case for the ISA objectives relating to Landscape, as the nature and scale of effects will be dependent on the precise location, scale and design of development.

## **6 Next Steps**

- 6.1.1 Following consultation on the LDP Pre-Deposit Documents and associated ISA Report, all consultation responses received will be reviewed and used to inform the NPTC RLDP Deposit Document, i.e. the full proposed NPTC RLDP. This will build upon the RLDP Preferred Strategy to set out all strategic framework elements, policies and site allocations proposed for inclusion in the NPTC RLDP. The NPTC RLDP Deposit Document will be accompanied by an updated an expanded ISA Report, with both documents expected to be consulted on in tandem in December 2025. Following a subsequent Examination in Public, NPTC then intends to adopt the finalised NPTC RLDP.