

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	Lana Beynon	Planning Policy Manager	16.10.2024

1. Details of the initiative

	Title of the Initiative: Neath Port Talbot Replacement Local Development Plan (RLDP) (2023-2038): Preferred Strategy Consultation
1a	Service Area: Neath Port Talbot Council
1b	Directorate: Environment and Regeneration
1c	Summary of the initiative: The purpose of the Report is to consider and agree the RLDP Preferred Strategy (2023-2038) (December 2024) together with the Interim Integrated Sustainability Appraisal Report (ISA) (December 2024), Habitats Regulations Assessment (HRA) Screening Report (December 2024) and Candidate Sites Register (CSR) and Assessments (December 2024), for the purpose of statutory public consultation. The Neath Port Talbot Council (NPTC) has a statutory requirement to produce a Local Development Plan (LDP) for the County Borough. The NPTC existing LDP sets out the scale and location of development in the county borough over the period of 2011-2026. NPTC's Replacement LDP (RLDP) will replace the existing LDP. The RLDP will help shape Neath

	<p>Port Talbot for the next 15 years (2023-2038) ensuring the right development happens in the right place at the right time, benefitting communities and the economy and setting out which areas need to be protected.</p> <p>Following agreement of the Delivery Agreement (DA) by Welsh Government (WG) in November 2023, the Preferred Strategy consultation is the first formal, statutory consultation stage in the preparation of the RLDP. In accordance with The Planning and Compulsory Purchase Act 2004 and Welsh Government guidance (Development Plans Manual, Edition 3, 2020), as part of the Preferred Strategy consultation members of the public and stakeholders will have the opportunity to provide comments on the Interim ISA, HRA, CSR and Assessments, and Preferred Strategy document.</p> <p>Views will then be taken into consideration and a second formal opportunity for comments will be provided as part of the Deposit Plan consultation, anticipated Autumn-Winter 2025.</p>
1d	<p>Is this a ‘strategic decision’?</p> <p>Yes, the RLDP guides the future development of an area, providing a clear vision for the County Borough setting out where, when and how much new development can take place over the next 15 years (2023-2038). The aim is to provide developers and the public with certainty about the planning framework for Neath Port Talbot (NPT).</p>
1e	<p>Who will be directly affected by this initiative?</p> <p>Everyone who lives, works and/or visits NPT.</p>
1f	<p>When and how were people consulted?</p> <p>The RLDP Preferred Strategy, HRA, ISA, CSR and assessment, including all supporting documentation and background papers will be published for public/stakeholder consultation on 12th December 2024 to 6th February 2024 for an 8-week period.</p> <p>Members of the public, and stakeholders identified in the WG agreed DA, have both formally and informally been consulted as part of the development of the Preferred Strategy. Formal opportunities have been provided as part of the consultation on the Review Report, Delivery Agreement (including Community Involvement Scheme), ISA Scoping and Call for Candidate Sites. Informal opportunities have been provided on a draft initial CSR, Key Issues, Vision and Objectives and Growth and Spatial Options. Targeted engagement has also taken place with stakeholders as part of the preparation of evidence to inform the Preferred Strategy, including Welsh Language and Viability Topic Working Groups; methodologies have been shared with neighbouring authorities; and meetings have taken place with key stakeholders with regards to education, infrastructure, housing, and renewable energy.</p>
1g	<p>What were the outcomes of the consultation?</p>

Views sought from stakeholders have been used to feed into the preparation of the evidence base and preparation of the Preferred Strategy, ISA, HRA, CSR and assessments, and the preparation of the evidence base documents.

Following the Preferred Strategy consultation, views will be incorporated into the preparation of updated evidence base documents, technical studies and the Deposit Plan consultation.

In accordance with national guidance (Development Plans Manual, pp. 36) an initial consultation report will be compiled for Deposit Plan. The consultation report will then be updated ahead of submission and submitted as part of the examination in accordance with Regulation 22.

For each consultation, comments received have been collated into a database and internally we have responded to each to have a record of where changes are or not required.

2. Evidence

What evidence was used in assessing the initiative?

Legislation requires LDPs to be underpinned by a significant amount of gathered evidence, to ensure the plan is 'sound'. In preparing the RLDP, NPTC has gathered information from existing sources, and has carried out, or commissioned, a significant amount of research and evidence-based studies. As part of the information gathering process stakeholder views have been collated. Information collected has been used to identify the key issues, vision, objectives, growth and spatial options and formed the basis for policy development in the RLDP.

In accordance with national guidance (Paragraph 4.5 Development Plans Manual), an initial Integrated Sustainability Appraisal (ISA) has been undertaken to identify, assess and address in an integrated manner any likely significant effects on the environment (including European Sites), sustainability, health and equalities in the preparation of the RLDP. This includes the integration of statutory and key elements such as Well-Being for Future Generations Act (2015) requirements, Equalities Act, Welsh language, Health Impact Assessment and the Environment Act (Section 6) (where relevant).

A HRA report and IIA assessment for Preferred Strategy has also been prepared which will be built upon for Deposit.

3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	+			<p>As highlighted in Appendix F of the ISA, the percentage of people over 65 in NPT is growing.</p> <p>The Preferred Strategy will have a positive impact regarding age.</p> <p>Through Strategic Policy SP1, housing developments are required to provide an appropriate housing mix, support a variety of housing tenures and types to address a range of needs in line with the Local Housing Market Assessment, and contribute towards local affordable housing targets as set out in Strategic Policy SP8.</p> <p>Through Strategic Policies SP1, SP3 and SP5, the RLDP seeks to ensure housing is located within the most sustainable location with access to services, facilities, and public transport. By ensuring development is located within the most sustainable locations, the Preferred Strategy ensures that young people are located close to educational facilities, working age people are located close to a range of jobs and service, and older people are located close to easily accessible services and facilities, including health facilities. The Preferred Strategy also seeks to locate development close to public transport which will benefit all age groups that utilise public transport.</p> <p>Through SP1 and SP8, the RLDP aims to deliver 3,480 new homes from a supply of 4,176 new homes (including 20% flexibility allowance) and secure a variety of housing types and tenures. This will ensure the provision of dwellings appropriate for all ages including smaller start-up/ down sizer accommodation, family accommodation, affordable and market provision, and for affordable housing homes built to Lifetime Homes standards. Detailed policies detailing housing mix and requirements will be set out in the Deposit Plan.</p>

			<p>For working age people, the Preferred Strategy will provide employment opportunities to take into account the significant economic restructuring taking place following the Tata announcement and recently designated Celtic Freeport and recently consented development schemes such as GCRE and Freeport.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, including young people, children and older people.</p> <p>The Youth Council YOVO, Junior Youth Council YOVO and Young Mayor are key stakeholder groups which are engaged throughout the Plan making process. The Ethnic Youth Support Team Wales and Youth Access and Youth Cymru are also general consultees of the RLDP.</p>
Disability	+		<p>The RLDP Preferred Strategy has a positive impact regarding disability. As highlighted in Appendix F of the ISA, Strategic Policy SP4 of the RLDP acts to reduce health inequalities and improve social cohesion by:</p> <ul style="list-style-type: none"> • Developing and enhancing sustainable, safe and cohesive communities through the provision of local services, facilities and employment; • Improving accessibility within and between communities to encourage healthier and more active lifestyles through improvements to the physical and built environment, including maintaining and/or enhancing the extent, quality and connectivity of active travel network, green infrastructure networks, and recreational space; • Providing good quality, and energy efficient housing; and • Reducing people's exposure to adverse environmental impacts on their health through enhancing local environments and addressing, where possible, all types of pollutions. <p>In accordance with national planning policy, the RLDP will require all planning applications to submit a Design and Access Statements</p>

			<p>Through Strategic Policies SP1 and SP8, the Preferred Strategy establishes a policy framework for the Deposit Plan which will aim to deliver a variety of housing types and tenures to be provided which includes dwellings appropriate for those who may not be able to navigate a home built to the default standard. Affordable homes will be built to Lifetime Homes standard and DQR standards to help address accessibility.</p> <p>By directing development to sustainable locations through SP1 and SP4, the RLDP Preferred Strategy seeks to ensure that all people can meet their needs more easily and that new developments are accessible and closely located to sustainable transport.</p> <p>As highlighted in SP1, a key priority for the RLDP Preferred Strategy is an emphasis on placemaking. By focussing on placemaking principles through SP1 and SP5, the Preferred Strategy seeks to make Neath Port Talbot a more accessible location for all.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, including people with disabilities and disability organisations.</p> <p>Disabled groups identified as stakeholders include Disability Rights Commission and Disability Wales.</p>
Gender reassignment		+/-	<p>As identified in Appendix F of the ISA, the RLDP is not expected to discriminate or differentially impact anyone based on the grounds that they have changed or are in the process of changing their gender. The RLDP Preferred Strategy is therefore considered to have a neutral overall impact.</p>

			As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, irrespective of their gender expression.
Marriage & civil partnership		+/-	<p>As identified in Appendix F of the ISA, the RLDP is not expected to discriminate or differentially impact anyone based on the grounds of marriage or civil partnership. The RLDP Preferred Strategy is therefore considered to have a neutral overall impact.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, irrespective of their marital or partnership status.</p>
Pregnancy and maternity	+		<p>As identified in Appendix F of the ISA, the RLDP will have minor positive impacts on pregnancy and maternity by locating growth in the areas of NPT with the best access to services (including health infrastructure) and public transport, thus allowing pregnant woman to more easily access essential services and facilities locally and further afield.</p> <p>Through Strategic Policies SP1 and SP8, the Preferred Strategy seeks to ensure a range of housing types and tenures are provided, providing opportunities for people to move into larger homes that are affordable.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public.</p>
Race	+		<p>As highlighted in Appendix F of the ISA, the RLDP Preferred Strategy will have a positive impact on race.</p> <p>NPT has a well-established community of Gypsies and Travellers. The Gypsy Traveller Accommodation Assessment (GTAA) 2022 identifies no need in the short term and 10 pitches in the long term. SP8 establishes the strategic policy framework for the provision of Gypsy, Traveller and Showpeople accommodation and a detailed policy will be prepared for the Deposit RLDP.</p>

			<p>In addition, the RLDP Preferred Strategy will have minor positive impacts on race by increasing the range of housing and job opportunities which could potentially encourage people from different racial backgrounds to move into the County Borough from more diverse areas, such as neighbouring Swansea. Through SP1, SP4 and SP5, new housing will be located in accessible locations with good access to sustainable transport. This will ensure people of all races can maintain contact with family and friends living outside the County Borough.</p> <p>The Preferred Strategy establishes the policy framework to ensure a range of housing types are provided that will meet the needs of all sections of the community.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, including ethnic minorities.</p> <p>The Black Asian and Minority Ethnic Community Association, Ethnic Youth Support Team Wales, Ethnic Minority Foundation, Friends, Families and Travellers, Commission for Race Equality, Race Council Cymru and the Gypsy Council are some of the groups identified as stakeholders for the RLDP.</p>
Religion or belief	+		<p>As identified in Appendix F of the ISA, the RLDP Preferred Strategy will have a minor positive impact for people of religious backgrounds as it establishes the strategic policy framework through Strategic Policy SP5 to retain and protect and develop community facilities, which includes places of worship. Strategic Policy SP1 requires developments to be located in accordance with the spatial strategy and to be directed to the most sustainable locations where services and facilities are available in accessible locations to support and promote health and well-being.</p> <p>As noted in Appendix F of the ISA, the RLDP Preferred Strategy is not expected to have any significant impact on people from different religions or beliefs.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, including bodies which represent the interests of different religious people, and people of different religions or beliefs.</p>

			Religious groups identified as stakeholders include Church in Wales, Swansea Hebrew Congregation, Neath Port Talbot Methodist Cymru, and Muslim Council for Wales.
Sex	+		<p>As referenced in Appendix F of the ISA, the RLDP Preferred Strategy is not expected to discriminate or differentially impact anyone based on their sex. The RLDP Preferred Strategy seeks to provide a suitable mix of housing types, tenures, sizes, and of a suitable design to meet the diverse needs of the NPT population.</p> <p>Preferred Strategy is expected to have minor positive impacts on sex through directing growth to accessible locations with a good standard of existing services and facilities which should allow people to meet their needs regardless of sex, including educational and employment needs.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public irrespective of their sex.</p>
Sexual orientation		+/-	<p>As referenced in Appendix F of the ISA, the RLDP Preferred Strategy is not expected to discriminate or differentially impact anyone based on their sexuality. The Plan seeks to maximise opportunities for enhanced inclusivity across all policies within the RLDP.</p> <p>As part of the consultation on the Preferred Strategy, in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public, irrespective of their sexual orientation.</p>

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

As concluded in Appendix F of the ISA, no negative impacts are identified.

As part of the consultation on the Preferred Strategy in line with the Council's agreed Community Involvement Scheme, the Council will proactively seek to engage with all members of the public irrespective of their protected characteristic.

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	+			<p>As highlighted in Appendix F of the ISA, the RLDP is not expected to discriminate, harass and victimise anyone. The Plan seeks to maximise opportunities for enhanced inclusivity across all policies within the RLDP. The RLDP Preferred Strategy will increase the range of housing and job opportunities which could potentially encourage people from different backgrounds to move into the County Borough from more diverse areas, such as neighbouring Swansea.</p> <p>Through Strategic Policies SP1, SP4 and SP5, all new development will be located within sustainable, accessible locations with access to services, facilities and public transport and will be required to ensure they contribute towards placemaking objectives.</p> <p>The Preferred Strategy establishes through SP8 the policy framework to ensure a range of housing types are provided that will meet the needs of all sections of the community.</p> <p>As highlighted in Paragraphs 5.4.3-5.4.5, SP1, SP2, SP3, SP4, SP5, SP6, SP7, SP12, SP16, SP17, and SP18 are predicted to have major positive (i.e. significant beneficial) effects on the SA objective 'health and wellbeing' which incorporates the need to address harassment and discrimination experienced by some residents with additional requirements. Whilst not at the level of setting out detailed criteria, these strategic policies were considered to provide a supportive high-level policy framework to improve health outcomes by ensuring adequate provision of social and community infrastructure; direct development to the most sustainable locations;</p>

			<p>promote and support the uptake of active travel; support the co-location of housing and employment growth; recognise the importance of landscape protection for physical and mental health and wellbeing; reduce pollution, address environmental risks and improve ecosystem reliance; and prioritise on previously developed land.</p>
<p>To advance equality of opportunity between different groups</p>	+		<p>The RLDP would ensure development and enhancement of sustainable, safe and cohesive communities where people of all ages and backgrounds have access to good quality services and facilities that they need to live full, productive and prosperous lives.</p> <p>The RLDP would require active travel opportunities to be provided within new developments and opportunities would be explored to improve the accessibility between communities across the County Borough more generally.</p> <p>These would advance equality of opportunity between different groups.</p> <p>As identified in Paragraphs 5.4.6, 5.4.7 and 5.4.8, SP1, SP2, SP4, SP5, SP6, SP7, SP8, SP11 and SP16 are predicted to have major positive (i.e. significant beneficial) effects on equality and social inclusion SA objective which takes into consideration the need to advance equality of opportunity between different groups. Whilst not at the level of setting out detailed criteria, these strategic policies provide a supportive high-level policy framework to provide adequate social and community infrastructure to meet the needs of existing and future communities; ensure an appropriate mix of uses to support the creation of vibrant and sustainable communities; support economic development and rural regeneration; direct development to the most sustainable locations; promote and support the uptake of active travel; improve accessibility within and between communities; and support the co-location of housing and employment growth. The ISA concluded that at this stage none of the proposed strategic policies are predicted to have negative (i.e. adverse) effects on this objective. Several were identified to have no clear relationship with this SA objective.</p> <p>The proposed RLDP Vision and all proposed objectives, with the exception of NO12, were considered to align with this SA Objective.</p>

To foster good relations between different groups	+		<p>Welcoming places are those that foster social cohesion, providing shared public spaces that encourage people to meet and interact, breaking down social barriers and fostering a sense of belonging.</p> <p>The RLDP would promote the creation of inclusive, safe and welcoming places, ensuring an appropriate housing mix to help support the Authority's housing needs and support the creation of vibrant and diverse communities.</p>
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What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify actual impact, particularly in relation to Public Sector Equality Duty, and to explore potential mitigating actions for consideration.

NPTC will produce an Annual Monitoring Report (AMR) on its RLDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the RLDP to replace or amend the policy.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>As identified in the ISA Scoping Report, the ISA Framework includes objectives relating to socio-economic issues. This is assessed in the ISA Framework through Objective 2 'Equality and Social Inclusion'. The ISA objective is to 'reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion'.</p> <p>The RLDP Preferred Strategy will have a positive impact upon the socio-economic duty. The economy of NPT is undergoing a major contextual change following the recent Tata announcement. The RLDP would support future economic development, provide a planning framework that balances homes and jobs, foster new investment opportunities to aid the economic recovery and support the long-term potential of NPT.</p>

	<p>The RLDP encourages and enables the establishment and growth of new clean green technologies and industries to promote and maintain a leading role for NPT in the national and international renewables and industrial economies. This helps to encourage local people gaining employment in these new areas.</p> <p>The RLDP would have a positive benefit by improving people's opportunities and experiences, reducing and wherever possible eliminating inequalities faced by many, thereby improving people's health and wellbeing, their life chances and the communities in which they live and work.</p>
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What action will be taken to reduce inequality of outcome

NPTC will produce an Annual Monitoring Report (AMR) on its RLDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the RLDP to replace or amend the policy.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	+			<p>Strategic Objective 2 'Equality and Social Inclusion' of the ISA assesses the extent to which the Plan will 'reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion'.</p> <p>The RLDP Preferred Strategy establishes the strategic framework to promote cohesive communities through the co-location of jobs, facilities, and services in accordance with the settlement hierarchy. The Preferred Strategy establishes a placemaking principle at the heart of new developments. It establishes the strategic framework to protect existing community facilities and recreational space and ensure new development provides adequate infrastructure.</p>

				The RLDP Preferred Strategy is therefore considered to have a positive impact upon community cohesion.
Social Exclusion	+			<p>Strategic Objective 2 'Equality and Social Inclusion' of the ISA assess the extent to which the Plan will 'reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion'.</p> <p>The RLDP promotes and supports the uptake of active travel, provides an appropriate balance of homes and jobs, and enable access to a range of services, activities, facilities with adequate efficient infrastructure. This would reduce social exclusion.</p>
Poverty	+			<p>Strategic Objective 2 'Equality and Social Inclusion' of the ISA assess the extent to which the Plan will 'reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion'.</p> <p>The RLDP would support future economic development, provide a planning framework that balances homes and jobs, fosters new investment opportunities to aid the economic recovery and support the long-term potential of NPT. The RLDP would also allocate employment land to meet identified need, safeguarding existing employment areas which provide a range of employment facilities within local communities and resisting the loss of employment uses both within and outside of the designated areas in order to ensure that there is sufficient land available for new development (including opportunities associated with Green Growth) and existing business expansion. These would encourage employment and have beneficial effect to poverty.</p>

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

NPTC will produce an Annual Monitoring Report (AMR) on its RLDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the RLDP to replace or amend the policy.

6. Welsh

	+	-	+/-	Why will it have this effect?
<p>What effect does the initiative have on:</p> <ul style="list-style-type: none"> - people's opportunities to use the Welsh language 	+			<p>Strategic Objective 12 'Cultural Heritage and Welsh Language' assess the extent to which the plan 'conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language'.</p> <p>As noted in Appendix H of the ISA, the RLDP sets out a clear vision and objective that Welsh language should be a consideration as part of the RLDP making process for development.</p> <p>The RLDP will support, enhance and enrich the Welsh language, across all NPT's communities through the application of placemaking principles at a local level.</p> <p>The RLDP establishes the strategic framework to require development to promote the use of the language and avoid negative impacts on the use of the Welsh language. As noted in Appendix H, SP1, SP5, SP6, SP10, SP3, SP11, and SP8 have all been developed to promote and support the use of the Welsh language.</p> <p>As noted in Paragraph 8.6.8 of the Preferred Strategy, Technical Advice Note 20 highlights a number of potential measures to help manage the impact of development on the Welsh Language and to promote its use. Such measures will be incorporated into detailed policy in the deposit plan and expanded upon through the preparation of revised supplementary planning guidance.</p> <p>The RLDP Preferred Strategy includes the provision of two new Welsh language primary schools on key sites (Land to the East of Rhos and Coed Hirwaun). This will increase people's opportunities to use the Welsh language.</p>

			<p>The Preferred Strategy therefore provides a number of opportunities to increase people's opportunities to use the Welsh language.</p> <p>The RLDP Preferred Strategy will be published in Welsh and the consultation will be undertaken in accordance with the Welsh Language Standards (No.1) Regulations 2015.</p>
- treating the Welsh and English languages equally	+		<p>As noted above, under the RLDP, many opportunities have been provided to increase opportunities for people to use Welsh language, promote the use of Welsh language within NPT and support opportunities for people to engage with, promote and protect the Welsh language and bilingualism. The RLDP requires developments to assess their impact on the Welsh language.</p> <p>As above, the RLDP Preferred Strategy will be published in Welsh and the consultation will be undertaken in accordance with the Welsh Language Standards (No.1) Regulations 2015.</p>

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

Consultation is required to identify actual impact, particularly in relation to the use of Welsh Language, and to explore potential mitigating actions for consideration.

When developing sites for the new schools in the Preferred Strategy, both NPT's Welsh in Education Strategic Plan and RLDP can work together to, for example:

- encourage those moving into the area to learn Welsh;
- promote Welsh medium education with parents; and
- provide a Welsh language immersion centre for primary school age children to attend to learn Welsh

NPTC will produce an Annual Monitoring Report (AMR) on its LDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the LDP to replace or amend the policy.

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>SA Objective 8 ‘Biodiversity, Geodiversity and Soil’ seeks to conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources’.</p> <p>As detailed in Paragraphs 5.4.24-26, Strategic Policies SP2, SP3, SP15, SP16, SP17 and SP18 are predicted to have a major positive (i.e. significant beneficial) effect on aspects of this SA objective. Whilst not at the level of setting out detailed criteria, these strategic policies are considered in the ISA to provide a supportive high-level policy framework to reduce biodiversity loss and increase ecosystem resilience; reduce pollution from all sources; conserve, protect and enhance sites designated at national and local levels for reasons of ecological importance or biodiversity conservation; protect areas of landscape value, thereby indirectly protecting their ecological features; and protect and enhance the green infrastructure network. None of the proposed strategic policies were predicted to have a negative (i.e. adverse) effect on the SA objective.</p> <p>As part of the preparation of the RLDP, the Council has prioritised the redevelopment of previously developed land, taking into consideration other constraints, before identifying greenfield sites. The Council has undertaken a step-wise approach in accordance with national policy. All sites have been reviewed by the Council’s Biodiversity team.</p> <p>The RLDP establishes the strategic framework to ensure identified protected species and designated habitats present would be safeguarded and conserved in accordance with statutory requirements. In addition, the RLDP requires development to demonstrate that a net benefit for biodiversity and ecosystems resilience would be achieved.</p>

				<p>A HRA has also been undertaken to assess the potential environmental impacts from the RLDP alone, as well as in-combination with other plans and projects, advising on appropriate policy mechanisms for delivering mitigation where required.</p>
<p>To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.</p>	+			<p>In addition to above, SA Objective 6 'Air Quality' seeks to 'prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality'. Paragraphs 5.4.18-20 of the ISA conclude that the SP1, SP2, SP4, SP6, SP7, SP12, SP13, SP16 and SP18 are predicted to have major positive (i.e. significant beneficial) effects on aspects of this SA Objective. Whilst not at the level of setting out detailed criteria, these strategic policies were considered to provide a high-level policy framework to define and deliver a housing land strategy to meet identified housing needs and support economic growth; provide good quality, and energy efficient housing; provide adequate infrastructure to support housing growth; direct housing development to sustainable and accessible locations; support the retention and provision of a mix of community, retail, employment and recreational facilities in appropriate locations across the county borough; and manage long-term settlement growth to avoid urban sprawl. None of the proposed strategic policies were predicted to have a negative (i.e. adverse) effect on the SA objective.</p> <p>SA Objective 9 'Water and flood risk' also seeks to 'conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding'. Paragraphs 5.4.27-29 of the ISA conclude that SP1, SP2, SP3, SP4, SP16, SP17 and SP18 are predicted to have major positive (i.e. significant beneficial) effects on aspects of this SA objective. Whilst not at the level of setting out detailed criteria, it was considered that these strategic policies provide a supportive high-level policy framework to direct development to the most sustainable locations; adopt appropriate design, adaptation and mitigation measures to help address climate change; protect and enhance the green infrastructure network; increase ecosystem resilience; protect and enhance surface and groundwater quantity and quality; and support sustainable flood risk management and increased protection against flood risk. None of the proposed strategic policies were predicted to have a negative (i.e. adverse) effect on the SA objective.</p>

			<p>The RLDP Preferred Strategy requires development to demonstrate that a net benefit for biodiversity and establishes the strategic framework to ensure ecosystems resilience will be achieved. The RLDP Preferred Strategy ensures that environmental issues and future changes including flood risk, coastal and fluvial change and pollution issues are appropriately avoided, addressed and adverse impacts minimised.</p> <p>Ecology, air quality and flooding constraints have been taking into consideration as part of the assessment of all Candidate Sites.</p>
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What action will be taken to improve positive or mitigate negative impacts?

NPTC will produce an Annual Monitoring Report (AMR) on its RLDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the RLDP to replace or amend the policy.

The HRA found that adverse effects on site integrity could not be excluded for certain impact pathways at this stage, necessitating further evaluation and policy refinement at the Deposit Plan stage. This will be addressed following consultation, following revisions to policies taking into consideration consultees feedback (including Natural Resource Wales) and following the development of detailed policies.

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	The NPT Well-being Plan (2023-2038) has been drawn upon in the formation of the Preferred Strategy and ISA. In line with national guidance (Development Plans Manual), the Well-being of Future Generations Act and the five ways of working have been used to formulate the SA objectives. In Paragraph 5.5.7 of the ISA it is concluded that the Preferred Strategy performs positively against the majority of SA objectives, in particular against health and well-being, sustainable placement, equality and social inclusion, inclusive economic growth, transport and communications, and housing with significant long-term positive effects through supporting sustainable development that embeds placemaking principles; supporting sustainable transport

	<p>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; and providing and associated community infrastructure to meet the needs of communities.</p> <p>The RLDP establishes the strategic framework to shape NPT for the next 15 years (2023-2028) ensuring the right development happens in the right place at the right time, benefitting communities and the economy and setting out which areas need to be protected. It seeks to balance opportunities and constraints taking into consideration the current economic restructuring taking place, development opportunities, changing economic context, environmental constraints, and viability constraints.</p>
<p>ii. Prevention – preventing problems occurring or getting worse</p>	<p>The Well-being Plan (2023-2028) notes NPT has one of the least healthy diets and lowest levels of physical activity in Wales resulting in increasing rates of obesity and ill health. Air quality remains an area of concern in the area. There remain high concentrations of deprivation and poverty in areas of NPT. Climate change is expected to exacerbate these inequalities, and there is a risk that responses to climate change could place a disproportionate burden on vulnerable people and more deprived communities.</p> <p>Drawing upon the Well-being Plan, the RLDP has included objectives and policies to tackle these issues:</p> <p>Healthier active lifestyles: Through SP4 ‘Health’, the RLDP requires the improvement of accessibility within and between communities. This will encourage healthier and more active lifestyles through improvements to the physical and built environment, including maintaining and/ or enhancing the extent, quality and connectivity of the following: (1) Active Travel Network; (2) Green Infrastructure Networks; (3) Recreation space.</p> <p>Poverty: Through SP6, SP10 and SP11, the RLDP will ensure that all areas of NPT are able to benefit from economic growth and from modern economic infrastructure, including visitor attractions, appropriate to meet the economic, social, environmental and cultural needs and aspirations. Through SP8 the Council will ensure sufficient housing is provided in order to help reduce homelessness and establish the strategic policy framework to ensure the delivery of affordable housing.</p>

	<p>Health and Well-being: Through SP1, SP4 and SP5 the RLDP will ensure development and enhancement of sustainable, safe and cohesive communities where people of all ages and backgrounds have access to good quality services and facilities that they need to live full, productive and prosperous lives. Through SP2, SP5 and SP18 the RLDP would also ensure that environmental issues and future changes including flood risk, coastal and fluvial change and pollution issues (including air pollution) are appropriately avoided, addressed and adverse impacts minimised.</p> <p>Climate Change: Through Objective NO1 the RLDP seeks to minimise the causes and adapt to the current and predicted impacts of climate change through: (1) Minimising greenhouse gas emissions; (2) Requiring appropriate location and design of development; and (3) The protection and enhancement of all environmental assets required for climate adaptation and resilience. Through SP2 the RLDP establishes the strategic framework for the Authority over the period from 2023 to 2038 to address climate change.</p> <p>Finally, NPTC will produce an Annual Monitoring Report (AMR) on its RLDP. The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the RLDP to replace or amend the policy.</p>
<p>iii. Collaboration – working with other services internal or external</p>	<p>NPT have collaborated internally with NPT Highways, Environmental Health, Estates, Public Protection, Housing, Tourism, Regeneration, Development Management, Biodiversity teams and other Council departments to inform the preparation of the evidence base and RLDP Preferred Strategy, ISA, HRA and CSR and Assessments.</p> <p>Externally evidence base study methodologies have been shared with neighbouring authorities. Consultation has taken place with statutory consultees and key stakeholders including Councillors.</p>
<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>In line with the Welsh Government agreed Community Involvement Strategy of the Delivery Agreement, the Council has engaged with a variety of stakeholders in the preparation of the RLDP Preferred Strategy to reflect the diversity of the population in NPT. This has included informal consultation and targeted engagement.</p> <p>As part of the Preferred Strategy consultation, these groups will also be consulted in line with the Delivery Agreement.</p>

<p>v. Integration – making connections to maximise contribution to:</p>	<p>The RLDP Preferred Strategy, ISA, HRA, CSR and assessments take into account the Corporate Plan, Well-being Plan, national planning policy and guidance, Council strategies such as Decarbonisation and Renewable Energy and the Welsh in Education Strategic Plan. These have been used to formulate the development of the Key Issues, Vision, Objectives, Growth and Spatial Options, Key Sites, Strategic Policies and the development of the evidence base.</p>
<p>Council’s well-being objectives</p>	<p>The Council’s Well-being Objectives are set out below:</p> <ul style="list-style-type: none"> • All children get the best start in life • All communities are thriving and sustainable • Our local environment, heritage and culture can be enjoyed by future generations • Jobs and skills - local people are skilled and can access high quality, green jobs
<p>Other public bodies objectives</p>	<p>Public Services Board Priorities:</p> <p>The Well-being of Future Generations (Wales) Act 2015 in sections 37- 38 sets out the duty of Public Services Boards (PSB) to prepare and publish an assessment of the state of the economic, social, environmental and cultural well-being in its area.</p> <p>PSB members work together to deliver the objectives set out in the PSB Well-being Plan and monitor progress on delivery of the work. In May 2023 the PSB published its revised Well-being Plan 2023/2028 setting out the priorities the PSB will focus on to improve the well-being of Neath Port Talbot.</p> <ul style="list-style-type: none"> • To ensure all children get the best start in life; • To ensure all our communities are thriving and sustainable; • To ensure our local environment, culture and heritage can be enjoyed by future generations; and • To ensure there are more secure, green and well paid jobs and that skills across the area are improved <p>The PSB are a key statutory consultee in the preparation of the RLDP. The DA sets out how and when they have/ will be consulted as part of the preparation of the RLDP.</p>

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.

As part of the preparation of the RLDP, the ISA which includes an assessment of the Well-being for Future Generations Act (2015), Equalities Act, Welsh language, Health Impact Assessment and Environment Act (Section 6) (where relevant) and HRA will be updated.

Following adoption of the RLDP, the Council is required to produce an Annual Monitoring Report (AMR) on its RLDP. This will identify any policy that is not being implemented in the anticipated manner; and provide an assessment of whether the underlying RLDP strategy remains sound.

It will not necessarily mean that a failure to meet an established target will automatically result in a review of the policy in question. The first course of action will normally include a thorough analysis of the reason or reasons for the failure and a broader assessment of the implications as far as the successful implementation of the RLDP is concerned.

Monitoring of the anticipated impacts as identified in the IIA will be monitored and reported as part of the agreed reporting arrangements. Actions identified in the IIA will be monitored in the same way.

10. Assessment Conclusions

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

	Conclusion
Equalities	The RLDP would have a positive effect on addressing inequalities and tackle the causes of inequality experienced by particular groups within our society. Engagement with different groups and communities in the development of the Key Vision and Objectives has fostered a greater understanding of and between groups and fostered a shared sense of purpose.
Socio Economic Disadvantage	The RLDP will have a positive effect on addressing inequalities in the short medium and longer term. The RLDP will have a positive effect by improving people's opportunities (e.g. employment, housing, healthcare, etc) and experiences, reducing and wherever possible eliminating inequalities faced by many, thereby improving people's health and wellbeing, their life chances and the communities in which they live and work.
Community Cohesion/ Social Exclusion/Poverty	The RLDP will have a positive effect on many areas to deal with poverty and social exclusion and will potentially result in stronger communities, greater community cohesion.

Welsh	The RLDP will have positive effect in relation to opportunities to use the Welsh language. It supports, enhances and enriches the distinctiveness of NPT's communities, including use of the Welsh language, through positive placemaking actions at a local level.
Biodiversity	The RLDP will have a positive effect on biodiversity and eco-system resilience. The RLDP will safeguard and conserved identified protected species and designated habitats present in accordance with statutory requirements. All Development will be required to demonstrate that a net benefit for biodiversity and ecosystems resilience will be achieved.
Well-being of Future Generations	There will be a positive benefit as the well-being objectives have been incorporated into the preparation of the RLDP and the RLDP has been developed in line with the 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

The RLDP will perform positively against the Health, Well-being, Equality and Social Inclusion 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 homes and jobs;
- fostering new investment opportunities;
- providing associated community infrastructure to meet the needs of communities, etc.

There will be a positive effect on biodiversity and eco-system resilience. The RLDP will safeguard and conserve identified protected species and designated habitats present in accordance with statutory requirements. It will require new development across the county borough to achieve a net biodiversity benefit and enhanced ecosystems resilience.

The RLDP will support, enhance and enrich the distinctiveness of NPT's communities, including use of the Welsh language, through positive placemaking actions at a local level.

There will be a positive benefit in relation to the Wellbeing of Future Generations as the strategic objectives have been developed in line with the five ways of working.

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

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?
A revised RLDP and monitoring framework will be developed to measure the success of policies and plan delivery in improving the objectives.	The policy team with feed in from other teams and directorates	2023-2038	The RLDP including a framework of policies and SPG is implemented across NPT and monitored annually.

12. Sign off

	Name	Position	Date
Completed by	Lana Beynon	Planning Policy Manager	23.10.24
Signed off by	Ceri Morris	Head of Planning and Public Protection	31st October 2024