

# **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

## **Special Economic and Community Regeneration Cabinet Board**

19<sup>th</sup> January 2016

### **Report of the Head of Planning**

Nicola Pearce

#### **Matter for Decision**

**Wards Affected:** All

**Neath Port Talbot Local Development Plan (LDP) – Consideration of: the Inspectors’ Report; the LDP as amended by the Inspectors’ Report; the final Sustainability Appraisal incorporating Strategic Environmental Assessment [SA (SEA)]; the final Habitat Regulations Appraisal (HRA); the LDP Adoption Statement; and the procedures necessary for formal adoption of the LDP.**

#### **Purpose of the Report**

- 1 To consider the findings of the Inspectors’ Report following the LDP Examination in Public (EIP); the adoption version of the LDP as amended by the Inspectors’ Report; the final Sustainability Appraisal report; the final Habitats Regulations Appraisal report; the LDP Adoption Statement; and the procedures necessary for formal adoption of the LDP.

#### **Executive Summary**

- 2 The Council is required to prepare and keep under review a LDP for its area. The LDP sets the framework for shaping the future growth, regeneration and conservation of Neath Port Talbot for the period 2011-2026.
- 3 The Inspectors’ Report and associated recommendations is legally binding upon the Council and as such this report seeks Member approval to commence the adoption, notification and publication procedures in order for the Council to formally adopt the LDP as amended by the Inspectors.

## Background

- 4 Part 6 of the Planning and Compulsory Purchase Act (2004) places a duty on each Local Authority in Wales to prepare a LDP. The Neath Port Talbot LDP sets out the strategy and policy framework for development and conservation within Neath Port Talbot's administrative area for the period 2011-2026.
- 5 Over the course of its preparation, the LDP has progressed through various stages and where required has been the subject of public / stakeholder consultation undertaken in accordance with the Community Involvement Scheme (CIS), including:
  - Delivery Agreement (Sept 2008 / revised July 2013);
  - Call for Candidate Sites (2009-2010)
  - Issues and Alternatives Participation (Feb / Mar 2009);
  - Pre-Deposit Participation (May 2011);
  - Pre-Deposit Plan (Oct 2011);
  - Deposit Participation (Emerging Proposals) (Sept / Oct 2012);
  - Deposit Plan (Aug 2013);
  - Alternative Sites (Jan / Mar 2014);
  - Focussed Changes (Sept / Oct 2014);
  - Submission (Sept 2014);
  - Independent Examination (Jan – Jun 2015);
  - Matters Arising Changes (Jun / Aug 2015);
  - Adoption (scheduled for Jan 2016);
  - Annual Monitoring Report (scheduled for Oct 2017).
- 6 Full details of the various stages of Plan preparation can be found on the Council's LDP website: [www.npt.gov.uk/ldp](http://www.npt.gov.uk/ldp)

## Examination In Public

- 7 Members will recall that the LDP was submitted for independent Examination to the Planning Inspectorate on 30<sup>th</sup> September 2014. The Ministers of the Welsh Government (WG) appointed Siân Worden as the Lead Planning Inspector and Nicola Gulley as the Assistant Planning Inspector to conduct the Examination to assess the soundness of the Plan.

- 8 The Examination commenced with a Pre-Hearing Meeting on 28<sup>th</sup> January 2015 and a series of Hearing Sessions subsequently took place over a 13 week period from 11<sup>th</sup> March 2015 to 11<sup>th</sup> June 2015.
- 9 In broad terms the Examination proved successful with no significant soundness issues raised. As a result of proceedings however the need for a number of 'Matters Arising Changes' (MACs) emerged. The 'Schedule of Proposed Matters Arising Changes' went out to consultation over a 6 week period (July / August 2015), with all duly made representations forwarded to the Inspectors for consideration.

### **Inspectors' Report**

- 10 The Inspectors' Report was formally submitted to the Council by the Planning Inspectorate on 2<sup>nd</sup> December 2015. A copy of the Inspectors' Report is attached in **Appendix 1**.
- 11 Members will recall that the recommendations contained within the Report are binding, meaning that the Council must accept the changes recommended by the Inspectors.
- 12 The Report concludes '*...that, subject to the recommended Matters Arising Changes (MACs) and Inspector Changes (IMACs) set out in Appendix A (of the Inspectors' Report), the Neath Port Talbot LDP provides an appropriate basis for the planning of the County Borough up to 2026. The Council has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered. With the recommended changes the Plan satisfies the requirements of Section 64(5) of the 2004 Act and meets the tests of soundness in LDP Wales*'.

### **Inspectors' Report – Summary of Main Findings**

- 13 The Report notes that a number of changes are needed to meet legal and statutory requirements and to ensure the Plan is sound. The changes do not alter the thrust of the Council's overall strategy and almost all of the recommended changes have already been put forward and consulted upon by the Council in response to matters discussed during the Examination.
- 14 The Inspectors summarise the main changes as:
- Clarification of essential elements of the LDP including the strategy, measures to address health and the settlement hierarchy;

- Bringing the approach on flooding in line with national policy, both generally throughout the LDP and specifically in respect of the Harbourside allocation;
- Adjusting the amount of housing provision by adding an additional 160 dwellings to the housing supply in order to incorporate an appropriate flexibility allowance;
- Reducing the number of dwellings proposed at the Compair/GMF allocation from 120 to 70 in the light of the updated DAM maps;
- New housing allocations at Tirbach Washery, Ystalyfera and Parc Ynysderw, Pontardawe delivering a further 210 dwellings in total;
- Use of an alternative methodology for the calculation of affordable housing;
- Clarification that the affordable housing contribution to be made will depend upon the circumstances of each proposal including viability;
- Clarification in respect of the need for new Gypsy and Traveller pitches by defining in Policy SP9 the required provision of 20 pitches over the Plan period;
- Provision of greater certainty with regard to the regeneration of the canal network during the plan period and beyond;
- Amendments to the renewable energy policy RE 1;
- Provision of a clearer and more realistic monitoring framework, particularly in respect of housing delivery, economic development and affordable housing.

15 In addition to those changes already put forward by the Council, the Report introduces 15 'Inspector Changes' (IMACs) that must be made, these are summarised in the table below.

Ref:	Section	Change / Reason
IMAC1	Policy SP2 Health	<i>Change:</i> add Policy W1 to the list of key policies relevant to criterion 2.  <i>Reason:</i> to enhance the explanation of the ways in which health matters will be addressed in the LDP.
IMAC2	Policy SP2 Health	<i>Change:</i> add reference to cultural facilities.  <i>Reason:</i> to emphasise the holistic nature of good health.
IMAC3	Policy SP7 Housing Requirement	<i>Change:</i> amendments to the Total Housing Requirement and Flexibility Allowance.
IMAC4	Para 5.1.3	<i>Reason:</i> to account for the inclusion of Blaenbaglan Farm, Baglan and Tirbach Washery, Ystalyfera as residential allocations in Policy H1 (Housing Sites).
IMAC5	Table 5.1 Total Housing Requirement	
IMAC6	Table 5.2 Components of the Housing Requirement	

IMAC7	Policy AH1 Affordable Housing	<p><i>Change:</i> add reference to the fact that the exact affordable housing contribution will depend on the circumstances of each proposal and the viability of the scheme.</p> <p><i>Reason:</i> to clearly express in the policy the Council's willingness to negotiate with developers.</p>
IMAC8	Paras 5.1.32-5.1.33	<p><i>Change:</i> delete reference to annual viability appraisals.</p> <p><i>Reason:</i> to clearly express that affordable housing contributions will be secured on the basis of a percentage of the units to be delivered on site.</p>
IMAC9	Policy SP9 & Para 5.1.45 Gypsies and Travellers	<p><i>Change:</i> add additional text defining the requirement for provision over the Plan period.</p> <p><i>Reason:</i> to provide clarity in respect of the level of provision over the Plan period.</p>
IMAC10	Policy RE1 Renewable and Low Carbon Energy Development	<p><i>Change:</i> reorganise the policy and delete reference to 'community-based' schemes.</p> <p><i>Reason:</i> to clearly separate considerations within the SSAs from those for proposals, of any size, outside their boundaries; and the fact that criterion 3 covers all proposals of less than 5MW.</p>
IMAC11	Para 5.3.70	<p><i>Change:</i> add reference to Settlement Protection Zones (SPZs).</p> <p><i>Reason:</i> to provide clarity in respect of how SPZs are shown on the Proposals Map.</p>
IMAC12	Policy BE3 & Paras 5.5.23-5.5.25 The Canal Network	<p><i>Change:</i> add specific reference to the stretches of the canal that are drained, infilled, culverted, obstructed or cut off from the rest of the network.</p> <p><i>Reason:</i> to ensure that the presence of these canals is taken into account as part of any development proposal and to provide clarity in respect of the nature of the constraint.</p>
IMAC13	Proposals Map	<p><i>Change:</i> amend boundary of Policy EN1 adjacent to Baglan Bay.</p> <p><i>Reason:</i> to remove an area of land that is considered to be inconsistent with the undeveloped coast designation.</p>
IMAC14	Proposals Map	<p><i>Change:</i> amend boundary of the safeguarded area associated with Tata Steel to include an area of hard surfacing currently used for HGV parking / container storage.</p> <p><i>Reason:</i> to ensure accuracy and clarity.</p>
IMAC15	Appendix A Housing Sites	<p><i>Change:</i> H1/11 Neath Road / Fairyland Road, Tonna – add additional text outlining the possible requirement for measures, such as traffic regulations order, to address any highway problems in this area.</p> <p><i>Reason:</i> to provide clarity in respect of the fact that additional traffic generated by the development might exacerbate problems with on-street parking.</p>

- 16 Members should note that a reference copy of the adoption version of the LDP, incorporating and presenting all required amendments as *'tracked changes'*, is available electronically and in hard copy in the Members Room.

### **Sustainability Appraisal & Habitats Regulations Appraisal**

- 17 The Council is required to consider the final elements of the Sustainability Appraisal (SA) report [incorporating Strategic Environmental Assessment (SEA)] and the final elements of the Habitats Regulations Appraisal (HRA) report before adopting the LDP. Accordingly, copies of these appraisals are also available electronically and in hard copy in the Members Room.
- 18 Members should note that all changes to the LDP have been appraised and are in accordance with the SA and HRA respectively.

### **Adoption, Notification and Publication Procedures**

- 19 Regulation 25(1) of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2015 requires that the Council must adopt the LDP within eight weeks of receipt of the Inspectors' Report. Upon adoption, the LDP will supersede the current Unitary Development Plan (UDP) and be the primary document for use in the determination of planning applications.
- 20 Furthermore, the Council is also required to prepare and publish an 'Adoption Statement' which sets out what the Plan is, the scope of the appraisal that has been carried out and how the findings of the appraisal have been taken into account. The LDP Adoption Statement is attached in **Appendix 2**.
- 21 Upon adoption of the LDP, the following will be undertaken:
- The LDP, Adoption Statement, final SA Report and final HRA Report will be published on the Council's website and hard copies made available for public inspection during normal opening hours, in Neath Civic Centre, Port Talbot Civic Centre and all public libraries within the County Borough;
  - An updated version of the interactive online Proposals Map will be added to the Council's website; and
  - A notification letter will be sent to all individuals, stakeholders and organisations listed on the LDP database.

- 22 Members should note that whilst a basic version of the Plan will initially be made available, following the expiration of the six week legal challenge period, a fully designed, high quality version of the LDP will be prepared and published in paper format, placed in Neath Civic Centre, Port Talbot Civic Centre and all public libraries within the County Borough and an electronic copy can be accessed via the Council's website. Copies of the final document will also be sent, along with the Adoption Statement, to the Welsh Government.
- 23 In accordance with the Authority's Welsh Language Scheme all publicity / communication will be bilingual and the adopted version of the LDP will also be translated. The supporting background technical documentation will not be translated.
- 24 The adopted LDP will be available for purchase at a reasonable charge. In common with previous practice, it is suggested that the price be based on the cost of printing together with post and package at the prevailing cost. Electronic copies will be made available at no cost.

### **Financial Impact**

- 25 The decisions will incur expenditure in relation to the adoption, notification and publication procedures. These costs will be accommodated within existing budgets.

### **Equality Impact Assessment**

- 26 In order to assist the Council in discharging its Public Sector Equality Duty under the Equality Act 2010, an Equality Impact Assessment Screening Exercise has been carried out.
- 27 The LDP was subjected to a Sustainability Appraisal process which included an assessment of the LDP policies and proposals on equalities (including sex, age, race and disability issues). These aspects have therefore been assessed alongside all the other sustainability and environmental issues, enabling the effects of the Plan to be fully assessed.
- 28 Given that the SA of the LDP incorporated an Equalities Impact Assessment, the Screening Exercise concluded that there is no requirement to carry out an additional separate exercise.

## **Workforce Impacts**

29 There are no workforce impacts in respect of this report.

## **Legal Impacts**

30 Anyone who wishes to challenge the validity of the LDP on the grounds that it is not within the powers conferred by Part 6 of the Planning and Compulsory Purchase Act 2004 or that any requirement of the Act or regulation made under it has not been complied with in relation to the adoption of the LDP, may make an application to the High Court under Section 113 of the 2004 Act. Applications for such a challenge must be made within six weeks of the date of adoption.

## **Risk Management**

31 The LDP and associated documents have been prepared in accordance with the relevant legislation, regulations and Delivery Agreement, so in this respect the risk of legal challenge is considered to be low.

32 Should the Council not adopt the LDP, the Welsh Government has the power to intervene and approve the Plan as the LDP for the local planning authority area and recover from the authority any costs incurred.

## **Recommendation**

33 That having considered the report, it is resolved to make the following recommendations for approval:

1. The findings of the Inspectors' Report as set out in Appendix 1 are noted.
2. The adoption version of the Neath Port Talbot LDP (2011-2026), as amended by the Inspectors' Report and the final elements of the Sustainability Appraisal and Habitats Regulations Appraisal are agreed.
3. The LDP Adoption Statement as set out in Appendix 2 is agreed.
4. The adoption and publication procedures as set out in the report are implemented.



## **Reasons for Proposed Decision**

- 34 The recommendations are needed to ensure compliance with the requirements of the Planning and Compulsory Purchase Act 2004, The Town and Country Planning (Local Development Plan) (Wales) Regulations 2015, The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and The Conservation (Natural Habitats, &c.) Regulations 1994.

## **Implementation of Decision**

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

## **Appendices**

- 36 Appendix 1 – Inspectors’ Report.  
37 Appendix 2 – LDP Adoption Statement.

## **List of Background Papers**

### ***Legislation and Regulations:***

- 41 Planning and Compulsory Purchase Act 2004.  
42 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2015.  
43 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.  
44 The Conservation (Natural Habitats, &c.) Regulations 1994.  
45 EC Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).

### ***Planning Guidance:***

- 46 The Local Development Plan Manual (2006).  
47 Planning Policy Wales Edition 7 (2014).  
48 Technical Advice Notes (TANs).  
49 Mineral Planning Policy Wales (2000).  
50 Mineral Technical Advice Notes (MTANs).

## **Officer Contact**

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**Adroddiad i Gyngor  
Bwrdeistref Sirol Castell-  
nedd Port Talbot**

**Report to Neath Port Talbot  
County Borough Council**

gan Siân Worden BA DipLH MCD MRTPI  
a Nicola Gulley MA MRTPI

by Siân Worden BA DipLH MCD MRTPI  
and Nicola Gulley MA MRTPI

Arolygyddion a benodir gan Weinidogion

Dyddiad: 02/12/2015

Inspectors appointed by the Welsh Ministers

Date: 02/12/2015

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 64

**REPORT ON THE EXAMINATION INTO THE  
NEATH PORT TALBOT LOCAL DEVELOPMENT  
PLAN**

Plan submitted for examination on 30 September 2014

Examination hearings held between 11 March 2015 and 11 June 2015

Cyf ffeil/File ref: LDP/Y6930/14/515473

## **Abbreviations used in this report**

AP	Action Point
AHVS	Affordable Housing Viability Study
AQMA	Air Quality Management Area
BCIS	Building Costs information Service
CCSA	Coastal Corridor Strategy Area
DAM	Development Advice Map
DAT	Development Appraisal Tool
dph	dwellings per hectare
EUV	Existing Use Value
ELR	Employment Land Review
FC	Focussed Change
GDV	Gross Development Value
HRA	Habitats Regulations Assessment
HIA	Health Impact Assessment
IMAC	Inspector Change
LDP	Local Development Plan
LHMA	Local Housing Market Assessment
MAC	Matters Arising Change
NPT	Neath Port Talbot
NNR	National Nature Reserve
NRW	Natural Resources Wales
Para.	Paragraph
PPW	Planning Policy Wales
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SAM	Scheduled Ancient Monument
SEA	Strategic Environmental Assessment
SFCA	Strategic Flood Consequences Assessment
SLA	Special Landscape Area

SMP	Shoreline Management Plan
SPG	Supplementary Planning Guidance
SSA	Strategic Search Area
SSSI	Site of Special Scientific Interest
S106	Section 106 agreement
RSL	Registered Social Landlord
TA	Transport Assessment
TAN	Technical Advice Note
UDP	Unitary Development Plan
VSA	Valleys Strategy Area
WG	Welsh Government
WPA	Waste Planning Assessment
WSP	Wales Spatial Plan

## **Non-Technical Summary**

This report concludes that, subject to the recommended Matters Arising Changes (MACs) and Inspector Changes (IMACs) set out in Appendix A, the Neath Port Talbot Local Development Plan (LDP) provides an appropriate basis for the planning of the County Borough up to 2026. The Council has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements and to ensure that the Plan is sound. These do not alter the thrust of the Council’s overall strategy and do not undermine the Sustainability Appraisal carried out by the Council. The main changes are summarised as:

- Clarification of essential elements of the LDP including the strategy, measures to address health and the settlement hierarchy;
- Bringing the approach on flooding in line with national policy, both generally throughout the LDP and specifically in respect of the Harbourside allocation;
- Adjusting the amount of housing provision in order to incorporate an appropriate flexibility allowance;
- Reducing the number of dwellings proposed at the Compair/GMF allocation in the light of the updated DAM maps;
- New housing allocations at Tirbach Washery, Ystalyfera and Parc Ynysderw, Pontardawe;
- Use of an alternative methodology for the calculation of affordable housing;
- Clarification that the affordable housing contribution to be made will depend upon the circumstances of each proposal including viability;
- Clarification in respect of the need for new Gypsy and Traveller pitches after the plan period;
- Provision of greater certainty with regard to the regeneration of the canal network during the plan period and beyond;
- Amendments to the renewable energy policy RE 1;
- Provision of a clearer and more realistic monitoring framework, particularly in respect of housing delivery, economic development and affordable housing.

Almost all of the recommended changes have been put forward by the Council in response to matters discussed during the examination. With the recommended changes the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in LDP Wales.

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## 1 Introduction

- 1.1. Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a Local Development Plan is to determine:
  - a) whether it satisfies the requirements of sections 62 and 63 of the Act and of regulations under section 77, and
  - b) whether it is sound.
- 1.2. This report contains the assessment of the Neath Port Talbot Local Development Plan (from here referred to as “the LDP” or “the Plan”) in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the Act.
- 1.3. The submitted LDP has been prepared pursuant to the Act and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. We have considered it against the tests of soundness set out in paragraph 4.35 of *Local Development Plans (LDP) Wales, 2005*. There are three groups of tests:
  - **Procedural** - whether the Plan has been prepared in accordance with a delivery agreement, whether it has been subject to a sustainability appraisal;
  - **Consistency** – does it have regard to national, regional and local policies and strategies;
  - **Coherence & effectiveness**– is it clear and logical, compatible with the plans of neighbouring authorities, realistic and appropriate, flexible and does it contain mechanisms for implementation and monitoring.
- 1.4. The starting point for the examination is that the Local Planning Authority has submitted what it considers to be a sound plan, together with the evidence base that supports its position.
- 1.5. Prior to submission of the LDP for examination the Council considered the representations received and decided to make a number of Focussed Changes to the deposit Plan. These changes were duly advertised and the responses taken into account. At the Pre-Hearing Meeting the Council confirmed that the Plan it wishes to be examined is the deposit LDP as modified by the Focussed Changes<sup>1</sup>. Since the Focussed Changes have been consulted on and the SA has been revisited where necessary, they are accepted as part of the submitted LDP. The deposit Plan as modified by the Focussed Changes has therefore formed the starting point for the examination of the Plan’s soundness.
- 1.6. Since the purpose of the examination is to determine whether the Plan is sound we recommend changes in this report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. Throughout the examination the Council maintained a schedule of

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<sup>1</sup> SD20 Schedule of Proposed Focussed Changes

Action Points (AP) which included changes the Council suggested in response to matters raised during the examination. Many of these have become matters arising changes to the Plan (MACs); they do not alter the thrust and strategy of the LDP. The schedule has formed the basis of the MACs set out in Appendix A to this report. The MACs prefixed with an ‘I’ are Inspector changes (IMACs). The MACs and IMACs contained in Appendix A form the basis of our recommendations and are therefore binding changes which are necessary to ensure the soundness of the Plan. We are satisfied that no parties will be prejudiced by the MACs or the IMACs and that they will have no material impact on the findings of the Plan’s sustainability appraisal. All others were proposed by the Council and have been the subject of consultation. We have taken the MAC consultation responses into account in writing our report.

- 1.7. The MACs that are not highlighted are not required to make the Plan sound but are included because they improve clarity and precision. These MACs are only referred to in the report where they aid understanding of the matters being discussed. MACs relating to minor editing and typographical errors are not referred to in this report. The Council may make any consequential amendments arising from the MACs. We are satisfied that all of the changes including the IMACs are in line with the substance of the overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken.
- 1.8. All duly made representations and the matters raised at the examination Hearings have been considered. Given the focus of the examination on soundness, our report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan’s soundness. Plan changes sought by any representor are the subject of a recommended change only where we have found, on the basis of the evidence, that such a change is required to make the Plan sound.
- 1.9. There are many allocations in the LDP, particularly for housing and employment. Many of our comments in respect of the allocations are generic and there has been no need for us to refer to them all separately in this report; in only a few instances do we refer to the individual merits of a site.
- 1.10. A number of representors have proposed alternative sites to those allocated in the Plan, most notably for housing development. What is required of the Council is that it produces a strategy, policies and allocations that are sound. There are likely to be a number of ways that the Council could meet the needs of its community, each of which may be valid. Some may consider that the allocations in the Plan do not present the best solution, but our remit is only to recommend changes where required to make the Plan sound. It is not our remit to seek to make a sound plan better. Our conclusions as to the submitted Plan’s soundness and the changes proposed by the Council in response to matters arising have thus guided how far we have needed to consider in detail other candidate sites for allocation. For this reason no specific reference is made to the majority of proposed alternative sites in this report.
- 1.11. The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 came into force in September 2015. These amend the 2005 regulations and, as the changes relate to plan revision



procedures and the alternative sites stage, they have no bearing on this examination. Chapter 2 of PPW has been updated in the light of the new regulations and a new LDP manual has been published. The new manual includes revised soundness tests, which have been reduced from 10 to three although the principles underpinning them remain the same. The NPT LDP has been prepared on the basis of the previous tests, but as the principles remain unchanged, there was no need to seek views from participants on the impact of the new tests on the soundness of the plan. Subject to the changes contained in the MACs and IMACs, we are satisfied that the LDP accords with national policy. These changes are included in the appendix.

## **2 Procedural tests**

- 2.1. The LDP has been prepared in accordance with the Delivery Agreement<sup>2</sup> (as revised by agreement with the Welsh Government on 3 July 2013) and the Community Involvement Scheme.
- 2.2. Concerns were raised with regard to what was perceived to be a low level of response from the County Borough’s residents during the earlier consultation stages. In addition it was considered that the Council should have monitored the response rate and adjusted its approach to consultation accordingly. It is usual, however, that during the first, strategic stages of plan preparation most responses are from business interests and statutory consultees. Local residents tend to become involved as potential allocations, which will have a more tangible effect upon their properties and communities, are identified. At the deposit stage representations were received from 802 parties and, in relation to alternative sites, from a further 618 many of whom were residents of the County Borough.
- 2.3. From what was said at the hearings and our inspection of the Consultation Report<sup>3</sup> we are satisfied that the Council did not wish to minimise contact with the public but, on the contrary, was keen to engage with all stakeholders at all stages. To that end an additional, non-statutory consultation was undertaken in the autumn of 2012 which, through measures including stakeholder events, press releases and a leaflet delivered to every household and commercial property, informed stakeholders about the LDP’s emerging proposals. Overall we consider that the requirements of the Community Involvement Scheme have been met.
- 2.4. The processes by which the Council selected potential development sites and consulted on them are described in the Strategic Housing Site Assessment Report<sup>4</sup> and the Consultation Report<sup>5</sup>. Further information has been supplied in respect of the Neath Road/Fairyland Road allocation<sup>6</sup> which was submitted as a candidate site in July 2009 and was the subject of the same level of assessment

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<sup>2</sup> SD03

<sup>3</sup> SD10: Consultation Report Volume 1: Stages of Engagement, Consultation and Participation.

<sup>4</sup> EB06

<sup>5</sup> SD10

<sup>6</sup> AP4.2 Matter 4 (AP4) Clarification Note – Policy H1 11 (Tonna)

and consultation as all other potential sites. It is clear that this site has been the subject of much objection. However, decisions, including whether sites should be allocated, must be made on planning grounds not popularity.

- 2.5. During the plan preparation period Local Planning Authorities must respond to changes which take place such as the development of new national policy or the release of more up-to-date evidence. There is not, therefore, anything untoward in the Council having increased its housing allocations and dwelling numbers in line with more recent data. The critical factors are that all allocations must be based on robust, consistent assessments and be the subject of proper consultation.
- 2.6. All proposed changes made to the deposit Plan, as outlined in the above Introduction, have been advertised and consulted on. The Plan thus complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 in this respect, including in relation to consultation, advertisement and the publication and availability of prescribed documents.
- 2.7. The Plan has been subject to SA including Strategic Environmental Assessment (SEA)<sup>7</sup>. Further changes put forward by the Council as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA<sup>8</sup>. We are satisfied that the SA/SEA process undertaken is robust and satisfies procedural and legal requirements.
- 2.8. In accordance with the Habitats Directive<sup>9</sup> a Habitats Regulations Assessment (HRA) of the Plan has been undertaken, and reviewed as necessary in the light of changes put forward during the examination. We are satisfied that the results of the HRA Screening demonstrate that an Appropriate Assessment is not required. It can therefore be concluded that no significant effects upon the integrity of the European sites<sup>10</sup> within the plan area or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a result of implementing the Plan.

### *Conclusion*

- 2.9. Accordingly, procedural requirements have been satisfied and the relevant legal requirements complied with.

## **3 The Plan Strategy**

### *Vision, objectives and principles of the development strategy*

- 3.1. Located between the Brecon Beacons National Park and the coast, and in close proximity to the city of Swansea, Neath Port Talbot is an area of variety and

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<sup>7</sup> Sustainability Appraisal of the Deposit LDP – SD05 Main Report, SD06 Appendices & SD07 Addendum

<sup>8</sup> ED040: Sustainability Appraisal of Proposed Schedule of Matters Arising Changes.

<sup>9</sup> European Union Habitats Directive (92/43/EEC)

<sup>10</sup> As defined in PPW Edition 7, Chapter 2 (August 2015), paragraph 2.3.13

contrasts. Attractive countryside – there are six designated Special Landscape Areas (SLAs) – and sites rich in biodiversity and geodiversity, three with European designations as well as 20 Sites of Special Scientific Interest (SSSIs), sit alongside large tracts of previously developed land from which former industrial and commercial uses have withdrawn. The County Borough is particularly rich in mineral resource and also has an interesting and varied history, exemplified by many listed buildings, ancient monuments and six conservation areas.

- 3.2. The recent recession combined with a decline in the County Borough’s traditional mining and manufacturing industries, has affected not only the physical fabric of the County Borough but also the wealth and well-being of its communities. There is already evidence on the ground, however, in the form of new and recently completed development, of a resurgence in the local economy. This is generally focussed on the County Borough’s good transport links running along the coastal corridor; revitalising the more remote valley areas will be harder to achieve.
- 3.3. These circumstances are neatly encapsulated in the LDP Vision<sup>11</sup> and addressed in the twenty five objectives which spring from it. Logically organised under the themes identified in the Wales Spatial Plan (WSP) they are thus carried through into the policy groupings. Subject to **MAC6**, which will add a reference to ‘countryside’ to OB 15 (as this will be an element of the environment protected by policy<sup>12</sup>), the objectives cover all the identified issues.
- 3.4. The overall plan strategy, which comprises several components, is generally clearly explained but there is some inconsistency in the naming of the various parts and the layout of the chapter. The changes made by **MAC7** may appear to be stylistic and minor but as they will enable full understanding of the strategy they are necessary for coherence and thus soundness. Subject to **MAC8** which will significantly improve their legibility, Map 1.1 *Spatial Context of Neath Port Talbot*, Map 1.2 *Topography and Main Settlements of Neath Port Talbot* and Map 2.1 *Waterfront and Western Valleys Spatial Area* are valuable illustrations which augment the written descriptions of the County Borough’s location, topography and relationship to the surrounding region.
- 3.5. The Proposals Map is broken down into A3-sized tiles and bound into the back of the LDP. Whilst we have found the large sheets provided to us by the Council most helpful, the A3 format of the document allows each tile to cover a sufficiently large area for the map to be useable. Its clarity is, however, more of a problem. The County Borough’s rich mineral resource and expanses of protected landscape particularly require that a large number of designations and areas covered by policies must be identified on the Proposals Map.
- 3.6. The Council has considered relieving the pressure on the Proposals Map by producing a separate Constraints Map which would illustrate the following layers of information:

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<sup>11</sup> Deposit LDP page 13

<sup>12</sup> Policy SP14 The Countryside and Undeveloped Coast

- Special Areas of Conservation (SACs);
  - Sites of Special Scientific Interest (SSSIs);
  - National Nature Reserves (NNRs);
  - Landscape of Historic Interest;
  - Historic Parks and Gardens; and
  - Scheduled Ancient Monuments (SAMs).
- 3.7. As shown on the illustrative Constraints Map produced by the Council<sup>13</sup>, the extent of these areas is not significant, however, and their removal from the Proposals Map would not result in its substantial improvement. We therefore agree that there would be little benefit in the production of a Constraints Map.
- 3.8. The addition of settlement names and better distinction between the Core Road Network and Strategy Area boundaries will make the Proposals Map considerably clearer and easier to use (**MAC55**).
- 3.9. The LDP’s Development Strategy is to facilitate growth in the County Borough, focusing on the Coastal Corridor whilst reinvigorating the communities in the Valleys. This strategy reflects and formalises the existing position; the Coastal Corridor has good transport infrastructure, accommodates the majority of the population and businesses, and has significant sites available for development whilst the Valleys are less accessible with fewer development opportunities. Other considerations, such as the results of consultation, viability, market demand and the SA, have been fully considered in developing the strategy.
- 3.10. At the start of the plan-making process the County Borough was divided into eight sub-areas, namely the towns of Neath and Port Talbot and each of the six valleys radiating from them. Notwithstanding the strong identity of each of these original sub-areas, the two coastal towns share many common characteristics and problems, as do the valleys. Consequently other important considerations, including the regional context; settlement review and candidate site assessment; market, viability and deliverability issues; and environmental and sustainability constraints, supported the merging of the sub-areas into the two strategy areas now designated.
- 3.11. In respect of the strategies to be pursued in the areas four options were consulted on:
- **Option 1: Continuation of the UDP strategy**  
some new development in the main urban areas and coastal belt; some new housing and regeneration activities in the valleys;
  - **Option 2: Focus on the M4/Fabian Way Corridor**  
all new development in the main urban areas and coastal belt; decline in the valleys;
  - **Option 3: Promote Significant Growth in the Valleys**  
large scale housing-led development in the valleys; increased commuting and travel; relocation of public sector jobs to the valleys; and
  - **Option 4: Focus on Coastal Corridor & Reinvigorate Valleys**

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<sup>13</sup> Matter 2 AP2.7

majority of development in the main urban areas and coastal belt; greater emphasis to reinvigorate the valley communities through the promotion of housing, small businesses and tourism.

- 3.12. The Council’s preference was Option 4 and, it being something of a hybrid, ‘best of both worlds’ choice, it is not surprising that it was supported by a majority of stakeholders. We consider, however, that the other options could also have been implemented and were genuine alternatives.
- 3.13. In prioritising growth in identified key settlements the Development Strategy is consistent with the WSP and also with the strategies of neighbouring authorities.

#### *Growth Model*

- 3.14. The LDP was prepared in a challenging economic climate. For that reason the overall strategy is aspirational in its approach; it is based on the economic prospects for the County Borough and the performance of the wider South Welsh economy rather than on trend-based forecasts which would depress projections. The aim of the aspirational strategy is to generate a prosperous society fostering economic and sustainable growth in Neath Port Talbot.
- 3.15. The basis of the aspirational strategy is an employment-led growth model which capitalises on a large, untapped labour supply. Based on job growth and projected economic activity rates, the model calculates the working-age population necessary to support the anticipated number of jobs and, related to that, the amount of housing needed. Comparisons with the Welsh Government (WG) population projections have been made, and when necessary adjusted, to ensure consistency.
- 3.16. It is predicted that the number of jobs in the County Borough will increase by 3,850 during the plan period<sup>14</sup>. This calculation is based on Experian Economics forecasts, adjusted slightly to iron-out inaccuracies, with a 20% increase reflecting the potential and aspiration for growth. The model was updated early in 2015 to take account of the Welsh Government’s 2011-based population and household projections. The Experian forecasts were retained, however, as there were not more up-to-date projections. The components of the model, explaining the assumptions made, sources of data and rationale, have been clearly set out in the review document<sup>15</sup>. Adjustments were made to the level of economic activity, which was increased following a recent actual improvement in the rate in Neath Port Talbot.
- 3.17. In addition, the figure for average household size was amended. That used in the 2012 model was based on the 2008-based population projections but was unrealistically low. Neither was it consistent with the 2011-based projections but, as those were likely to have been depressed by the recession, they were not symptomatic of a growth agenda. A rate of 2.15, which is almost mid-way

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<sup>14</sup> EB14 Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot , paragraph 5.3.8

<sup>15</sup> ED009 Review of Levels of Growth 2015

between the figures generated by the 2008 and 2011 projections, has therefore been used, this being supported by a downward trend in household size in the County Borough since 2011.

- 3.18. The approach is in line with Planning Policy Wales’ (PPW) support for economic and employment growth within the context of sustainable development as well as its advice that jobs and services should be aligned with housing wherever possible<sup>16</sup>. It is also compatible with that taken in Swansea thus contributing to PPW’s requirement that local planning authorities should work strategically and co-operatively<sup>17</sup>.
- 3.19. Since the LDP base-date (2011) the rate of unemployment has reduced considerably in comparison with the Welsh average. In 2011 the Neath Port Talbot rate, 9.9%, was 1.4% greater than the Welsh average. By 2013 it had reduced to 8.25%, only 0.13% above that of Wales as a whole<sup>18</sup>. During the past decade there has been a corresponding increase in the rate of economic activity; from 67% in 2005 to 73.6% in 2014.
- 3.20. Important infrastructure, such as Harbour Way and the bridge linking both sides of the Baglan Energy Park, has recently been completed, and improvements to Port Talbot Parkway station are in progress. Other major construction projects, including the Science and Innovation Campus, Coed Darcy and continuing development at the Baglan Bay employment site, are well underway.

### *Conclusion*

- 3.21. Robust evidence thus supports the aspirational approach based on an economic growth model and indicates that it is well-founded, realistic and deliverable. We consider it to be a pro-active and appropriate strategy which will help the County Borough to benefit from locational and other advantages in order to recover from previous economic stagnation.

## **4 Overarching Policies**

### *Health*

- 4.1. Key Issue 2, that residents in Neath Port Talbot experience some of the worst health in Wales, encapsulates findings set out in the *Health Topic Paper*<sup>19</sup>. Neath Port Talbot is ranked as the worst of all local authorities with 16% of the population suffering from long term illness or disability which limits activity, in England and Wales. With regard to chronic conditions the County Borough experiences the highest level of asthma and diabetes in Wales, the fourth highest level of hypertension and the fifth worst rate of coronary heart disease and stroke<sup>20</sup>.

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<sup>16</sup> Planning Policy Wales edition 7 paragraph 7.1.3

<sup>17</sup> Planning Policy Wales edition 7 paragraph 7.1.5

<sup>18</sup> ED009, Table 2.2

<sup>19</sup> SD39

<sup>20</sup> Ibid. Table 4.4

- 4.2. PPW identifies that one of the main outcomes WG wishes to deliver is a sustainable society; the enjoyment of good health is identified as integral to that objective<sup>21</sup>. It is appropriate therefore that one of the LDP’s objectives should address poor health and encourage more active, safe and generally healthier lifestyles. This is an ambitious objective which can only be fully achieved through multi-agency initiatives; a land-use plan such as the LDP can, nonetheless, contribute significantly. Additional explanation in Chapter 2, which describes the LDP’s strategy (**MAC11**), references to the relevant policies against each criterion in Policy SP 2 (**MAC12**) and an expanded accompanying text (**MAC13**), will result in a coherent LDP strategy for health which can be implemented. This will be enhanced by amended wording for criterion 2 of Policy SP 2 to clarify what is meant by ‘the determinants of poor health’. The addition of retail facilities to those listed in criterion 3, will reflect the importance of easy access to shops selling fresh foodstuffs (**MAC12**) whilst a reference to cultural facilities will emphasise the holistic nature of good health (**IMAC2**).
- 4.3. Key Issue 13 identifies the problems of air quality within the County Borough and particularly within the Port Talbot area. Although 'Welsh Index Multiple Deprivation - Air Emissions Index (2011) indicates that air quality has improved since the designation of the Port Talbot Air Quality Management Area (AQMA) in 2000, the LDP recognised that this is an on-going issue<sup>22</sup>. To this end the LDP, in accordance with PPW<sup>23</sup>, seeks to: protect and where possible manage water, ground and air quality (Policies SP16 and EN8); manage development activity in central Port Talbot to minimise the impact on air quality (EN9); identify quiet areas throughout the County Borough (EN10); and reduce pollutants through the promotion of a sustainable transport system (SP20).

#### *Settlement hierarchy and limits*

- 4.4. The definition of a settlement hierarchy, together with boundaries around each of them determining the limits of development, are essential for the delivery of sustainable communities and, consequently, the protection of the open countryside. The evidence for both is the Settlement Review and Urban Capacity Study, undertaken in 2011, which is described in the Settlement Topic Paper<sup>24</sup>. Following a review of the existing function of each settlement, the relationships between them, and their future role<sup>25</sup>, a six-tier hierarchy was defined. The LDP assigns each settlement to one of the tiers which range from towns at the top through district, large local and small local centres, to villages and dormitory settlements at the bottom. In addition a settlement limit is defined around each, with the exception of dormitory settlements, taking into account the assessed capacity and potential for development.

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<sup>21</sup> PPW paragraph 4.1.5

<sup>22</sup> SD47 Environment Topic Paper (2014)

<sup>23</sup> PPW, Chapter 13

<sup>24</sup> SD40

<sup>25</sup> SD40 Settlement Topic Paper Appendix A

- 4.5. Through Policy SC 1 this framework directs appropriate levels of development to various categories of settlement in order to contribute towards the objectives of delivering sustainable communities and maximising accessibility to a range of facilities<sup>26</sup>. It will also help to conserve the countryside consistent with OB 15. The addition of a column to Table 3.1 explaining the role and function of the settlements in each tier, together with further explanation in the text, are necessary to clarify the type and scale of development that is likely to be suitable. A new paragraph will explain the approach to be taken in dormitory settlements which have insufficient facilities to be classed as sustainable locations (**MAC14**, **MAC15** and **MAC16**).
- 4.6. Settlement limits were defined following an assessment of each settlement’s capacity to accommodate growth and consideration of a number of factors including: relevant extant planning consents; the location of small candidate sites; physical constraints to development; the functional and visual relationship between land and/or buildings; and the settlement and opportunities for large scale expansion. We are satisfied that the identification and delineation of the settlement limits in the LDP has been undertaken in a logical and consistent manner. Consequently, boundaries have been defined that strike an appropriate balance between the growth requirements of the area and the need to protect the countryside.
- 4.7. Several settlement limits will be amended by **MAC60**, **MAC61**, **MAC62** and **MAC63** to include additional land as follows:
- AS(N)12 – Land at Moorlands, Dyffryn Cellwen
  - AS(N)49 – Land at Rutherglen Yard, Felindre
  - AS(SL)3 – Land adjacent to Tavancore, Pentwyn Road, Cynonville
  - AS(SL)7 – Land adjacent to Brookside, Pontrhydyfen, Neath
- 4.8. The additional areas of land to be included in the boundaries are considered to be functional and visual parts of their respective settlements.

### *Conclusion*

- 4.1. The overarching policies adequately reflect the central planks of the LDP strategy. They are clear, appropriate and based on up-to-date, credible and robust evidence.

## **5 Area Based Policies**

- 5.1. The Area Based Policies set out the different approaches to development in the Coastal Corridor Strategy Area, Policy SP 5, and the Valleys Strategy Area, Policy SP 6. As development will be concentrated in the former, Policy SP 5 identifies the major schemes in the County including the strategic regeneration areas at Coed Darcy and Harbourside, strategic employment sites, mixed use regeneration projects in Neath and Port Talbot town centres and at Aberafan

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<sup>26</sup> OB3 and OB 4



seafront, the university campus at Fabian Way and several transport improvements. The main objective for the Valleys Strategy Area is to reinvigorate communities and improve their economic prospects which will mainly be achieved through the encouragement of development by taking a flexible approach. Designations and allocations in the Valleys Strategy Area, which are, therefore, fewer and smaller, include the mixed use regeneration scheme at Glynneath, public realm improvements in Glynneath and Pontardawe town centres and a tourism site at Rheola.

### *Coed Darcy*

- 5.2. Coed Darcy is a regeneration scheme of national importance which is being constructed on the former Llandarcy oil refinery site. It is a mixed use development, including 4000 dwellings, for which outline planning permission was granted in February 2008. Large amounts of land have been reclaimed and remediated, new infrastructure has been installed and development of the first phase of 300 houses began in 2012. There is strong interest in the site and we saw when we visited that the majority of completed dwellings appeared to be occupied.
- 5.3. Progress continues to be made and, at the time of the hearings, permission was anticipated for part of the second phase of residential development, including part of the local centre, and approval of a development brief for the whole of the second phase. An application for the first primary school was due to be submitted shortly. In addition improvement works to Junction 43, which were required as part of the package of highways works, were underway. Arrangements were also being made to adjust the section 106 agreement to enable development on the southern part of the site to commence sooner.
- 5.4. The status of the Coed Darcy project, the progress made so far, the high quality design as illustrated in the submitted development brief<sup>27</sup> and apparent on site, and the housing completion and occupation rates to date are all positive indicators. Consequently, we are confident that the predicted delivery rates, including the additional 250 units required as a result of the Council’s further consideration of the Focussed Changes<sup>28</sup>, will be achieved.

### *Harbourside*

- 5.5. The Harbourside Strategic Regeneration Area is also a large brownfield site, in this case former dockland close to the town centre of Port Talbot. Similarly to Coed Darcy its regeneration is well underway with some parcels of land having been developed and a new route, Harbour Way, which links the site to the M4 recently completed. The mixed uses on the site will include residential, employment and bulky goods retail.
- 5.6. Large parts of the site, indeed much of Port Talbot town centre, are within flood risk Zone C1 with a smaller area covered by Zone C2. National policy with

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<sup>27</sup> Coed Darcy: Site Development Brief: Phase 2 Residential AP2.17

<sup>28</sup> ED008 para. 2.4.1.6

regard to development plans and flood risk<sup>29</sup> is that allocations should only be made in Zone C if the development is justified with regard to three tests and the consequences of locating development are assessed as acceptable. In respect of flood risk concerns, and through FC 13, the housing element of the allocation was reduced from 14.8 ha to 10 ha and from 520 dwellings to 385.

- 5.7. In the LDP, and through a revised masterplan, development proposed for the Harbourside allocation is located in Zone A wherever possible. Development is also phased with the most at-risk areas being within the final phase, beyond the end of the plan period. The development of those areas would depend upon the construction of an appropriate flood alleviation scheme.
- 5.8. Where allocated development is within Zone C1 it meets TAN15 test i) by reason of being necessary for the local authority’s Harbourside regeneration initiative, and test iii) through concurring with the aims of PPW and meeting the definition of previously developed land. In order to demonstrate that the potential consequences of a flooding event for the proposed development would be acceptable, as required for test iv), the Council has prepared a Strategic Flood Consequences Assessment (SFCA)<sup>30</sup> which includes extensive modelling. NRW expressed concern that the lack of extreme event modelling cast doubt over the delivery of certain parts of the Harbourside site. However, additional technical work, for example on flood mitigation, would be included in the SPG and the Council has explored the capacity of the Zone A land to accommodate the residential, retail and employment elements of the allocation. As a result of that work and discussions on changes to the Plan, NRW has accepted that additional flood modelling is not required at this stage in order to demonstrate that development is feasible. Consequently it has agreed to withdraw its objections; a formal, signed agreement to that end has been provided<sup>31</sup>.
- 5.9. Changes to the Plan as a result will be:
- Removal of Plots 11 and 12 from the Harbourside SRA2 allocation;
  - Reduction in the Harbourside employment allocation from 11 ha to 7ha;
  - Consequential additional 4 ha added to the Baglan Bay employment allocation;
  - Amendment of the SPG Masterplan to take account of the amended allocation boundary and to move Plot 10 from Phase 2 to Phase 3;
  - Other minor changes to site boundaries within the Masterplan.
  - Amendments to policy wording, text, maps and tables to reflect the up-to-date position (**MAC18, MAC19, MAC20, MAC21**).

### *University Campus*

- 5.10. In order to reflect the significance and unique nature of the development at the University Campus a new, site-specific policy and text will be added to the Area Based Policies chapter. It will clarify the type of development which will be appropriate there (**MAC22**).

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<sup>29</sup> TAN15 *Development and Flood Risk*

<sup>30</sup> EB01 and EB02

<sup>31</sup> Matter 7, AP 3, 4 & 5

### *The Valleys*

- 5.11. The LDP recognises the need to reinvigorate the Valley areas and improve their economic prospects<sup>32</sup>. Pontardawe and the Upper Neath Valley are identified, through their Strategic Growth Area (SGA) designations, as settlements with existing services and links which are thus sustainable and suitable locations for further development. A range of housing, employment, retail and tourism allocations has been made within them. Although this designation will not result in any differentiation in the way planning applications are to be assessed it will assist in directing development to the most sustainable parts of the Valleys Strategy Area.
- 5.12. Development in other parts of the Valleys is desirable and necessary. As there is less certainty over viability and deliverability, however, the LDP strategy is to encourage proposals through a flexible approach, particularly in respect of employment and retail schemes of a suitable scale, rather than to allocate sites which might not come forward. These principles, as well as other specific proposals, are set out in Policy SP 6 which applies only to the Valleys Strategy Area. In combination with Policy SP 3, which defines settlement limit boundaries and a settlement hierarchy, and Policy SC 1, which identifies acceptable development both within and outside of settlements, the approach to proposals in the Valleys Strategy Area is appropriate and clear. Policies EC5, EC6, R3 and TO1, which apply to various types of development outside of the main urban areas, support and add further definition to the strategy for the Valleys area. In addition Policy H1 allocated land for the development of new housing within the Strategy Area.

### *Conclusion*

- 5.13. The overall strategy of the LDP is coherent and based on a clear, robust and methodically applied preparation process. The various strategies set out in the LDP and its policies are realistic and appropriate in the light of relevant alternatives and are based on sufficiently up-to-date and credible evidence.

## **6 Amount, Distribution and Delivery of Housing Provision**

### *Calculation of amount of housing*

- 6.1. In line with the LDP’s overall aspirational strategy the housing requirement for Neath Port Talbot is derived from the economic growth model rather than being based on population projections. Over recent years the County Borough has experienced a decline in the working-age population. It is considered that the chosen strategy will result in population growth in order to enable an increase in economic activity and reduction in the unemployment rate, thus addressing the plan’s objectives<sup>33</sup>.

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<sup>32</sup> LDP page 13 OB 5

<sup>33</sup> Deposit LDP, SD04, page 14, OB 12

- 6.2. The housing need set out in Policy SP 7 of the Deposit LDP was 8,000 which, with a 13% flexibility allowance, took the total requirement to 9,150. Following the release of some 2011 Census data and the publication of WG’s 2011 Household Projections, Focussed Changes<sup>34</sup> reduced the overall requirement to 8,350. These changes gave rise to several objections which led the Council, through its consultants, to review the economic model<sup>35</sup> and update the calculations.
- 6.3. Fundamental to these is the number of jobs, 3,850, forecast for the County Borough by 2026<sup>36</sup>. The model then calculates the number of dwellings needed to accommodate the labour force necessary to maintain those jobs. Table 2.1 of the review document<sup>37</sup> sets out the methodology in clear steps with explanations of the information used and assumptions made which were updated in the review. In particular the model used a new economic activity rate, 76%<sup>38</sup>, as that used in the earlier report<sup>39</sup>, 73%, had been exceeded. In order to reflect this improvement in economic activity the average household size was adjusted. It was previously concluded that 2.25 people was a reasonable average but, as that figure might have been influenced by the recent recession limiting people’s ability to set up separate homes, it was reduced to a more realistic 2.13.
- 6.4. The review included a demographic-led housing requirement calculated using similar assumptions, where appropriate, to the economic model. The demographic model resulted in a population which would be sufficient not to constrain the proposed level of economic growth. Furthermore the figures from the two models corroborated one another. As a result of the review the Council adjusted the figures further<sup>40</sup> and it was these which formed the basis of discussion at the hearing.
- 6.5. Migration trends and flows between administrative districts have been taken fully into account in the Local Housing Market Assessment. This assessed the range of housing requirements for the area and provided the evidence on which the LDP housing strategy has been based. It reveals the comparatively high number of in-migrants to Neath Port Talbot from Swansea, a net figure of +840 between 2005 and 2010, at a time before houses were available for sale at Coed Darcy. No evidence has been provided, however, that the housing needs of these or other in-movers are not being adequately met, or that there are significant numbers of people who are unable to move for want of a suitable house in the right part of the County Borough to suit their lifestyle.
- 6.6. The number of dwellings projected for Neath Port Talbot using the 2011-based Household Projections is substantially lower than that derived from the 2008 projections. The economic-led method will thus avoid replicating a period of

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<sup>34</sup> Schedule of Proposed Focussed Changes, SD20, FC06-FC12

<sup>35</sup> Review of Levels of Growth, Peter Brett ED009

<sup>36</sup> See explanation of *Growth Model* in section 3 above.

<sup>37</sup> ED009

<sup>38</sup> ED009

<sup>39</sup> Growth Strategy Supplementary Paper (2014) EB04

<sup>40</sup> Observations on the Focussed Change Representations (January 2015), ED008, pp16-19

very poor economic performance, as advocated by the (then) Minister for Housing and Regeneration<sup>41</sup>.

- 6.7. A certain level of vacancy is normal and necessary to enable the process of buying, selling and letting to work efficiently. As vacancy is a function of the housing market the Council has rightly removed the rate from the overall flexibility allowance and incorporated a trend-based vacancy rate of 4% into the basic housing need. This takes account of the County Borough’s initiative to bring empty homes back into use but, as data is only available for short term projections, a reducing vacancy rate has not been applied; we are satisfied with that position.

#### *Delivery of housing allocations*

- 6.8. Our main concern with housing provision has been in respect of the viability and thus likely development of several allocated sites; it was a worry to us that this might threaten the delivery of the total requirement. An additional hearing session<sup>42</sup> and further evidence provided by the Council allayed most of these fears. In particular, given the overall high level of biodiversity interest in the County Borough, it is unsurprising that many sites have habitat or other features of some value. In most cases we are satisfied that development could be designed to incorporate and preserve valuable habitats, particularly as in many instances site boundaries, densities and unit numbers have been defined to allow for ecological management. Where this was not possible, adverse effects would need to be mitigated against and compensated for under Policy EN 6. This is the case with H1/20 Purcell Avenue, Sandfields<sup>43</sup> where a proposal for complete off-site mitigation has been agreed with the landowner.
- 6.9. The Council considers that delays in progressing sites caused by land ownership or market constraints are likely to be short term. None of the allocated sites have any significant physical constraints which would prevent development and it is reasonable to conclude that with continued up-lift in the housing market the allocations will be constructed largely as forecast<sup>44</sup>.
- 6.10. In the case of H1/LB/13 Blaenbaglan Farm, however, we remained unconvinced that the development of the site was likely to commence before the end of the plan period. The extant planning permission for 219 dwellings dating from 1992<sup>45</sup>, which was confirmed by the positive outcome of the lawful development appeal<sup>46</sup> in November 2000, was not reassuring; it seemed to us that, there apparently having been little interest in the site for over 20 years, the likelihood of any being generated in time for dwellings to be completed within the plan period was small.

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<sup>41</sup> Letter from Carl Sargeant to all local authorities dated 10 April 2014, ED013

<sup>42</sup> Session 12 held on 14 April

<sup>43</sup> EB06, paragraph 4.2.9.6 -7

<sup>44</sup> ED010

<sup>45</sup> 92/8571

<sup>46</sup> AP4.14

- 6.11. However, further information has come to light, particularly with regard to the provision of appropriate access to the site<sup>47</sup>. The landowner has confirmed that a thorough assessment, including drawings and profiles, of the land needed to create an access to the public highway has been carried out; the Council and landowner thus agree that the proposed access way is feasible and acceptable in principle.
- 6.12. They also agree that, as long as the site is included for development in the LDP and the Plan is adopted, a feasible and probable timescale for development of the site would be:
- Adoption of LDP: Jan/Feb 2016
  - Agreement of Council to sale of land required for access purposes: July 2016
  - Conclusion of arrangements for purchase of land required for access purposes: Late 2016
  - Commencement on site following conclusion of design and planning stages: Late 2017 (earliest).
- 6.13. Policy H 1 of the Deposit LDP allocated the site for 260 units within the Plan period. This was later reduced to 160 units<sup>48</sup>. The parties agree that the following is a realistic projection of the number of dwellings likely to be delivered on the site within the Plan period.

Year	20/21	21/22	22/23	23/24	24/25	25/26
Units	20	30	30	30	30	20

- 6.14. We now consider there to be ample evidence that the site will deliver a substantial number of dwellings during the plan period such that it should remain as a housing allocation.
- 6.15. In order to provide elsewhere for the number of dwellings which would have been lost had the Blaenbaglan Farm allocation been removed, **MAC25** allocated an additional site in Ystalyfera. Having heard from a number of site proponents at the additional site sessions and looked in detail at the consultation report on the alternative sites,<sup>49</sup> we considered that an appropriate option would be the allocation for development of part of the Tirbach Washery site<sup>50</sup>. This is a brownfield site of nearly 11 ha in total, a size which would enable biodiversity, rights of way and other constraints to be mitigated and still provide 160 units on the remaining 7ha. It is in a sustainable location close to the facilities and services offered by Ystalyfera, classified as a large local centre, and Ystradgynlais, one of the larger settlements just over the boundary in Powys. At the hearing the site’s owner told us that, when the current use ceases in about a year’s time, he has the resources and motivation to remediate the site ready for residential development.

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<sup>47</sup> ED046 Statement of Common Ground between the Council and Mr Williams on Blaenbaglan Farm

<sup>48</sup> FC14

<sup>49</sup> SD17

<sup>50</sup> AS(N) 56. NB AS(N) 57 is the western part only of the site.

- 6.16. Taking into account the loss of units at the existing site in Ystalyfera, Compair, and their replacement at the Parc Ynysderw site in Pontardawe (**MAC24**), the change in the distribution of housing would be slight and not contrary to the spatial strategy, as indicated in the amended LDP table 5.3 at para. 6.23 below.
- 6.17. The additional dwellings will result in a welcome boost to the flexibility allowance. This will be 960 dwellings, equating to a rate of 12.31% applied to the basic housing need which will help to ensure that housing need is provided for should not all sites come forward as anticipated. This is greater than the 10% commonly accepted as an appropriate proportion but, in these circumstances, we do not consider it unreasonable.
- 6.18. The delivery of the housing requirement depends upon windfall and small sites allowances amounting to 1,635 during the plan period, an average of nearly 150 per annum. On the basis of past trends<sup>51</sup>, which indicate that from 2001 to 2011/12 an average of 122 windfall/small site dwellings were completed each year, this is ambitious. In our view, the justification for the allowances set out in the topic paper<sup>52</sup> is overly optimistic. The Council has provided additional information on the numbers of units likely to be provided by Registered Social Landlords (RSL)<sup>53</sup> and stressed that the provision of windfalls will increase in the latter years of the plan period, as previously unknown, unallocated sites come forward. The position will also be eased slightly by the amendments to settlement boundaries detailed in para. 4.7 above, made in order to promote consistency with the criteria set out in the settlement topic paper<sup>54</sup>.
- 6.19. Although the delivery of the windfall and small site allowances will be a challenge we consider, that the evidence shows it to be achievable.
- 6.20. The total housing requirement now proposed is 8,760 made up as follows (**IMAC5**):

Basic Housing Need + vacancy rate of 4%	7,500 + 300 = 7,800
Flexibility Allowance = 12.31%	+ 960
<b>Total Housing Requirement</b>	<b>8,760</b>

- 6.21. As a consequence of the proposed change to the total housing requirement Policy SP7 and its supporting text need to be amended in accordance with **IMAC3, IMAC4 and IMAC6**.

*Phasing*

- 6.22. In an area such as Neath Port Talbot where there is a pressing need for new housing any mechanism which seeks to further manage the release of land, such as a phasing policy giving priority to the release of previously developed

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<sup>51</sup> Population and Housing Topic Paper SD41 Tables 9.6 and 9.18

<sup>52</sup> Ibid

<sup>53</sup> AP3.2 Emerging Windfall RSL Schemes

<sup>54</sup> SD40, appendix A, Stage 3

land, is likely to frustrate the operations of the housing market and have an adverse impact on the rate of delivery.

*Distribution of new housing*

6.23. The changes in housing distribution across the County Borough as a result of the revised housing figures, and as shown in the amended table below, are not significant.

<b>Spatial Area</b>	<b>Land Bank Sites</b>	<b>New allocation</b>	<b>Windfalls</b>	<b>Small Sites</b>	<b>Total Provision</b>	<b>Share Out</b>
<b>Neath</b>	2,890 <sup>1</sup>	1,075	290	210	4,465	51.0%
<b>Port Talbot</b>	476	1,249	260	100	2,085	23.8%
<b>Afan Valley</b>	-	-	39	65	104	1.2%
<b>Amman Valley</b>	-	-	39	70	109	1.2%
<b>Dulais Valley</b>	105	-	33	70	208	2.4%
<b>Neath Valley</b>	114	150	68	85	417	4.8%
<b>Pontardawe</b>	215	449 <sup>2</sup>	80	135	879	10.0%
<b>Swansea Valley</b>	172	230 <sup>2</sup>	16	75	493	5.6%
<b>Total</b>	3,972	3,153	825	810	8,760	100%

<sup>1</sup> add 250 for Coed Darcy

<sup>2</sup> add new allocation at Parc Ynysderw +50 dwellings

<sup>3</sup> remove dwellings from Compair allocation – 50, add new allocation at Tirbach Washery + 160

6.24. In making appropriate housing provision the Council was constrained by existing conditions, such as the permission for a significant number of dwellings at Coed Darcy, and faced other challenges including the topography of the area and large amount of land affected by flood risk. These circumstances have led to a considerably greater proportion of units being allocated in the Neath area compared with Port Talbot. As the two settlements are both within the defined Coastal Corridor, however, this irregular distribution is not contrary to the LDP’s spatial strategy. A sufficient number of units are allocated in the Coastal Corridor Strategy Area as a whole on sites which have been selected largely on the basis of sustainability criteria.

*Density*

6.25. The density of new residential development will normally be a minimum of 35 dph in the Coastal Corridor Strategy Area and of 30 dph in the Valleys Strategy Area. In adding this requirement to Policy BE 1, together with additional explanatory text, **MAC50** will ensure that the best, most efficient use is made of the valuable land resource.



### *Five year supply*

6.26. The most recent housing trajectory<sup>55</sup> provides an overview of the scale, composition and timing of new housing development in Neath Port Talbot over the Plan period. The data is not intended to be prescriptive but provides an estimate of housing delivery based on best available information. That accepted, the trajectory indicates that a five year supply of housing land will be available throughout the plan period and provides a useful basis from which to monitor progress. The trajectory predates the MACs and our changes to housing allocations but these will not worsen the position.

### *Conclusion*

6.27. The amount and distribution of housing provision set out in the LDP is realistic and appropriate and founded on a robust and credible evidence base. It will achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy. Subject to the MACs, the policies are clear, reasonable and appropriate.

## **7 Affordable & Gypsy and Traveller Accommodation**

### *Target for the provision of affordable housing*

- 7.1. National planning policy requires the LDP to set a target for providing affordable homes on the basis of a Local Housing Market Assessment (LHMA) taking into account the availability of finance and realistic developer contributions. The affordable housing policies of the LDP are informed by the LHMA, which was produced jointly with the City and County of Swansea in 2013. The findings of the LHMA indicate that there is a need for 3,100<sup>56</sup> new affordable homes over the plan period, representing about 40% of the total housing requirement. The findings of the LHMA indicate that the predominant housing need in Neath Port Talbot between 2010 and 2026 will be for 1, 2 and 3 bedroom units<sup>57</sup>.
- 7.2. The affordable housing target set out in Policy SP8 of the submitted LDP indicated that 2500 new affordable units will be delivered over the plan period. As a result of the amendment to Policy SP7 and the acceptance that the affordable housing target should only include those units that can be delivered through the planning system, the Council has revised the target to 1,200 units (**MAC28** and **MAC29**). Approximately 773 units will be delivered on landbank sites with the remainder provided on by allocated sites and a further 716 units by Registered Social Landlords (RSL). In total 1916 units will be provided over the plan period, amounting to approximately 60% of the need identified in the LHMA. Whilst the target identified in the Plan will not meet all of the need identified in the LHMA, we are satisfied that the target is realistic and that the

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<sup>55</sup> AP3.4 & AP4.8

<sup>56</sup> EB05 LHMA (2013) page 89, figure 80.

<sup>57</sup> EB05 LHMA (2013) page 89, figure 82

inclusion of measures such as a low site threshold, different targets for strategy areas and a rural exceptions policy will maximise the opportunities for delivery.

### *Gross development value approach*

- 7.3. The Affordable Housing Viability Study (AHVS) (2012)<sup>58</sup> provides the evidence base for the LDP’s approach to securing affordable housing. The methodology is broadly based on the development appraisal toolkit (DAT) which has been used by a number of local authorities in Wales. The methodology has been prepared in accordance with the requirements of national planning policy and provides an appropriate basis on which to determine the Plan’s affordable housing and thresholds and targets. The AHVS assessed the affordable housing contribution as a percentage of gross development value (GDV) and not as a percentage of the units to be delivered on site.
- 7.4. The use of GDV to deliver affordable housing is an innovative and, as a result, largely untested approach. The Council contends that the GDV approach is a fair, equitable and transparent way of determining the level of contribution which will maximise the amount of affordable housing delivered. Whilst we recognise that the use of GDV has the potential to deliver slightly more affordable housing than other more established approaches, we are nevertheless concerned about the effect its practical application will have on the provision of both new market and affordable housing. We consider that the use of GDV would lead to uncertainty amongst land owners, developers and lending institutions about the cost of a development over the life of a scheme and could deter much needed investment in the County Borough. Moreover, we believe that the approach would mean that every planning application for residential development in the Neath, Port Talbot and Pontardawe areas would be subject to negotiation and potentially re-negotiation as a scheme evolved. The result would be a complicated and protracted application process which would delay the delivery of new housing in Neath Port Talbot.
- 7.5. In light of these concerns we consider that Policy AH 1 is not realistic or appropriate and does not constitute a clear mechanism for delivering affordable housing. In order to address those soundness failings **MAC30, MAC31, MAC32, IMAC7** and **IMAC8** will amend Policy AH1 and its supporting text so that affordable housing will be secured on the basis of a percentage of the units to be delivered on site.

### *Viability*

- 7.6. The AHVS identifies benchmark land values for each of the sub market areas in the County Borough. The land values have been established using historic transactional data, which was compliant with policies in the Unitary Development Plan, and then reducing the value by 20% for compliance with other policies in the Plan. This approach differs from that used in many viability studies, which identify the existing use value (EUV) of the land and add 20-30%. As a consequence the benchmark values in the AHVS are set at a much

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<sup>58</sup> EB10 AHVS (2012) Chapter 2

higher level than EUV + 30%<sup>59</sup>. The approach taken to identifying benchmark land values in the AHVS is realistic, based on robust evidence from the District Valuation Office and allows for headroom between existing and future use values.

- 7.7. The Council acknowledges that a proportion of the development in the County Borough will be on previously developed land and as a result will incur exceptional development costs. Whilst we accept that the industrial heritage of the area will have an impact on the cost of development, the exact costs are unknown and will vary from site to site. As a result, assigning an allowance for abnormal/exceptional works would be unrepresentative of the cost of development on all sites in Neath Port Talbot and would undermine the provision of affordable housing. Taking abnormal/exceptional costs into account as part of the AHVS and making an allowance for these in the DAT would not, therefore, be appropriate. Moreover, we consider that the approach taken in the AHVS to identifying land values would provide sufficient headroom to off-set any additional development costs.
- 7.8. The build costs identified in the AHVS are based on the data provided by the Building Costs Information Service (BCIS) and have been adjusted for West Glamorgan. In addition, 18% has been added to the cost projections contained in the AHVS to allow for external works and contingencies. The AHVS does not make any specific reference to the cost of providing fire sprinklers, which WG estimate will be £3,100 per unit<sup>60</sup> (although an allowance has been made for sprinklers in the sensitivity analysis). However, this additional cost would to some extent be off-set by the provision for external works and contingencies and by variations in construction costs over the life of the plan. In addition, it is likely that the cost of provision would fall over time as technologies improve.
- 7.9. The DAT contains an allowance of £1,750 per unit for s106 (excluding affordable housing<sup>61</sup>) which the Council contend is based on an assessment of past contributions. Additional evidence provided by the Council and the Home Builders Federation indicates that the average s106 contribution secured over recent years is £401.00 per unit<sup>62</sup>. Although much lower than that in the DAT, we note that this figure is based on actual contributions secured under the UDP and does not take into account the increase in contributions which is likely to occur as a result of the requirements of Policy I1. The figure of £1,750 is acceptable as a representative figure in the AHVS and the additional headroom will assist in off-setting any increase in the cost of s106 contributions that may occur as a result of the Council’s emerging Planning Obligations SPG<sup>63</sup>.
- 7.10. The Council acknowledges that the viability of sites may vary across the County Borough and proposed a change to the supporting text of Policy AH 1 to allow for site specific negotiations. Whilst this would have gone some way to addressing concerns, we consider that in order to ensure certainty about the

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<sup>59</sup> EB10 AHVS (2012) pages 6-8inc.

<sup>60</sup> NPT Examination Statement - Matter 5, page 6.

<sup>61</sup> EB10 AHVS (2012) page 16

<sup>62</sup> Action Point 5.6

<sup>63</sup> SD33 Planning Obligations SPG – Draft 2014

application of the policy and to assist in the delivery of affordable housing the policy itself should be amended to express the Council’s willingness to negotiate with developers (**IMAC7**). Moreover, we consider that the proposed requirement for annual viability assessment may not be necessary or reasonable in all cases and likely to frustrate the delivery of new housing. As a consequence, we have removed this requirement from the additional paragraph on negotiation (**MAC33**)/(**IMAC8**).

#### *Deliverability of Affordable Housing*

- 7.11. As a result of the move away from the GDV approach, the Council has determined the percentage of affordable housing to be secured using evidence on housing need contained in the LHMA. It has taken the surplus residual values identified in the AHVS and calculated the percentage target for units to be delivered in the CCSA and VSA<sup>64</sup>. As a result, Policy AH 1 has been amended to require a contribution on all qualifying sites of 25% in the CCSA and 10% in the Pontardawe area. We consider that the approach taken in determining the level of provision is clear and based on robust evidence. In addition, the requirement in Policy AH 1 for qualifying developments outside the Pontardawe area, but in the VSA, to demonstrate that they are not viable would promote uncertainty and deter investment. As a result this will be deleted from Policy AH 1 (**MAC32**).
- 7.12. In order to provide certainty about the application of Policy AH 1 the supporting text of Policy AH 1 and the Proposals Map will be amended to include a geographical definition of the ‘Pontardawe area’ which will, as a consequence, delete the amendment to the LDP proposed by FC 36 (**MAC32** and **MAC56**). The amendments allow for certainty in the interpretation of the spatial requirements of Policy AH 1 and ensure that only those areas to which the policy applies are defined on the Proposals Map.

#### *Exception sites*

- 7.13. In order to maximise provision, Policy AH 2 of the LDP permits RSLs to build a maximum of 9 affordable units on sites outside defined settlement limits. **MAC34** will resolve the contradiction between Policy AH 2 (2) and paragraph 5.1.37 and will make clear the locational requirements for exception sites. In addition, in order to avoid unnecessary duplication and ensure consistency within the Plan, **MAC35** deletes criterion 4, 5 and 6 of Policy BE 1. The proposed amendments will ensure that the policy accords with the requirements of national planning policy.

#### *Provision for Gypsies and Travellers*

- 7.14. PPW requires<sup>65</sup> that local authorities assess the accommodation needs of Gypsy and Traveller families, and have policies for the provision of Gypsy and Traveller sites in their development plans.

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<sup>64</sup> Action Point 4.5

<sup>65</sup> PPW Chapter 9 Housing, paragraph 9.2.12

- 7.15. Neath Port Talbot has a well-established Gypsy and Traveller population with 54 pitches across three authorised public sites. Two sites are located at Wharf Road, Briton Ferry with a further site at Cae Garw Farm, near Margam<sup>66</sup>. The Council commissioned a Gypsy and Traveller Accommodation Needs Study in 2012 to inform the preparation of the LDP. The findings of the study indicate that in total there is a need for an extra 20 pitches in the County Borough during the plan period. The study’s methodology includes the collection and assessment of both qualitative evidence, obtained from structured interviews with representatives of the Gypsy and Traveller communities, individual families, the Council and adjoining local authorities<sup>67</sup>, and quantitative evidence taken from bi-annual counts, site occupancy data and planning information<sup>68</sup>. The approach taken to determining the need for new accommodation is consistent with the requirements of national planning policy.
- 7.16. We consider that the approach taken in determining the level of provision is clear and based on robust evidence.
- 7.17. The study recognises that there are difficulties with accurately predicting need over a 15 year period<sup>69</sup> and suggests that the Council could allocate land for 11 pitches to meet the defined need up to 2022 and closely monitor the need for the additional 9 pitches<sup>70</sup>. In line with that recommendation the LDP’s strategy, expressed in Policy SP 9, is to allocate a site for 11 pitches (Policy GT 1) supported by a criteria-based policy, GT 2, against which proposals for new sites and pitches will be judged.
- 7.18. Unlike other strategic policies in the Plan, therefore, Policy SP 9 does not define a requirement for new provision over the Plan period. This omission would in our view undermine the clarity and consistency of the Plan. As a result additional text defining the requirement for provision over the plan period is added to Policy SP 9 and paragraph 5.1.45 of the LDP (**IMAC9**).
- 7.19. The new Gypsy and Traveller pitches allocated by Policy GT 1 will be adjacent to the existing site at Cae Garw, Margam. The supporting text of the policy, as amended by **MAC36** identifies the level of need for new Gypsy and Traveller Sites and makes clear that, whilst the identified need would not be met in its entirety by a specific allocation, it would be closely monitored and if necessary the remaining nine pitches implemented by 2026. The Council confirmed at the Hearing session that funding had been secured for the allocated site; that development would be completed during 2016; and that any shortfall in the provision could be met by the further expansion of the Cae Garw site and/or the reuse of two currently de-commissioned pitches at Wharf Road, Briton Ferry.
- 7.20. Policy GT 2 provides a detailed framework for the assessment of proposals on non-allocated sites. The criteria contained in the policy accord with the requirements of Welsh Government Circular 30/2007 – Planning for Gypsy and

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<sup>66</sup> SD43 Gypsy and Traveller Topic Paper (September 2014), page 15

<sup>67</sup> EB 11 Gypsy and Traveller Accommodation Needs Study (2012), paragraph 3.1 – 3.3

<sup>68</sup> EB 11 paragraph 4.7

<sup>69</sup> EB 11 paragraph 8.1

<sup>70</sup> EB 11 paragraph 9.2

Traveller Caravan Sites and therefore provide a sound basis for assessing planning applications.

### *Conclusion*

- 7.21. All in all, we conclude that the affordable housing provisions of the Plan as amended by the MACs, are supported by robust and credible evidence, are consistent with national planning objectives concerning affordable housing and are sufficiently flexible to recognise the circumstances of individual sites.
- 7.22. The provisions for Gypsy and Travellers’ accommodation, as amended by the MACs, are supported by robust and credible evidence, consistent with national policy and are sufficiently flexible to recognise the circumstances of individual sites.

## **8 Allocated housing sites**

- 8.1. The Council twice invited the submission of candidate sites for development. These stages lasted for a six month period in 2009 and for six weeks during 2010, and resulted in 538 sites, 358 of which were proposed for residential development. At the same times the public was invited to comment on the sites resulting in replies from about 11,000 respondents.
- 8.2. As well as the submitted candidate sites the Council assessed sites in Council ownership, undeveloped Unitary Development Plan (UDP) allocations, and sites lying within existing settlement boundaries. The methodology for assessing the residential candidate sites<sup>71</sup> consisted of four stages. Sites could initially be excluded if they had a European designation or were below the minimum size threshold, stage 2 was an initial planning assessment and, beyond that, stage 3 considered the site against consultees’ comments and the Preferred Strategy. Sites which progressed this far were then subject to the stage 4 detailed assessment. All the sites which were deemed suitable following the stage 4 assessment became residential allocations.
- 8.3. Taking everything into account this was a thorough, methodical and consistent exercise. The evidence-based, site-specific approach has resulted in the identification of realistic and achievable allocations.
- 8.4. Over half of the housing sites are landbank sites with a valid planning permission for residential development; some of these have been completed and others are under construction. As the permitted sites will make a significant contribution to the County Borough’s housing requirement and five year supply of housing land, it is appropriate that, in the main, they are identified in the Plan.
- 8.5. The results of the assessments<sup>72</sup> provide the evidence base for the allocated sites. The number of units for each allocated site has been estimated having

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<sup>71</sup> Candidate Site Assessment Report (August 2014) EB07, Section 3

<sup>72</sup> EB06 Strategic Housing Site Assessment Report

regard to the size of the site, topography and the presence of other constraints; the character of the surrounding area and the application of the average density figures for the CCSA and VSA set out in Policy BE1 (**MAC50**).

- 8.6. The Plan does not, however, include any of the detailed information gathered during the assessment in respect of individual site characteristics or development requirements. The absence of this information does not provide certainty to either residents of the County Borough or potential developers and could delay the delivery of much needed new housing. In order to ameliorate the situation **MAC65** adds a detailed schedule of housing sites as an appendix to the LDP. This will provide a description of each site, its characteristics in terms of development opportunities and constraints, and details of the s106 requirements. The clarity thus provided is necessary for certainty and to assist in the delivery of housing in Neath Port Talbot.
- 8.7. When assessing planning applications for housing allocations the determining factors will be general planning considerations including other relevant LDP policies. Policy BE 1, broadly entitled ‘Design’, covers most of these matters; it would be supplemented by a thorough assessment of issues including biodiversity (Policy EN 7), pollution of all kinds and land instability (Policy EN 8), traffic, transport and access (Policy TR 2), and so on. The requirement for new infrastructure, including education, health provision and Welsh language provision, is common to many allocations and will be addressed through Policy I 1 at the planning application stage. Such requirements will also be listed in the new Appendix A provided through **MAC65**.

#### *H1/2 - Leiros Park Extension*

- 8.8. This is a 12 ha greenfield allocation located in an elevated position on the north eastern edge of the large local centre of Bryncoch. The site was identified in the UDP as part of the Alltwen/Rhos/Bryncoch/Neath Abbey /Leiros Park Green Wedge. In the light of the need to provide additional homes in the County Borough the Council has re-evaluated it through the LDP preparation process. A green wedge which will protect the landscape setting of Neath has been designated under LDP Policy EN3/1; we consider that the omission of the allocated site from that wedge would not adversely affect the setting of the urban area, significantly reduce the openness of the countryside surrounding Leiros Park or risk coalescence.
- 8.9. Whilst the site would be visible, its proximity to the Leiros Park Estate and other residential developments in the locality would ensure that when viewed from the surrounding area the allocation would appear to be part of the urban area. Moreover, the density of the allocation, which is below 35dph, and the retention of a landscape buffer on the northern boundary of the site would reduce the visual impact and allow the development to integrate into the countryside. Whilst some of the established view points from the site would be lost, with the careful design of the layout some viewpoints may be retained and enhanced.
- 8.10. Whilst some biodiversity interest is present, this is not significant. If necessary, it could be accommodated in the layout of the development in accordance with Policy BE1 or, if that was not possible, mitigation and/or compensation could be provided under Policy EN6.

- 8.11. A Transport Assessment (TA) has been undertaken which considered the potential impact of the development on the local highway network. The TA concluded that with improvements to the roundabouts at the A474/B4434 and A474/B4230 junctions the additional traffic generated by the site could be accommodated on the highway network. More detailed consideration in respect of appropriate access to the site itself would be given at the time of a planning application.
- 8.12. The allocated site is relatively unconstrained and located within a strong housing market in the CCSA and no evidence has been presented to suggest that the site would not be delivered in the way anticipated in the trajectory.

*H1/11 - Neath Road / Fairyland Road, Tonna*

- 8.13. This allocation is a 14 ha greenfield site located on the southern edge of the small local centre of Tonna. The site was identified in the UDP as part of the Neath/Tonna/Cimla /Efail Fach Green Wedge. The primary purpose of the wedge was to prevent the coalescence of Neath and Tonna. As at the Leiros Park Extension allocation, because of the need for additional homes in NPT the site has been reassessed. A green wedge intended to prevent the coalescence of Neath and Tonna has been designated under LDP Policy EN3/3. Whilst we accept that the allocation will reduce the gap between Neath and Tonna, we nevertheless consider that the area of open land which will remain, and which includes Llantwit Cemetery and a small remnant field, is of sufficient size to prevent the coalescence of the settlements and protect the setting of the urban area.
- 8.14. There is some biodiversity interest on the site but it is not significant and, if necessary, could be incorporated into the layout of the development or addressed under Policy EN6.
- 8.15. A Transport Assessment (TA) has been undertaken which considered the potential impact of the development on the local highway network. The TA concluded that sufficient capacity exists on the existing network to accommodate the traffic generated by the allocation. The Council accepts that additional traffic might exacerbate problems with on-street parking close to Tonna Post Office and along Llantwit Road. In order to address this concern, additional text outlining the possible requirement for measures, such as a traffic regulations order, to address any highway problems in this area, will be added to the schedule of housing sites (**IMAC15**).
- 8.16. We note that part of the site is already subject to a planning application. Given this, and the fact that the allocation is located within a strong housing market in the CCSA it is reasonable to conclude that the site would be delivered in the timescale anticipated in the trajectory.

*H1/14 Western Logs, Cwmafan*

- 8.17. The allocation is a 5.9 ha brownfield site located to the east of Ynysyguas. The site is currently occupied by an operational timber yard and is adjacent to the H1/13 Hawthorn Close housing allocation.



- 8.18. There are a number of potential constraints to development on this site including the possibility of ground contamination caused by the existing use of the site; its close proximity to a historic refuse site and the need for significant improvements to the existing access arrangements. No evidence has been presented to suggest that contamination, if found, could not be remediated or that the access arrangements could not be improved by the addition of traffic signals at the entrance to the site.
- 8.19. The site is in a strong housing market in the CCSA and no financial or technical evidence has been presented to demonstrate that the site would not be delivered in the timescale anticipated in the trajectory.

*H1/29 Parc Ynysderw, Pontardawe*

- 8.20. This site is close to transport nodes and the retail, educational and leisure facilities in the centre of Pontardawe. Its allocation is consistent with the strategy of the LDP, particularly as it is in the Pontardawe Strategic Growth Area, and its development would help to sustain the population of the wider area. There are no significant site constraints; we are satisfied that matters such as appropriate measures for drainage and access issues could be adequately addressed at the planning application stage. The site has an area of 1.2 ha and, given its sustainable location, is appropriate for higher density development, for example 40 dph. On that basis the site could yield more than 50 dwellings.
- 8.21. Despite the site being considered as an allocation early in the plan-making process it was discounted at Stage 4 of the assessment. At that time the landowner did not want to release the site for housing but was intending to pursue a retail scheme in line with a planning permission which has since lapsed. We are satisfied that the position has now changed and that, therefore, the site constitutes an appropriate residential development which is likely to be delivered during the plan period.
- 8.22. Because of other circumstances affecting their allocation and delivery the housing element of some sites is discussed elsewhere in this report:

Blaenbaglan Farm, Baglan	H1/LB/13	- paras 6.10 - 6.11
Tirbach Washery, Ystalyfera		- paras 6.15
Coed Darcy Urban Village	H1/LB/4 & 5	- paras 5.2 – 5.4
Compair/GMF, Ystalyfera	H1/29	- para. 10.16
Harbourside, Port Talbot	H1/17	- paras 5.65 – 5.9
Park Avenue, Glynneath	H1/23	- para. 10.16

*Conclusion*

- 8.23. Relevant alternatives have been considered and the identification of the housing sites is based on a robust and rational site selection process. The allocated sites are likely to be deliverable within the plan period and will make an appropriate contribution towards the housing requirement. With the addition of Appendix A (**MAC65**) the policies for the housing sites are clear, reasonable and sufficient.

## 9 Economy – employment, retail and tourism

### *Employment land provision*

- 9.1. A key issue for the LDP is the development of an aspirational strategy to reinvigorate the economy of Neath Port Talbot. The primary evidence for the employment strategy is contained in the Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot<sup>73</sup> and in the Employment Land Review (ELR)<sup>74</sup>. The assessment has been updated to take account of the most recent Census data<sup>75</sup>; its findings demonstrate that up to 3,850 jobs will be created in Neath Port Talbot between 2011 and 2026<sup>76</sup>. When this figure is converted into floorspace requirement it shows that there is a need for 34,000 sq m of net additional floorspace for class B1, B2 and B8 uses, which is the equivalent of 8.6 ha of new employment land over the plan period. In addition the assessment identifies the need for a further 11.4 ha of industrial land to meet the needs of the Regional Waste Plan<sup>77</sup>. The Economic Assessment recommends that in order to meet the identified need only commercially attractive sites which are close to the M4 should be allocated in the emerging LDP<sup>78</sup>.
- 9.2. Policy SP 11 provides a framework for the management of new and existing employment development in the County Borough. The policy allocates 96 ha of land for employment and business purposes; identifies the provision of additional employment land within the Strategic Regeneration Areas; seeks to safeguard existing employment land and premises; and provides for a flexible approach to the delivery of employment proposals in the VSA. The total Employment Land requirement is made up as follows:

Reference	Site	Size	Use Class Permitted
EC1/1	Baglan Bay	75 ha, of which 15 ha is allocated for B Use Class	B1, B2 and B8 Use Classes defined within Glossary
EC1/2	Junction 38 (M4), Margam	6 ha	B1, B2 and B8
EC1/3	Land within Coed Darcy SRA	4 ha	B1
EC1/4	Land within Harbourside SRA	7 ha	B1
	<b>Total</b>	<b>32 ha</b>	

<sup>73</sup> EB14 Economic Assessment & Employment Land Provisions for Swansea & Neath Port Talbot (2012)

<sup>74</sup> EB15 Employment Land Review (2014)

<sup>75</sup> ED009 Review of Levels of Growth (2015), paragraph 1.1.1 – 1.1.16

<sup>76</sup> ED009, paragraph 2.3

<sup>77</sup> EB14, paragraph 5.5.7 -5.5.11

<sup>78</sup> EB14, paragraphs 6.5.9 – 6.5.10

- 9.3. The strategic policy is supported by policies EC 1 to EC 6 which allocate land for new employment development and provide a framework for assessing proposals.
- 9.4. Of the 96 ha of land allocated under Policy SP 11, only 32 ha are expected to be developed for employment uses during the plan period. The remaining 64 ha are intended to meet the needs of the energy sector. The 32 ha of land comprise 8.6 ha for employment related development, 11.4 ha for waste related development and an additional 12 ha to allow for flexibility and choice. Changes to TAN 21<sup>79</sup> mean that the allocation for waste related development is no longer required. However, this element of the allocation is retained in order to off-set the recent loss of 10.6 ha of existing employment land<sup>80</sup>. Although the allocation of employment land contained in Policy SP 11 exceeds anticipated demand, the provision is of a modest scale and complies with TAN 23 by making an appropriate allowance for flexibility, competition and choice<sup>81</sup>.

#### *Employment land allocations*

- 9.5. The ELR was undertaken by the Council in order to ensure sufficient land was available to meet the identified need and to ensure that the most suitable land was allocated for employment purposes. Following the recommendations contained in the Economic Assessment, the ELR also sought to reduce the quantum of surplus land being planned in order to avoid confusing the market or undermining the viability of suitable sites. In addition allocations have been focussed on large commercially attractive sites close to the M4 which are deliverable and existing businesses and their sites are protected. The ELR assessed approximately 68 sites including those allocated in the UDP; candidate sites; and existing employment land<sup>82</sup>. The findings of the ELR were that sufficient range and choice of sites exists within close proximity to the M4 to meet the growth requirements contained in the LDP. The recommendations contained in the ELR provide the basis for the sites identified in Policies EC 1 and EC 2<sup>83</sup>.
- 9.6. Policy EC 1 of the submitted Plan allocates land at Baglan Bay; Junction 38 (M4), Margam; land at Coed Darcy Strategic Regeneration Area; and land at Harbourside Strategic Regeneration Area.
- 9.7. Allocation EC 1/1 Baglan Bay is a 75 hectare site, of which only 15 ha is allocated for employment use (**MAC38**). In recognition of the economic potential of the site, **MAC40** will amend the supporting text of Policy EC 1 to acknowledge the strategic importance of the Baglan Bay site and allow for the development of a minimum of 15 ha of land at the site for employment related uses. The greater flexibility proposed by **MAC40** would effectively increase the potential for the site to be redeveloped for commercial uses over the plan period.

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<sup>79</sup> Technical Advice Note 21 – Waste (2014)

<sup>80</sup> NPT Examination Statement, Matter 6 – Economy, paragraph 1.2.1.7

<sup>81</sup> Technical Advice Note 23 – Economic Development (2014), paragraph 4.5.2

<sup>82</sup> SD45 Economy and Employment Topic Paper (2014)

<sup>83</sup> EB15, Section 9

- 9.8. Junction 38 (M4), Margam, is allocated under Policy EC 1/2 of the submitted LDP for the development of 6 ha of employment related uses. The allocation was formerly part of a much larger site allocated in the UDP for employment purposes. It is clear that the area of the former UDP allocation has been assessed as part of the ELR process and that the site has, correctly, been reduced to take account of ecological constraint, flooding risk and areas which are no longer available for development because of planning commitments such as the biomass power station and mitigation for the Harbour Way scheme.
- 9.9. Allocation EC 1/4 is part of the larger Harbourside SRA. Issues in relation to the development of SRAs are considered in detail in Chapter 5 of this report. However, it is important to note that in accordance with the findings of the flood consequences assessment of the site the employment allocation on the site will be reduced to 7 ha. In order to off-set the reduction **MAC39** will increase the size of the allocation made under Policy EC 1/1 Baglan Bay from 11 to 15 ha.

#### *Employment policy framework*

- 9.10. In accordance with the recommendations contained in the Economic Assessment and the ELR, Policy EC 2 safeguards existing employment areas. The policy lists 18 existing employment areas throughout Neath Port Talbot which have been identified because of their existing function and the valuable contribution they make to the overall provision of employment in Neath Port Talbot<sup>84</sup>. In addition Policy EC 3 ensures that any future development on allocated or existing employment sites complements and supports the primary use of the site.
- 9.11. Policies EC 2 and EC 3 will be amended by **MAC41** and **MAC42** to safeguard existing employment uses at Tata Steel, a nationally important employer, and provide a context for the development of vacant and under-used land within the site. The area of hard surfacing currently used for HGV parking and container storage to the south is a comparatively small but useful piece of operational land. Although its exclusion from the safeguarded area would not prevent its continued use, for the sake of accuracy and clarity it should be included within the safeguarded boundary on the Proposals Map (**IMAC14**).
- 9.12. With regard to Port Talbot Docks, Policy EC 2/10 (Llewellyn’s Quay, Port Talbot) and Policy TR 4 (Safeguarding Freight Facilities) make clear the important role of the operational Dock and provide a clear and consistent basis on which to assess proposals for future development. **MAC42** will provide clarity as to the type of alternative uses which might be acceptable at these sites.

#### *Retail*

- 9.13. A retail study of the County Borough<sup>85</sup> reveals that Neath and Port Talbot centres have slipped down the retail rankings during the past decade; in 2005 Neath was ranked at 258<sup>th</sup> in the UK and Port Talbot at 411<sup>th</sup> but by 2011 their

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<sup>84</sup> SD45, paragraph 6.2.50

<sup>85</sup> EB16 Neath Port Talbot Retail Study

positions had fallen to 317<sup>th</sup> and 485<sup>th</sup> respectively. The Retail Topic Paper<sup>86</sup> notes that changes in a town centre’s ranking are dependent not only on how that centre is performing but also on other centres improving their offer and moving upwards through the ranks. The slippage for both Neath and Port Talbot suggests, therefore, that neither is keeping pace with improvements made by competing centres.

- 9.14. Furthermore, the competition is mainly outside of Neath Port Talbot including, not only the city and town centres of Cardiff, Swansea, Llanelli and Bridgend, but also out-of-town retail centres such as Llansamlet, Fforestfach and Trostre. The leakage of expenditure to these locations is detrimental to the economy of the County Borough. This issue is reflected in LDP Objective OB 13 which, as well as developing a hierarchy of retail centres, recognises the principal roles of Neath, Port Talbot and Pontardawe town centres.
- 9.15. At the time the UDP was being prepared, under provision of retail warehousing<sup>87</sup> and food stores<sup>88</sup> had led to the loss of trade and jobs outside the County Borough. The new retail provision at Baglan Moors helped to improve the situation and it was designated as a district centre in the UDP. Now there is a health centre with pharmacy adjacent to the centre and a new pub/restaurant but no other non-retail services such as banks or building societies. In terms of TAN4 *Retailing and Town Centres*<sup>89</sup> it does not, therefore, match strongly the definition of a district centre.
- 9.16. Were the Baglan Moors centre to be designated as a district centre proposals for new retail development there would be considered against Policy R2. It would not be necessary to assess whether the facility was needed, to apply the sequential test or to evaluate the effect on the vitality and viability of existing shopping centres such as Port Talbot and Neath town centres, all requirements of the policy, Policy R3, which currently applies to Baglan Moors. Under Policy R2 there would be the potential for retail development which would be better located in one of the town centres to be permitted at the Baglan Moors centre, potentially to the detriment of the main centres’ vitality and viability. In view of the fragile health of the existing town centres and OB 13 the exclusion of Baglan Moors from the retail centre hierarchy is essential to the LDP strategy and thus appropriate.

### *Tourism*

- 9.17. Neath Port Talbot is an area rich in natural resources, cultural heritage and landscape beauty. As a result of increased investment in tourism infrastructure, during the last 10 years the County Borough has seen a steady growth in visitor numbers which in turn has generated additional income for the local economy and created new jobs in the sector. In order to assist in revitalising the economy of the County Borough the LDP, through Policy SP 13, takes a flexible approach to new tourism proposals; encourages new

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<sup>86</sup> SD46

<sup>87</sup> UDP paragraph 1.6.12

<sup>88</sup> Ibid paragraph 2.11.5

<sup>89</sup> TAN4, Annex A Glossary of Terms

sustainable tourism development and resists where possible the loss of existing facilities<sup>90</sup>. This is supported and supplemented by policies TO 1 and TO 2 which manage tourism development in the countryside and protect existing tourism facilities. This approach is consistent with national planning policy.

- 9.18. The LDP includes a single allocation for tourism-led development at the Rheola Estate near Glynneath (TO3/1). This is centred on the Grade II\* listed Rheola House, its designated Historic Park and Garden focussed and surrounding parkland. The site also includes a former aluminium works and it is on this brownfield area that up to 100 units of holiday accommodation, a small shop and a leisure complex will be developed.
- 9.19. A significant part of the site lies within flood risk Zone C2 where TAN15 does not permit highly vulnerable development such as residential uses including holiday accommodation. There is also, however, sufficient Zone A land to safely accommodate the allocated development and to provide for safe egress and emergency access in the event of a flood.
- 9.20. We are satisfied that the biodiversity interests on the site, which include ancient and semi natural woodland, wet woodland, lakes and ponds could be incorporated and preserved as part of the overall design of the scheme. Where this is not possible any adverse effects would need to be mitigated against and compensated for under Policy EN 6.
- 9.21. Although the LDP strategy is to deliver the majority of new housing on large site allocations in the Coastal Corridor Strategy Area and the Pontardawe and Upper Neath Valley growth points, the fact that the site is in the Neath Valley is not reason in itself for not allocating part of the site for housing development. The Rheola Estate, however, is a considerable distance from the nearest settlements of Glynneath and Resolven. As such it is not in a sustainable location and has not been classified as a settlement in the LDP. It is therefore not appropriate to allocate any part of the site for housing development.

### *Conclusion*

- 9.22. The overall scale, type and distribution of the allocated employment and retail sites achieves the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy. Relevant alternatives have been considered and the identification of the allocated sites is based on a robust and rational site selection process. The policies for employment, retail and tourism development are clear, reasonable and appropriate.

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<sup>90</sup> SD45 Economy & Employment Topic Paper (2014), section 4.2

## 10 Environment and Resources

### *The Undeveloped Coast*

- 10.1. A band of coastline around the River Neath estuary is defined and protected by Policy EN 1. This policy is entitled ‘The Undeveloped Coast’ and the accompanying text explains that a relatively limited area of NPT’s coastline can be defined as such. Only limited types of development, for which a coastal location is necessary and which cannot be accommodated on the developed coast, will be permitted within the EN 1 designation. An area of previously developed land at Baglan Bay, part of which is currently in use as a ragworm farm, is included within the designation and is thus inconsistent with the ‘undeveloped coast’ designation.
- 10.2. The LDP cites the provisions of the Shoreline Management Plan (SMP)<sup>91</sup>, particularly managed realignment of the sand dunes, as a basis for the designation. Preventing erosion of the dunes is important and necessary, not only for biodiversity reasons, but also to minimise the risk of flooding hinterland areas including a power station and industrial area.
- 10.3. Neither the SMP nor the geomorphological report<sup>92</sup>, the main purpose of which was to inform decision making relating to the ecological and recreational management of the dune system, provide any evidence of such a wide, 300m, buffer of land as proposed by the Council. Although the SMP refers to a risk of increasing dune erosion during the period from 2009 – 2029 neither is there any evidence in terms of current or potential erosion rates. Indeed Environment Agency maps<sup>93</sup> indicate that predicted erosion in the area will be negligible.
- 10.4. In respect of the geomorphological report, the main area ‘B’<sup>94</sup> identified for dune management works is considerably smaller than that designated in the LDP and confined to the existing extent and position of the dunes. Furthermore the report makes clear that existing damage results from sand blowing back through gaps in the dunes made by and/or for their recreational use by motorcyclists. Measures proposed in the area are intended to reduce this harm and its causes rather than to facilitate the backward movement of the dunes. The report does not provide any support for the provision of a protective zone as wide as that covered by EN 1.
- 10.5. **IMAC13** therefore amends the boundary of EN 1 to that necessary to protect the dunes. The provision for lapwing mitigation on a nearby area is a requirement of a previous planning permission. We understand that, by reason of its temporary nature, this creates some uncertainty but including the site within the EN 1 when not justified is not an appropriate measure.

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<sup>91</sup> SWW03 Lavernock Point to St Ann’s Head Shoreline Management Plan SMP2

<sup>92</sup> ED031 Baglan and Crymlyn Burrows Geomorphological Report

<sup>93</sup> M6-S10-0042 Appendix 5 Atkins Technical Note section 3, 1<sup>st</sup> para.

<sup>94</sup> ED031 page 60, Figure 57

### *Special Landscape Areas*

10.6. Following a study of the County Borough’s landscapes<sup>95</sup> Policy EN 2 identifies six Special Landscape Areas. The mechanism for their protection, as set out in the policy, is to only permit development which will not have a significant adverse impact on the features and characteristics for which each has been designated. In order that the policy can be implemented effectively these will be set out in SPG (**MAC43**).

### *Green Wedge*

10.7. There are five green wedges in Neath Port Talbot which have been designated to prevent the coalescence of settlements and to protect the setting of urban areas. Green wedges serve the same purposes as Green Belts and in both there is a presumption against inappropriate development. Green wedge designations are established through development plans with those proposed in the LDP carried over in a large part from the UDP.

10.8. PPW states that green wedge policies should be reviewed as part of the development plan process. In order to do this the Council commissioned a study which made clear that where key candidate sites were proposed within existing green wedges and did not undermine their integrity, the sites could be removed from the relevant wedge<sup>96</sup>.

10.9. PPW also advises that, when considering green wedge designations, local planning authorities need to ensure that a sufficient range of development land is available<sup>97</sup>. In redrawing limited parts of green wedge boundary and allocating some housing sites, notably the Leiros Park Extension (H1/2) and Neath Road/Fairyland Road (H1/11), which are discussed in more detail in the allocated housing sites section, on land previously within green wedges, this is what the Council has rightly done. Such actions are, therefore, consistent with national policy and the allocations are not unsound in respect of the green wedge.

### *Open Space*

10.10. In its assessment of Open Space provision in the County Borough, the Council took a pragmatic and focussed approach relying on the predominantly rural nature of the area and the easy accessibility to a large amount and varied range of greenspace. In addition, whilst consultation responses were made in respect of the provision of formal categories of open space, access to greenspace was not identified as a salient issue.

10.11. Regardless of the open space typology being described only as a ‘useful basis’ for assessment and policy preparation, TAN 16: Sport, Recreation and Open Space states clearly that the open space assessment should address all forms of open space provision. In excluding greenspace the Council’s open space

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<sup>95</sup> EB18 and EB19

<sup>96</sup> EB18, Provision of Landscape Advice (2011), paragraph 8.2.

<sup>97</sup> PPW paragraphs 4.8.11-4.8.13



assessment is not fully consistent with PPW and TAN 16. As there is no evidence, however, that the amount, quality and accessibility of greenspace in the County Borough is an issue or that it is otherwise threatened we consider that the Council’s approach has been reasonable. The lack of evaluation of greenspace is not, therefore, sufficiently out of kilter with national guidance as to be unsound.

- 10.12. The purpose of such assessments is to enable the objectives set out in PPW to be achieved, namely the provision of a framework for well-located facilities which are well designed, well maintained, safe and accessible to all. In order to protect and enhance provision, LDPs should provide standards for the various types of open space based on the assessments; Policy OS 1 does this for outdoor sport facilities, children’s play space, informal space, categories formerly covered by the Six Acre Standard, and allotments.
- 10.13. Most of the countryside areas, which equate to greenspace, are protected through the identification of settlement limits and by other policies including, Policy EN 1 The Undeveloped Coast, Policy EN 2 Special Landscape Areas and/or Policy EN 3 Green Wedges. In adding ‘greenspace’ to the open space types listed in paragraph 5.1.53 MAC37 will clarify that Policy OS 2 protects all open spaces. In addition, the Council has made a commitment to prepare SPG on ‘Open and Greenspace’ and this is identified in the LDP and monitoring framework.
- 10.14. All in all, and despite the omission of greenspace from the open space assessment, we consider that the LDP’s strategy for such areas is robust. It will provide adequate protection for all types of open space and be a sound basis for the provision of additional facilities as new residential development comes forward.

#### *Environmental Protection*

- 10.15. Subject to changes to policy SP1 and its supporting text which will clarify the factors to be taken into account in considering development proposals the LDP’s approach to flood risk is consistent with national policy as set out in TAN 15 and adequate (**MAC26**).
- 10.16. Changes to the Development Advice Maps (DAMs), and the land included in the various flood zones, resulted in a reduced capacity at two allocated sites. At Park Avenue, Glynneath the developable area of the site is now 7.9 ha which should still be sufficient for approximately 150 dwellings (H1/23) and a convenience shop of about 660 sq m (R1/4). The Compair/GMF allocation (H1/29) in Ystalyfera has also been affected and the 2.3 ha of the site remaining outside of Zone C will not be large enough for the projected 120 dwellings. The indicative number of units has therefore been reduced by 50 and an additional site allocated in Pontardawe to take account of their loss (**MAC24**).

#### *Minerals*

- 10.17. The County Borough has a rich mineral resource. In order to properly exploit this whilst protecting the surrounding countryside, general environment and amenity of local communities, the policy framework is comprehensive.

- 10.18. In addition Policy SP16 Environmental Protection and Policy EN8 Pollution and Land Stability set out the strategy and policy framework for protecting and improving the environment. It would be inconsistent with national guidance<sup>98</sup> to safeguard the tertiary resource and there is no evidence that such protection is necessary in Neath Port Talbot.
- 10.19. Subject to **MAC44**, which will refer interested parties to more information on exceptional circumstances without repeating national guidance in the LDP, the policies and explanatory text are sufficiently clear and consistent with national policy. **MAC64** will amend the Proposals Map so that the contradictory policy advice caused by an overlap of existing mineral operations with settlement protection zones is erased. In respect of criterion 1 of Policy M2 Settlement Protection Zones are shown on the Proposals Map. These are drawn at a distance of 500m around all the settlements in Neath Port Talbot, as well as taking account of those in neighbouring authorities which are within 500m of the boundary. This will be clarified in an addition to the explanatory text (**IMAC11**).

### *Renewable Energy*

- 10.20. In accordance with FC25 and FC38 the boundaries of both the SSAs within the County Borough are thus consistent with those identified in TAN8. The definition of SSAs does not preclude wind farm development beyond their boundaries, provided it conforms with criteria in respect of visual amenity and landscape character. Although the Arup study<sup>99</sup> is a decade old, in following the TAN8 Annex D methodology it is thorough, robust and an appropriate basis for the refined boundary, albeit that it does not include the existing Maesgwyn wind farm.
- 10.21. TAN8 charges WG with scrutinising LDPs to ensure that SSA installed capacity targets, which have been clarified in a letter from the Minister<sup>100</sup>, are capable of being met<sup>101</sup>. In the light of the focussed changes, and despite not agreeing with the Council’s calculation of the consented and operational capacity in SSA E and F, WG has not maintained its objection to the SSA boundary or capacity target. Even if wind farm development within the 5km buffer zone is subtracted from the calculation we do not have serious concerns that maximum capacity would not be achieved with the refined SSAs.
- 10.22. In requiring proposals within SSAs to be subject to consideration of landscape character and visual amenity Policy RE 1 is not consistent with TAN8 which accepts that wind farms are likely to lead to significant changes in landscape character<sup>102</sup>. We have reorganised the policy slightly in order to clearly separate considerations within the SSAs from those for proposals, of any size, outside their boundaries. In addition, we have deleted the reference to

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<sup>98</sup> Minerals Technical Advice Note 2: Coal (MTAN2)

<sup>99</sup> EB21 TAN 8 Annex D study of Strategic Search Areas E and F: South Wales Valleys

<sup>100</sup> From John Griffiths, Minister for Environment and Sustainable Development, July 2011

<sup>101</sup> TAN 8 paragraph 5.4

<sup>102</sup> TAN 8 Planning for Renewable Energy Annex D, paragraph 8.4

‘community-based’ schemes from the new third criterion as it was clarified at the hearing that it would apply to all proposals of less than 5MW (**IMAC10**).

### *Waste*

10.23. Policy W 1 indicates the preferred sites for in-building waste treatment facilities and, through FC28, has been updated to remove the Best Practicable Environmental Option (BPEO) test. In addition, **MAC45** introduces the need for waste proposals to be supported by a Waste Planning Assessment. The policy is thus consistent with TAN 21 Waste.

10.24. The provision of a Health Impact Assessment (HIA) for waste related planning applications is not required by TAN 21. The reference to the submission of a HIA ‘where appropriate’ should be retained in the explanation and not the policy itself, particularly as an HIA is likely to be included as part of the Environmental Statement required for major proposals. In view of the enhanced explanation of the ways in which health matters will be addressed in the LDP a reference to Policy W 1 should be included in Policy SP2 (**IMAC1**).

### *Conclusion*

10.25. The policies and proposals on this matter will achieve the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy and are based on robust and credible evidence. They are clear, reasonable and appropriate.

## **11 Infrastructure**

11.1. The Council’s Infrastructure Delivery Plan<sup>103</sup> recognises the importance of providing appropriate infrastructure to meet the social, economic and environmental needs of communities throughout Neath Port Talbot. The document takes account of the potential costs of providing infrastructure, possible sources of funding, the phasing of development and provides demonstrable evidence that the allocated sites can be delivered in the way set out in the LDP. In support of this Policies SP 4 and I 1 provide a framework for the effective management of existing infrastructure and to secure the provision of new infrastructure such as affordable housing, open space and recreation facilities, community and environmental hubs, schools and training facilities, and community and public transport. We were concerned that Policy I 1 provided a general list of items that may be required over the plan period rather than a detailed and prioritised list specifically intended to meet the needs of the community. **MAC17** and **MAC65** provide details of the infrastructure necessary to deliver the key policies and proposals in the Plan and explain the approach to prioritising requirements.

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<sup>103</sup> EB03

- 11.2. We thus conclude that the provisions of infrastructure, as amended by the MACs, are supported by robust and credible evidence, consistent with national policy.

## 12 Transport and Access

### *Delivery of Transportation Proposals*

- 12.1. Through Policy SP 20 the LDP seeks to ensure the development of an integrated transportation network which is safe, efficient and sustainable. The framework provided by the policy is intended to address the need for improvements to the highway network to facilitate new development; deliver key regeneration proposals; and improve accessibility<sup>104</sup>.
- 12.2. Policy TR1 identifies a number of transportation schemes intended to enhance the highway network; improve public transport stations; safeguard land for walking and cycling routes and provide new park and share facilities. The majority of the schemes are identified in the Regional Transport Plan<sup>105</sup>. The remainder, with the exception of the Afan Valley Trail, are required to facilitate access to Coed Darcy Urban Village. As a consequence, funding for the schemes has been secured from public and private sector bodies. At the time of the examination the Council confirmed that planning permission had been granted for the Coed Darcy Southern Access Road; work had commenced on the Junction 43, M4 improvements; and the Integrated Transportation Hub (Port Talbot); and the Amman Valley Cycle Way; the Ffordd Amazon (stage 2); Harbour Way (PDR); and Afan Valley schemes were complete. The combination of these schemes provides a comprehensive package of improvements that will promote sustainable travel patterns and ensure greater accessibility for local residents travelling within and outside the County Borough.

### *Design and Access*

- 12.3. Criteria for assessing the design and access arrangements for new development are set out under Policy TR 2. Amongst other things the policy seeks to ensure the safe, effective and efficient use of the highway network. In addition guidance in relation to the impact of development on the primary and core network is contained in the supporting text of Policy SP 20. In order to ensure clarity and consistency within the Plan, the text set out under Policy SP 20 will be deleted and the supporting text of Policy TR 2 amended to include guidance in relation to the impact of new development on the highway network (**MAC47** and **MAC48**).

### *Safeguarding of Freight Facilities*

- 12.4. Policy TR 4 seeks to safeguard land at Port Talbot Tidal Harbour; Port Talbot Docks; the existing and potential wharves, and existing rail connections and sidings for storage and movement of freight. Whilst the policy is flexible

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<sup>104</sup> Deposit LDP, page 11, KI 16

<sup>105</sup> SWW12 Regional Transport Plan 2010 -2015

enough to allow proposals for alternative or complementary uses at these locations, it is clear that these would only be acceptable where it can be demonstrated that they would not inhibit the future movement of freight. The harbour, docks, wharves, rail connections and sidings have been clearly delineated on the Proposals Map. The approach to the identification and safeguarding of freight facilities in Policy TP 4 accords with the requirements of national planning policy<sup>106</sup>.

### *Conclusion*

- 12.5. We conclude that the policies and proposals for Transport and Access, as amended by the MACs, are consistent with national policy, sufficiently flexible to recognise the changing demands of the transportation network and deliverable.

## **13 Culture and Heritage**

- 13.1. Policy SP21 provides a policy framework for the conservation and enhancement of the built environment and historic heritage of Neath Port Talbot. **MAC49** is necessary to ensure that issues, such as the enhancement of heritage assets; and the preparation of conservation area appraisals, are properly addressed through the policy and that it thus complies with national planning policy.

### *The Canal Network*

- 13.2. The canal network is a key element of the historic heritage of Neath Port Talbot. The County Borough has three canals - the Neath, Tennant and Swansea. Whilst restoration has taken place to ensure that significant lengths of these canals are navigable there is a considerable amount of work still to be done<sup>107</sup>. Policy BE 3 seeks to safeguard extensive parts of the Swansea Canal, the whole of the Tennant Canal, and a substantial part of the Neath Canal. The safeguarded lengths are identified on the Proposals Map. In addition, Policy BE 3 seeks to protect other unspecified parts of these canals from any future development which would be a physical impediment to their restoration.
- 13.3. Several parts of the network are not identified in Policy BE 3 or on the Proposal Map. The Council’s position in omitting these stretches is that there is little prospect of restoration taking place during the plan period as, in many instances, they have been filled in, built over or severed from the network by road construction. It considers that to identify these stretches of canal in Policy BE 3 or its supporting text would not comply with the requirements of LDP Wales (2005).
- 13.4. It is clear that the stretches of canal in question are unlikely to be restored during the plan period and that they should not, therefore, be added to Policy BE 3. However, PPW<sup>108</sup> acknowledges that plans can, in some circumstances, be aspirational. In this instance, the locations of these canals are known and

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<sup>106</sup> Technical Advice Note 18: Transport (2007), paragraphs 8.11 – 8.15

<sup>107</sup> SD47 Environment Topic Paper (2014), paragraphs 4.1.10 – 4.1.14

<sup>108</sup> PPW, paragraph 2.2.2

evidence has been presented to demonstrate that over time, and with the appropriate funding, they could be restored<sup>109</sup>. Therefore, in order to ensure that the presence of these canals is taken into account as part of any development proposal, the supporting text of the policy will be amended to specify the locations of these canals. In addition, we also propose to amend Policy BE 3 and its supporting text to more accurately reflect the nature of the constraint on the canal network (**IMAC12**). **MAC51** and **MAC52** express support for the restoration of the network and provide certainty about the approach to protection.

### *Welsh Language*

13.5. The 2011 Census shows an overall decline in the amount of people able to speak Welsh in Neath Port Talbot. At ward level the picture is more varied with some wards with low levels of Welsh speakers and others, where the language is an integral part of the social fabric, with significantly higher levels<sup>110</sup>. Policy SP 22 provides a framework for the protection, promotion and enhancement of the Welsh Language in the Amman Valley; Swansea Valley; Pontardawe; and the community of Crynant in the Dulais Valley where more than 25% of the population speak Welsh. **MAC57** will amend the Proposals Map to delineate Language Sensitive Areas. In addition Policy WL 1, as amended by **MAC53**, requires qualifying development in these areas to provide a language action plan, setting out measures to protect, promote and enhance the Welsh Language. The policy approach is based on robust and credible evidence and is consistent with the requirements of national planning policy.

### *Conclusion*

13.6. We conclude that the provisions made for culture and heritage in the submitted LDP, as amended by the MACs, are consistent with national planning policy and supported by robust and credible evidence.

## **14 Plan monitoring and review**

14.1. Section 6 of the LDP contains a Monitoring Framework which sets out the indicators to be used to monitor delivery of the Plan’s policies and proposals. The monitoring indicators are categorised by strategic policies and consist of core indicators, needed to monitor and assess changes relevant to aspects of national policy, together with local and contextual indicators specific to Neath Port Talbot. The monitoring framework identifies a range of actions which, should the monitoring process indicate that the Plan is not being delivered in the manner intended, will signal a need for the Council to address the situation.

14.2. During the course of the Hearing sessions, the Council accepted that some aspects of the monitoring framework, principally in relation to housing delivery,

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<sup>109</sup> ED029 Restoration of the Neath, Tennant and Swansea Canals (2002); AP10.3 Swansea Canal – Trebanos to Herbert Street Bridge Restoration (2014) and AP10.3(a) Feasibility Study on the Swansea Canal (1994)

<sup>110</sup> SD52 Welsh Language Topic Paper (2014), Chapter 4

economic development and affordable housing, needed to be revised. As a consequence **MAC66** sets out a revised framework.

- 14.3. We conclude that the provisions made for the monitoring and review in the submitted LDP, as amended by **MAC66**, are consistent with national planning policy and will provide a consistent and robust basis on which to assess the performance of the Plan.

## **15 Overall Conclusions**

- 15.1. We conclude that, with the binding recommended changes identified in this report and set out in Appendix A, the Neath Port Talbot Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural, consistency and coherence and effectiveness tests of soundness in LDP Wales.

*Siân Worden*

*Nicola Gulley*

Inspectors

## Appendix A

### Neath Port Talbot Local Development Plan – Schedule of Matters Arising Changes (MACs) and Inspector Changes (IMACs) recommended by the Inspectors

MACs in **bold type** are required to make the Plan sound and are binding on Neath Port Talbot County Council. All other MACs have been proposed by the Council because they improve the clarity, precision and consistency of the Plan. The alterations will result in the renumbering of paragraphs. The MAC references and chapters in the following table relate to the paragraph numbers set out in the submitted plan. The changes to the Plan as amended by the Focused Changes and Minor Changes are indicated in the form of underlined text for additions and ~~strikethroughs~~ for deletions. The Council can make consequential changes arising from MACs and they are not included in this schedule.

The MACs prefixed with an ‘I’ are Inspector changes (IMACs). Additional text recommended by the Inspectors is indicated in **bold italics**. The MACs and IMACs form the basis of our recommendations and are therefore binding changes which are necessary to ensure the soundness of the Plan.

MAC Number	Section in LDP	Details of Change
MAC1	Sub heading and 1.2.3	<p>Sub-Heading - amend to read: Planning Policy Wales (PPW) Edition <u>5 7 (2012 2014)</u></p> <p>Paragraph 1.2.3 – amend to read: The Welsh Government’s land use planning policies are set out in Planning Policy Wales (PPW) Edition <u>5 7 (2012 2014)</u> which provides...</p>
MAC2	1.2.14	<p>Delete Sub Heading <del>A Vibrant Economy (2005)</del></p> <p>Delete supporting text within Paragraph 1.2.14:  <del>This document outlines the Welsh Government's strategic framework for economic development which aims to deliver strong and sustainable economic growth. The approach for realising this vision is built around Wales's core strengths, an increasingly skilled, innovative and entrepreneurial workforce; an advanced technology and knowledge base; strong communities; a stunning natural environment; and an exceptional quality of life. At the heart of the document is the objective of creating more employment and also raising the quality of employment available to both raise the employment rate and the average earnings within Wales. The document states that the Welsh Government will aim to achieve this by:</del></p> <p>Supporting job creation;</p> <ul style="list-style-type: none"> <li><del>• Investing in community regeneration projects;</del></li> <li><del>• Investing in transport networks and other economic infrastructure;</del></li> <li><del>• Attracting more high added value functions to Wales;</del></li> </ul>



MAC Number	Section in LDP	Details of Change
		<ul style="list-style-type: none"> <li>• <del>Helping businesses become more competitive by supporting other drivers to business growth: entrepreneurship, innovation investment and trade;</del></li> <li>• <del>Creating an environment in which businesses can improve the adverse occupational mix and increase average added value per job with the consequent benefit for earning levels;</del></li> <li>• <del>Helping to create a stable and favourable business environment through the public sector;</del></li> <li>• <del>Improving Wales’s skills and qualifications profile;</del></li> <li>• <del>Encouraging the growth of employment in the following high growth sectors — automotive, aerospace, agri food, high technology, pharmaceuticals / bio-chemicals, financial services, creative industries, construction, hospitality, leisure and tourism and social care.</del></li> </ul>
MAC3	1.2.21- 1.2.22	<p>Sub-Heading - amend to read:  <del>South West Wales Regional Transport Plan (2010-2015)</del> <u>Joint Transport Plan for South West Wales (2015-2020)</u></p> <p>Paragraph 1.2.21 – amend to read:  <del>The Regional Transport Plan (RTP) is the result of joint working between four local authorities including Carmarthenshire, Neath Port Talbot, Swansea and Pembrokeshire. The Plan shapes the transport policy in the region for the period 2010-15 and beyond’.</del>  <u>The Joint Transport Plan for South West Wales (JTP) Regional Transport Plan (RTP) is the result of joint working between four local authorities including Carmarthenshire, Neath Port Talbot, Swansea and Pembrokeshire. The Plan shapes the transport policy in the region for the period 2015-2020 and beyond’.</u></p> <p>Paragraph 1.2.22 – amend to read:  <del>The vision is to improve transport and access within and beyond the region to facilitate economic regeneration, reduce deprivation and support development and the development and use of more sustainable and healthier modes of transport. To deliver this vision the RTP identifies strategic objectives, a long term strategy and a programme of projects to deliver the strategy and objectives’.</del></p>
MAC4	1.2.48- 1.2.50	<p>Delete Sub Heading  <del>Local Housing Strategy (2007-2012)</del></p> <p><del>Section 87 of the Local Government Act 2003 requires local authorities to produce Local Housing Strategies (LHS) that set out the key issues facing housing provision within a local authority area. The strategy covers a five year period (2007-2012) and considers how people’s housing needs and aspirations can be met within a national, regional and local strategic context which includes: housing supply, needs and demands in the area across all tenure; the housing needs of all sections of the community; healthiness, quality, eco-efficiency and broader environmental factors relating to housing.</del></p>

MAC Number	Section in LDP	Details of Change
		<p>Delete Paragraph 1.2.49  <del>The strategy identifies a number of specific challenges facing the authority for the period to 2012, together with an action planning framework for the achievement of those objectives.</del></p> <p>Delete Paragraph 1.2.50  <del>The objectives are based around:</del></p> <ul style="list-style-type: none"> <li><del>• Poor health and disability;</del></li> <li><del>• An increase in homelessness including families with children;</del></li> <li><del>• Poor housing conditions across all tenures;</del></li> <li><del>• Changing demographics (i.e. ageing population, people moving out of the area);</del></li> <li><del>• Need for housing based support;</del></li> <li><del>• Fuel poverty, energy efficiency and affordable warmth;</del></li> <li><del>• New and evolving strategic responsibility, including housing within the regional context;</del></li> <li><del>• The need for a sound evidence base on which to base strategies and plans as well as to ensure ongoing relevance;</del></li> <li><del>• Sustaining Employment Opportunities.</del></li> </ul> <p>Replace with:  <u>Local Housing Strategy (2015-2020)</u>  <u>Section 87 of the Local Government Act 2003 requires local authorities to produce Local Housing Strategies (LHS) that set out the key issues facing housing provision within a local authority area. Housing, and access to housing, is a fundamental aspect of life and impacts on all members of society regardless of age, race or status. The LHS sets out the agreed vision for addressing the housing needs of Neath Port Talbot over the period to 2020: 'Our Vision is that Housing in Neath Port Talbot will be appropriate, affordable, of good quality, in sustainable communities, offering people choice and support if they need it'.</u>  <u>In 2011, the Council transferred its social housing stock to NPT Homes, following the implementation of the Welsh Housing Quality Standards. Whilst the management responsibilities have been transferred, the Council still retains a strategic housing function. The LHS links to the priorities and outcomes of other relevant plans and strategies, in particular the Single Integrated Plan 2013-2023, ensuring the Council works together to meet housing needs.</u>  <u>The Strategy focuses on the following:</u></p> <ul style="list-style-type: none"> <li>• <u>The impact of welfare reform in Neath Port Talbot;</u></li> <li>• <u>The housing market in Neath Port Talbot, including local demographics;</u></li> <li>• <u>Gypsy and Traveller accommodation needs;</u></li> <li>• <u>Increasing the supply of affordable housing;</u></li> </ul>

MAC Number	Section in LDP	Details of Change
		<ul style="list-style-type: none"> <li>• <u>Improving housing conditions; including Empty Property Recyclable Loans, Disabled Facilities Grant and Welsh Housing Quality Standards;</u></li> <li>• <u>The role of the private rented sector;</u></li> <li>• <u>Preventing homelessness;</u></li> <li>• <u>Housing, health and social care agenda;</u></li> <li>• <u>Older persons housing; and</u></li> <li>• <u>Housing and regeneration’.</u></li> </ul>
MAC5	1.2.51-1.2.52	<p>Delete Sub Heading <del>Local Biodiversity Action Plan (2008)</del></p> <p>Delete Paragraph 1.2.51  <del>The Local Biodiversity Action Plan (LBAP) was produced on behalf of the Neath Port Talbot Biodiversity Forum and published in 2008.</del></p> <p>Delete Paragraph 1.2.52  <del>The LBAP lists action plans for a number of species and habitats of national and/or local priority in Neath Port Talbot and sets out the targets for conservation action. The overall aims of the LBAP are:</del></p> <ul style="list-style-type: none"> <li><del>• To increase awareness of the importance of local wildlife;</del></li> <li><del>• To educate people about the importance of particular habitats in order to conserve the flora and fauna they support;</del></li> <li><del>• To encourage local people to get involved in protecting and enjoying their local biodiversity;</del></li> <li><del>• To increase and share the knowledge held about particular species and sites;</del></li> <li><del>• To influence man's activities to be more sensitive to local biodiversity needs;</del></li> <li><del>• To enhance and protect existing habitats, to restore former habitat and actively create new ones;</del></li> <li><del>• To halt the loss of biodiversity in Neath Port Talbot, in line with the national target.</del></li> </ul> <p>Replace with:  <u>Local Biodiversity Action Plan (2014)</u></p> <p><u>The Neath Port Talbot Local Biodiversity Action Plan (LBAP) 2014 is a tool for securing and focusing the resources needed to protect and enhance the biodiversity of the County Borough. The focus of the LBAP is to achieve no net loss of listed habitats and species, and a gain in the (perceived or actual) extent / population of listed habitats and species.</u></p>

MAC Number	Section in LDP	Details of Change
		<p>The LBAP contains all the information needed to allow organisations to protect and enhance biodiversity in the County Borough. In a move away from traditional target led plans the LBAP concentrates on actions, which will be informed by regular reviews of the status and pressures on habitats and species’.</p>
<b>MAC6</b>	2.2, OB 15	<p>Amend objective OB 15 as follows:                      OB 15: Conserve Neath Port Talbot's important landscapes, <u>countryside</u>, undeveloped coast, important wildlife, habitats and geodiversity sites, ensuring that developments throughout the County Borough respect all landscapes and minimise adverse impacts.</p>
<b>MAC7</b>	Section 2	<p>Remove all references to the ‘<del>LDP Strategy</del>’ and ‘<del>Development Strategy</del>’ and replace with ‘<u>The Strategy</u>’.                      Replace all references to the ‘<del>Growth Strategy</del>’ and ‘<del>Spatial Strategy</del>’ with ‘<u>Growth</u>’ and ‘<u>Spatial Distribution</u>’ respectively.                      Delete paragraph 2.3.1                      Amend paragraph 2.3.8 to read ‘The ‘Coastal Corridor <del>Strategy Area</del>’ contains the main centres of population...’                      Amend paragraph 2.3.8 to read ‘...In the Valleys <del>Strategy Area</del> the scope for development is further reduced due to topography and access to the main arterial transport routes (rail and M4). <del>The Valleys area is made up of five main valleys; the Afan, Amman, Dulais, Neath and Swansea and the town of Pontardawe.</del>’                      Amend paragraph 2.4.1 to read ‘The level of growth is based on an economic-led <u>strategy scenario</u> which complements...’                      Amend paragraph 2.4.3 to read ‘This ensures alignment between the employment and housing <del>strategies</del> resulting in a more sustainable pattern of development which in turn improves the robustness of the LDP <del>Strategy.</del>’                      Amend paragraph 2.4.6 to read ‘...environmental capacity to accommodate <del>#</del> <u>growth</u> without causing...’                      Amend paragraph 2.4.14 to read ‘...Baglan Bay aligns with other elements of the <del>LDP Strategy</del>...’                      Amend paragraph 2.5.4 to read ‘...The <del>identification of a</del> ‘settlement hierarchy’ <u>has identified communities that have the sufficient capacity to accommodate new development within designated boundaries. It has been used to provide a balanced approach to managing growth, directing development to areas reflecting the attributes contained within that community and their ability to accommodate growth...</u>’                      Amend paragraph 2.5.10 to read ‘<del>The strategy provides a different approach</del> In the Valleys, <del>where the identification of</del> growth areas <u>are identified</u> in recognition of their role as service hubs...’                      Amend paragraph 2.5.28 to read ‘... <del>The Plan strategy is</del> <u>A number of measures are identified</u> to encourage a modal shift...’                      Amend the use of headings and fonts in order to distinguish and better illustrate elements of the strategy.</p>

MAC Number	Section in LDP	Details of Change
<b>MAC8</b>	Map 1.1, Map 1.2 Map 2.1	Insert images of improved quality for: Map 1.1 – Spatial Context of Neath Port Talbot; Map 1.2 – Topography and Main Settlement of Neath Port Talbot; and Map 2.1 – Extract from the Wales Spatial Plan of the Waterfront and Western Valleys Spatial Area.
MAC9	2.4.8	Amend to read 'Two of the four overarching objectives <del>/strategies</del> of the Plan include climate change and health which will be <u>embedded</u> <del>implemented</del> through all of the Plan's policies and proposals'.
MAC10	2.2 Policy SP2	Add reference to Key Issue 2 (KI 2) to all relevant Plan Objectives (i.e. all objectives with the exception of OB14, OB18; OB19; OB20).
<b>MAC11</b>	2.4	<p>Within the Climate Change, Health &amp; the Environment section of the Strategy, add new text after paragraph 2.4.9:</p> <p><u>Both the natural and built environments contain features that can impact on the health and well being of the population. A well-designed, adequately resourced and well-connected neighbourhood can have positive health benefits. Ensuring that connections between the places where the residents of Neath Port Talbot work, live, play, relax and socialise can help contribute towards the creation of healthy and sustainable communities.</u></p> <p><u>The quality of the natural environment and the basic natural needs that it provides for are of great importance for health and well-being. The Strategy will seek to protect the environment (air, water and ground quality) and the amenity of the local communities and ensure the location of major housing developments takes account of the need to reduce people’s exposure to those elements that can have an adverse impact on their health, including siting sensitive developments away from sources of noise, air pollution and flood risk.</u></p> <p><u>The quality of the built environment can also influence the health and well-being of the population. Well connected, accessible, attractive and safe communities with access to community facilities (such as shops, schools, health-care facilities and open space) may encourage greater levels of physical activity (walking and cycling) and social activity which in turn can improve health and well-being.</u></p> <p><u>The employment-led strategy aims to encourage economic development throughout the County Borough providing a range of jobs. The strategy seeks to increase economic activity rates and reduce unemployment levels in line with the Welsh average. The provision of new employment opportunities may also result in</u></p>

MAC Number	Section in LDP	Details of Change
MAC12	Policy SP 2	<p><u>positive health benefits.</u></p> <p>Add reference to the relevant key policies under each of the criteria to ensure that the contribution from other policies towards addressing the health issues is highlighted. For clarity amend criterion 2.</p> <p><b>Policy SP2</b></p> <p><b>Health</b> The following measures will be taken in relation to the high levels of poor long term health and sickness in Neath Port Talbot:</p> <ol style="list-style-type: none"> <li>1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework;  <u>Relevant Key Policies - SC1; SC2; I1; EC1-EC6; BE1.</u></li> <li>2. People's exposure to <del>the determinants of poor health</del> <u>those elements that can have an adverse impact on their health (such as their social, economic or physical environment)</u> will be reduced where possible through consideration of the environmental and safety impacts of new developments;  <u>Relevant Key Policies: H1; AH1-AH2; GT1-2; OS1-OS2; EN8-EN10; BE1.</u></li> <li>3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, <u>retail</u>, social and community facilities throughout the County Borough;  <u>Relevant Key Policies: OS1-OS2; SC2; I1, R1-R3; BE1.</u></li> <li>4. Accessibility within and between communities will be improved to encourage active travel;  <u>Relevant Key Policies: TR1; TR2; BE1.</u></li> <li>5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates.</li> </ol>

MAC Number	Section in LDP	Details of Change
		<p><u>Relevant Key Policies: EC1-EC6.</u></p> <p>Add reference to the Health Objective (OB2) to all relevant Strategic Policies:</p> <p>SP1 (Climate Change); SP3 (Sustainable Communities); SP4 (Infrastructure); SP7 (Housing Requirement); SP8 (Affordable Housing); SP9 (Gypsies and Travellers); SP10 Open Space; SP11 (Employment Growth); SP12 (Retail); SP16 (Environmental Protection); SP20 (Transport Network) and SP21 (Built Environment and Historic Heritage).</p>
<b>MAC13</b>	3.0.7	<p>Amend paragraph 3.0.7 to read:</p> <p><del>'As with Policy SP1 Climate Change, the measures outlined to address health issues will be implemented through a number of all the Plan policies and proposals: focusing on sustainable development principles, strengthening communities and encouraging more healthy lifestyles through the provision of facilities. Environmental and housing issues will be addressed, and increased employment opportunities encouraged.</del></p> <ul style="list-style-type: none"> <li>• <u>Sustainable Settlements – the development of sustainable, healthy and cohesive communities, either newly-built settlements such as Coed Darcy or through the enhancement and improvement of existing settlements is a fundamental element of the LDP’s strategic approach. In defining a ‘settlement hierarchy’, development is directed to the most sustainable locations helping to sustain the existing services and facilities on offer and also provide the opportunity to deliver additional services and facilities for the benefit of the wider community. A well designed, adequately resourced and well-connected neighbourhood can provide positive health benefits;</u></li> <li>• <u>Housing Allocations – the location of the major housing developments takes account of the need to reduce people’s exposure to those elements that can have an adverse impact on their health, including siting sensitive developments away from sources of noise, air pollution and flood risk. Furthermore, new housing is built to strict environmental standards to increase energy efficiency;</u></li> <li>• <u>Protection of Community Facilities – healthier, more active and safer lifestyles are encouraged through policies seeking the retention of a range of accessible leisure, recreational, health, social, cultural and community facilities throughout the County Borough. Multi-use facilities and the co-location of new health and community facilities are also encouraged;</u></li> </ul>

MAC Number	Section in LDP	Details of Change									
		<ul style="list-style-type: none"> <li>• <u>Provision and Protection of Open Space – policies seek to ensure that all residents have access to adequate open space through ensuring that new development addresses local needs and that existing open spaces are retained and protected. Such provision includes outdoor sport facilities, children’s play facilities, informal open space, green space and allotments;</u></li> <li>• <u>Accessibility – policies seek to improve accessibility between communities, encouraging active travel wherever possible. New developments are required to be served by sustainable transport options and facilitate connectivity between existing and new development, providing footpath/ cycle links where feasible;</u></li> <li>• <u>Employment – policies seek to provide new employment opportunities to reduce unemployment and economic inactivity rates;</u></li> <li>• <u>Environment – the quality of the environment and the basic natural needs that it provides for are of great importance for health and well being. Policies therefore seek to protect the environment and the amenity of local communities. Air, water, ground quality and the environment generally are protected. In particular, policies seek to ensure that developments do not increase the number of people exposed to significant levels of pollution’.</u></li> </ul>									
<b>MAC14</b>	Table 3.1	<p>Insert new column within table in order to better explain the settlement hierarchy.</p> <table border="1" data-bbox="568 986 1921 1348"> <thead> <tr> <th data-bbox="568 986 748 1054">Tier of Hierarchy</th> <th data-bbox="748 986 1335 1054">Role &amp; Function</th> <th data-bbox="1335 986 1921 1054">Settlement</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 1054 748 1254">Town</td> <td data-bbox="748 1054 1335 1254"><u>Regionally important settlements providing the widest and most diverse range of functions. Located on the strategic road network, they are fully accessible by a range of transport options.</u></td> <td data-bbox="1335 1054 1921 1254">Neath (including Melincryddan) / Port Talbot (including Velindre) / Pontardawe (including Trebanos, Rhydyfro &amp; Ynysmeudwy)</td> </tr> <tr> <td data-bbox="568 1254 748 1348">District Centre</td> <td data-bbox="748 1254 1335 1348"><u>Settlements with good transport links and a wide range of functions serving the immediate and surrounding communities.</u></td> <td data-bbox="1335 1254 1921 1348">Briton Ferry / Skewen / Taibach / Glynneath (including Pontwalby)</td> </tr> </tbody> </table>	Tier of Hierarchy	Role & Function	Settlement	Town	<u>Regionally important settlements providing the widest and most diverse range of functions. Located on the strategic road network, they are fully accessible by a range of transport options.</u>	Neath (including Melincryddan) / Port Talbot (including Velindre) / Pontardawe (including Trebanos, Rhydyfro & Ynysmeudwy)	District Centre	<u>Settlements with good transport links and a wide range of functions serving the immediate and surrounding communities.</u>	Briton Ferry / Skewen / Taibach / Glynneath (including Pontwalby)
Tier of Hierarchy	Role & Function	Settlement									
Town	<u>Regionally important settlements providing the widest and most diverse range of functions. Located on the strategic road network, they are fully accessible by a range of transport options.</u>	Neath (including Melincryddan) / Port Talbot (including Velindre) / Pontardawe (including Trebanos, Rhydyfro & Ynysmeudwy)									
District Centre	<u>Settlements with good transport links and a wide range of functions serving the immediate and surrounding communities.</u>	Briton Ferry / Skewen / Taibach / Glynneath (including Pontwalby)									



MAC Number	Section in LDP	Details of Change			
		Large Local Centre	<u>Settlements with adequate public transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision.</u>	Bryncoch / Cimla / Neath Abbey / Baglan / Aberavon / Baglan Moors / Sandfields / Margam / Cwmafan (including Ynysygwas) / Resolven / Crynant (including Treforgan, Pen y Bont & Ynyswen) / Gwaun Cae Gurwen (including Cae Newydd) / Ystalyfera	
		Small Local Centre	<u>Settlements with adequate public transport links with at least one shop and/or several community facilities.</u>	Aberdulais / Cadoxton / Cilfrew / Longford / Tonna / Bryn / Coed Hirwaun / Alltwen / Rhos / Cwmgwrach / Onllwyn & Banwen / Seven Sisters / Cwmgors / Lower Brynamman / Tairgwaith / Cilmaengwyn & Godre’r Graig / Cwmllynfell / Cwmtwrch / Cymmer / Croeserw / Glynccorrwg / Blaengwynfi & Abergwynfi / Tonmawr	
		Village	<u>Settlements with at least one community facility and adequate public transport links.</u>	Crymlyn Burrows / Jersey Marine / Llandarcy / Ynysygerwyn / Goytre / Oakwood / Gellinudd / Clyne / Melincourt / Abergarwed / Pant y Ffordd / Pontrhydyfen & Efail Fach / Dyffryn (including Cynonville)	
		Dormitory Settlement	<u>Settlements with minimal or no facilities, served by minimal or no public transport.</u>	Dyffryn Church / Ten Acre Wood / Eglwys Nunydd & St David’s Park / Pen y Bryn / Fforest Goch / Cilybebyll / Cyd Terrace / Glynccastle / Ynysarwed / Penrhiwfawr / Cwm Ifan Bach / Abercregan	

MAC Number	Section in LDP	Details of Change
<b>MAC15</b>	3.0.12	<p>Amend paragraph in order to better explain the approach to be taken in relation to the settlement hierarchy as follows:</p> <p><u>All settlements have been assessed for their capacity to accommodate new development and their potential for expansion. Consequently, with the exception of Dormitory settlements, all settlements have defined limits, with greater potential for development incorporated for settlements that are higher in the hierarchy.</u> Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside’.</p>
<b>MAC16</b>	3.0.13 & new paragraph	<p>Amend paragraph in order to better explain the approach to be taken in relation to the settlement hierarchy as follows:</p> <p>Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy <u>and subject to it being proportionate in scale and form to the role and function of the settlement. For example, larger scale proposals, such as developments of more than a few dwellings or uses that will attract or accommodate significant numbers of people are only likely to be acceptable in larger centres or towns where there are adequate facilities and transport infrastructure.</u> <del>but</del> In areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy’</p> <p>Insert new paragraph after 3.0.13 in order to better explain the approach to be taken in relation to the settlement hierarchy as follows:</p> <p><u>Due to their lack of facilities, Dormitory settlements are not considered to be sustainable locations for most types of development and consequently do not have defined settlement limits. Proposals for development in Dormitory settlements will be treated as development outside settlement limits under Policy SC1. Proposals for development outside settlement limits that can be justified under the terms of Policy SC1 will be expected to be located near to existing development whenever possible, preferably within or adjacent to Dormitory settlements where appropriate.</u></p>

MAC Number	Section in LDP	Details of Change												
<b>MAC17</b>	3.0.26	<p>Amend paragraph to read:</p> <p><u>'Once the essential infrastructure needed to enable a scheme to proceed (such as access and servicing) has been addressed, the priorities given to the provision of different types of infrastructure and community benefits will vary depending upon a number of factors. Different communities within the County Borough will have distinct and specific needs across a range of infrastructure categories which may change or evolve over time. Additionally, the priority given to different types of infrastructure will vary according to the area concerned, the nature of the site and development proposed scale, type and the specific policies applicable to the development. Hence it is not deemed appropriate to identify a rigid or consistent prioritisation of infrastructure requirements that can be used to pre-determine the type of developer contribution to be provided. It is expected however that the requirement for planning obligations will aim to address the key issues of the Plan, with the provision of affordable housing being of paramount importance. Further details and information will be given in the Planning Obligations Supplementary Planning Guidance'</u></p>												
<b>MAC18</b>	SRA2	<p>Policy SRA2 (Harbourside Strategic Regeneration Area) - amend the table to read:</p> <table border="1" data-bbox="703 783 1785 975"> <thead> <tr> <th>Reference</th> <th>Use</th> <th>Size</th> </tr> </thead> <tbody> <tr> <td>H1/17</td> <td>Residential</td> <td>385 <del>520</del> Units</td> </tr> <tr> <td>EC1/4</td> <td>Employment</td> <td>7 <del>11</del> ha</td> </tr> <tr> <td>R1/3</td> <td>A1 Bulky Comparison Goods</td> <td>3.37 ha</td> </tr> </tbody> </table>	Reference	Use	Size	H1/17	Residential	385 <del>520</del> Units	EC1/4	Employment	7 <del>11</del> ha	R1/3	A1 Bulky Comparison Goods	3.37 ha
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<b>MAC19</b>	New Paragraph after 4.0.12	<p>Add new text after Paragraph 4.0.12:</p> <p><u>The Harbourside allocation area is affected by the risk of flooding, with significant parts identified as being within Development Advice Map Zone C<sup>1</sup>. All development proposals within the Harbourside allocation will be required to demonstrate that they accord with national policy relating to flood risk as set out in TAN15, including provision for emergency access and egress in accordance with an agreed evacuation plan.</u></p>												

<sup>1</sup> Area based on NRW extreme flood outline having probability of flooding of 0.1% or greater.

MAC Number	Section in LDP	Details of Change
<b>MAC20</b>	4.0.13	<p>Amend para. 4.0.13 to take into account the amended Harbourside masterplan and SPG as follows:</p> <p><u>In order to support the regeneration of the area and to give clarity about site constraints a masterplan will be published in the form of Supplementary Planning Guidance (SPG). The masterplan will provide guidance as to the type of development that the Council considers appropriate within Harbourside and the town centre, including residential units, bulky goods retail, leisure and recreation, education and business uses (offices, light industry and storage/distribution). The phasing and timescales envisaged for the development will be set out, taking into account the current position, the amount of site preparation needed and flood risk considerations. The majority of development plots identified in the masterplan are not within flood risk areas and those that are include sufficient Zone A<sup>2</sup> land to accommodate the development envisaged.</u></p>
<b>MAC21</b>	4.0.14 & Map 4.2	<p>Amend para. 4.0.14 to update text in relation to Harbour Way as follows:</p> <p>Parcels of land have already been developed including a Research and Development Facility and a Justice Centre. Harbour Way is <u>now completed and provides</u> <del>nearing completion and once opened will</del> excellent transport links from the site to the M4.</p> <p>Insert updated map to latest version of Harbourside SRA Masterplan (dated 26<sup>th</sup> May 2015)</p>
<b>MAC22</b>	New Policy	<p>Add new policy after paragraph 4.0.24:</p> <div style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p><u>Policy CCUC1</u></p> <p><u>Coastal Corridor University Campus</u></p> <p><u>Land is allocated on Fabian Way for the development of the Swansea University Science and Innovation Campus, comprising of Academic University Facilities, Research and Development and Student Residential Accommodation.</u></p> </div>

<sup>2</sup> Area defined as being at little or no risk of fluvial or tidal/coastal flooding.

MAC Number	Section in LDP	Details of Change
		<p>Move existing Paragraph 4.0.5 and add new text as follows:</p> <p><u>The Swansea University Science and Innovation Campus is a significant development in Neath Port Talbot and has the potential to promote growth within the local area and also within the City Region.</u></p> <p><u>Outline Planning Permission was granted in August 2012 for the Science and Innovation Campus for Swansea University, with facilities for academic, university residential uses, industrial/research and development (R&amp;D) space (Use Class B1). Reserved matters were subsequently approved for Phase 1 in December 2012. It will include capacity to accommodate up to 4,000 full time student residents, with academic facilities for a total of up to 5,100 students.</u></p> <p><u>The remainder of the site allows for further expansion of this integrated research/education campus facility, which also has the potential to extend beyond the Authority's boundary to the west. The development is seen as significant in terms of attaining the aspirations and key principles for socio-economic growth in the region as set out within the Wales Spatial Plan, acting as a major contributor to the knowledge economy in providing an innovation campus where higher education and research and development can be fully integrated.</u></p> <p><u>Applications for ancillary services and facilities will be assessed on the merits of the proposal to ensure schemes are appropriate in scale and to the function of the campus. Such facilities may include small scale retail, commercial services and additional R&amp;D facilities.</u></p>
MAC23	5.1.7	<p>Delete Paragraph 5.1.7:  <b>Empty Homes Initiative</b>— An allowance has been made within the housing requirement for a number of empty properties to be brought back into use for residential purposes.</p>

MAC Number	Section in LDP	Details of Change																																				
<b>MAC24</b>	5.1.10 Policy H1	<p>Amend Paragraph 5.1.10/Policy H1 Housing Sites table and make any necessary consequential changes throughout the Plan.</p> <p>Reduce Housing allocation H1/29 from 120 to 70.</p> <table border="1" data-bbox="566 424 1928 624"> <thead> <tr> <th colspan="6">Valleys</th> </tr> <tr> <th>Spatial Area</th> <th>Ref:</th> <th>Site Name</th> <th>Settlement</th> <th>Estimated Number of Units</th> <th>Site Area (ha)</th> </tr> </thead> <tbody> <tr> <td>Swansea Valley</td> <td>H1/29</td> <td>Compair / GMF</td> <td>Ystalyvera</td> <td><del>120</del> 70</td> <td>3.3</td> </tr> </tbody> </table> <p>Add the following site at Parc Ynysderw to address the reduction in housing supply.</p> <table border="1" data-bbox="566 719 1928 890"> <thead> <tr> <th colspan="6">Valleys</th> </tr> <tr> <th>Spatial Area</th> <th>Ref:</th> <th>Site Name</th> <th>Settlement</th> <th>Estimated Number of Units</th> <th>Site Area (ha)</th> </tr> </thead> <tbody> <tr> <td><u>Pontardawe</u></td> <td></td> <td><u>Parc Ynysderw</u></td> <td><u>Pontardawe</u></td> <td><u>50</u></td> <td><u>1.2</u></td> </tr> </tbody> </table>	Valleys						Spatial Area	Ref:	Site Name	Settlement	Estimated Number of Units	Site Area (ha)	Swansea Valley	H1/29	Compair / GMF	Ystalyvera	<del>120</del> 70	3.3	Valleys						Spatial Area	Ref:	Site Name	Settlement	Estimated Number of Units	Site Area (ha)	<u>Pontardawe</u>		<u>Parc Ynysderw</u>	<u>Pontardawe</u>	<u>50</u>	<u>1.2</u>
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<b>MAC26</b>	SP1 & explanatory text	<p>Amend policy wording to clarify the approach to be taken to flood risk as follows:</p> <p>In relation to the consequences of climate change:</p> <ol style="list-style-type: none"> <li>1. Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by <del>guiding</del> <u>avoiding</u> development <del>away from</del> <u>on</u> land that is at risk from flooding <u>in the first instance in accordance with the sequential approach set out in national guidance or in</u> locations that could increase the risk of flooding elsewhere;</li> </ol> <p>Add new explanatory text after paragraph 3.0.4:</p> <p><u>New developments will be expected to avoid unnecessary flood risk and to meet the requirements of TAN 15: Development and Flood Risk. No highly vulnerable development will be permitted within Development Advice Map (DAM) zone C2<sup>1</sup> and development will only be considered in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in the TAN.</u></p> <p>Footnote to read:</p> <p><sup>1</sup>TAN15 Development Advice Map (DAM) is available to view on the following link:  <a href="http://data.wales.gov.uk/apps/floodmapping/">http://data.wales.gov.uk/apps/floodmapping/</a></p>
<b>MAC27</b>	Policy H1	<p>Add new text after Paragraph 5.1.16:  <u>Appendix A provides brief descriptions of the proposed housing sites together with an overview of site specific delivery and implementation issues, including information, where this is known, of site constraints, necessary mitigation/compensation measures and the potential S106/infrastructure requirements that will be needed in order to bring the sites forward for development.</u></p>
<b>MAC28</b>	Policy SP 8	<p>Amend Policy SP 8: Affordable Housing and supporting text, as follows;</p> <p>Provision will be made to deliver <del>2,500</del> <u>1,200</u> affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures...</p>
<b>MAC29</b>	5.1.20	<p>Amend para. 5.1.20 to read:</p> <p>Strategic Policy SP7 detailed the total housing requirement for the LDP period as <del>8,000</del> <u>7,800</u> new dwellings. Of these dwellings, <del>2,500</del> <u>1,200</u> will be 'affordable.</p>

MAC Number	Section in LDP	Details of Change
MAC30	Policy AH1	<p>Amend Policy AH1 to read: All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision.</p> <p><del>The contribution is calculated as a percentage of Gross Development Value (GDV).</del></p> <p>Affordable Housing Percentage Targets will be sought in the following spatial areas: Coastal Corridor:</p> <ul style="list-style-type: none"> <li>• Neath - <del>20%</del> <u>25%</u></li> <li>• Port Talbot - <del>20%</del> <u>25%</u></li> </ul> <p>Valleys:</p> <ul style="list-style-type: none"> <li>• Pontardawe - <del>5%</del> <u>10%</u></li> <li>• <del>Afan Valley 0%</del></li> <li>• <del>Amman Valley 0%</del></li> <li>• <del>Dulais Valley 0%</del></li> <li>• <del>Neath Valley 0%</del></li> <li>• <del>Swansea Valley 0%</del></li> </ul> <p>The provision of affordable housing will be implemented through the use of planning conditions, obligations and/or legal agreements between the Council, Developers and Registered Social Landlords.</p> <p><del>Proposals for 10+ residential units in areas where there is a 0% Affordable Housing target will be required to produce a viability assessment. If viable, a 5% contribution will be required.</del></p>
MAC31	5.1.28	<p>Amend paragraph 5.1.28 by deleting the following:</p> <p><del>The targets identified are based on Gross Development Value, rather than a set percentage of units. The Council considers this approach to be more robust, as it takes into consideration specific factors associated with developing a particular site and the economics at that point in time. Contributions will be sought on developments of 3 or more units’.</del></p>
MAC32	5.1.29 & 5.1.30	Combine and amend paras. 5.1.29 & 5.1.30 as follows:



MAC Number	Section in LDP	Details of Change
		<p><del>'Reflecting the variation in residual values and the ability of spatial areas in Neath Port Talbot to support affordable housing, Based on a percentage of the total number of units, affordable housing will be required at a rate of 20% of Gross Development Value (GDV) 25% in the Neath and Port Talbot spatial areas and at a rate of 5% 10% in Pontardawe. The spatial area of Pontardawe consists of the Trebanos, Alltwen, Rhos and Pontardawe electoral wards, which combined include the following settlements: Pontardawe; Trebanos; Rhydyfro; Ynysmeudwy; Alltwen; Gellinudd; and Rhos. The GDV of a site will be agreed between the Council and the applicants based on the number of units to be accommodated and the open market value of the completed dwellings'. The Viability Study found the Valley areas did not support the provision of affordable housing and as such no contribution is sought within these areas. However, there are potential 'hot spots' within these areas that may have the potential to contribute to affordable housing. On this basis, sites of 10 units or more will be required to undertake a viability assessment as part of the planning application to assess if the site can contribute to affordable units. Should affordable housing prove viable, contributions will be required at 5% GDV, in line with the contributions sought in Pontardawe'.</del></p>
<b>MAC33</b>	5.1.32 - 5.1.33	<p>Add new paragraph between 5.1.32 and 5.1.33 to explain the approach that will be taken in negotiation with developers on affordable housing matters as follows:</p> <p><u>The Council acknowledges there may be exceptional circumstances where achieving the target percentages may result in a development not being economically viable. In such circumstances the Authority will require evidence from the developer to demonstrate that the economic viability of the site is affected by genuine economic constraints through the submission of a detailed financial viability appraisal. Where the Authority is satisfied that the developer has been able to show, using robust evidence that the provision of affordable housing identified in Policy AH 1 is not viable, then reduced or phased contributions may be negotiated or the requirement to provide affordable housing removed (subject to annual viability appraisals until the development is complete).</u></p>
<b>MAC34</b>	5.1.37	<p>Amend para. 5.1.37 as follows:</p> <p>RSLs must be able to fully justify the release of such sites by demonstrating there is genuine evidence of local need, which cannot be addressed within the existing settlement. Applicants will be required to demonstrate that the need in the area cannot be met within LDP housing allocations in that area or within existing settlement limits. <del>Only if no sites are available adjacent to settlement limits will sites in sustainable locations away from settlements be considered.</del></p>
<b>MAC35</b>	Policy AH 2	<p>Amend Policy AH2 Affordable Housing Exception Sites as follows:</p> <p>Small affordable housing sites (9 units and below) outside identified settlement limits will be permitted</p>

MAC Number	Section in LDP	Details of Change
		<p>where all of the following criteria, where relevant, are satisfied:</p> <ol style="list-style-type: none"> <li>1. Evidence exists in the form of a local housing needs survey (or by reference to alternative housing need data) that there is a genuine demonstrable local need for such accommodation;</li> <li>2. It is demonstrated that the need for affordable housing cannot be satisfactorily met within existing settlement limits and the development is located adjacent to an existing settlement;</li> <li>3. The site is solely for affordable housing and there are clear and adequate arrangements to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers.</li> <li>4. <del>It is demonstrated that measures can be taken to reduce adverse impacts on the environment, landscape and neighbouring amenities;</del></li> <li>5. <del>It can be demonstrated that the development would not compromise highway safety;</del></li> <li>6. <del>The location of the site is sustainable, taking into account accessibility to facilities, services and public transport.</del></li> </ol>
<b>MAC36</b>	5.1.44 – 5.1.45	<p>Amend supporting text to Policy GT1 to provide clarity on how the need for Gypsy and Traveller sites will be provided over the whole plan period as follows:</p> <p>5.1.44 The 2012 Neath Port Talbot Gypsy and Traveller Accommodation Needs Study identified a need of <u>20 additional residential pitches over the Plan period, with 11 of these pitches required additional pitches over the short to medium term of the LDP, up to 2022. This need These 11 pitches will be provided through an expansion of the existing, well established Gypsy and Traveller site at Cae Garw, Margam’.</u></p> <p>Para. 5.1.45 The Council intends to closely monitor the need and take-up of pitches through the Annual Monitoring Report and will review the requirement for the latter part of the Plan period (post 2023), through <u>the monitoring framework specified targets and triggers. In accordance with the Housing (Wales) Act 2014, the Council will undertake a new Gypsy and Traveller Accommodation Assessment (GTAA) every five years, and unless an updated GTAA identifies a revised need, the remaining 9 pitches identified by the 2012 study will be implemented by 2026.</u></p>
<b>MAC37</b>	5.1.53	<p>Amend paragraph 5.1.53 to include a reference to greenspace as follows:</p> <p>The LDP strategy is to address inequalities in Open Space provision where possible through the planning system by retaining and enhancing existing provision and requiring new development to make provision for Open Space where there is a need. The term 'Open Space' refers to publicly accessible recreational space</p>

MAC Number	Section in LDP	Details of Change																								
		and includes playing fields, sports pitches and courts; children’s play areas, facilities for older children, informal open space, <u>greenspace</u> , parks and allotments’																								
<b>MAC38</b>	5.2.3	Amend Paragraph 5.2.3 as follows: This area of land is made up of <u>15</u> <del>11</del> hectares of conventional B class employment uses																								
<b>MAC39</b>	Policy EC 1	<p>Policy EC1 Employment Allocations – amend to read: The following sites are allocated for employment uses:</p> <table border="1"> <thead> <tr> <th>Reference</th> <th>Site</th> <th>Size</th> <th>Use Class Permitted</th> </tr> </thead> <tbody> <tr> <td>EC1/1+</td> <td>Baglan Bay</td> <td>75 ha*, of which <del>11ha</del> <u>15ha</u> is allocated for B Use Class **</td> <td>B1, B2 and B8 Use Classes defined within Glossary</td> </tr> <tr> <td>EC1/2+</td> <td>Junction 38 (M4), Margam</td> <td>6 ha **</td> <td>B1, B2 and B8</td> </tr> <tr> <td>EC1/3</td> <td>Land within Coed Darcy SRA</td> <td>4 ha</td> <td>B1</td> </tr> <tr> <td>EC1/4</td> <td>Land within Harbourside SRA</td> <td><del>11 ha</del> <u>7ha</u></td> <td>B1</td> </tr> <tr> <td colspan="2" style="text-align: right;"><b>Total:</b></td> <td><b>32 ha</b></td> <td></td> </tr> </tbody> </table>	Reference	Site	Size	Use Class Permitted	EC1/1+	Baglan Bay	75 ha*, of which <del>11ha</del> <u>15ha</u> is allocated for B Use Class **	B1, B2 and B8 Use Classes defined within Glossary	EC1/2+	Junction 38 (M4), Margam	6 ha **	B1, B2 and B8	EC1/3	Land within Coed Darcy SRA	4 ha	B1	EC1/4	Land within Harbourside SRA	<del>11 ha</del> <u>7ha</u>	B1	<b>Total:</b>		<b>32 ha</b>	
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<b>MAC40</b>	5.2.12	Amend paragraph 5.2.12 to read: It is anticipated that the site will be developed over the medium to long term, <u>with 15ha of the site developed for B Space uses. Given the site’s potential to facilitate economic growth within the City Region and its ability to accommodate a wide range of uses, the 15ha of B Space is anticipated to be a minimum amount of B Space development over the Plan period.</u> The site will be closely monitored ensuring that if the anticipated demand for the site were to change, this could be addressed through a review of the Plan. <u>Applications in excess of 15ha of B Space will be reported within the Annual Monitoring Report and reviewed where necessary alongside the creation of jobs and overall level of employment land.</u>																								
<b>MAC41</b>	Policy EC 2	Amend Policy EC2 Existing Employment Areas as follows: ‘In order to protect the employment function of the County Borough’s employment areas, uses on the following sites will be restricted in accordance with Policy EC3:																								
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		EC2 /1*	Fabian Way
		EC 2 /2	Lonlas Village Workshops, Neath
		EC2 /3	Neath Abbey Business Park, Neath
		EC2 /4	Neath Abbey Wharf, Neath
		EC2 /5*	Melincryddan CMB / Milland Road Industrial Estate, Neath
		EC2 /6*	Baglan Energy Park
		EC2 /7*	Baglan Industrial Estate, Port Talbot
		EC2 /8	Endeavour Close, Port Talbot
		EC2 /9+	Kenfig Industrial Estate, Port Talbot
		EC2 /10*	Llewellyn's Quay, Port Talbot
		<u>EC2/11*</u>	<u>Tata Steel Site, Margam</u>
		EC2 / <del>12</del> <del>11</del>	Croeserw Industrial Estate, Afan Valley
		EC2 / <del>13</del> <del>12</del> *	Glyncorwg Workshops, Afan Valley
		EC2 / <del>14</del> <del>13</del> *	Cwmgors Workshops and Industrial Estate, Amman Valley
		EC2 / <del>15</del> <del>14</del> *	Crynant Business Park, Dulais Valley
		EC2 / <del>16</del> <del>15</del> *	Vale of Neath Supplier Park, Neath Valley
		EC2 / <del>17</del> <del>16</del> *	Glynneath Village Workshops, Neath Valley
		EC2 / <del>18</del> <del>17</del>	Alloy Industrial Estate, Pontardawe
		EC2 / <del>19</del> <del>18</del> *	Former Compair / GMF Factory, Ystalyfera, Swansea Valley
<b>MAC42</b>	New paragraph	<p>Add new paragraph after para. 5.2.22:</p> <p><u>Within heavy industrial sites, such as Tata Steel, the types of ancillary facilities or services that would be appropriate would be different to that of general employment estates or employment parks. Due to their heavy industrial nature, the types of ancillary services that may be appropriate could include energy and power generation, and waste recovery and transfer proposals not contained within the traditional B use</u></p>	

MAC Number	Section in LDP	Details of Change
		<p><u>class. Such uses will be favourably considered where the proposals would support the overall function of the employment area and would not cause any adverse impact on the area for employment purposes or cause unacceptable harm to the amenity of neighbouring properties.</u></p>
<b>MAC43</b>	5.3.11	<p>Amend to read:</p> <p>While development is not precluded within the SLAs, these areas will be protected as far as possible from any development that would harm their distinctive features or characteristics. <u>Supplementary Planning Guidance will be issued to give further information about the approach that will be taken to development proposals within SLAs and to set out the features and characteristics for which each SLA has been designated.</u> Applications for developments within these areas will thus have to conform to high design standards.</p>
<b>MAC44</b>	5.3.71	<p>Insert footnote to read:</p> <p>'Any proposals for surface coal operations within 500 metres of settlements would need to demonstrate that exceptional circumstances as set out in Mineral Technical Advice Note 2: Coal (MTAN2)<sup>1</sup> can be fully justified'.</p> <p><sup>1</sup> Paragraph 49 Minerals Technical Advice Note 2: Coal (Welsh Government – 2009).</p>
<b>MAC45</b>	Policy W 1	<p>Amend to read:</p> <p><b>Policy W1</b> <b>In-Building Waste Treatment Facilities</b></p> <p>'Proposals for the treatment, processing, storage and distribution of waste will only be permitted where all of the following criteria, where relevant, are satisfied:</p> <ul style="list-style-type: none"> <li>(a) <u>The proposal reflects the priority order of the waste hierarchy as far as possible</u> <del>The proposed facility is the Best Practicable Environmental Option (BPEO);</del></li> <li>(b) The proposal is carried out within a purpose built or appropriately modified existing building, unless it can be demonstrated that part or all of the proposed operation can only be carried out in the open;</li> <li>(c) It can be demonstrated that the development would not compromise highway safety;</li> <li>(d) It is demonstrated that measures can be taken to reduce, and where possible avoid, damage or disturbance to the environment and the amenity of neighbouring land uses or individual properties to acceptable levels;</li> <li>(e) Appropriate, acceptable site management proposals are submitted for the duration of the</li> </ul>

MAC Number	Section in LDP	Details of Change
		<p>development;                      (f) <u>The proposal is supported by an appropriate Waste Planning Assessment’</u></p> <p>Add following new paragraph after existing paragraph 5.3.121:  <u>In accordance with national guidance, a Waste Planning Assessment (WPA) will be required to support all applications for a waste facility classified as a disposal, recovery or recycling facility. The WPA should be appropriate and proportionate to the nature, size and scale of the development proposed and comprise all relevant information</u></p>
MAC46	SP20 & 5.4.8	<p>Update references by amending as follows:</p> <p>Policy SP20                      1. Implementing key transport projects and supporting schemes identified in the <u>Joint Regional Transport Plan</u>.</p> <p>Para. 5.4.8                      The Core network comprises the A48, A4109, A4107, A474, A4067, A4221 and A4069. These routes are identified in the <u>Joint Regional Transport Plan</u> as the Regional Strategic Highway Network and consist of major roads that provide key routes through the County Borough.</p>
<b>MAC47</b>	5.4.7 – 5.4.8	<p>Amend paras. 5.4.7 &amp; 5.4.8 as follows, combining into one paragraph:</p> <p>The Primary network comprises the M4 motorway, the A465(T) and the A483. These are routes that are fundamental in allowing Neath Port Talbot to function regionally and provide the key network for the movement of people and goods, carrying a substantial amount of traffic. <del>New direct access will generally not be appropriate unless it can be demonstrated that a new access is required to facilitate wider regeneration initiatives and any development will be expected to demonstrate that the proposal will not be detrimental to the flow of traffic or highway safety.</del> The Core network comprises the A48, A4109, A4107, A474, A4067, A4221 and A4069. These routes are identified in the Joint Transport Plan as the Regional Strategic Highway Network and consist of major roads that provide key routes through the County Borough. <del>In relation to the Core road network, generally the provision of on street parking, new direct frontage access, and turning movements will be restricted in the interest of highway safety and the efficient movement of traffic’.</del></p>

MAC Number	Section in LDP	Details of Change
<b>MAC48</b>	5.4.23:	<p>Add a new paragraph after para. 5.4.23:</p> <p><u>In respect of the Primary network, new direct access will generally not be appropriate unless it can be demonstrated that a new access is required to facilitate wider regeneration initiatives and any development will be expected to demonstrate that the proposal will not be detrimental to the flow of traffic or highway safety. In respect of the Core network, generally the provision of on-street parking, new direct frontage access, and turning movements will be restricted in the interest of highway safety and the efficient movement of traffic.</u></p>
<b>MAC49</b>	Policy SP21 And after para 5.5.3	<p>Amend Policy SP21 to read:</p> <p><b>Policy SP21 Built Environment and Historic Heritage</b></p> <p>The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:</p> <ol style="list-style-type: none"> <li>1. Encouraging high quality design standards in all development proposals;</li> <li>2. Protecting arterial gateways from intrusive and inappropriate development;</li> <li>3. Safeguarding features of historic and cultural importance;</li> <li>4. The identification of the following designated sites to enable their protection <u>and where appropriate enhancement</u>: <ol style="list-style-type: none"> <li>(a) Landscapes of Historic Interest;</li> <li>(b) Historic Parks and Gardens;</li> <li>(c) Conservation Areas;</li> <li>(d) Scheduled Ancient Monuments; <u>and</u></li> <li>(e) <u>Listed Buildings and their curtilage.</u></li> </ol> </li> </ol> <p>Add new paragraph after para. 5.5.3:</p> <p><u>Within conservation areas, development proposals will be dealt with in accordance with national policy and guidance, which includes additional controls on demolition and the removal of trees set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. The Council will be preparing a conservation area character appraisal for each conservation area which will outline the elements that contribute to the special character or historic interest of the area and will provide a robust framework for its future management and enhancement. In dealing with applications, full regard will be paid to the effects of proposals on the character of the conservation area as set out in the relevant Conservation Area Appraisal, with the objective</u></p>

MAC Number	Section in LDP	Details of Change
		<p><u>of ensuring that all proposals accord with the need to preserve or enhance the area’s identified character, appearance and setting.</u></p>
<b>MAC50</b>	Policy BE1 & 5.5.13	<p>Amend Policy BE1 criterion 8(a) to read:</p> <p>(a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, <u>normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;</u></p> <p>Amend paragraph 5.5.13 to read:</p> <p>In order to make the best use of available land, developments should be designed where possible to maximise the accommodation provided while remaining in keeping with the surrounding area. <u>Development below the specified residential density levels will not be permitted unless it can be demonstrated that there are significant constraints associated with a site that prevent development at the specified levels or where development at the density required would have an adverse impact on the character or appearance of the locality or result in the loss of an important site feature.</u> In central locations which have good access to services, facilities and public transport links, higher density developments will be appropriate. Policy H1 indicates those allocated residential sites where higher densities are considered to be appropriate and will be encouraged.</p>
<b>MAC51</b>	Policy BE3 & 5.5.25	<p>Policy BE3 The Canal Network – amend Part 2 to read:</p> <p>‘Developments affecting locations where lengths of canal have been drained, infilled or cut off from the remainder of the network, but where there is the possibility of future reinstatement, will be expected to take into account the historic line of the canal and to avoid <del>where possible</del> the introduction of buildings or structures that would prevent reinstatement’.</p> <p>Delete/remove Proposed Focussed Change FC30, i.e. addition of ‘where possible’ to para. 5.5.25.</p>



MAC Number	Section in LDP	Details of Change
MAC52	5.5.23	The canal network is an important part of the County Borough's historic heritage and is also significant for recreation, biodiversity and landscape reasons. There are three principal canals within Neath Port Talbot, comprising the Neath, Tennant and Swansea canals. Significant lengths of these canals have now been restored to navigable standards and they form part of a wider network of green corridors which encourage walking and cycling attracting visitors to the area. There are however gaps in the network where the line of the canals have been lost or navigation is prevented by obstructions such as low bridges. <u>Aspirations to restore and reinstate further lengths of canal and to link the three principal canals to create an integrated waterway system are supported in principle by the Council in recognition of the potential benefits this would bring, including the enhancement of recreation and tourism interests.</u>
MAC53	Policy WL1	Amend Policy to read:  'The following development proposals within the identified language sensitive areas will be required to submit a Language Action Plan setting out the measures to be taken to protect, promote and enhance the Welsh language:  (a) Residential development for 10 or more dwellings;  (b) Retail, <u>commercial or industrial development</u> with a total floorspace of 1000 sq m or more.  <del>(c) Commercial or industrial development.</del>
MAC54		Due to amendments there is no MAC54
MAC55	Proposals Map	Amend the Proposals Map: (i) To include settlement names; (ii) To make the distinction between the annotations for A-Roads and Strategy Boundary Areas clearer.
MAC56	Proposals Map	Delete Proposed Focussed Change FC36 (i.e. the addition of all Spatial Areas to the Proposals Map), and include the Pontardawe Spatial Area based on the fact that the area has a unique affordable housing target (10%).
MAC57	Proposals Map	Policy WL1 - as a consequential change, add the Pontardawe / Amman Valley / Swansea Valley Spatial Areas / and the Crynant electoral ward (combined) as a Language Sensitive Area.

MAC Number	Section in LDP	Details of Change
MAC58	Proposals Map	Add Tirbach Washery site, Ystalyfera as a housing allocation (Site Ref: H1/31) and include within settlement limits.
MAC59	Proposals Map	Add Parc Ynysderw, Pontardawe as a housing allocation (Site Ref: H1/29).
MAC60	Proposals Map	Add land at Moorlands, Dyffryn Cellwen [AS(N)12] within settlement limit.
MAC61	Proposals Map	Add land adjacent to Travancore, Pentwyn, Cynonville [AS(SL)3] within settlement limit.
MAC62	Proposals Map	Add land adjacent to Brookside, Pontrhydyfen [AS(SL)7] within settlement limit.
MAC63	Proposals Map	Add land at Rutherglen Yard, Felindre (Site B) within settlement limit.
MAC64	Proposals Map	Amend as follows:  <b>Policy M2/1 Settlement Protection Zones</b> – remove overlap in following instances (i) East Pit East Revised Opencast; (ii) Dan Y Graig Colliery; (iii) Aberpergwm Mine (Deep Mine); (iv) Selar Opencast; (v) Gilfach Quarry; (vi) Port Talbot Sand & Gravel Quarry; and (vii) Margam Opencast.
MAC65	Appendix A	Add new Appendix A: Policy H1 (Housing Sites) – see Appendix 5 to this schedule
MAC66	Section 6	Amend Table 6.2 Monitoring Framework as in Appendix 7 to this schedule.

### MAC Schedule Appendices:

- Appendix 1 – Clarification of strategy including amendments to layout
- Appendix 2 – Enhanced Map 1.1, Map 1.2 and Map 2.1
- Appendix 3 – Example of changes to Proposals Map
- Appendix 4 – Map 4.2 Harbourside SRA Masterplan
- Appendix 5 – Policy H1 (Housing Sites)
- Appendix 6 – Boundary of EN 1 adjacent to Baglan Bay employment area
- Appendix 7 – Table 6.2 Monitoring Framework

IMAC Number	Section in LDP	Details of Change
<b>IMAC1</b>	Policy SP 2	<p>Add Policy W 1 to list of key policies relevant to item 2:</p> <p>2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments;</p> <p>Relevant Key Policies: H1; AH1-AH2; GT1-2; OS1-OS2; EN8-EN10; <b>W 1</b>; BE1.</p>
<b>IMAC2</b>	Policy SP 2	<p>Amend criterion 3 to read:</p> <p>3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, retail, social, <b>cultural</b> and community facilities throughout the County Borough;</p>
<b>IMAC3</b>	SP 7	<p>Amend to read:</p> <p>In order to deliver the <del>7,500</del> <b>7,800</b> new dwellings required to meet the Economic-Led Growth Strategy, provision will be made for the development of <del>8,350</del> <b>8,760</b> additional dwellings between 2011-2026 including a <del>14%</del> <b>12.31%</b> flexibility allowance.</p>
<b>IMAC4</b>	Para 5.1.3	<p>Amend to read:</p> <p>The LDP provides a framework for the development of <del>8,350</del> <b>8,760</b> additional residential units. This is greater than the identified housing need in order to provide a <del>13%</del> <b>12.31%</b> <del>contingency flexibility</del> allowance <del>for sites not coming forward as anticipated</del>. This will allow for vacancies within the new dwelling stock, <del>choice and flexibility for sites not coming forward as anticipated</del>.</p>

IMAC Number	Section in LDP	Details of Change																			
<b>IMAC5</b>	Table 5.1	<p><b>Table 5.1 Total Housing Requirement</b> – insert revised table:</p> <table border="1" data-bbox="562 325 1977 788"> <thead> <tr> <th></th> <th>Assumptions</th> <th>Number of Units</th> </tr> </thead> <tbody> <tr> <td>Basic Housing Need (<u>including Vacancy provision</u>)</td> <td>Preferred Economic Growth Scenario to meet the projected need for 3,850 jobs</td> <td><del>8,027</del> <b>7,800</b></td> </tr> <tr> <td>Flexibility Allowance</td> <td>An allowance for sites not coming forward as anticipated</td> <td><del>±008</del> <b>960</b></td> </tr> <tr> <td>Empty Homes Initiative</td> <td><del>Empty Properties brought back into use for residential purposes.</del></td> <td><del>±15</del></td> </tr> <tr> <td></td> <td>Total Housing Requirement</td> <td><del>9,150</del> <b>8,760</b></td> </tr> </tbody> </table>		Assumptions	Number of Units	Basic Housing Need ( <u>including Vacancy provision</u> )	Preferred Economic Growth Scenario to meet the projected need for 3,850 jobs	<del>8,027</del> <b>7,800</b>	Flexibility Allowance	An allowance for sites not coming forward as anticipated	<del>±008</del> <b>960</b>	Empty Homes Initiative	<del>Empty Properties brought back into use for residential purposes.</del>	<del>±15</del>		Total Housing Requirement	<del>9,150</del> <b>8,760</b>				
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<b>IMAC6</b>	Table 5.2	<p>Amendment to take account of revised figures.</p> <p><b>Table 5.2 Components of the Housing Requirement</b></p> <table border="1" data-bbox="575 986 1980 1281"> <thead> <tr> <th>Category</th> <th>Sub Category</th> <th>Number of Units</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Site Specific</td> <td>Landbank</td> <td><del>3,822</del> <b>3,972</b></td> </tr> <tr> <td>New Allocations</td> <td><del>3,128</del> <b>3,153</b></td> </tr> <tr> <td rowspan="2">Allowances</td> <td>Large Windfalls</td> <td><del>1,275</del> <b>825</b></td> </tr> <tr> <td>Small Sites</td> <td>810</td> </tr> <tr> <td>Empty Homes Initiative</td> <td><del>Empty Properties brought back into use for residential purposes.</del></td> <td><del>±15</del></td> </tr> <tr> <td></td> <td><b>Total</b></td> <td><del>9,150</del> <b>8,760</b></td> </tr> </tbody> </table>	Category	Sub Category	Number of Units	Site Specific	Landbank	<del>3,822</del> <b>3,972</b>	New Allocations	<del>3,128</del> <b>3,153</b>	Allowances	Large Windfalls	<del>1,275</del> <b>825</b>	Small Sites	810	Empty Homes Initiative	<del>Empty Properties brought back into use for residential purposes.</del>	<del>±15</del>		<b>Total</b>	<del>9,150</del> <b>8,760</b>
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<b>IMAC7</b>	Policy AH1	<p>Amend Policy AH1 to read:</p> <p>Valleys:</p>																			

IMAC Number	Section in LDP	Details of Change
		<ul style="list-style-type: none"> <li>• Pontardawe - 5% <u>10%</u></li> <li>• <del>Afan Valley 0%</del></li> <li>• <del>Amman Valley 0%</del></li> <li>• <del>Dulais Valley 0%</del></li> <li>• <del>Neath Valley 0%</del></li> <li>• <del>Swansea Valley 0%</del></li> </ul> <p><b><i>The exact affordable housing contribution to be provided will depend on the circumstances of each proposal, and the viability of the scheme.</i></b></p> <p>The provision of affordable housing will be implemented through the use of planning conditions, obligations and/or legal agreements between the Council, Developers and Registered Social Landlords.</p>
<b>IMAC8</b>	5.1.32 - 5.1.33	<p>Amend new paragraph added between 5.1.32 and 5.1.33 as follows:</p> <p>The Council acknowledges there may be exceptional circumstances where achieving the target percentages may result in a development not being economically viable. In such circumstances the Authority will require evidence from the developer to demonstrate that the economic viability of the site is affected by genuine economic constraints through the submission of a detailed financial viability appraisal. Where the Authority is satisfied that the developer has been able to show, using robust evidence that the provision of affordable housing identified in Policy AH 1 is not viable, then reduced or phased contributions may be negotiated or the requirement to provide affordable housing removed (<del>subject to annual viability appraisals until the development is complete</del>).</p>
<b>IMAC9</b>	SP9 and Paragraph 5.1.45	<p>Amend Policy SP9 to read:</p> <p>Provision will be made for <del>the requirements of 20</del> Gypsies and Travellers <u>pitches</u> through the following measures:</p> <p>Amend paragraph 5.1.45 to read:</p> <p>... through the Annual Monitoring report and will review the requirement for <b><i>an additional 9 pitches</i></b> in the latter part of the plan period (post 2023), through specific targets and triggers.</p>

IMAC Number	Section in LDP	Details of Change
<b>IMAC10</b>	Policy RE1	<p>Amend to read as follows:</p> <p><b>Policy RE1 Criteria for the Assessment of Renewable and Low Carbon Energy Development</b></p> <p>Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria:</p> <ol style="list-style-type: none"> <li>1. Large scale wind farm developments (&gt;25MW) will be expected to be located within the boundaries of the refined Strategic Search Areas (SSAs).</li> <li>2. Proposals for wind farms of any size outside the SSAs will only be permitted where it is demonstrated that there will be no unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure.</li> <li>3. Small scale wind farm developments (&lt;5MW) will be required to demonstrate that impacts are confined to the local scale.</li> <li>4. All renewable energy or low carbon energy development proposals will be required to demonstrate that: <ol style="list-style-type: none"> <li>a. Measures have been taken to minimise impacts on visual amenity and the natural environment;</li> <li>b. There will be no unacceptable impacts on residential amenity;</li> <li>c. The development will not compromise highway safety;</li> <li>d. The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and</li> <li>e. There are satisfactory proposals in place for site restoration as appropriate.</li> </ol> </li> </ol>
<b>IMAC11</b>	5.3.70	<p>Amend paragraph to read:</p> <p>... Surface coal operations include opencast working and those surface facilities associated with underground mining. <u>In respect of criterion 1 Settlement Protection Zones are shown on the Proposals Map. These are drawn at a distance of 500m around all the settlements in Neath Port Talbot, as well as taking account of those settlements in neighbouring authorities which are within 500m of the boundary.</u></p>
<b>IMAC12</b>	Policy BE3 5.5.23 5.5.25	<p>Amend Policy BE3 (2) to read:</p> <p>...drained, infilled, <b>culverted, obstructed</b> or cut off from the remainder of the network, but where there is the possibility...</p>

IMAC Number	Section in LDP	Details of Change
		<p>Amend paragraph 5.5.23 to read:</p> <p>‘..where the line of the canals have been lost, <b>for example through infilling or culverting</b>, or navigation..</p> <p>Amend paragraph 5.5.25 to read:</p> <p>‘...physical impediment. <b>These lengths of the canal include:</b></p> <p><b>(a) From the Pontardawe Playing Fields, Trebanos to the northern exit/entrance of the subway under the A474 in Pontardawe;</b></p> <p><b>(b) From the northern exit/entrance to the Swansea Canal Nature Reserve, Godre'r Graig to Woodmans Terrace, Ystalyfera; and</b></p> <p><b>(c) The Neath Canal from Ysgwrfa Bridge Aberpergwm to Manor Drive, Glynneath’.</b></p>
<b>IMAC13</b>	Proposals Map	Amend boundary of EN 1 adjacent to Baglan Bay employment area as shown in Appendix 6 of M6-S10-0042
<b>IMAC14</b>	Proposals Map	Policy EC2/11 - add additional employment safeguarded area for the Tata Steel site as indicated in Map 1 of AP6.4 amended by Map 2 of the same document which shows additional land proposed by Tata Steel.
<b>IMAC15</b>	Appendix A	<p>Amend new Appendix A, H1/11 Neath road / Fairyland Road, Tonna to read:</p> <p>Highways – two points of access required to enable a looped highway arrangements. Traffic Regulations Orders <b>may</b> be required in order to address <b>local highway and parking problems along Park Street and Llantwit Road.</b></p>

## 2 The Strategy

**2.0.1** With an understanding of the key issues and challenges facing the County Borough, this section of the Plan sets out the following:

- The Vision;
- Objectives; and
- The **Development** Strategy (including ~~the~~ Growth **Strategy**, Spatial **Distribution Strategy** and Strategic Diagram).

### 2.1 Vision

**2.1.1** The Local Development Plan (LDP) Vision for 2026, that is how Neath Port Talbot is envisaged to change over the Plan period, is set out below.

#### The LDP Vision

The natural beauty and environmental importance of Neath Port Talbot's waterfront and coastal corridor area will be protected and conserved while previously developed, underused and unsightly former industrial and commercial areas are redeveloped, transforming the function and appearance of the whole coastal belt.

Key sites at central Port Talbot, Baglan Bay, Coed Darcy and the Swansea University Science and Innovation Campus, coupled with the area's good and improving transport and communication links will help deliver a competitive, knowledge-based economy. New and expanded settlements will provide sustainable housing and employment to meet the needs of local communities and the wider area.

The County Borough's rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes such as the Strategic Tourism Destinations at Margam Park and the Afan Valley.

Benefits from natural resources will be maximised and the cultural, historic and natural heritage will be supported and enhanced. Economic growth and community cohesion will be promoted by concentrating development in key areas to provide benefits to a wider hinterland.

**2.1.2** This overarching vision has guided the development of the strategy and the integrated set of policies contained within the Plan. It also complements the Authority's overall vision as set out in the Single Integrated Plan.

**2.1.3** The vision sets out how existing assets located along the urbanised coastal belt will be enhanced and utilised to improve the economic and social outlook for the whole area, while improving the general environment. The future role for more rural parts of the County Borough is outlined, together with the way that the economy and communities of the valleys will be supported and enhanced.

### 2.2 Objectives

**2.2.1** The LDP Vision will be delivered through a number of objectives which will address the key issues facing the County Borough. The objectives are fundamental to the LDP and form the basis for policy development. For clarity, the key issues to which each objective relates is identified.

**2.2.2** The first four objectives are considered to be overarching in that they are wide ranging and will inform all areas of the Plan. The area based objectives concern the two

identified strategy areas, while the remaining objectives are grouped under the following themes identified in the Wales Spatial Plan:

- Building Healthy, Sustainable Communities<sup>(5)</sup>;
- Promoting a Sustainable Economy;
- Valuing Our Environment;
- Achieving Sustainable Accessibility; and
- Respecting Distinctiveness.

#### Overarching Objectives

**OB 1:** Minimise the causes and consequences of climate change through reduced greenhouse gas emissions and adapt to climate change through consideration of it's effects in the design and location of new development.

[KI 1]

**OB 2:** Reduce people's exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.

[KI 2]

**OB 3:** Deliver sustainable, safe and confident communities and develop vibrant settlements supporting a range and mix of facilities and services.

[KI 5]

5 The title of the first theme has been amended by the addition of the word 'healthy' to reflect the importance of tackling poor health in Neath Port Talbot



**OB 4:** Maximise accessibility to a range of leisure, recreational, health, social and community facilities in line with the role and function of settlements.

[KI 2]

### Area Based Objectives

**OB 5:** Realise the diverse potential and opportunities available for sustainable economic development along the Coastal Corridor to foster economic growth, with Coed Darcy, Swansea University Science and Innovation Campus, Baglan Bay and Harbourside being the anchors for growth.

[KI 3]

**OB 6:** Reinvigorate the Valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth.

[KI 4]

### Building Healthy, Sustainable Communities

**OB 7:** Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.

[KI 5, KI 6 and KI 7]

**OB 8:** Provide additional affordable housing units throughout the County Borough and ensure new housing developments make a fair and justified contribution towards the provision of affordable housing.

[KI 6]

**OB 9:** Deliver additional pitches, to meet the identified need of Neath Port Talbot's Gypsy and Traveller community.

[KI 7]

**OB 10:** Deliver more equitable open space provision within and around settlements.

[KI 2 and KI 8]

### Promoting a Sustainable Economy

**OB 11:** To promote and protect a diverse portfolio of employment land and employment opportunities to meet the needs of residents and businesses and stimulate economic growth.

[KI 3, KI 4 and KI 9]

**OB 12:** Improve and strengthen the economic base of Neath Port Talbot to increase economic activity, reduce the unemployment rate in line with the Welsh average and negate some of the impacts of a reduced working age population.

[KI 9]

**OB 13:** Maintain, enhance and develop a hierarchy of retail centres in line with the settlement framework recognising the principal role of Neath, Port Talbot and Pontardawe town centres.

[KI 10]

**OB 14:** Provide a holistic approach to tourism development to capitalise on Neath Port Talbot's growing tourism industry, specifically growth in the Neath and Afan Valleys to support the local economy.

[KI 3 and KI 4]

### Valuing Our Environment

**OB 15:** Conserve Neath Port Talbot's important landscapes, undeveloped coast, important wildlife, habitats and geodiversity sites, ensuring that developments throughout the County Borough respect all landscapes and minimise adverse impacts.

[KI 11 and KI 12]

**OB 16:** Address air quality issues and minimise the adverse impacts from noise generating and polluting activities.

[KI 13]

**OB 17:** Promote the efficient use of land and safeguard the quality and quantity of environmental assets.

[KI 14]

**OB 18:** Safeguard the County Borough's mineral resource and make a proportionate contribution to the supply of mineral reserves to meet local, regional and national demand whilst ensuring adverse impacts are minimised.

[KI 11]

**OB 19:** To make a proportionate contribution towards the energy needs of Wales with a focus on renewable energy.

[KI 11]

**OB 20:** To meet the requirement to make adequate and appropriate provision for waste treatment and disposal facilities.

[KI 15]

### Achieving Sustainable Accessibility

**OB 21:** Increase accessibility, promote active travel and encourage a shift to more sustainable modes of transport for people and freight.

[KI 16]

**OB 22:** Reduce impacts of traffic growth and congestion and promote the efficient and effective use of the transport network.

[KI 16]

### Respecting Distinctiveness

**OB 23:** Protect and enhance the County Borough's historical heritage, built environment and identity.

[KI 17]

**OB 24:** Conserve and enhance the County Borough's main arterial gateways.

[KI 17]

**OB 25:** Preserve and enhance the area's cultural heritage and identity with a focus on the Welsh Language in language sensitive areas.

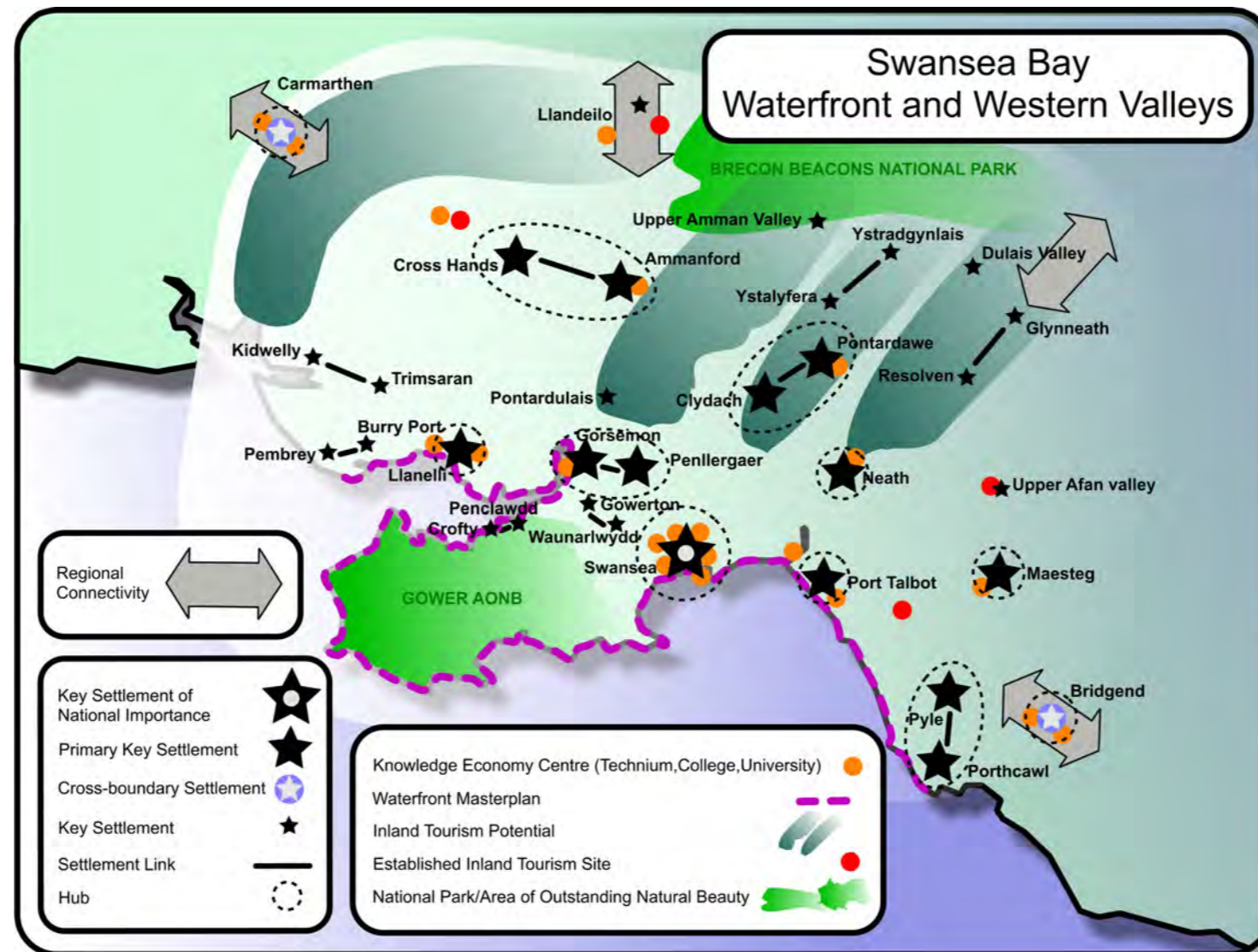
[KI 18]

## 2.3 The Strategy

**2.3.1** ~~The Development Strategy (comprising both Growth and Spatial Strategies) is a fundamental element of the LDP Strategy. In addition, the topic-based policies are derived from the strategies set out within the Strategic Policies (SP).~~

**2.3.2** The ~~LDP~~ Strategy guides the Plan and provides the overarching framework to meet the vision, objectives and key issues outlined in the previous sections. The ~~LDP uses this strategy is used~~ to provide a land use structure which focuses on providing sustainable, prosperous communities creating social and economic opportunities. The strategy is derived from having regard to national, regional and local policy whilst focusing on issues that are specific to Neath Port Talbot

Map 2.1 Waterfront and Western Valleys Spatial area



**Regional Context: Wales Spatial Plan (WSP)**

**2.3.3** Neath Port Talbot sits within the Swansea Bay Waterfront and Western Valleys spatial area alongside Swansea and parts of Carmarthenshire, Bridgend and Brecon Beacons National Park. Neath Port Talbot's role in meeting the region's aims, objectives and aspirations is to support the City and County of Swansea through steering growth towards the identified key settlements of Neath, Port Talbot and Pontardawe and to the supporting communities within the Valleys. This regional settlement hierarchy will ensure compatibility of

strategies between Authorities within the region. Growth and the distribution of that growth should therefore complement and adhere to the regional context.

**2.3.4** With the aim of creating sustainable communities the analysis undertaken by the Settlement Review / Urban Capacity Study, established a Settlement Hierarchy which defined those areas which are the most sustainable locations to accommodate future growth in terms of their role and function within the wider context.

**2.3.5** In addition to having regard to the policy context for the area the strategy has been shaped through: the unique characteristics of the area; the feedback from community and stakeholder engagement; infrastructure and environmental constraints; past trends; the availability of sites; economic growth; viability; deliverability / market demand and the outcome of the Sustainability Appraisal.

**2.3.6** The LDP has been prepared in a challenging economic climate and as such ~~the strategy~~ adopts an aspirational approach to future development, aiming to provide a prosperous society whereby allocations and new development can foster economic and sustainable growth within Neath Port Talbot.

All communities within Neath Port Talbot can help to achieve the aims of the Plan and therefore the strategy recognises all communities and their function within the County Borough.

### Local Context: Neath Port Talbot - Coastal Corridor & Valleys

**2.3.7** At the outset of LDP preparation the County Borough was divided into eight Spatial Areas. Comprising the two towns of Neath and Port Talbot and the surrounding areas of the Afan Valley, Amman Valley, Dulais Valley, Neath Valley, Pontardawe and Swansea Valley, each of these areas were considered to have their own unique identity (refer to Map 1.1). As Plan preparation progressed, the eight spatial areas were refined into two area-based strategies to include the Coastal Corridor (comprising the two main urban towns and supporting communities of Neath and Port Talbot); and The Valleys (comprising the Afan Valley, Amman Valley, Dulais Valley, Neath Valley, Pontardawe and Swansea Valley).

**2.3.8** The 'Coastal Corridor ~~Strategy Area~~' contains the main centres of population, infrastructure and facilities and benefits from easy access to the M4 making the area more attractive in terms of investment for business, commercial and residential development.

**2.3.9** Moving towards the northern part of the County Borough the topography changes from flat, open landscape towards a setting of river valleys separated by upland plateaus and mountains. In the 'Valleys ~~Strategy Area~~' the scope for development is further reduced due to topography and access to the main arterial transport routes (rail and M4). ~~The Valleys area is made up of five main valleys; the Afan, Amman, Dulais, Neath and Swansea and the town of Pontardawe.~~

**2.3.10** The strategy for Neath Port Talbot therefore advocates a different approach to development within each of these two strategy areas of the County Borough.

### ~~The Development Strategy~~

**2.3.11** The ~~Development~~ Strategy aims to:

**Facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities.**

**2.3.12** This means:

- **Focusing development along the coastal corridor and in the urban areas of Neath and Port Talbot, in recognition of the important role these settlements play within the wider context;**
- **Maximising the benefit of market interest along the coastal corridor and stimulating growth through the delivery of strategic employment sites and strategic regeneration areas;**
- **Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the Valleys which will create a mechanism to co-ordinate investment and ensure the benefits of growth and regeneration are shared more widely throughout the valley communities;**
- **Providing a flexible approach to development within the Valley communities.**

## 2.4 Growth

**2.4.1** The level of growth is based on an economic-led ~~strategy scenario~~ which complements the approach being taken by the City and County of Swansea and addresses the key issues of Neath Port Talbot in order to achieve the LDP vision and objectives.

**2.4.2** The chosen economic-led scenario is aspirational in its approach and aims to maximise job growth within the local economy. In order to address the key issues of the County Borough, wealth creation through job growth is fundamental to achieving the LDP vision.

**2.4.3** This method has enabled the Authority to forecast how economic changes over the Plan period equate to the requirements for employment land and the number of new homes needed to accommodate the projected total population and required labour supply. This ensures alignment between ~~the~~ employment and housing ~~strategies~~ resulting in a more sustainable pattern of development which in turn improves the robustness of the ~~LDP Strategy~~.

**2.4.4** This approach has used the Welsh Government's 2008 population and household projections and detailed analysis of underlying trends in mortality and fertility rates and average household size. Based on the aspirational scenario of job growth (taking into account the Authority's aspiration to reduce unemployment and increase economic activity rates in line with the Welsh average), the population growth for the area has been driven by the ratio of working age population to total population. It is considered that this approach makes the projections more robust than purely trend-based projections which do not accurately reflect the Authority's aspirations for the area.

**2.4.5** The growth in population and households complements the economic prospects for Neath Port Talbot and the relative performance of the South West Wales economy as a whole. The level of housing has been mainly driven by the reduction in average household size, however, it has been promoted and encouraged to a far greater extent than in the past to ensure it meets the needs of the existing population but also encourages an element of migration into the County Borough. The level of growth aims to ensure the County Borough becomes more independent and less reliant on outside sources of labour by improving the economic activity rates of its residents.

### Climate Change, Health & the Environment

**2.4.6** The County Borough prides itself on its cultural, historic and natural heritage. As such, development has been directed to parts of the County Borough that have the environmental capacity to accommodate ~~it~~ growth without

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causing undue harm to areas that are intrinsically valued in terms of biodiversity, landscape, historic or conservation interest.

**2.4.7** The level of growth needed to achieve the Plan's objectives has to balance a drive for economic prosperity against protecting the environment and health and well being of the County Borough.

**2.4.8** Two of the four overarching objectives ~~strategies~~ of the Plan include climate change and health which will be ~~embedded implemented~~ through all of the Plan's policies and proposals. Alongside creating sustainable communities and providing both physical and social infrastructure, these two strategic issues lie at the heart of the Plan.

**2.4.9** The level of growth has therefore been heavily influenced by these factors. Development allocations have been selected in accordance with sustainable development principles to be in locations that take account, as far as possible, issues such as dependence on the private car, flood risk, air quality and access to facilities.

### Population, Housing & Economic Growth

**2.4.10** Based on the projected economic-led growth scenario of 3,850 jobs for the area, the Plan makes provision for an additional 8,000 new residential units, leading to an increase of approximately 7,000 people and a total population of 146,300 by 2026. This approach is aspirational, linked to the local economy and is set to complement the projected growth in economic activity and reduction in average household size in addition to helping meet the need for additional affordable residential units.

**2.4.11** Fundamental to delivering economic success is to ensure an appropriate supply, mix and range of high quality employment sites that can support emerging business and employment needs. At the local level, economic growth has

stagnated over the last 10 years. This has not been helped by the global recession. In order to meet the aspirations of the 15 year vision, key regeneration schemes and projects such as Harbourside, Coed Darcy Urban Village and Baglan Bay will transform the area by redeveloping previously used, unsightly former industrial land. These projects together with the relocation of Swansea University's Science and Innovation Campus at Fabian Way will attract high-tech industries and widen the skill pool for prospective employers.

**2.4.12** The level of employment land has been assessed to ensure it can be delivered within the Plan period. In order to meet the overall vision and strategy for the area, 96 hectares of land is allocated for employment, comprising of 32 hectares for Conventional B Class uses and space to accommodate the needs of the energy sector and ancillary facilities and services which support and complement the wider role and function of B Class Uses. In addition, eighteen existing employment sites are safeguarded for employment purposes.

**2.4.13** Baglan Bay provides a large brownfield site which can meet current and future requirements in existing and emerging economic sectors both during the Plan period and beyond. Whilst the site comprises 75 hectares of land, it is anticipated that only part will be developed within the Plan period with 11 hectares allocated for conventional B Class employment uses. A full range of activities and uses can be attracted to the area including energy sector schemes of all sizes and scales. Many energy generating proposals will not fall within any use class, for example, Photovoltaic schemes. Proposals for such uses would not contribute to the projected need of 20 hectares set out by the Economic Assessment and Employment Land Provision Study <sup>(6)</sup> as this is specifically related to conventional B Class uses (commercial, industrial and storage).

**2.4.14** The land could be attractive to future aspirational industries and sectors (i.e. those not anticipated within the economic growth projections) and the amount of land take up will be monitored as will the employment that is generated, to ensure that the performance of Baglan Bay aligns with other elements of the ~~LDP~~ Strategy (and other national and regional objectives).

**2.4.15** Tourism within Neath Port Talbot has become a significant contributor to the local economy and has provided a variety of opportunities, especially within the Valley areas. In 2011, the revenue to Neath Port Talbot from tourism was estimated to be in the region of £92million<sup>(7)</sup>, indicating the paramount importance of this sector to employment and business opportunity. Given that the Valley communities offer the greatest concentration of tourism facilities, growth in this sector has the potential to be a major regenerative tool.

### Deliverability & Flexibility

**2.4.16** Large areas of the County Borough are previously developed, former industrial, brownfield land. The strategy therefore aims to redevelop these areas through strategic regeneration schemes. This will ensure that investment is channelled into these areas preventing any unnecessary loss of greenfield land.

**2.4.17** To ensure that this rate of growth can be delivered over the Plan however, a mixture of both brownfield and greenfield sites has been included within the housing land supply. All sites have been robustly assessed in accordance with the Council's Candidate Sites Assessment Methodology and Sustainability Appraisal.

**2.4.18** In order to meet the level of growth an element of flexibility has been incorporated into the housing land supply to allow for sites not coming forward as originally anticipated.

6 Peter Brett Associates (2012) Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot

7 STEAM Report (2011).

The total housing requirement over the Plan period (to 2026) is 9,150 residential units which includes an element of flexibility.

### Infrastructure

**2.4.19** The LDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level of growth identified. Without appropriate investment to enable the provision of improved or new infrastructure, the proposed level of growth will neither be sustainable nor acceptable. New development may therefore be required to provide or contribute towards the provision of necessary infrastructure to enable it to be provided within the Plan period.

**2.4.20** An integral part of the LDP strategy is to deliver new infrastructure to support allocations and future growth. The strategy supports a number of key infrastructure projects that are essential to delivering a number of strategic allocations, including housing, employment and regeneration sites.

**2.4.21** The development of major new roads will allow the region to open up to the opportunities presented by future development and achieve its full potential. Development such as Harbour Way (Peripheral Distributor Road); the Southern Access Link Road at Coed Darcy; Baglan Energy Link Road and other planned improvements will provide additional capacity within the region to facilitate planned developments and foster economic growth.

## 2.5 Spatial Distribution

**2.5.1** This section identifies the broad locations for meeting the growth strategy and development needs for the future provision of housing, employment, retail and infrastructure.

**2.5.2** The urban towns of Neath and Port Talbot are identified as the County Borough's most sustainable settlements where there is the greatest potential for reducing the need to travel due to co-location of houses, jobs, shops, community facilities and public transport.

**2.5.3** Within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements in which to focus development to ensure benefits of growth and regeneration are shared more widely throughout the valley communities. A more flexible approach to development in the valleys compared to the coastal corridor will also help to reinvigorate communities through small scale retail and employment opportunities (including live-work units) seeking to sustain the existing population and reduce out-commuting.

**2.5.4** ~~The settlement strategy is a fundamental mechanism for the Plan, identifying communities that have the sufficient capacity and resources to accommodate new development within designated boundaries.~~ The identification of a 'settlement hierarchy' has identified communities that have the sufficient capacity to accommodate new development within designated boundaries. It has been used to provide a balanced approach to managing growth, directing development to areas reflecting the attributes contained within that community and their ability to accommodate growth. Such an approach identifies key settlements that have the appropriate infrastructure and will maximise the opportunity for resource efficient settlements that contribute to the environmental, social and economic sustainability of the County Borough. Settlement limits are used to provide clarity of where development may be directed.

**2.5.5** In terms of the direction of new development, in recent years the greatest proportion of house building and economic investment into Neath Port Talbot has been concentrated in the urban areas of Neath and Port Talbot. These urban areas are situated along the M4 corridor, providing a strategic link to the wider area, fostering strong transport and communication links to neighbouring Authorities.

**2.5.6** Demand for new industry and housing within the Valley communities has been lower with less private sector investment, a decline in traditional industries and a reduction in some facilities and services in certain communities. Whilst there has

been an element of decline, these communities have retained a strong community spirit and are rich in cultural and natural heritage.

**2.5.7** Based on recent trends and market focus, it is envisaged that the majority of investment will continue to be along the M4 Corridor, with demand in the Valley communities more limited. The strategy therefore focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development. In doing so, the strategy provides a balance between facilitating economic development, acknowledging the Coastal Corridor as the strongest area for attracting inward investment whilst recognising the key function Valley communities have and reinvigorating these areas to make them more resilient.

**2.5.8** The legacy of past activities in the County Borough, mainly relating to heavy industry along the coastal corridor, has resulted in large areas of brownfield land (some of which is contaminated). In line with national policy, the Authority has taken the opportunity to optimise the allocation of brownfield land where possible.

**2.5.9** The Coastal Corridor will therefore accommodate a significant amount of housing and employment opportunities to promote the regeneration of areas which have suffered from the legacy of heavy industrial activity and bring growth to the area as a whole.

**2.5.10** ~~The strategy provides a different approach~~ In the Valleys, ~~where the identification of~~ growth areas are identified in recognition of their role as service hubs within the valley communities will promote wider benefits that can filter through to other surrounding areas.

### Economic Considerations

**2.5.11** Over recent years, Neath Port Talbot has experienced low levels of economic activity and high levels of unemployment among the working age population, indicating a relatively large untapped labour force. The strategy, which encourages economic development therefore seeks to increase

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economic activity rates and reduce unemployment levels in line with the Council's planned interventions. This, combined with the trend of younger generations achieving improved higher education standards, could indicate a shift from the traditional, declining sectors of mining and manufacturing to higher knowledge based sectors.

**2.5.12** This shift is further supported by the development of the Swansea University Science and Innovation Campus at Fabian Way, the regeneration of Coed Darcy and Harbourside and the identification of strategic employment sites at Baglan Bay and Junction 38 (M4), Margam.

**2.5.13** In addition to the employment allocations, the LDP also seeks to ensure the needs of existing businesses and residents can be met through the identification of existing employment areas and the development of suitable vacant and previously developed land within these. Furthermore, a more flexible approach to employment growth will be adopted in the Valley communities to reinvigorate the local economy.

**2.5.14** Tourism within Neath Port Talbot has become a significant contributor to the local economy and has provided a variety of opportunities, especially within the Valley areas. The ~~LDP~~ strategy and policies seek to support this industry by taking a flexible approach to new tourism proposals and resisting where possible the loss of existing facilities.

**2.5.15** Housing and employment allocations are supported by the identification of a retail hierarchy which further embeds the principles of sustainable development and reflects the function of centres in terms of their existing commercial role and retail offer.

### Social and Environmental Considerations

**2.5.16** The County Borough is enriched with areas of natural beauty, with the urban, rural and coastal areas having a distinct, valued and unique natural environment. This, combined with a strong natural and cultural heritage, provides diverse

opportunities for tourism, recreation, leisure, alternative energy and helps to promote a healthy, more vibrant quality of life for residents.

**2.5.17** New development can have an adverse impact on the environment, with potential to cause contamination, pollution, loss of habitat and impact upon the landscape. In supporting new development, the LDP sets about sustainably balancing the need for development whilst minimising the potential for harm upon the environment. Such protection includes restricting development within the open countryside and within areas that pose a flood risk that cannot be mitigated against and protecting and enhancing the natural, historic and built environment and high value landscapes.

**2.5.18** Poor health is identified as a key issue for Neath Port Talbot. The strategy supports a number of principles that will help to foster healthier, more active lifestyles and looks at measures to help improve access to employment, services and facilities whilst encouraging more active travel.

### 'The Coastal Corridor'

*(Comprising of the Neath and Port Talbot Spatial Areas)*

**2.5.19** The greatest concentration of housing and employment allocations are focused within key settlements along the Coastal Corridor in recognition of the important role these settlements play within Neath Port Talbot and the regional context. The town centres and surrounding areas have a key function as social, economic and commercial hubs. Focusing key, strategic developments in these locations will maximise the opportunities available and their development potential whilst capitalising on the transport networks and strategic links.

**2.5.20** There are a number of major developments planned for this area that are of paramount importance in building sustainable, prosperous communities and delivering the LDP vision. Strategic Regeneration Areas at Coed Darcy and Harbourside and the construction of the Swansea University Science and Innovation Campus at Fabian Way are key

developments for Neath Port Talbot and will have a wider role in enhancing economic prosperity to the region acting as a catalyst for future growth.

**2.5.21** Coed Darcy will create a sustainable urban village, regenerating a large scale brownfield site. The mixed use development will comprise an element of residential, education, employment, retail and other community facilities. Highway improvements, including the creation of the new southern access road, public transport routes and walking and cycling links are all integral parts of the scheme. The Harbourside redevelopment will provide major regenerative effects to Port Talbot, with the mixed use proposal comprising of housing, bulky goods retail, waterside leisure shopping, sports, education, business and office facilities.

**2.5.22** The housing supply within Neath and Port Talbot will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the release of greenfield areas. In releasing sites for development, the strategy provides sufficient and viable housing sites that seek to maximise the potential to achieve affordable housing. As Neath and Port Talbot present the greatest market demand, these areas are required to provide the greatest contribution to affordable housing.

### Economy & Employment

**2.5.23** Strategic employment sites are allocated at Junction 38 (M4), Margam and Baglan Bay. They are located in an area of high market demand along the M4 corridor and have excellent transport connections. The employment strategy will be supported through the other key proposals, such as Harbour Way (PDR), Baglan Energy Park Link Road, improved transport corridors and the Swansea University Campus, Fabian Way.

**2.5.24** Existing employment sites are safeguarded in recognition of the existing role they play within the local economy and provide sufficient scope for infill development which will provide opportunities for existing businesses to relocate and expand.

**2.5.25** In addition, tourism within the Coastal Corridor is supported to ensure Neath Port Talbot becomes a well established tourism destination. Attractions in the urban areas such as the Gnoll Country Park, Margam County Park, Aberdulais Falls and Aberavon Seafront will contribute to the tourism economy and support tourism in the Valley areas by promoting Neath Port Talbot as an inclusive tourism destination.

### Retail

**2.5.26** The town centres of Neath and Port Talbot are identified at the top of the retail hierarchy, as they provide a principal function, with the greatest concentration of goods, services and employment opportunities. In reflection of their regional importance, the strategy will improve the vibrancy and vitality of these centres. The retail led regeneration scheme for Neath Town Centre and the retail led development at the former Glanafan Comprehensive School, Port Talbot will improve facilities and make the town centres more attractive shopping destinations. Improvements to Port Talbot Parkway, the new interchange facility and the redevelopment of Harbourside will also improve access to Port Talbot and give the Town Centre an increased function. Such improvements, in addition to recent public realm enhancements, will make the key centres more resilient and able to compete more effectively with out of town retail and other regional centres.

**2.5.27** Away from the main town centres, other housing areas within the coastal corridor are served by a range of smaller retail centres. District centres have been designated in Briton Ferry, Skewen and Taibach each providing a range of functions and services for surrounding settlements.

### Sustainable Transport

**2.5.28** The coastal belt constitutes a strategic transport corridor that both links together areas of the County Borough and its neighbouring authorities. ~~The Plan strategy is A number of measures are identified~~ to encourage a modal shift, to more sustainable forms of transport.

**2.5.29** The redevelopment of Port Talbot Parkway Station and development of an associated integrated transport hub will make the station more accessible and user friendly for all, provide an enhanced park and ride facility, and provide an efficient interchange facility for users. In addition, a Park and Share facility at Junction 38 (M4), Margam will be developed to reduce congestion and emissions and will promote a sustainable and efficient transport network.

**2.5.30** The construction of Harbour Way (PDR) will help to alleviate congestion in Port Talbot and the M4 whilst acting as a catalyst for the regeneration of the Harbourside area. In addition, the Baglan Energy Park Link Road will improve the public transport infrastructure and accessibility to the area, allowing the site to reach its full employment potential. Such transportation improvements, along with the Coed Darcy Southern Access Road, completion of the Ffordd Amazon (Stage 2) Road and cycle ways will provide increased accessibility to the area and enable Neath Port Talbot to be better placed to benefit from future economic growth.

### Conserving our Environment

**2.5.31** The strategy recognises the need to consider the environmental impacts of proposed development and will balance growth with environmental considerations. The designation of Special Landscape Areas conserves the highest value landscapes and the identification of Green Wedges prevents urban coalescence and protects the setting of the urban area. The identification of 'Arterial Gateways' such as the M4 and mainline railway at Margam in the South East and along the A483 Fabian Way from Swansea aims to protect such areas from visually intrusive and inappropriate development.

### 'The Valleys'

*(Comprising of the Amman Valley, Afan Valley, Dulais Valley, Neath Valley, Pontardawe and Swansea Valley Spatial Areas)*

**2.5.32** The Valley communities have a long tradition of strong cultural heritage and community identity, with a wide range of natural resources. In recent years however, some of the Valley areas have faced more challenging times, with a decline in many traditional industries, poor health, deprivation and out migration.

**2.5.33** In response, the valleys need to become more economically resilient through diversifying away from traditional industries of agriculture and mining and provide new opportunities for growth, investment and job/wealth creation while preserving the character and heritage of the area.

**2.5.34** A number of recent regeneration and funding initiatives have attempted to try to counterbalance the decline experienced and reverse the cycle of deprivation. Such initiatives have produced positive results, with areas seeing an increase in tourism related opportunities and an increase in some community and leisure facilities. However, the Valley areas are still experiencing decline and far greater intervention is required to provide a more prosperous future.

### Growth Areas

**2.5.35** The ~~EDP~~ strategy seeks to reinvigorate the Valleys principally through the identification of two growth areas, namely Pontardawe and the Upper Neath Valley. Development in these areas will provide managed growth consolidated into existing communities having regard to the social and economic role these settlements play within the wider context.

**2.5.36** Pontardawe and the Upper Neath Valley are identified as key and supporting settlements respectively within the Wales Spatial Plan and present a spatial advantage through their



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strategic location as service hubs where the positive effects of development will have a wider regeneration function to the surrounding area.

**2.5.37** These two growth areas are supported and supplemented by other settlements within the settlement hierarchy. Whilst the majority of large housing allocations are focused around the growth points, in remaining areas, growth will be delivered on smaller sites within the identified settlement limits.

### *Pontardawe*

**2.5.38** The town of Pontardawe is the third largest settlement in the County Borough and the largest settlement in the Valley areas. It connects to the M4 via the A4067 and acts as a transport hub with access to Neath and Swansea and is also a gateway to the valleys and beyond. Pontardawe sits at the foothills of the Brecon Beacons and the Black Mountain and is situated alongside the River Tawe that winds its way through the valley towards the open sea at Swansea.

**2.5.39** Pontardawe functions as a town centre for the Valley communities, providing a varied range of retail services, leisure facilities, education establishments and employment opportunities. There have been a number of recent regenerative works to the town centre, including refurbishment to existing facilities and enhancements to the public realm, creating a high quality public space that can be used for the town's festivals and events which are held throughout the year. Such schemes have improved the accessibility and attractiveness of the town centre.

**2.5.40** The retail park at Ynysderw offering a range of retail uses has pedestrian links to the town centre which helps support and complement its retail offer and vibrancy. Alloy Industrial Estate is also within walking distance of the town centre and offers a range of employment and community uses. This area is safeguarded for employment uses which encourages, in

principle, employment uses on the available land and premises within the estate. A more flexible approach to employment proposals will also help revitalise the area.

**2.5.41** The Pontardawe area has the ability to accommodate, and has an evident demand for, an additional amount of new housing development. As such, the strategy supports a significant amount of new housing that will reflect its function and growing status as a town and retail centre and act as a catalyst for further investment into the Valley areas. Additional housing in Pontardawe is allocated across the spatial area allowing the population to expand, support growth in retail, industry and community facilities and provide much needed affordable homes.

### *Upper Neath Valley*

**2.5.42** The strategically located settlement of Glynneath is situated along a key transport corridor, with the A465 (T) linking the Heads of the Valleys Road and the Midlands to Neath, Swansea, Cardiff and West Wales. Its location allows the town to provide cross valley links, serving a range of settlements from both the Neath and Dulais Valley.

**2.5.43** The identification of this route as an 'Arterial Gateway' aims to protect such areas from visually intrusive and inappropriate development.

**2.5.44** Glynneath, currently acting as a hub, provides a key retail function hosting a range of services, facilities and leisure uses. As such, the existing shopping centre is allocated as a District Centre to retain the broad range of services. The Glynneath Town Centre Regeneration Scheme will improve the public realm and provide enhancements to improve the appearance of the town, ensuring the town is welcoming to residents and visitors alike.

**2.5.45** The Park Avenue site is allocated for a retail led regeneration development, that includes a housing allocation for 150 units and new food store which will help to support the town centre, provide employment opportunities and promote growth throughout the Valley.

**2.5.46** Glynneath has a range of employment opportunities focused around the existing retail centre, village workshops, tourism industry and mineral operations that are still present in the Neath Valley. Glynneath Village Workshops are safeguarded for employment uses together with a more flexible approach to employment proposals to help revitalise the area.

**2.5.47** The Upper Neath Valley has the potential to support and increase tourism related industries. As a consequence, the area has the potential to develop a high quality tourism hub and a gateway to other valley areas. Glynneath lies at the heart of a variety of tourist attractions providing a strategically located base in which to explore a number of attractions across the broader area, including the Brecon Beacons National Park, waterfalls and canals.

**2.5.48** The area has many attractive walking and cycling routes which allow access to the picturesque landscape and scenery the area has to offer in addition to a variety of existing sports, leisure and community facilities. Each year the area also hosts the World Rally Championships and Welsh National Championships.

**2.5.49** Furthermore, the proposed tourism led mixed use scheme at Rheola will provide holiday accommodation and ancillary facilities which will further support the development in Glynneath and provide benefits for the wider community.

### **A Flexible Approach to Development**

**2.5.50** Due to their topography and distance from the main centres of population the Valley communities have suffered from decline and a lack of investment. There are communities that are vulnerable to further economic decline, deprivation and out migration. The LDP therefore seeks to encourage a more flexible approach to development in the Valleys in order to build sustainable, resilient communities with an aim to halt the process of depopulation and decline.

**2.5.51** In terms of employment, the Valley areas have seen relatively low levels of market investment over recent years. That said, there are existing businesses within the Valleys that

provide a positive economic function and have continued to thrive despite low market demand and other challenges faced by Valley communities.

**2.5.52** Farm diversification to tourist related activities has been one such success providing additional visitors to the area and creating jobs. Furthermore, workshop units within certain communities have seen high occupation rates, particularly for smaller units and as such, the LDP provides a framework to allow space for local and social enterprises to expand and thrive.

**2.5.53** A flexible approach will be taken with appropriate employment and 'live-work' units being acceptable outside of, but immediately adjacent to settlement limits and retail proposals considered at locations outside of designated town, district and local centres. This approach aims to support new and existing employment, create jobs and revitalise the area.

**2.5.54** Existing employment areas are safeguarded reflecting the important function they have within the Valley communities, including employment sites not contained within the growth areas, namely within the Afan, Dulais and Amman Valleys. The reuse of vacant premises and the development of land within the estates will also be encouraged in principle. In line with national policy, home working, rural enterprises and farm diversification will also be supported.

### **Tourism, Heritage & Culture**

**2.5.55** A wide range of visitor attractions and areas of natural beauty present opportunities for Neath Port Talbot to continue to build on its tourism industry. The LDP acknowledges this and seeks to support the industry by taking a more flexible approach to new tourism proposals and resisting where possible the loss of existing facilities. Rheola has been allocated for a new tourism development providing holiday accommodation and ancillary facilities to attract visitors to the area.

**2.5.56** The Afan Valley offers a range of adventure sports, in particular Mountain biking, with facilities and recent investment from the Cognation project resulting in the Afan

Valley receiving national recognition as a mountain bike destination, providing world class trails. Accompanied by Afan Forest Park Centre, Glyncoirwg Ponds and its links with Margam Park, the area has become the main tourist attraction in Neath Port Talbot, with an increase in visitor numbers which has in turn seen the development of small scale accommodation in the area.

**2.5.57** The Vale of Neath has become an important tourist destination, with the Waterfall Country and Neath Canal seeing increased visitors and opportunities for growth. In addition, the Swansea, Dulais and Amman Valleys present opportunities with tourist attractions in these areas and also their close proximity to the Brecon Beacons National Park.

**2.5.58** Linked to tourism, the strategy supports enhancements in leisure and open space provision for visitors and residents alike. Walking and cycling is promoted and facilities enhanced with the creation of the Amman Valley Cycle Track and Afan Valley Trail which links Aberavon Seafront to the Afan Valley, enhancing tourism facilities and improving connectivity between areas.

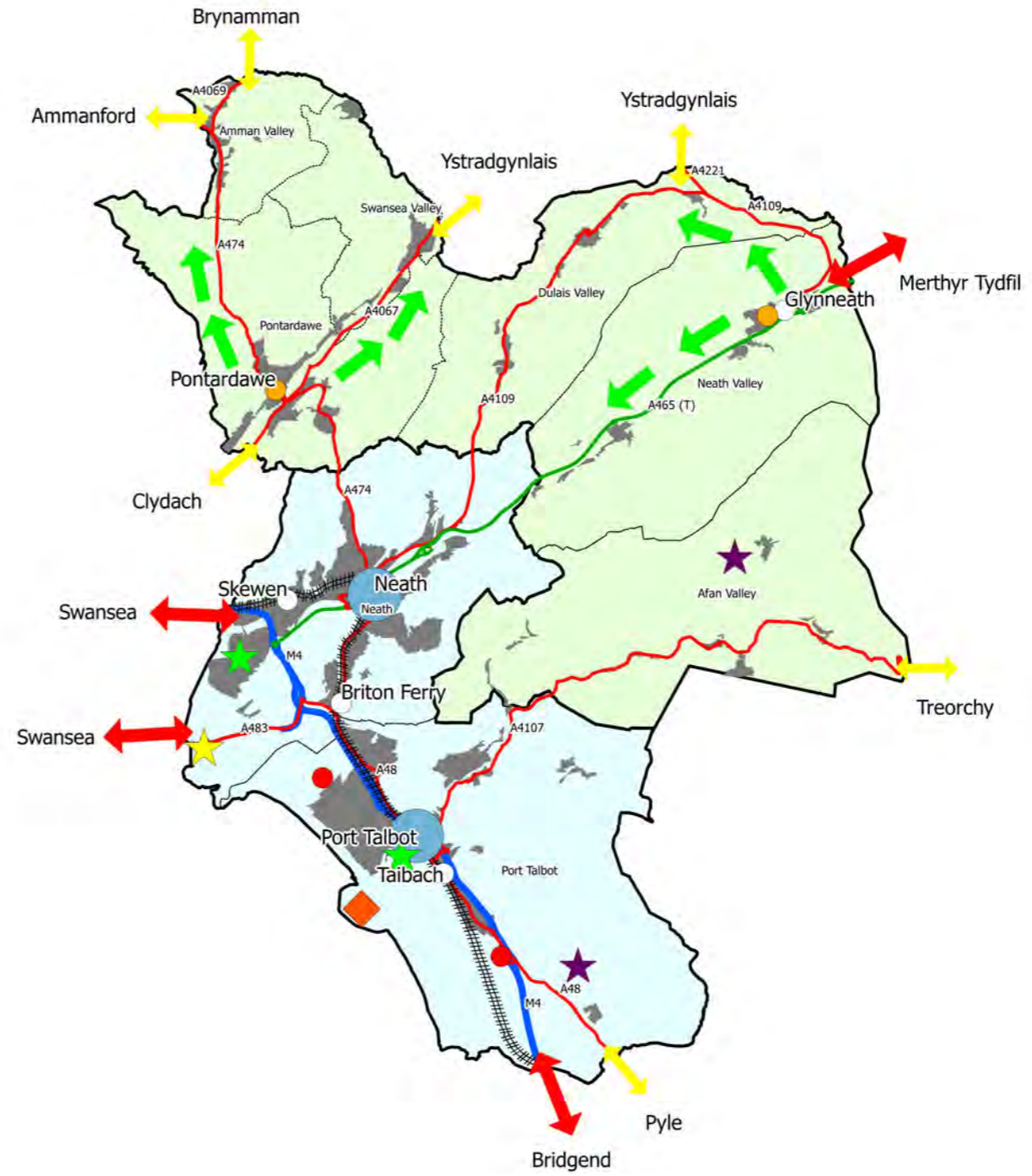
**2.5.59** Transport has been an issue within some Valley communities with a decline in public transport services which has had an impact on accessibility. The growth points identified provide public transport links and are accessible through a range of transport modes, for both leisure and everyday needs.

**2.5.60** In terms of the Welsh language, communities with a high proportion of Welsh speakers and where the language forms part of the cultural heritage have been identified as Language Sensitive Areas. In these areas the implications of new development on the Welsh language will be assessed and taken into account.

## Strategic Diagram

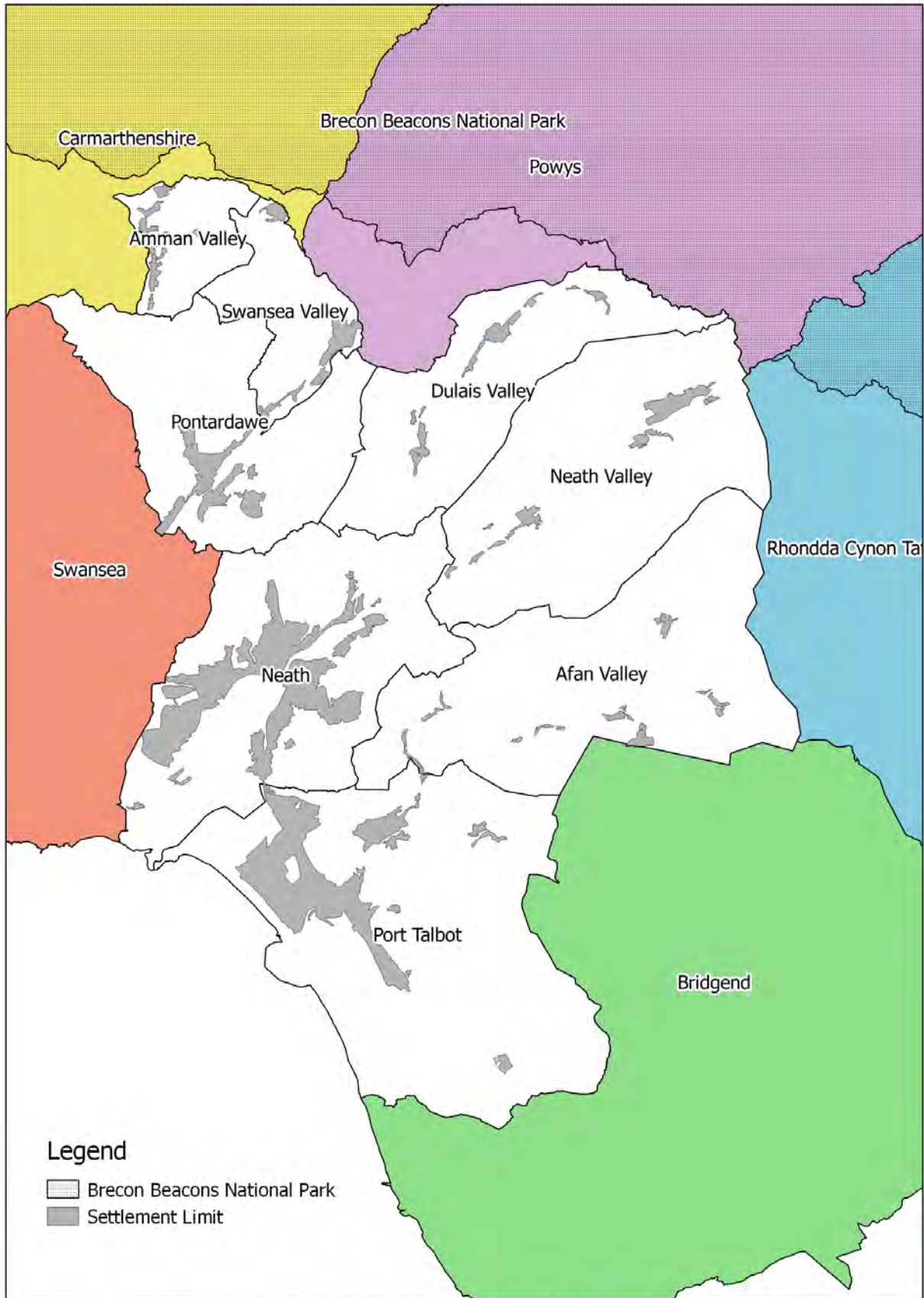
- Legend**
- Coastal Corridor Strategy Area
  - Valleys Strategy Area
  - Spatial Area
  - Settlement
  - Strategic Regeneration Area
  - Strategic Employment Site
  - Strategic Growth Area
  - Benefits of Growth
  - Town Centre
  - District Centre
  - University Campus
  - Strategic Tourist Destination
  - Primary Network Link
  - Core Network Link
  - Tidal Harbour / Docks
  - M4 Motorway
  - Primary Road Network
  - Core Road Network
  - Rail Line

Picture 2.1 Strategic Diagram

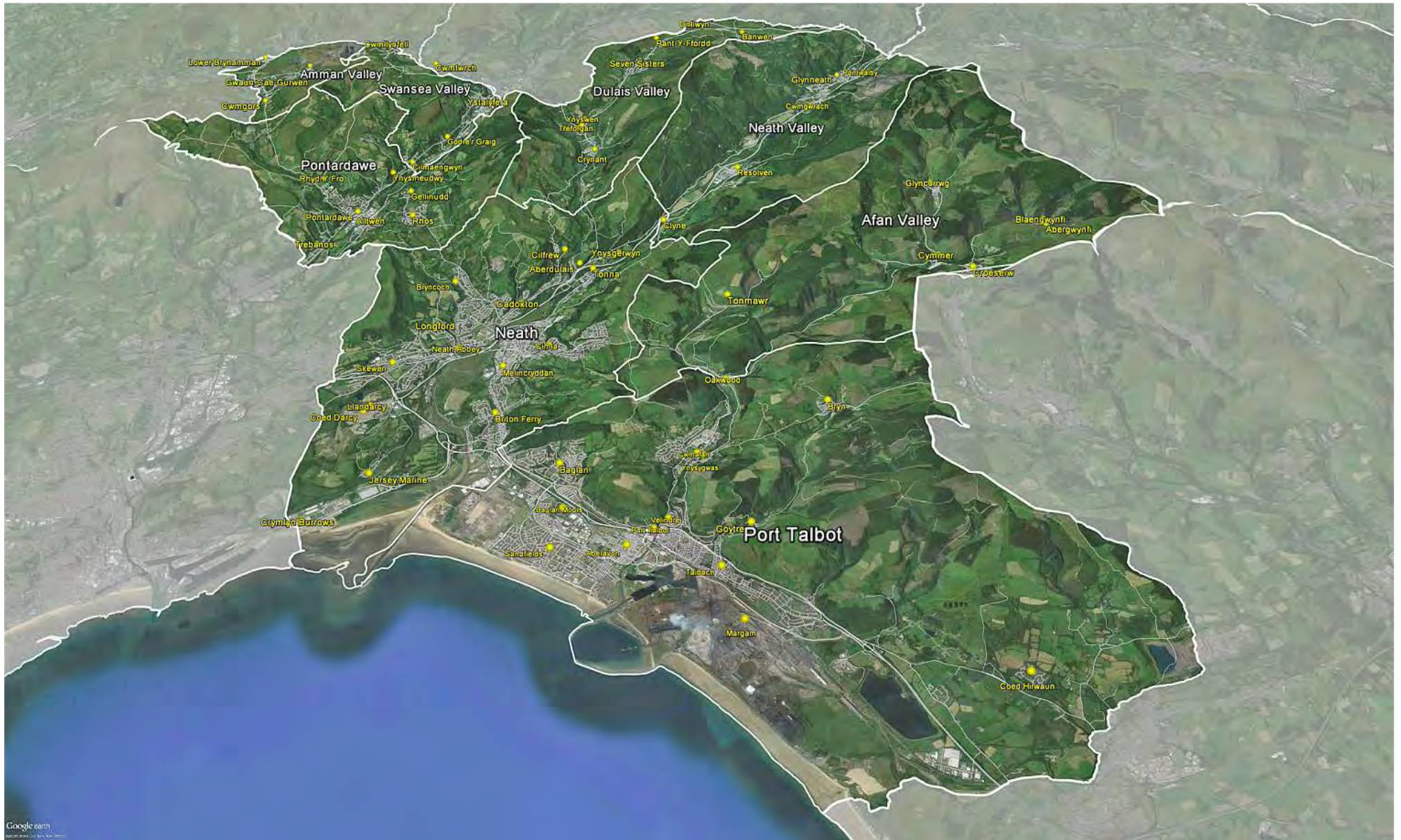


Appendix 2 - Enhanced Map 1.1, Map 1.2 and Map 2.1

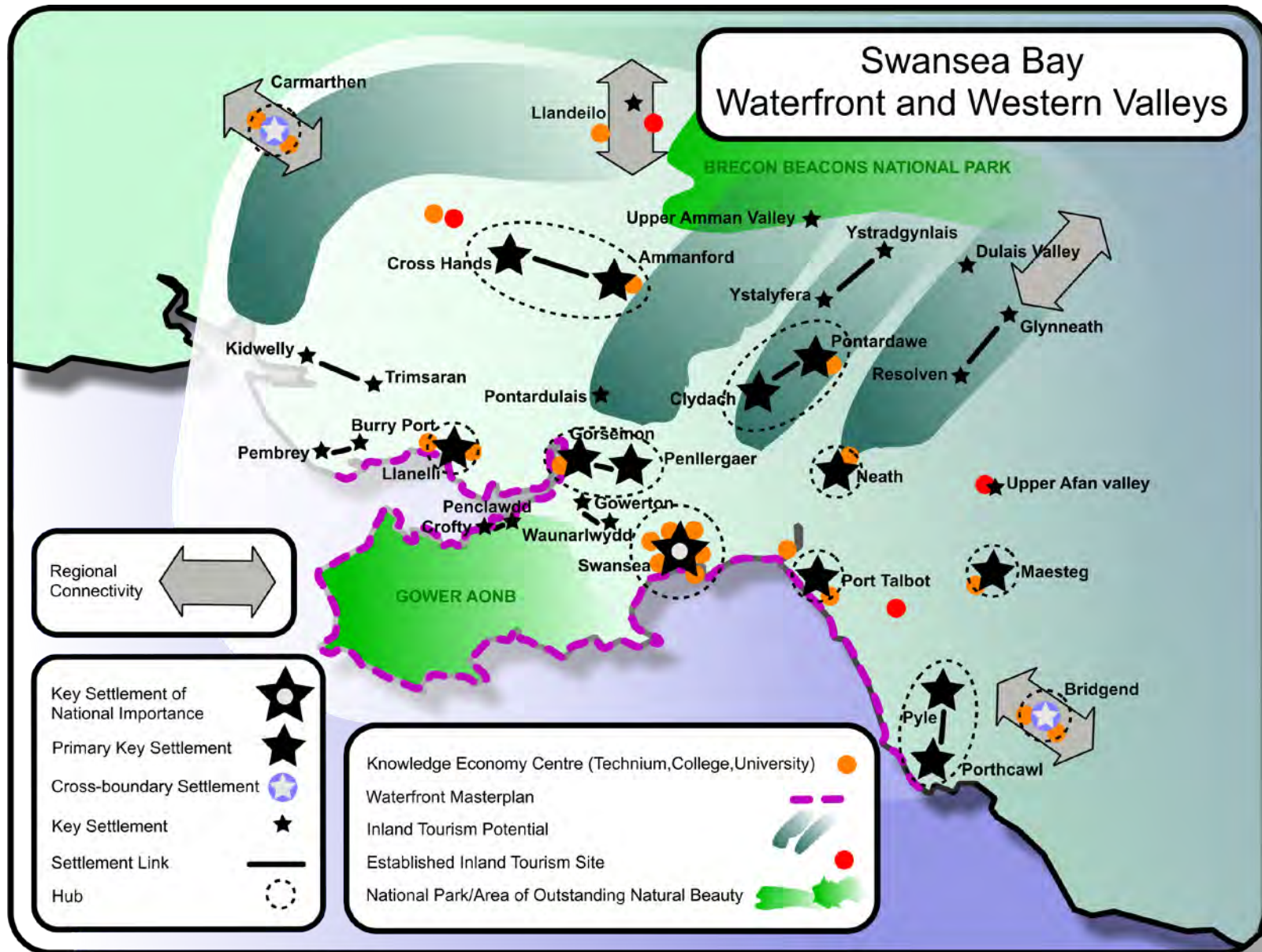
Map 1.1 - Spatial Context of Neath Port Talbot



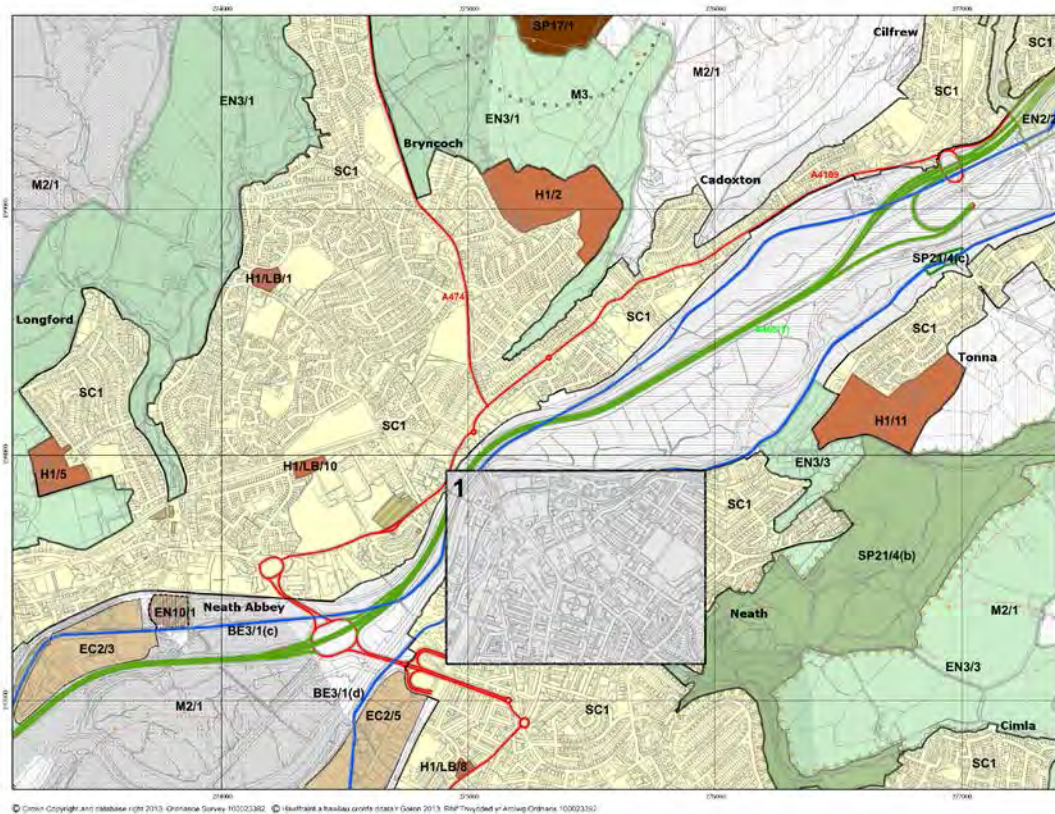
Map 1.2 Topography and Main Settlements of Neath Port Talbot



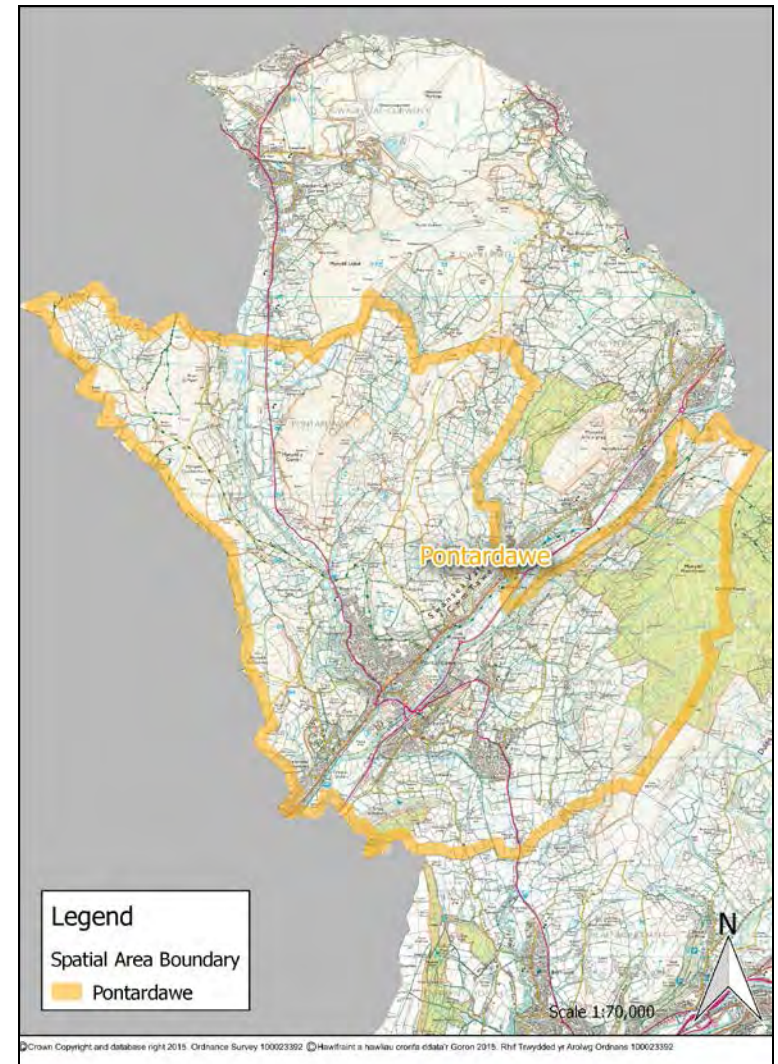
Map 2.1 - Waterfront and Western Valleys Spatial Area



## Appendix 3 - Example of Changes to Proposals Map

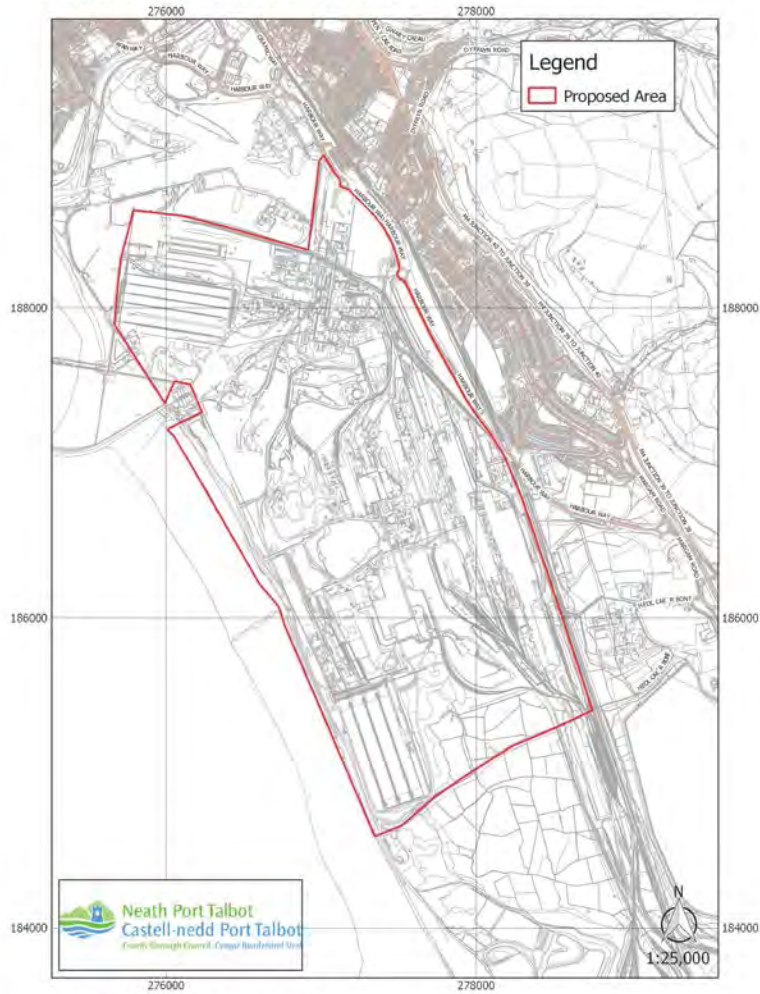


Settlement Annotations



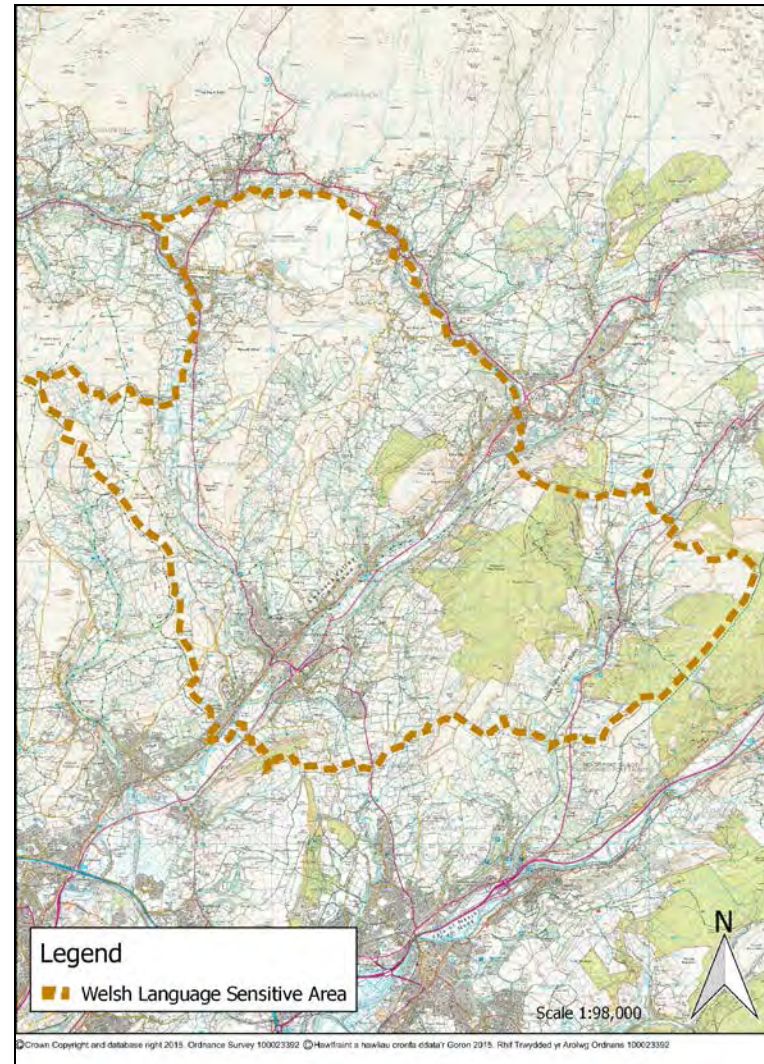
Policy AH1 Affordable Housing (Pontardawe Spatial Area)

**Proposed Employment Safeguarding Area**



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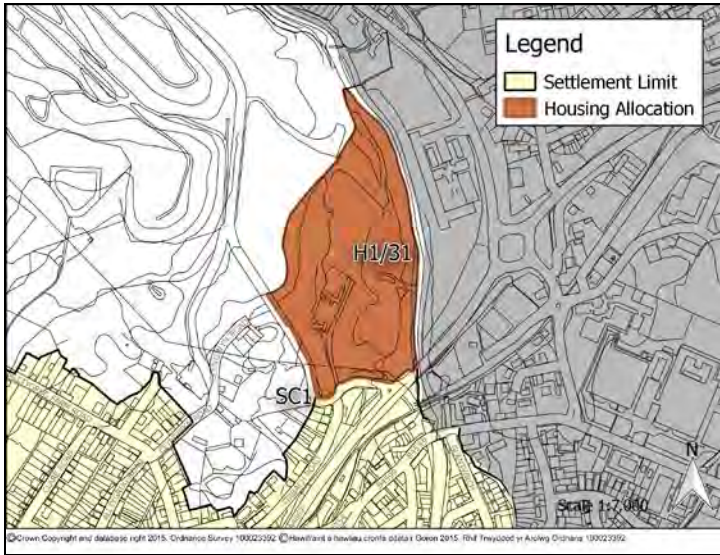
Policy EC2/11 Tata Steelworks, Margam



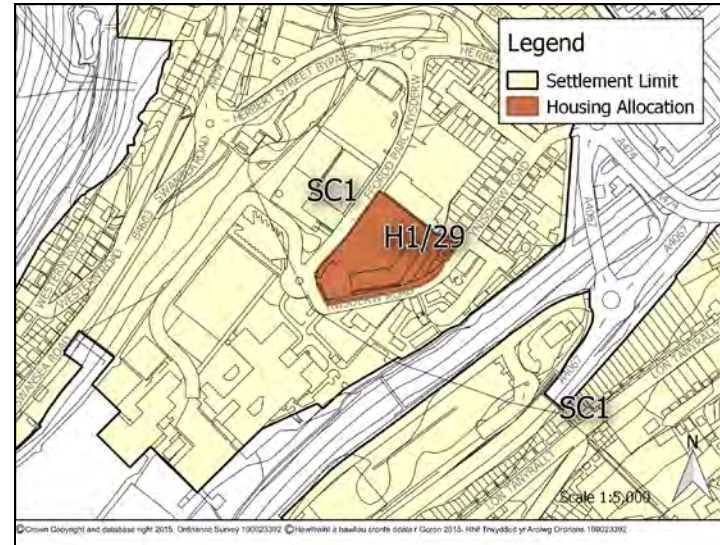
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Policy WL1 Language Sensitive Area

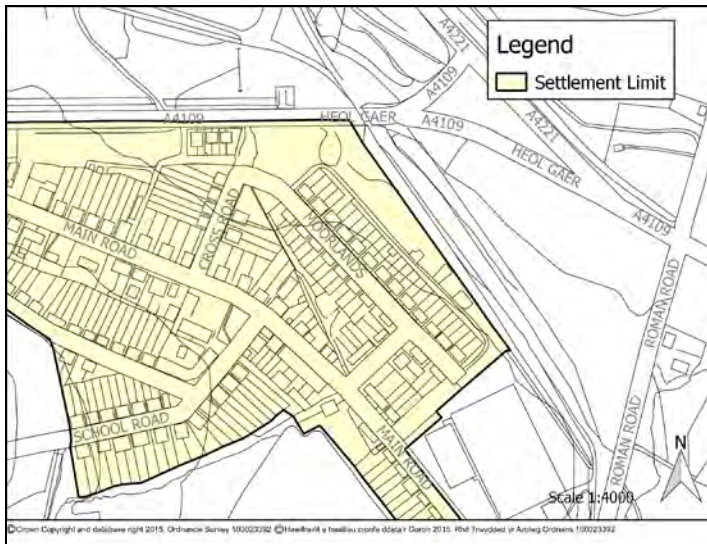




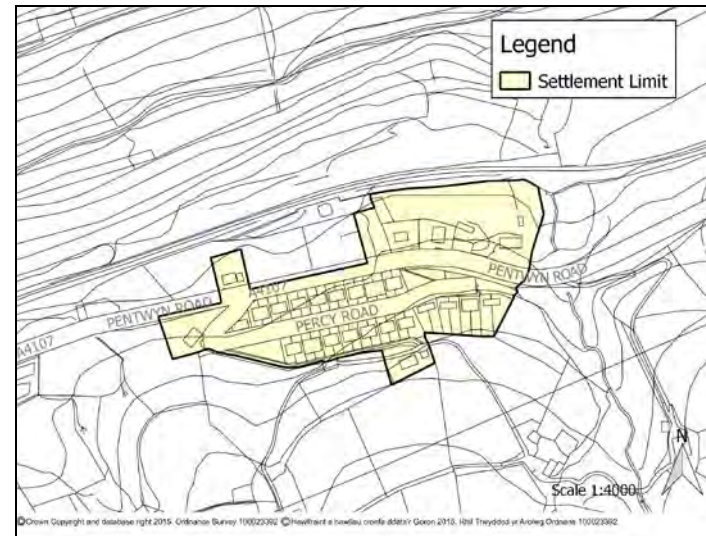
Policy H1/31 Tirbach Washery, Ystalyfera



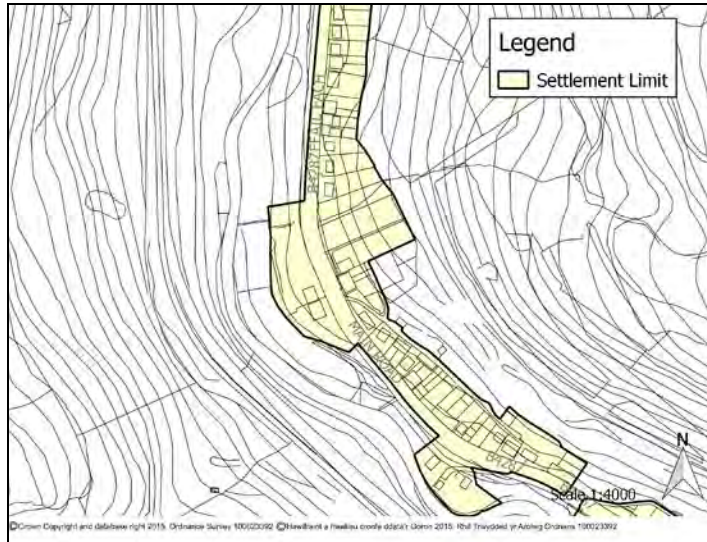
Policy H1/29 Parc Ynysderw, Pontardawe



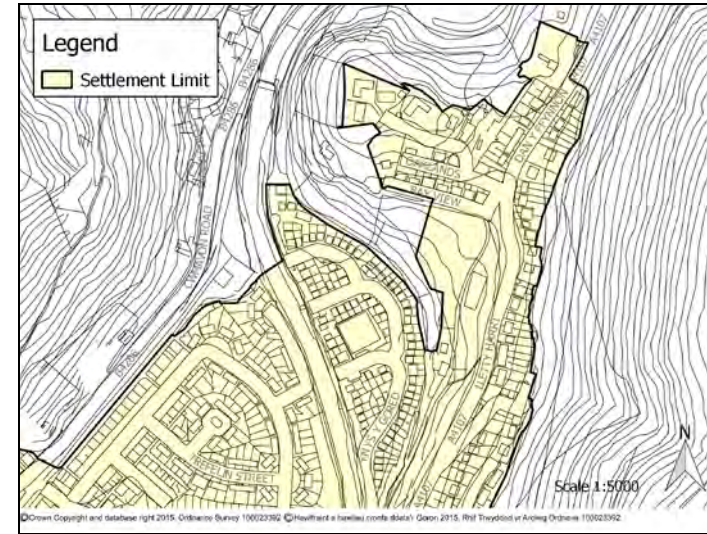
Policy SC1 Settlement Limit - Moorlands, Dyffryn Cellwen



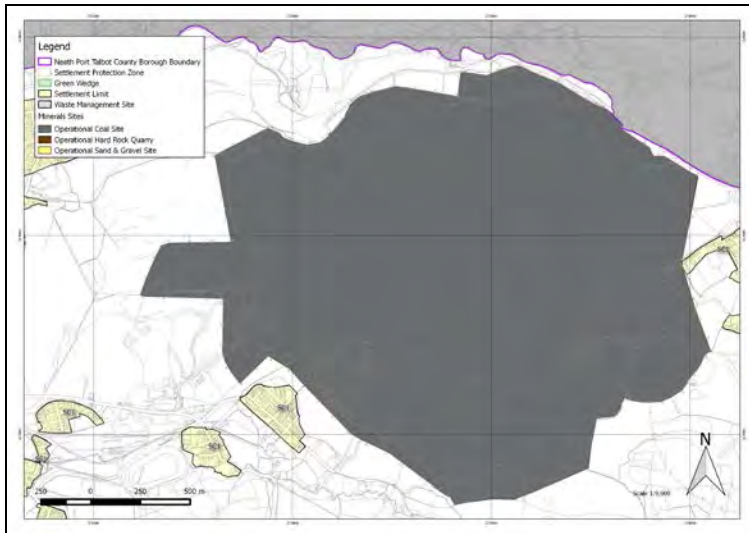
Policy SC1 Settlement Limit - Travancore, Pentwyn, Cynonville



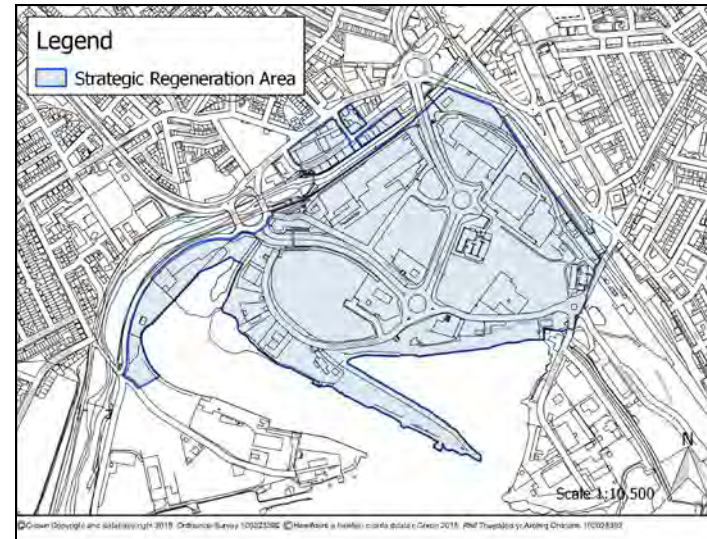
Policy SC1 Settlement Limit - Brookside, Pontrhydfen



Policy SC1 Settlement Limit - Rutherglen Yard, Felindre

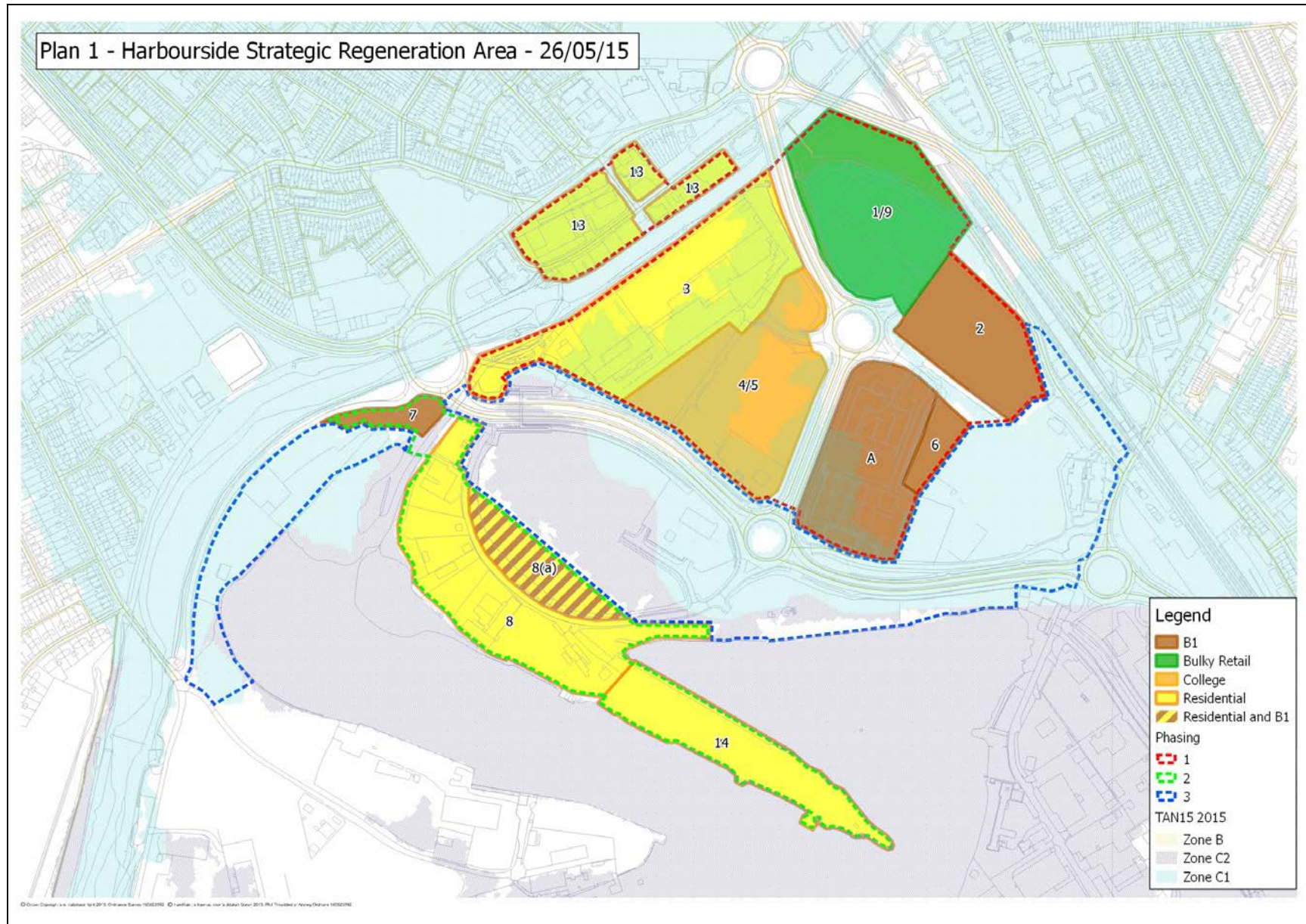


Policy M2/1 Settlement Protection Zones



Policy SRA2 Harbourside Strategic Regeneration Area

# Appendix 4 - Map 4.2 Harbourside SRA Masterplan



## APPENDIX 5 – Policy H1 Housing Sites

Central to the LDP Strategy is the delivery and implementation of the housing sites listed in Policy H1. Brief descriptions of these sites are provided below together with an overview of site specific delivery and implementation issues, including information, where this is known, of site constraints, necessary mitigation / compensation measures and the potential S106 / infrastructure requirements that will be needed in order to bring the sites forward for development.

It should be emphasised however that the information presented below is not definitive and represents a snapshot in time which critically is based on the best available information at the time of LDP adoption. Developers are therefore encouraged to enter into discussions at the earliest possible stage with Development Management officers [[planning@npt.gov.uk](mailto:planning@npt.gov.uk)] prior to submitting a formal planning application. Such pre-application discussions will provide a valuable opportunity for all parties to consider the scope and impact of the development proposal and any site specific constraints and infrastructure requirements that exist.

In respect of those Landbank sites [H1/LB/\*] that are either under-construction, nearing completion or complete, all matters relating to site constraints and infrastructure requirements would have been addressed at the detailed planning application stage and/or prior to the construction phase and consequently is not repeated here. In respect of those Landbank sites where the construction phase has not yet commenced, the detail provided has been restricted to, and derived from, the relevant planning consent.

Site	Site Description	Site Characteristics – Opportunities & Constraints
<b>NEATH SPATIAL AREA</b>		
<b>H1/1 Gorffwysfa Care Home, Bryncoch</b>	<p>The brownfield site is located on the northernmost edge of the settlement of Bryncoch and is adjacent to the A474 Neath Road, which is the principal route between urban Neath and Pontardawe to the north.</p> <p>The site offers a redevelopment opportunity on land which is currently occupied by a number of buildings which comprise the Gorffwysfa Residential Care Home. The facility is scheduled to close as a result of the Council's 'Transforming Older Person's Services Scheme' and residents are to transfer to a new purpose built facility in the locality.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required from Llys Gwynfryn; minor footpath improvement works required.</li> <li>• <b>Biodiversity</b> - potential for protected species in buildings and hedgerows on site, which may require mitigation.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - high pressure gas line runs to the north of the site which requires an appropriate buffer; overhead power cable and a low pressure gas main located on site; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<b>H1/2 Leiros Park Extension, Bryncoch</b>	<p>The greenfield site adjoins an established residential area on the north eastern edge of Bryncoch with good access to Neath Town Centre and the more local facilities and services on offer.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - off-site highway improvements required; two points of access (Daphne Road &amp; Leiros Park Drive) required to enable a looped highway arrangement;</li> <li>• <b>Public Transport / Connectivity</b> - key linkages for Public Transport / cycling / pedestrian connectivity required.</li> <li>• <b>Public Rights of Way</b> - retain landscaped buffers at elevated / prominent locations to protect vistas / views from network;</li> <li>• <b>Biodiversity</b> - hedgerows / stone walls provide means of connectivity; retain appropriate buffer to the Rhyddings Canal; trees along the green lane are protected by a Tree Preservation Order;</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - part of site crossed by overhead power cable; hydraulic modelling / assessment required to overcome issues with water supply and connections to the sewerage network.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - assessment required prior to the determination of any planning application; line of historic canal will need to be preserved.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/3 Groves Road (Phase 2), Cimla</b>	<p>The greenfield site adjoins an established residential area and adjacent to an existing development which is under-construction [H1/LB/2 - Groves Road (Phase 1)].</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access to the site via the adjacent Phase 1 development.</li> <li>• <b>Biodiversity</b> - retain appropriate development free buffer to Eastland Brook; woodland / hedgerows provide means of connectivity and should be retained where possible; potential for various species to be present.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<b>H1/4 Ocean View, Jersey Marine</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/5 Dwr Y Felin Lower School, Longford</b>	<p>The brownfield site is located within the existing settlement of Longford.</p> <p>The site offers a redevelopment opportunity on land</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - two points of access required to enable a looped highway arrangement.</li> <li>• <b>Public Transport</b> - key linkages for Public Transport / cycling / pedestrian connectivity required.</li> <li>• <b>Public Rights of Way</b> - retain landscaped buffers at elevated / prominent locations to protect vistas / views from network.</li> <li>• <b>Biodiversity</b> - narrow strip of woodland adjacent to the site boundary should be retained where possible.</li> </ul>

	which was previously occupied by Dwr Y Felin Lower School which closed as part of the Council's 'Strategic Schools Improvement Programme'.	<ul style="list-style-type: none"> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - part of site crossed by overhead power cable and public sewer; potential requirement to reinforce gas network; integrated drainage strategy required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/6 Hafod House Care Home, Neath</b>	<p>The brownfield site is located close to Neath Town Centre.</p> <p>The site offers a redevelopment opportunity on land which is currently occupied by a number of buildings which comprise the Hafod House Residential Care Home. The facility is scheduled to close as a result of the Council's 'Transforming Older Person's Services Scheme' and residents are to transfer to a new purpose built facility in the locality.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - existing means of access can be utilised.</li> <li>• <b>Biodiversity</b> - trees on site protected by a Tree Preservation Order.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - low pressure gas main / underground electricity cables on site; separate means of foul and surface water discharge will be required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<b>H1/7 Neath Town Centre Redevelopment, Neath</b>	The brownfield site comprises the land associated with the former Council offices, surface car park, Magistrates Court, Multi-story car park and two retail stores below, the row of demolished terrace houses on Water Street, land between the pedestrian path adjacent to St David's Church including the service yard, retail units and pub fronting Water Street and the Social Services building on Wind Street. It also includes the Rosser Street and High Street Car parks and a parcel of land off Wind Street.	<ul style="list-style-type: none"> <li>• <b>Environment</b> - the site is in close proximity to Victoria Gardens Conservation Area, Historic Park and Garden and a number of historic buildings (e.g. St David's Church Tower) which will need careful consideration.</li> <li>• <b>Biodiversity</b> - may be present within existing buildings, surveys required prior to demolition work.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - water main / public sewer / gas main / electricity supply cross the site.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - part of the site is located within the medieval town of Neath, although significant major development may have already destroyed or substantially damaged archaeological features. An assessment or evaluation will be required.</li> <li>• <b>Noise</b> - Church Place &amp; Victoria Gardens are adopted quiet areas which will need careful consideration.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<b>H1/8 Crymlyn Grove (Phase 2), Skewen</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/9 Crymlyn Grove (Phase 3), Skewen</b>	The greenfield site is located to the rear of the Crymlyn Parc Estate and adjacent to the proposed LDP housing allocation (H1/8).	<ul style="list-style-type: none"> <li>• <b>Highways</b> - two points of access required to enable a looped highway arrangement.</li> <li>• <b>Biodiversity</b> - existing hedgerows / stone walls should be retained where possible for connectivity; the north eastern part of the site is important for connectivity for reptiles and invertebrates, further assessment of reptiles, badgers and Himalayan Balsam is required; trees on the northern part of the site should be retained to screen development from the M4 Motorway - an assessment of noise in respect of the proximity of the site to the M4 will be required; the impact of site drainage on Crymlyn Bog SAC will need to be considered in detail at the planning application stage.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - an appropriate buffer to the high pressure gas pipeline will be required; overhead power lines cross the site; part of the site is at an elevation where mains water pressure cannot be guaranteed and consequently a water main supply may be required at the cost of the developer; on-site mains potentially required for sewerage connection; drainage scheme comparable with adjacent site potentially required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement; existing children's playground may need relocating to an accessible location with safe cycle / pedestrian links.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/10 Wern Goch, Skewen</b>	The greenfield site is partly under-construction, with planning consent having been granted for the first two phases of the development, Phase 1 has been constructed and Phase 2 is under-construction.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access from Crymlyn Road restricted to 50 units; traffic-calming measures required along Crymlyn Road.</li> <li>• <b>Biodiversity</b> - trees / hedgerows should be retained with appropriate buffer; an appropriate buffer to the watercourse will be required; careful consideration will need to be given to site drainage to determine the direction of drainage and whether there will be any effect on Crymlyn Bog SAC.</li> <li>• <b>Environment</b> - due to proximity of the site to the M4, properties should be set back to ensure dispersal of NO<sub>2</sub> and a noise assessment will be required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - water main crosses the site.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Connectivity</b> - feasibility of providing a pedestrian link from the site to Tennant Park and a link to the adjacent cycle route should be considered.</li> </ul>

		<ul style="list-style-type: none"> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<b>H1/11 Neath Road / Fairyland Road, Tonna</b>	The gently sloping greenfield site lies adjacent to the 'Hunters Ridge' and 'Paddocks' development in Tonna and is bordered to the west by Neath Road and the south by Fairyland Road.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - two points of access required to enable a looped highway arrangement; Traffic Regulation Orders will be required.</li> <li>• <b>Biodiversity</b> - hedgerows / boundary features should be retained where feasible; conservation verge on Fairyland Road, if affected by development, will require mitigation measures or compensation. A landscape buffer should be provided to Fairyland Road.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - electricity power lines cross the site; improved drainage scheme required; reinforcement of the gas main potentially required; hydraulic modelling / assessment required with potential improvements required to the water supply / sewerage system.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - a minor archaeological restraint exists at Cefn Y Don, work will be required prior to the positive determination of a planning application.</li> <li>• <b>Connectivity</b> - consideration should be given to the creation of a pedestrian link between the site and the children's playground on the adjacent Hunter's Ridge development.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/LB/1 Waunceirch, Bryncoch</b>	<i>Site is complete.</i>	
<b>H1/LB/2 Groves Road (Phase 1), Cimla</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/3 Elba Crescent, Crymlyn Burrows</b>	The flat, brownfield site is located adjacent to the settlement of Crymlyn Burrows and adjoins both an area of existing housing and employment.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Elba Crescent along with off-site highway improvement works.</li> <li>• <b>Biodiversity</b> - ecological survey / reptile survey required with potential requirement for mitigation.</li> <li>• <b>Environment</b> - noise assessment / acoustic barrier fence is required; 10 metre wide landscaped buffer to site boundary required; scheme for the eradication of invasive species required.</li> <li>• <b>Affordable Housing Provision</b> - 20% on-site requirement.</li> <li>• <b>Utilities</b> - public sewer crosses the site; potential requirement for on / off-site water mains.</li> <li>• <b>Contamination</b> - assessment required together with a remediation scheme as necessary.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> </ul>
<b>H1/LB/4 Area 1 Coed Darcy, Llandarcy</b>	<i>Site under-construction.</i>	
<b>H1/LB/5 Coed Darcy Urban Village, Llandarcy</b>	<i>Site under-construction.</i>	
<b>H1/LB/6 Eaglesbush, Neath</b>	The predominantly greenfield site is located at the eastern edge of Melincryddan. There are existing buildings on site which would need to be demolished.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - a maximum of 50 dwellings on site; off-site highway improvement works required along with Traffic Regulation Orders.</li> <li>• <b>Biodiversity</b> - surveys of existing buildings required; a 10 metre buffer to the adjacent woodland is required; a number of existing trees protected by a Tree Preservation Order.</li> <li>• <b>Affordable Housing Provision</b> - requirement.</li> <li>• <b>Utilities</b> - gas / electricity infrastructure crosses the site; a culvert exists under part of the site; potential requirement for on / off-site water mains and associated infrastructure.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - potentially present on site, a programme of historic building recording / analysis and a programme of work will need to be agreed.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> </ul>
<b>H1/LB/7 Garthmor (Phase 2), Neath</b>	The elongated greenfield site represents the final phase of a larger development.  The site is located in the established residential area of Melincryddan.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - traffic management scheme required.</li> <li>• <b>Biodiversity</b> - a number of existing trees protected by a Tree Preservation Order.</li> <li>• <b>Environment</b> - scheme for the eradication of invasive species required.</li> <li>• <b>Affordable Housing Provision</b> - requirement.</li> <li>• <b>Utilities</b> - public sewer / water main crosses the site; potential requirement for on / off-site water mains and associated infrastructure.</li> <li>• <b>Open Space Provision</b> - requirement.</li> </ul>
<b>H1/LB/8 Briton Ferry Road, Neath</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/9 The Ropewalk, Neath</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/10 Barrons Court, Neath Abbey</b>	This greenfield site is located within Neath Abbey and forms part of the existing Barrons Court development.  The site lies adjacent to the Cwrt Herbert Sports complex and existing residential development.	<ul style="list-style-type: none"> <li>• <b>Environment</b> - scheme for the eradication of invasive species required.</li> <li>• <b>Affordable Housing Provision</b> - S106 requirement for ongoing Affordable Housing Viability Assessments.</li> </ul>

H1/LB/11 Cardonnel Road, Skewen	The brownfield site is located close to the southern edge of Skewen. It comprises a dwelling and large garden, which is to be demolished to facilitate the development.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - improvements works required along with Traffic Regulation Orders.</li> <li>• <b>Environment</b> - scheme for the eradication of invasive species required; appropriate buffer to watercourse required.</li> <li>• <b>Affordable Housing Provision</b> - 100% affordable housing.</li> <li>• <b>Utilities</b> - drainage scheme required; sewer crosses site; potential requirement for on / off-site water mains and associated infrastructure.</li> </ul>
H1/LB/12 Crymlyn Grove (Phase 1), Skewen	<i>Site under-construction / nearing completion.</i>	
<b>PORT TALBOT SPATIAL AREA</b>		
H1/12 Blaenbaglan School (land to the rear of), Baglan	The greenfield site wraps around part of the eastern edge of the established residential area of Baglan and immediately to the rear of the school. The site is sloping and in an elevated location.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access points are required off Darren Wen, Tyn y Twr and Maes Ty Canol; off-site highway improvement works required.</li> <li>• <b>Public Transport / Connectivity</b> - key linkages for Public Transport / cycling / pedestrian connectivity required.</li> <li>• <b>Biodiversity</b> - hedgerows / boundary features should be protected where possible; species of interest associated with the northern area of woodland which requires protection by an appropriate buffer.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - mains water pressure cannot be guaranteed due to elevated location resulting in a requirement for a new water pumping station; hydraulic modelling / assessment required to overcome issues with water supply and connections to the sewerage network; likely requirement for off-site sewerage infrastructure; reinforcement of gas infrastructure potentially required; overhead power lines cross the site.</li> <li>• <b>Environment</b> - requirement for greenfield run-off rates to be maintained.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
H1/13 Hawthorn Close, Cwmafan	The greenfield site is located to the south east of Cwmafan, adjoining existing development and in close proximity to the allocated Western Logs site (H1/14).	<ul style="list-style-type: none"> <li>• <b>Highways</b> - highway improvements required; access off the A4107; full Transport Assessment required.</li> <li>• <b>Biodiversity</b> - loss of LBAP habitat as a result of development will require mitigation; hedgerows should be retained where possible; appropriate buffer to watercourse / woodland required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - hydraulic modelling / assessment required to overcome issues with water supply and connections to the sewerage network; overhead power lines cross the site.</li> <li>• <b>Environment</b> - appropriate buffer required to protect existing open culvert.</li> <li>• <b>Contamination</b> - desktop study required; potential mining legacy on-site, mitigation works potentially required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Connectivity</b> - pedestrian / cycle linkages to Cwmafan will be required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
H1/14 Western Logs, Cwmafan	The brownfield site is located to the south east of Cwmafan and in close proximity to the allocated Hawthorn Close site (H1/13).	<ul style="list-style-type: none"> <li>• <b>Highways</b> - highway improvements required; access off the A4107; full Transport Assessment required.</li> <li>• <b>Biodiversity</b> - the northern and eastern boundaries have some biodiversity value (mixed woodland) which are important for connectivity and should be retained where possible.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - hydraulic modelling / assessment required to overcome issues with water supply and connections to the sewerage network; overhead power lines cross the site.</li> <li>• <b>Environment</b> - appropriate buffer required to protect existing open culvert.</li> <li>• <b>Contamination</b> - desktop study required; potential mining legacy on-site, mitigation works potentially required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Connectivity</b> - pedestrian / cycle linkages to Cwmafan will be required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
H1/15 Neath Port Talbot College (Margam Campus), Margam	The brownfield site is located in the established residential area of Margam. The site offers a redevelopment opportunity on land which is currently occupied by buildings which comprise the College Campus. The higher education facility is scheduled to be relocated to the Harbourside area and once relocated, the site will become available for development.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Beechwood Road and College Green.</li> <li>• <b>Biodiversity</b> - survey of existing buildings required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - electricity / sewer infrastructure crosses the site; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Environment</b> - 10 metre buffer required to M4 Motorway.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
H1/16 Glanafan Comprehensive	The brownfield site is located in central Port Talbot	<ul style="list-style-type: none"> <li>• <b>Highways</b> - a maximum of 50 dwellings on site; access off Ty Draw Street.</li> </ul>

<p><b>School, Port Talbot</b></p>	<p>on the main shopping street of Station Road. The site offers a redevelopment opportunity on land which is currently occupied by Glanafan Comprehensive School which is to be relocated as part of the Council's Strategic Schools Improvement Programme.</p>	<ul style="list-style-type: none"> <li>• <b>Biodiversity</b> - survey of existing buildings required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - electricity infrastructure on site; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Environment</b> - site constrained by DAM Flood Zone C1, detailed Flood Consequences Assessment required; due to prominent location in the Town Centre careful consideration to the design of Station Road facade will be required; a Construction Management Plan (CMP) will be required in accordance with Policy EN9.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<p><b>H1/17 Harbourside, Port Talbot</b></p>	<p>Port Talbot 'Harbourside' is allocated as a Strategic Regeneration Area and is an extensive area of brownfield former dockland located immediately adjacent to Port Talbot Town Centre.</p> <p>The site provides an important opportunity for a comprehensive mixed use development in a sustainable central location, comprising residential, employment and retail elements.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access will vary depending on location of development plots.</li> <li>• <b>Biodiversity</b> - parts of the site contain areas of interest including rivers / streams, reed beds and 'regenerated' previously developed land; riverside development would require a riparian zone; survey of existing buildings required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - electricity / water / sewer infrastructure crosses the site, easements required where appropriate; separate means of foul and surface water disposal required; off-site water mains infrastructure potentially required; assessment of the Newbridge Road Sewage Pumping Station required to establish necessary improvements.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - minor archaeological restraint on parts of site which may require archaeological work prior to the positive determination of any planning application.</li> <li>• <b>Environment</b> - part of site (Site 3: Byass Works &amp; Site 13: Green Park) is constrained by DAM Flood Zone C1, detailed Flood Consequences Assessment required; due to the proximity to the Margam / Taibach Air Quality Management Area, a Construction Management Plan (CMP) will be required in accordance with Policy EN9; noise generated by neighbouring land uses will need careful consideration.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<p><b>H1/18 Afan Lido and land to the rear of Tywyn School, Sandfields</b></p>	<p>The brownfield site comprises the site of the former Afan Lido sports centre and swimming pool and adjacent land at the rear of Tywyn School which is in temporary use as a car park.</p> <p>The site offers a redevelopment opportunity following the Council's decision to build a replacement sports facility on nearby land.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - Transport Assessment is required to establish the impact on the Victoria Road signals and at Harbour Way / Water Street.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - sewer infrastructure on site; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Environment</b> - 5 metre buffer required to Princess Margaret Way.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<p><b>H1/19 Bay View Social Club, Sandfields</b></p>	<p>The relatively small brownfield site offers a redevelopment opportunity on land which was formerly occupied by the Bay View Social Club on Aberafan Seafront.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Promenade View.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - sewer infrastructure crosses the site.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<p><b>H1/20 Purcell Avenue, Sandfields</b></p>	<p>The greenfield site is located on the western edge of the established residential area of Sandfields.</p>	<ul style="list-style-type: none"> <li>• <b>Biodiversity</b> - as the site meets the criteria to be designated a Site of Interest for Nature Conservation (SINC), on-site mitigation or off-site compensation will be required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - hydraulic modelling / assessment required to overcome potential issues with connections to the sewerage network; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Environment</b> - 5 metre buffer required to main road.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<p><b>H1/21 Morfa Afan Care Home, Sandfields</b></p>	<p>The brownfield site offers a redevelopment opportunity on land which is currently occupied by a number of buildings which comprise the Morfa Afan</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Dalton Road.</li> <li>• <b>Biodiversity</b> - survey of existing buildings required.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> </ul>



	Residential Care Home.  The facility is no longer in use as a result of the Council's 'Transforming Older Person's Services Scheme' with residents transferring to a new purpose built facility in the locality.	<ul style="list-style-type: none"> <li>• <b>Utilities</b> - electricity / gas infrastructure on site; separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>
<b>H1/22 Tir Morfa Road, Sandfields</b>	The greenfield site is located in the heart of the established residential area of Sandfields.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - two points of access are required off Princess Margaret Way and Tir Morfa Road.</li> <li>• <b>Biodiversity</b> - loss of dune grassland will require on-site mitigation through appropriate landscaping.</li> <li>• <b>Affordable Housing Provision</b> - 25% on-site requirement.</li> <li>• <b>Utilities</b> - combined sewer crosses the site.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement or financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<b>H1/LB/13 Thorney Road, Baglan</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/14 Stycyllwen, Baglan</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/15 Abbotts Moor, Baglan Moors</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/16 Farteg Fawr, Bryn</b>	<i>Site under-construction.</i>	
<b>H1/LB/17 Copperminers, Cwmafan</b>	<i>Site under-construction / nearing completion.</i>	
<b>H1/LB/18 Forest Lodge Lane, Cwmafan</b>	<i>Site under-construction.</i>	
<b>H1/LB/19 Groeswen, Margam</b>	<i>Site is complete.</i>	
<b>H1/LB/20 Station Road, Port Talbot</b>	<i>Site is complete.</i>	
<b>H1/LB/21 Royal Buildings, Talbot Road, Port Talbot</b>	<i>Site is complete.</i>	
<b>H1/LB/22 Dyffryn Road, Taibach</b>	<i>Site is complete.</i>	
<b>DULAIS VALLEY SPATIAL AREA</b>		
<b>H1/LB/23 Maes Marchog, Banwen</b>	<i>Site is complete.</i>	
<b>H1/LB/24 Glyn Dulais Care Home, Crynant</b>	The brownfield site is centrally located in the established settlement of Crynant.  The site offers a redevelopment opportunity following the closure of the Care Home.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - a maximum of 25 dwellings on site; off-site highway improvement works required.</li> <li>• <b>Biodiversity</b> - reptile survey required.</li> <li>• <b>Affordable Housing Provision</b> - requirement.</li> <li>• <b>Utilities</b> - electricity / sewer infrastructure crosses the site.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> </ul>
<b>H1/LB/25 Heol Y Waun, Seven Sisters</b>	This gently sloping greenfield site is located at the northern end of the established settlement of Seven Sisters.	<ul style="list-style-type: none"> <li>• <b>Biodiversity</b> - survey for Marsh Fritillary is required; consent includes a Section 106 requirement for the purchase and maintenance of an area of Marsh Fritillary habitat.</li> <li>• <b>Utilities</b> - sewer crosses the site; potential requirement for on / off-site water mains and associated infrastructure.</li> <li>• <b>Open Space Provision</b> - consent includes a Section 106 requirement for the purchase and maintenance of an area of open space.</li> </ul>
<b>NEATH VALLEY SPATIAL AREA</b>		
<b>H1/23 Park Avenue, Glynneath</b>	The predominantly greenfield site, located to the south of Park Avenue in Glynneath, is being promoted as a mixed use regeneration scheme comprising retail and residential elements.  The sizeable site is located close to the centre of Glynneath. Whilst the site is predominantly flat, it is transversed by the remains of the A465 (T) embankment.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - principle point of access required off Park Avenue; highway improvements required, including signalled junction off Park Avenue.</li> <li>• <b>Biodiversity</b> - as the site meets the criteria to be designated a Site of Interest for Nature Conservation (SINC), on-site mitigation or off-site compensation will be required.</li> <li>• <b>Affordable Housing Provision</b> - no requirement.</li> <li>• <b>Utilities</b> - sewer infrastructure crosses the site; off-site water mains infrastructure required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - assessment required prior to the determination of any planning application.</li> <li>• <b>Environment</b> - the adjacent Glynneath Woollen Mill Conservation Area requires careful consideration in the design and layout of any development; part of site is constrained by DAM Flood Zone C2, detailed Flood Consequences Assessment required; an appropriate 7 metre buffer to the watercourse is required; the historic line of the Neath Canal transverses part of the site and should be retained as a feature in any development.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/LB/26 Heol Y Glyn, Glynneath</b>	The relatively small, gently sloping site is centrally located in an established residential area of Glynneath.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Heol Y Glyn with a ghost right turn lane.</li> <li>• <b>Biodiversity</b> - trees to the periphery of the site protected by Tree Preservation Order.</li> </ul>

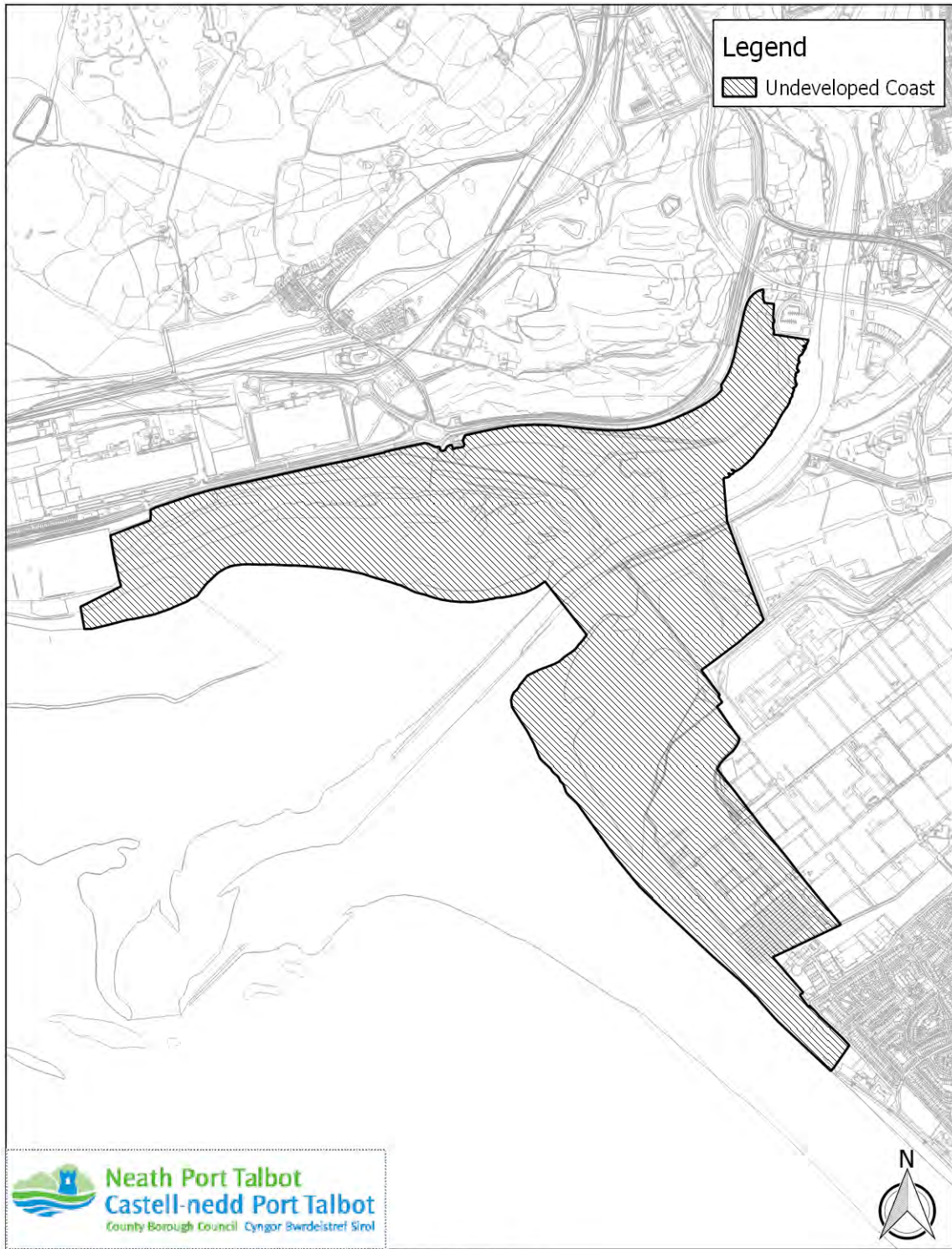
		<ul style="list-style-type: none"> <li>• <b>Utilities</b> - off-site foul drainage improvement works required, no dwellings to be occupied until complete.</li> <li>• <b>Archaeology</b> - Archaeologist to observe ground profiling works.</li> <li>• <b>Environment</b> - scheme for the eradication of invasive species required; ground profiling works required.</li> <li>• <b>Open Space Provision</b> - financial contribution required.</li> </ul>
<b>H1/LB/27 Welfare Hall, Glynneath</b>	The site is centrally located in an established residential area of Glynneath.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - highway improvements required; Traffic Regulation Order required to restrict parking at the junction on Park Avenue; relocation of Bus Stop on Park Avenue potentially required.</li> <li>• <b>Utilities</b> - potential requirement for on / off-site water mains and associated infrastructure; appropriate easement to sewer infrastructure required.</li> <li>• <b>Environment</b> - scheme for the eradication of invasive species required; application to register a Public Right of Way on the land.</li> </ul>
<b>H1/LB/28 Ynys Y Nos Avenue, Glynneath</b>	<i>Site under-construction.</i>	
<b>PONTARDAWE SPATIAL AREA</b>		
<b>H1/24 Bryn Morgrug (Phase 2), Alltwn</b>	<i>Site under-construction.</i>	
<b>H1/25 Ynysymond Road, Alltwn</b>	The gently sloping greenfield site is located at the south western end of the established settlement of Alltwn.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - a maximum of 50 dwellings on site; access required off Ynysymond Road; pedestrian access to Derwen Road is required.</li> <li>• <b>Biodiversity</b> - as the site meets the criteria to be designated a Site of Interest for Nature Conservation (SINC), on-site mitigation or off-site compensation will be required.</li> <li>• <b>Affordable Housing Provision</b> - 10% on-site requirement.</li> <li>• <b>Utilities</b> - potential requirement for on / off-site water mains and associated infrastructure; reinforcement of gas infrastructure potentially required; overhead power lines cross the site.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<b>H1/26 Cwmtawe School (Phase 2), Pontardawe</b>	<p>The elevated, greenfield site is located to the north east of the town of Pontardawe.</p> <p>The site adjoins the allocation H1/LB/31 (Phase 1) which is currently under-construction.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Alltycham Drive and via Phase 1 of the development.</li> <li>• <b>Biodiversity</b> - woodland / hedgerows to the site boundaries should be retained where possible; an appropriate buffer will need to be maintained to the area of biodiversity provided as mitigation for the development of Phase 1.</li> <li>• <b>Affordable Housing Provision</b> - 10% on-site requirement.</li> <li>• <b>Utilities</b> - separate means of foul and surface water disposal required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement or financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> </ul>
<b>H1/27 Waun Sterw / Waun Penlan, Rhydyfro</b>	<p>The greenfield site is located at the northern end of Rhydyfro, adjoining an established residential area.</p> <p>The site lies adjacent to the allocation H1/LB/33 (Waun Penlan). The site slopes in a northerly direction.</p>	<ul style="list-style-type: none"> <li>• <b>Highways</b> - a right turn access off the A474 will be required with links created to Heol Penlan and Waun Sterw.</li> <li>• <b>Biodiversity</b> - the southern portion of the site meets the criteria to be designated a Site of Interest for Nature Conservation (SINC), on-site mitigation or off-site compensation will be required; areas of Ancient Woodland (with appropriate buffer) to the site periphery will need to be excluded from developable area.</li> <li>• <b>Affordable Housing Provision</b> - 10% on-site requirement.</li> <li>• <b>Utilities</b> - potential requirement for off-site water mains and associated infrastructure.</li> <li>• <b>Environment</b> - appropriate buffer to watercourse will be required; due to the proximity of the site to the Frondeg SSSI, care will need to be taken to ensure associated drains, ditches and watercourses are not affected by development; greenfield run-off rates / SuDS will be required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/28 Bryn Brych Farm, Rhos</b>	The greenfield site is centrally located in the established settlement of Rhos. The lies adjacent to the A474 and opposite Rhos Primary School.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - principle access required off A474.</li> <li>• <b>Biodiversity</b> - any site drainage regime will be required to ensure no adverse effect on the adjacent Rhos Bends Bog; trees / hedgerows should be retained where possible.</li> <li>• <b>Affordable Housing Provision</b> - 10% on-site requirement.</li> <li>• <b>Utilities</b> - hydraulic modelling / assessment required to overcome potential issues with connections to the sewerage network; potential requirement for on / off-site water mains and associated infrastructure; overhead power lines cross the site; appropriate buffer to land drains / issues required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Environment</b> - greenfield run-off rates / SuDS will be required.</li> </ul>

		<ul style="list-style-type: none"> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
<b>H1/29 Parc Ynysderw, Pontardawe</b>	This flat, brownfield site is located in a highly sustainable location, close to a range of services and facilities in Pontardawe Town Centre.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - access required off Ynysderw Road, with road widening required. No frontage development / direct access off Ffordd Parc Ynysderw.</li> <li>• <b>Affordable Housing Provision</b> - 10% on-site requirement.</li> <li>• <b>Utilities</b> - gas infrastructure located on site.</li> <li>• <b>Archaeology</b> - given the historic use of the site (Ynysderw Tinplate Works), assessment / works required prior to the determination of any planning application.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement or financial contribution required.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<b>H1/LB/29 Bryn Morgrug (Phase 1), Alltwn</b>	<i>Site under-construction.</i>	
<b>H1/LB/30 Cwmtawe School (Phase 1), Pontardawe</b>	<i>Site under-construction.</i>	
<b>H1/LB/31 Holly Street, Pontardawe</b>	The brownfield site offers a redevelopment opportunity close to the centre of Pontardawe.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - highway improvement works required together with Traffic Regulation Orders; Transport Assessment submitted alongside planning application.</li> <li>• <b>Affordable Housing Provision</b> - requirement.</li> <li>• <b>Contamination</b> - ground investigation works required.</li> <li>• <b>Environment</b> - scheme for the eradication of invasive species required; an appropriate 7 metre buffer to the canal required; Flood Consequences Assessment submitted alongside planning application.</li> </ul>
<b>H1/LB/32 Waun Penlan, Rhydyfro</b>	This site is located at the northern edge of Rhydyfro in an established residential area and lies adjacent to the Primary School and allocation H1/27 (Waun Sterw / Waun Penlan).	<ul style="list-style-type: none"> <li>• <b>Highways</b> - highway improvement works required.</li> <li>• <b>Biodiversity</b> - an appropriate buffer to the watercourse is required.</li> <li>• <b>Utilities</b> - potential requirement for on / off-site water mains and associated infrastructure; water infrastructure crosses the site.</li> </ul>
<b>H1/LB/33 Glan Yr Afon (Phase 2), Ynysmeudwy</b>	<i>Site is complete.</i>	
<b>SWANSEA VALLEY SPATIAL AREA</b>		
<b>H1/30 Compair / GMF, Ystalyfera</b>	The brownfield / greenfield site is located at the southern end of Ystalyfera, in close proximity to the A4067 and the newly constructed Asda Food Store.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - two access points required with principle access off the A4067.</li> <li>• <b>Biodiversity</b> - a portion of the site meets the criteria to be designated a Site of Interest for Nature Conservation (SINC), on-site mitigation or off-site compensation will be required.</li> <li>• <b>Affordable Housing Provision</b> - no requirement.</li> <li>• <b>Utilities</b> - water infrastructure crosses the site; potential requirement for on / off-site water mains and associated infrastructure; a managed system for surface water disposal is required.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Archaeology</b> - assessment required prior to the determination of any planning application.</li> <li>• <b>Environment</b> - part of site is constrained by DAM Flood Zone C2, detailed Flood Consequences Assessment required; an appropriate 10 metre buffer to the A4067 is required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> </ul>
<b>H1/31 Tirbach Washery Site, Ystalyfera</b>	This brownfield site is located at the north eastern edge of the settlement, adjacent to the administrative boundary and close to the services and facilities on offer in Ystalyfera.	<ul style="list-style-type: none"> <li>• <b>Highways</b> - signalised junction required onto the A4067; improvements to the access road from the A4067 required; realignment of the existing haul road adjacent to the site required including the need to redirect the route into part of the site.</li> <li>• <b>Affordable Housing Provision</b> - no requirement.</li> <li>• <b>Biodiversity</b> - potential for various species, including those that are protected. Surrounding areas support open mosaic habitats on previously developed land, river and woodland (all BAP/S42 habitat). There is a watercourse SINC to the eastern site boundary and an Ancient Woodland SINC located to the north of the site.</li> <li>• <b>Utilities</b> - hydraulic modelling assessment would be required to establish whether anticipated flows from the site could be accommodated by local infrastructure. Site is crossed by water related infrastructure which potentially requires diversion.</li> <li>• <b>Contamination</b> - desktop study required.</li> <li>• <b>Open Space Provision</b> - on-site requirement.</li> <li>• <b>Education Provision</b> - potential financial contribution required.</li> </ul>

		<ul style="list-style-type: none"> <li>• <b>Welsh Language</b> - a Language Action Plan will be required in accordance with Policy WL1.</li> <li>• <b>Waste</b> - a Site Waste Management Plan will be required in accordance with Policy W3.</li> <li>• <b>Energy</b> - an Energy Assessment will be required in accordance with Policy RE2.</li> </ul>
H1/LB/34 Golwg Y Mynydd, Godre'r Graig	<i>Site is complete.</i>	
H1/LB/35 Graig Newydd (Phase 1), Godre'r Graig	<i>Site is complete.</i>	
H1/LB/36 Graig Newydd (Phase 2), Godre'r Graig	<i>Site under-construction.</i>	

# Appendix 6 - Boundary of EN1 adjacent to Baglan Bay Employment Area

## ENV1 - Undeveloped Coast



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## 6 Implementation and Monitoring

### 6.1 Delivery and Implementation

### 6.2 Monitoring and Review

**6.2.1** The Planning and Compulsory Purchase Act requires authorities to keep under review those matters that may affect the planning and development of their areas. This process of monitoring constitutes the regular, continuous and systematic collection and analysis of information to measure and assess policy implementation, effectiveness and impact through the use of a monitoring framework. The framework establishes a range of issues that need to be addressed and incorporates the gathering, organisation and analysis of information.

**6.2.2** Monitoring is an increasingly important aspect of evidence based policy making and monitoring systems are key mechanisms in developing a fuller understanding of the issues that impact upon communities and the extent to which existing policies are meeting their stated objectives leading to more effective future policy formulation. Components of the monitoring framework include:

- Identifying data needs and requirements;
- Data capture;
- Data analysis;
- Identification of targets; and
- Identification of indicators.

**6.2.3** The monitoring framework will allow for an ongoing assessment of whether the underlying LDP objectives remain valid or whether the prevailing economic, social or cultural circumstances have significantly altered. It provides the means by which progress towards meeting policy objectives can be measured and whether specific policies are being implemented

in the anticipated manner. In essence, the framework will allow an assessment of whether the implementation of the LDP has been, or is being, successfully achieved.

#### The Annual Monitoring Report

**6.2.4** The Authority is required to 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.

**6.2.5** The AMR will provide an assessment of whether the underlying LDP strategy remains sound, the impact of policies at the local and wider level and whether policies and related targets have been met or progress is being made towards meeting them.

#### Monitoring Indicators

**6.2.6** The monitoring framework has been structured around the Strategic Policies.

**6.2.7** A series of monitoring indicators has been established that will allow the measurement of policy effectiveness and impact. Local Development Plan Regulation 37 prescribes the following two indicators that must be included within the AMR:

- The housing land supply taken from the current Housing Land Availability Study (TAN 1); and
- The number of net additional affordable and general market dwellings built in the LPA area (TAN 2).

**6.2.8** Other core indicators are set out in national guidance and have been incorporated into the monitoring framework.

**6.2.9** Additionally, a range of further local indicators have been developed which relate to the Neath Port Talbot context and to the specific requirements of individual strategic policies

and objectives. Finally, a number of contextual indicators have been included which often relate to broader economic, social or cultural issues that the LDP may not be able to influence to any great degree. Nevertheless, account needs to be taken of these broad factors that may be national or international in nature as they may impact upon the way policy is implemented at the local level.

#### Targets

**6.2.10** Where practicable, realistic and achievable targets are identified for each indicator, together with the identification of the point or level at which any deviation from the identified target will trigger the need for action to be taken.

**6.2.11** Targets can be broadly grouped into three principal categories:

- Numerical or Quantum Targets - these might relate to the scale of development proposed (e.g. the level of anticipated housing development) and could be expressed as a single numerical value, as a series or range of values or as a percentage;
- Outcome Targets - these would relate to a particular outcome that the policy or policies in question aim to bring about or to prevent from occurring; and
- Proposal Specific Targets - these relate to specific development proposals (e.g. a highway scheme), where the target will be to deliver the proposal in question within the Plan period or by a specifically defined point in time.

#### Actions

**6.2.12** It is not necessarily anticipated that a failure to meet an established target will automatically result in a review of the policy in question. The first course of action would 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 LDP is concerned.

## 6 . Implementation and Monitoring

**6.2.13** There will be cases where effective policy implementation will be a key factor in determining how successful the LDP will be in achieving the strategic aims and objectives. In such cases (e.g. in relation to new housing development where delivery will need to occur throughout the Plan period), it will be important to ensure that delivery remains on track in order to achieve the policy aims by the end of the Plan period. Here, missing one specifically identified target would represent an opportunity to assess the policy to establish the causes of the lower than anticipated level of performance. However, missing a further target could significantly impact on the ability of the Plan to achieve its stated aims and objectives and would require a review of that particular policy.

Assessment	Action
The indicators point to the successful implementation of the Policy.	No further action required. Monitoring to continue.
Training Required.	Officer and/or Member training may be required where LDP policies are not being implemented in the intended manner.
Supplementary Planning Guidance Required.	Supplementary Planning Guidance may be required in addition to those already identified in the Plan.
The indicators are suggesting that the LDP strategic policy is not proving to be as effective as originally expected.	Further research and investigation required.
The indicators are suggesting that the strategic policy is not being implemented.	Following confirmation, the policy will be subject to a review process.
The indicators are suggesting that LDP strategy is not being implemented.	Following confirmation, the LDP will be subject to a review process.

**6.2.14** Table 6.2 sets out the Monitoring Framework for the LDP.



**Table 6.2 Monitoring Framework**

Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>Strategic Policy: SP1-Climate Change / Issue: Addressing the causes of climate change through more cohesive and efficient settlements and settlement patterns</b>				
Policy:BE 1 Objective: 1 SA Objectives: 1,2,6,7	Local Indicator: The number of applications permitted below 35 dwellings per hectare within the Coastal Corridor Strategy Area (CCSA)	An average density of 35 dwellings per hectare on allocated sites within the CCSA should be achieved	The average density permitted on sites allocated within Policy H1 falls below 35 units per hectare, unless it aligns with the policy framework	NPTCBC Planning Policy & Development Management Databases
Policy:BE 1 Objective: 1 SA Objectives: 1,2,6,7	Local Indicator: The number of applications permitted below 30 dwellings per hectare within the Valleys Strategy Area (VSA)	An average density of 30 dwellings per hectare on allocated sites within the VSA should be achieved	The average density permitted on sites allocated within Policy H1 falls below 30 units per hectare, unless it aligns with the policy framework	NPTCBC Planning Policy & Development Management Databases
Policies:SP 16 BE 1 Objective: 1 SA Objectives: 1,2	Local Indicator: Amount of greenfield land lost not allocated in the LDP	No greenfield land lost contrary to the policy framework	The loss of greenfield land contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP1-Climate Change / Issue: Addressing the causes of climate change by encouraging freight &amp; commercial transport by alternatives to road</b>				
Policies:SP 20 TR 4 Objective: 1 SA Objectives: 1,5	Local Indicator: The number of applications permitted within safeguarded freight facility locations	No applications permitted on sites safeguarded for the transportation of freight contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP1-Climate Change / Issue: Addressing the consequences of climate change by guiding development away from land that is at risk from flooding</b>				
Objective: 1 SA Objective: 1	Local Indicator: The number of applications permitted within C1 floodplain areas	No applications permitted for highly vulnerable development within C1 floodplain areas that does not meet all the TAN15 tests	One application permitted for highly vulnerable development that does not meet all the TAN15 requirements	NPTCBC Planning Policy & Development Management Databases Natural Resources Wales data
	Local Indicator: The number of applications permitted within C2 floodplain areas	No applications permitted for highly vulnerable development within C2 floodplain areas	One application permitted for highly vulnerable development	NPTCBC Planning Policy & Development Management Databases Natural Resources Wales data
<b>Strategic Policy: SP2-Health / Issue: Addressing health and sickness issues through the retention of accessible leisure, recreational, health, social and community facilities</b>				
Policies:SP 10 OS 2 SC 2 Objective: 2 SA Objectives: 6,7	Local Indicators: The net change, type and spatial distribution of open space & community facilities	No loss of facilities permitted contrary to the policy framework	One facility lost contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
Policy:BE 1 Objectives: 23,24 SA Objective: 4	Local Indicator: The number of applications refused on design grounds	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Design	To prepare the SPG relating to Design by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP3 - Sustainable Communities / Issue: Promoting sustainable and cohesive communities by identifying a settlement hierarchy</b>				

## 6 . Implementation and Monitoring

Cross Reference	Indicators	Target	Trigger Point	Data Source
Policy:SP 2 SC 1 Objectives: 3,4 SA Objectives: 2,6	Core Indicator:  Amount of major retail, office and leisure development permitted in town centre & in out-of-town centres	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP3 - Sustainable Communities / Issue: Promoting sustainable and cohesive communities by resisting inappropriate development outside settlement limits</b>				
Policy:SP 2 SC 1 Objectives: 3,4 SA Objectives: 2,6	Local Indicator: The number of applications permitted outside settlement limits	No applications permitted outside settlement limits contrary to the policy framework	One application permitted outside settlement limits contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy : SP4 - Infrastructure / Issue: Infrastructure provision and the impact of new development on existing communities</b>				
Policy: I1 Objectives:3,4,7,9,22,25  SA Objectives: 2,8	Local Indicator: The number of applications permitted where new or improved infrastructure has been secured through developer contributions	New development will address the impact on communities through the provision of new or improved infrastructure where appropriate	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Planning Obligations	To prepare the SPG relating to Planning Obligations by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: To make provision for the majority of new housing development along the Coastal Corridor</b>				
Policies:SP 7 H 1 Objective: 5 SA Objectives: 2,6	Local Indicator: The number of new housing units permitted and delivered within the Coastal Corridor Strategy Area	Sites have been allocated within Policy H1 for the provision of <b>5,530</b> new housing units within the Coastal Corridor Strategy Area over the Plan period  Annual Targets: 2011/12: 152 2012/13: 134 2013/14: 216 2014/15: 268 2015/16: 318 2016/17: 379 2017/18: 495 2018/19: 553 2019/20: 518 2020/21: 493 2021/22: 472 2022/23: 438 2023/24: 382 2024/25: 357 2025/26: 355	The number of new housing units provided within the Coastal Corridor Strategy Area falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: Allocation of a Strategic Regeneration Area at Coed Darcy</b>				

Cross Reference	Indicators	Target	Trigger Point	Data Source
Policies:SP 7 SRA 1 H 1 Objective: 5 SA Objectives: 2,6,8	Local Indicator: The amount & type of new development permitted & delivered within Coed Darcy Strategic Regeneration Area	To provide <b>2,400</b> new housing units by 2026  Annual Targets: 2011/12: 0 2012/13: 3 2013/14: 72 2014/15: 100 2015/16: 125 2016/17: 140 2017/18: 170 2018/19: 190 2019/20: 215 2020/21: 215 2021/22: 215 2022/23: 225 2023/24: 235 2024/25: 245 2025/26: 250	The number of new housing units provided within the Coed Darcy SRA falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policies:SP 11 SRA 1 EC1/3 Objective: 5 SA Objectives: 2,6,8	Local Indicator: The amount & type of new development permitted & delivered within Coed Darcy Strategic Regeneration Area	A minimum of <b>4 Ha</b> of land will be developed during the Plan period for employment uses, with a minimum of <b>0.33</b> Ha developed per annum for the remaining years of the Plan period with a cumulative target of <b>0.66</b> Ha to be developed over any 2 year period	The amount of land developed for employment uses within the Coed Darcy SRA falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policy:TR1/2 Objectives: 21,22 SA Objective: 6	Local Indicator: The amount & type of new development permitted & delivered within Coed Darcy Strategic Regeneration Area	To deliver the Coed Darcy Southern Access Road in accordance with the timeframe identified within the S.106 agreement	The Coed Darcy Southern Access Road is not delivered in accordance with the timeframe identified within the S.106 agreement	NPTCBC Planning Policy  Other Council Departments
Policy:TR1/4 Objectives: 21,22 SA Objective: 6	Local Indicator: The amount & type of new development permitted & delivered within Coed Darcy Strategic Regeneration Area	To deliver the Junction 43 (M4) Improvements in a phased manner in accordance with the timeframe identified within the S.106 agreement	The Junction 43 (M4) is not delivered in accordance with the timeframe identified within the S.106 agreement	NPTCBC Planning Policy  Other Council Departments
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: Allocation of a Strategic Regeneration Area at Harbourside</b>				

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Cross Reference	Indicators	Target	Trigger Point	Data Source
Policies:SP 7 SRA 2 H 1 Objective: 5 SA Objectives: 2,6,8	Local Indicator: The amount & type of new development permitted & delivered within Harbourside Strategic Regeneration Area	To provide <b>385</b> new housing units by 2026  Annual Targets: 2011/12: 0 2012/13: 0 2013/14: 0 2014/15: 0 2015/16: 35 2016/17: 0 2017/18: 10 2018/19: 30 2019/20: 30 2020/21: 50 2021/22: 50 2022/23: 50 2023/24: 50 2024/25: 50 2025/26: 30	The number of new housing units provided within the Harbourside SRA falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policies:SP 11 SRA 2 EC1/4 Objective: 5 SA Objectives: 2,6,8	Local Indicator: The amount & type of new development permitted & delivered within Harbourside Strategic Regeneration Area	A minimum of <b>7 Ha</b> of land will be developed during the Plan period for employment uses with a minimum of <b>0.46</b> Ha developed per annum for the remaining years of the Plan period with a cumulative target of <b>0.92</b> Ha to be developed over any 2 year period	The amount of land developed for employment uses within the Harbourside SRA falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policy: R1/3 Objective: 13 SA Objectives: 2,6,8	Local Indicator: The amount & type of new development permitted & delivered within Harbourside Strategic Regeneration Area	To deliver the retail development at Harbourside SRA in accordance with the Port Talbot Harbourside & Town Centre Development Framework	The retail development at Harbourside SRA is not delivered in accordance with the Port Talbot Harbourside & Town Centre Development Framework	NPTCBC Planning Policy & Development Management Databases
Policy:TR1/4 Objectives: 21,22 SA Objective: 6	Local Indicator: The amount & type of new development permitted & delivered within Harbourside Strategic Regeneration Area	To deliver Harbour Way (PDR)	<b>COMPLETE</b>	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Port Talbot Harbourside & Town Centre Development Framework	To prepare the SPG relating to Port Talbot Harbourside & Town Centre Development Framework by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: To promote mixed-use regeneration schemes - Neath Town Centre</b>				
Policies:SP 7 CCRS1/1 H 1/7 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Neath Town Centre Mixed-Use Regeneration Scheme	To deliver 50 new housing units with anticipated commencement from 2016/17	The housing development within Neath Town Centre Mixed-Use Regeneration Scheme is not delivered from 2016/17	NPTCBC Planning Policy & Development Management Databases
Policies:SP 12 CCRS1/1 R 1/1 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Neath Town Centre Mixed-Use Regeneration Scheme	To deliver the retail element of the Neath Town Centre Regeneration Scheme:  Phase 1 - By 2016 (Currently under construction)  Phase 2 - By 2020	The retail element of the Neath Town Centre Regeneration Scheme is not delivered in accordance with the identified timescales	NPTCBC Planning Policy & Development Management Databases

Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: To promote mixed-use regeneration schemes - Glanafan Comprehensive School</b>				
Policies:SP 7 CCRS1/2 H1/17 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Glanafan Comprehensive School Mixed-Use Regeneration Scheme	To deliver 50 new housing units with anticipated commencement from 2017/18	The housing development within Glanafan Comprehensive School Mixed-Use Regeneration Scheme is not delivered from 2017/18	NPTCBC Planning Policy & Development Management Databases
Policies:SP 12 CCRS1/2 R 1/2 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Glanafan Comprehensive School Mixed-Use Regeneration Scheme	To deliver the retail element of a mixed use development at Glanafan Comprehensive School, Port Talbot by 2020	The retail element of a mixed use development at Glanafan Comprehensive School, Port Talbot is not delivered by 2020	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: To promote mixed-use regeneration schemes - Afan Lido</b>				
Policies:SP 7 CCRS1/3 H 1/19 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Afan Lido Mixed-Use Regeneration Scheme	To deliver 150 new housing units with anticipated commencement from 2016/17	The housing development within Afan Lido Mixed-Use Regeneration Scheme is not delivered from 2016/17	NPTCBC Planning Policy & Development Management Databases
Policy:CCRS 1/3 Objective: 5 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within Afan Lido Mixed-Use Regeneration Scheme	To deliver a tourism / recreation development at Afan Lido by 2020	The tourism / recreation development at Afan Lido is not delivered by 2020	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP5 - Development in the Coastal Corridor Strategy Area / Issue: To deliver a University Campus at Fabian Way</b>				
Policy: CCUC 1 Objective: 5 SA Objectives: 6,8	Local Indicator: The number of applications permitted at the Bay Campus for uses contrary to the policy framework	The Swansea University Science and Innovation Campus to be delivered by 2015:  Work to commence May 2013  First buildings completed May 2014  All non-residential buildings completed May 2015  Student accommodation completed September 2015	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP6 - Development in the Valleys Strategy Area / Issue: To deliver housing development within the Valleys Strategy Area</b>				
Policies:SP 7 VRS 1 H 1 Objective: 6 SA Objectives: 2,6,8	Local Indicator: The number of new housing units permitted and delivered within the Valleys Strategy Area	Sites have been allocated within Policy H1 for the provision of 1,435 new housing units over the Plan period  Annual Targets: 2011/12: 61 2012/13: 108 2013/14: 44 2014/15: 60 2015/16: 90 2016/17: 112 2017/18: 92 2018/19: 75	The number of new housing units provided within the Valleys Strategy Area falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases

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Cross Reference	Indicators	Target	Trigger Point	Data Source
		2019/20: 122 2020/21: 125 2021/22: 117 2022/23: 117 2023/24: 112 2024/25: 126 2025/26: 74		
<b>Strategic Policy: SP6 - Development in the Valleys Strategy Area / Issue: Pontardawe Strategic Growth Area</b>				
Policies:SP 7 H 1 Objective: 6 SA Objectives: 2,6,8	Local Indicator: The number of new housing units permitted and delivered within the Pontardawe Strategic Growth Area	Sites have been allocated within Policy H1 for the provision of <b>664</b> new housing units over the Plan period  Annual Targets: 2011/12: 0 2012/13: 46 2013/14: 30 2014/15: 38 2015/16: 65 2016/17: 92 2017/18: 72 2018/19: 50 2019/20: 66 2020/21: 50 2021/22: 40 2022/23: 40 2023/24: 35 2024/25: 40 2025/26: 0	The number of new housing units provided within the Pontardawe Strategic Growth Area falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP6 - Development in the Valleys Strategic Area / Issue: Upper Neath Valley Strategic Growth Area</b>				
Policies:SP 7 VRS 1 H 1 Objective: 6 SA Objectives: 2,6,8	Local Indicator: The number of new housing units permitted and delivered within the Upper Neath Valley Strategic Growth Area	Sites have been allocated within Policy H1 for the provision of <b>264</b> new housing units over the Plan period  Annual Targets: 2011/12: 5 2012/13: 0 2013/14: 9 2014/15: 2 2015/16: 0 2016/17: 0 2017/18: 0 2018/19: 0 2019/20: 21 2020/21: 45 2021/22: 37 2022/23: 37 2023/24: 37 2024/25: 36 2025/26: 35	The number of new housing units provided within the Upper Neath Valley Strategic Growth Area falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases

Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>Strategic Policy: SP6 - Development in the Valleys Strategic Area / Issue: Park Avenue, Glynneath Mixed-Use Regeneration</b>				
Policies:SP 7 VRS 1/1 H 1 Objective: 6 SA Objectives: 2,6,8	Local Indicator: The amount of new development permitted & delivered within the Park Avenue, Glynneath Mixed-Use Regeneration Scheme	To provide <b>150</b> new housing units with anticipated commencement from 2020/21	The housing development within the Park Avenue, Glynneath Mixed-Use Regeneration Scheme is not delivered from 2020/21	NPTCBC Planning Policy & Development Management Databases
Policies:SP 12 VRS 1/1 R 1/4 Objective: 6 SA Objectives: 6,8	Local Indicator: The amount of new development permitted & delivered within the Park Avenue, Glynneath Mixed-Use Regeneration Scheme	To deliver the retail element of a mixed use development at Park Avenue, Glynneath in accordance with the Park Avenue, Glynneath SPG	The retail element of a mixed use development at Park Avenue, Glynneath is not delivered in accordance with the Park Avenue, Glynneath SPG	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Park Avenue, Glynneath	To prepare the SPG relating to Park Avenue, Glynneath by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP6 - Development in the Valleys Strategic Area / Issue: Encouraging Employment Uses including Live-Work units</b>				
Policies:SP 11 EC 5 EC 6 Objective: 6 SA Objectives: 6,8	Local Indicator: The number of live-work proposals permitted	An increase in the number of live-work units permitted	No increase in the number of live-work units permitted for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP6 - Development in the Valleys Strategic Area / Issue: Tourism development</b>				
Policies:SP 13 TO3/1 Objective: 6 SA Objectives: 6,8	Local Indicator: The number of applications permitted at Rheola	The allocation at Rheola will be delivered by 2021	The allocation at Rheola is not delivered by 2021	NPTCBC Planning Policy & Development Management Databases
<b>THEME: BUILDING HEALTHY, SUSTAINABLE COMMUNITIES</b>				
<b>Strategic Policy: SP7 - Housing Requirement / Issue: To deliver sufficient housing to meet the economic-led growth strategy</b>				
Policy:SP 2 H 1 Objective: 7 SA Objective: 6	Core Indicator: The number of net additional affordable and general market dwellings built in the LPA area	A total provision of <b>8,600</b> new housing units will be made in order to ensure that a minimum of <b>7,800</b> new housing units will be delivered by 2026 Annual Targets: 2011/12: 262 2012/13: 287 2013/14: 301 2014/15: 386 2015/16: 486 2016/17: 549 2017/18: 625 2018/19: 686 2019/20: 698 2020/21: 676 2021/22: 647 2022/23: 614 2023/24: 553 2024/25: 542 2025/26: 488	The number of new housing units provided within the County Borough falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases

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Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>Strategic Policy: SP7 - Housing Requirement / Issue: To make provision for sufficient land for new housing to meet short, medium and long term needs</b>				
Policy:H 1 Objective: 7 SA Objective: 6	Core Indicator: The housing land supply taken from the current Housing Land Availability Study (TAN 1)	Housing land supply should not fall below 5 years as determined by the Housing Land Availability Study (TAN 1) in any given year	The housing land supply falls below 5 years as determined by the Housing Land Availability Study (TAN 1) in any given year	Annual Joint Housing Land Availability Study
<b>Strategic Policy: SP8 - Affordable Housing / Issue: To make sufficient provision for affordable housing</b>				
Policies:SP 2 AH 1 Objective: 8 SA Objective: 6	Core Indicator: The number of net additional affordable and general market dwellings built in the LPA area	To deliver <b>1,200</b> affordable housing units by 2026 Annual Targets: 2011/12: 7 2012/13: 5 2013/14: 22 2014/15: 37 2015/16: 72 2016/17: 90 2017/18: 115 2018/19: 130 2019/20: 124 2020/21: 120 2021/22: 111 2022/23: 102 2023/24: 90 2024/25: 89 2025/26: 86	The number of new affordable housing units provided within the County Borough falls below the cumulative requirement for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: Changes in residual values across the 6 sub-market areas: 1) Port Talbot 2) Neath 3) Pontardawe 4) Neath & Dulais Valleys 5) Swansea & Amman Valley 6) Afan Valley	To deliver the maximum level of affordable housing considered viable	An increase or decrease of 5% of residual value in any sub-market housing area in one year	Development Appraisal Toolkit HM Land Registry House Price Index RICS Building Cost Information Service (BCIS) Tender Prices
Policies: SP 2 AH2	Local Indicator: The number of applications permitted on affordable housing exception sites	An increase in the number of affordable housing exception sites	No increase in the number of affordable housing exception sites permitted for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Affordable Housing	To prepare the SPG relating to Affordable Housing by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP9 - Gypsies &amp; Travellers / Issue: To make sufficient Gypsy and Traveller Provision</b>				
Policies:SP2 GT 1 GT 2 Objective: 9 SA Objective: 6	Local Indicators: The number of additional pitches provided at Cae Garw  The number of proposals for Gypsy & Traveller sites permitted annually  The number of unauthorised Gypsy & Traveller encampments reported annually The need for additional Gypsy & Traveller provision as identified within a GTAA	4 pitches will be provided at Cae Garw by 2017 7 pitches will be provided at Cae Garw by 2022  9 pitches will be provided (on an appropriate site / or Cae Garw) by 2026	Failure to deliver the 4 pitches at Cae Garw by 2017 Failure to deliver the 7 pitches at Cae Garw by 2022  Failure to deliver 9 pitches (on an appropriate site / or Cae Garw) by 2026	NPTCBC Planning Policy & Development Management Databases  Other Council Departments



Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>Strategic Policy: SP10 - Open Space / Issue: New Development &amp; Open Space Provision</b>				
Policies:SP 2 OS 1 Objective: 10 SA Objectives: 6,7	Local Indicator: The number of applications permitted for housing development that do not address the open space needs of the occupants	All new housing development of 3 or more units should make provision for open space where there is a quantitative deficiency in open space provision	One application for new housing development of 3 or more units permitted that does not make provision for open space where there is a quantitative deficiency in open space provision	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP10 - Open Space / Issue: Protection of Existing Open Space</b>				
Policies:SP 2 OS 2 Objective: 10 SA Objectives: 6,7	Local Indicator: The number of existing open spaces lost to development contrary to the policy framework	No loss of open space contrary to the policy framework	One application permitted resulting in the loss of open space contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Open Space & Greenspace	To prepare the SPG relating to Open Space & Greenspace by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>THEME: PROMOTING A SUSTAINABLE ECONOMY</b>				
<b>Strategic Policy: SP11 - Employment Growth / Issue: To make provision for new and expanding employment developments by allocating land for employment uses</b>				
Policy:SP 2	Local Indicator: The level of Workplace Employment in NPT  Contextual Indicators: The change of Workplace Employment for Wales & UK  The level & rate of employment in NPT The level & rate of employment for Wales & UK	Principal Target: A net gain of <b>3,850</b> jobs up to 2026  Interim Targets:  2011/14: - 1,458 2014/17: +1,326 2017/20: +1,326 2020/23: +1,326 2023/26: +1,326  Annual Target: An average gain of <b>442</b> jobs per annum from 2014 over the remainder of the Plan period with a cumulative target of <b>884</b> jobs over any 2 year period	The level of jobs growth deviates from the cumulative target of <b>884</b> jobs over any 2 year period for 2 consecutive years	Welsh Government / Statswales  Business Register Employment Survey  ONS Annual Population Survey
Policies:SP 2 EC1/1  EC1/2  EC1/3  EC1/4	Core Indicator: Employment land permitted on allocated sites as a % of all employment allocations	Principal Target:  To develop a minimum of <b>32</b> Hectares of land on the following sites allocated for employment purposes up to 2026.  Baglan Bay : 15 Ha  Junction 38 : 6 Ha  Coed Darcy SRA : 4 Ha  Harbourside SRA : 7 Ha  Interim Targets:	The amount of land developed for employment purposes falls below the cumulative target of 5 Ha to be developed over any 2 year period for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases

## 6 . Implementation and Monitoring

Cross Reference	Indicators	Target	Trigger Point	Data Source
		2011/14: 1.7 Ha (Actual) 2014/17: 7.6 Ha 2017/20: 7.6 Ha 2020/23: 7.6 Ha 2023/26: 7.6 Ha  Annual Target: To develop an average of <b>2.5</b> Ha of land for employment purposes per annum over the remainder of the Plan period with a cumulative target of <b>5</b> Ha to be developed over any 2 year period		
Policies:EC1/1	Local Indicator: The number of applications permitted for employment purposes within Baglan Bay	Principal Target: To develop a minimum of <b>15</b> Ha of land at Baglan Bay for employment purposes  Interim Targets:  2011/14: 0 2014/17: 2.7 Ha 2017/20: 4.1 Ha 2020/23: 4.1 Ha 2023/26: 4.1 Ha  Annual Target: To develop an average of <b>1.35</b> Ha of land at Baglan Bay for employment purposes with a cumulative target of <b>2.7</b> Ha of land to be developed over any 2 year period	The amount of land developed for employment purposes at Baglan Bay deviates from the cumulative target of 2.7 Ha to be developed over any 2 year period for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policies:SP 2 EC 1 Objectives: 2, 11,12 SA Objectives: 6,7,8	Local Indicator: The net change in the amount of employment land & floorspace	To make provision for a net gain of approximately 34,000 square metres of employment floorspace within the County Borough by 2026  Interim Targets:  2011/14: 7,000 sq m 2014/17: 7,000 sq m 2017/20: 7,000 sq m 2020/23: 7,000 sq m 2023/26: 7,000 sq m  Annual Target: To develop an average of <b>2,250</b> sq m of employment floorspace per annum with a cumulative target of <b>4,500</b> sq m to be developed over any 2 year period	The amount of floorspace developed for employment purposes falls below the cumulative target of 4,500 sq m to be developed over any 2 year period for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
Policy:SP 2	Local Indicator: The rate of economic activity for NPT  Contextual Indicator: The rate of economic activity for Wales & UK	To achieve an increase in the rate of economic activity to 76% by 2026	The rate of economic activity declines for 2 consecutive years	Welsh Government / Statswales  Business Register Employment Survey  ONS Annual Population Survey

Cross Reference	Indicators	Target	Trigger Point	Data Source
Policy:SP 2	Local Indicator: The rate of unemployment for NPT  Contextual Indicator: The rate of unemployment for Wales & UK	To achieve a decrease in the unemployment rate to 6.9% by 2026	The rate of unemployment increases for 2 consecutive years	Welsh Government / Statswales  Business Register Employment Survey  ONS Annual Population Survey
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Baglan Bay Masterplan	To prepare the SPG relating to Baglan Bay Masterplan by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP11 - Employment Growth / Issue: To support and safeguard existing employment uses</b>				
Policies:SP 2 EC 2 EC 3 EC 4 EC 5 Objectives: 6,11,12 SA Objectives: 6,8	Local Indicator: The number of applications permitted on safeguarded sites contrary to the policy framework	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP12 - Retail / Issue: The protection of appropriate retail and mixed uses in retail hierarchy</b>				
Policies:SP 2 R 2 R 3 Objective: 13 SA Objectives: 6,8	Local Indicator: The number of applications permitted for retail development contrary to the defined retail hierarchy	No applications permitted for retail development contrary to the policy framework	One application permitted for retail development contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP12 - Retail / Issue: Small scale retail proposals</b>				
Policies:SP 2 R 3 Objective: 6 SA Objectives: 6,8	Local Indicator: The number of applications for small scale retail development permitted	An increase in the number of small scale retail proposals permitted	No increase in the number of small scale retail proposals permitted for 2 consecutive years	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP13 - Tourism / Issue: Provide a flexible approach to tourism proposals in the open countryside</b>				
Policy:TO 1 Objective: 14 SA Objectives: 6,8	Local Indicator: The number of applications permitted contrary to the policy framework	No tourism proposals to be permitted contrary to the policy framework	One application permitted for tourism proposals contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP13 - Tourism / Issue: Resisting proposals which would result in the loss of tourism facilities</b>				
Policy:TO 2 Objective: 14 SA Objectives: 6,8	Local Indicator: The number of tourism facilities lost contrary to the policy framework	No loss of tourism facilities contrary to the policy framework	One application permitted resulting in the loss of tourism facilities contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP13 - Tourism / Issue: The provision of new &amp; improved Walking and Cycling Routes</b>				
Policies:SP 2 TO4/1 TO4/2 TO4/3 Objective: 14 SA Objectives: 6,7	Local Indicator: The development of a range of improved walking & cycling routes	Completion of the Wales Coast Path by 2012	<b>COMPLETE</b>	NPTCBC Planning Policy & Development Management Databases
		Completion of the Cognation Mountain Bike Trails by 2013	<b>COMPLETE</b>	NPTCBC Planning Policy & Development Management Databases

## 6 . Implementation and Monitoring

Cross Reference	Indicators	Target	Trigger Point	Data Source
		Completion of the Great Dragon Ride Route by 2012	<b>COMPLETE</b>	NPTCBC Planning Policy & Development Management Databases
<b>THEME: VALUING OUR ENVIRONMENT</b>				
<b>Strategic Policy: SP14 - The Countryside &amp; the Undeveloped Coast / Issue: Protection of the Undeveloped Coast, Green Wedges &amp; Special Landscape Areas</b>				
Policies:EN 1 EN 2 EN 3 Objective: 15 SA Objective: 2	Local Indicator: The number of applications permitted within the undeveloped coast, special landscape areas & green wedges contrary to the policy framework	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Special Landscape Areas	To prepare the SPG relating to Special Landscape Areas by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP15 - Biodiversity &amp; Geodiversity / Issue: To protect nationally &amp; internationally designated sites &amp; site of regional &amp; local importance</b>				
Policy: EN 6 Objective: 15 SA Objectives: 2,3	Local Indicator: The number of applications permitted on nationally & internationally designated sites, regionally important biodiversity and geodiversity sites contrary to the policy framework	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Biodiversity	To prepare the SPG relating to Biodiversity by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP16 - Environmental Protection / Issue: Environmental protection</b>				
Policies:SP 2 EN 8 Objectives: 16,17 SA Objectives: 2,5	Local Indicator: The number of applications permitted within the AQMA contrary to the policy framework	Development proposals should not lead to a significant increase in pollution levels and should not lead to an increase in the number of people exposed to significant levels of pollution	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP16 - Environmental Protection / Issue: To protect the Central Port Talbot Area from breaches in air quality objectives</b>				
Policies:SP 2 EN 9 Objectives: 16,17 SA Objectives: 5,7	Local Indicator: The number of applications permitted not accompanied by a Construction Management Plan	No breaches of air quality should occur during the construction phase contrary to the submitted and agreed Construction Management Plan	One or more breaches of air quality occurring during the construction phase contrary to the submitted and agreed Construction Management Plan	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Air Quality	To prepare the SPG relating to Air Quality by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP16 - Environmental Protection / Issue: Quiet Areas</b>				
Policies:SP 2 EN 10 Objectives: 16,17 SA Objectives: 5,7	Local Indicator: The number of applications permitted within designated Quiet Areas	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP17 - Minerals / Issue: Maintaining a minimum supply of aggregate throughout the Plan period</b>				

Cross Reference	Indicators	Target	Trigger Point	Data Source
Objective: 18 SA Objective: 2	Core Indicator: The extent of primary land-won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN)  Local Indicator: Aggregates land supply	A 10 year landbank of crushed rock to be retained throughout the Plan period	A 10 year landbank of crushed rock is not retained throughout the Plan period	NPTCBC Planning Policy Database  SWRAWP Annual Monitoring Reports
<b>Strategic Policy: SP17 - Minerals / Issue: Safeguarding identified resources</b>				
Policy:M 1 Objective: 18 SA Objective: 2	Local Indicator: The number of applications permitted that would sterilise a mineral resource	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
Policy:M2	Local Indicator: The number of planning applications for extraction of aggregate mineral not in line with Policy M2	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP17 - Minerals / Issue: Development in Mineral Buffer Zones</b>				
Policy:M 3 Objective: 18 SA Objective: 2	Local Indicator: The number of applications permitted within Mineral Buffer Zones	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP18 - Renewable &amp; Low Carbon Energy / Issue: To provide for an appropriate contribution to meeting national renewable energy targets</b>				
Policy:RE 1 Objective: 19 SA Objective: 1	Local Indicator: The number of applications permitted for renewable energy and low carbon technology development	To achieve TAN 8 SSA capacity targets and to encourage where appropriate all forms of renewable energy and low carbon technology development	No increase in the number of renewable energy schemes permitted is recorded	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP18 - Renewable &amp; Low Carbon Energy / Issue: Renewable &amp; Low Carbon Energy in New Development</b>				
Policy:RE 2 Objective: 19 SA Objective: 1	Local Indicator: The number of applications permitted accompanied by a Renewable Energy Assessment	No applications permitted contrary to the policy framework	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Renewable & Low Carbon Energy	To prepare the SPG relating to Renewable & Low Carbon Energy by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP19 - Waste Management / Issue: Waste Management in New Development</b>				
Policy:W 3 Objective: 20 SA Objective: 2	Local Indicator: The number of applications permitted accompanied by Site Waste Management Plans	All new development proposals falling within the terms of the Policy W3 should produce Site Waste Management Plans	One application permitted contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The number of waste facilities permitted and refused on employment sites	To ensure appropriate supply of employment sites for waste	One application refused on an employment site considered suitable for waste	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The amount of land and facilities to cater for waste in NPT	To maintain sufficient land and facilities to cater for waste in NPT (to be confirmed at a regional level in accordance with TAN 21)	Triggers to be established at a regional level in accordance with TAN 21	NPTCBC Planning Policy & Development Management Databases

## 6 . Implementation and Monitoring

Cross Reference	Indicators	Target	Trigger Point	Data Source
<b>THEME: ACHIEVING SUSTAINABLE ACCESSIBILITY</b>				
<b>Strategic Policy: SP20 - Transport Network / Issue: Highway Network Enhancements</b>				
Policies:SP 2 TR1/1 TR1/2 TR1/3 TR1/4 TR1/5 Objectives: 21,22 SA Objective: 6	Local Indicator: The delivery of the Baglan Energy Park Link Road	The Baglan Energy Park Link Road is delivered by early 2015	<b>COMPLETE</b>	NPTCBC Planning Policy & Development Management Databases  NPTCBC Highways Department
	Local Indicator: The delivery of the Coed Darcy Southern Access Road	The Coed Darcy Southern Access Road is delivered in accordance with the terms of the S.106 agreement	The Coed Darcy Southern Access Road is not complete before the occupation of the 501st unit or by July 2017 whichever is the sooner	
	Local Indicator: The delivery of the Ffordd Amazon (Phase 2)	The Ffordd Amazon (Phase 2) is delivered by 2014	<b>COMPLETE</b>	
	Local Indicator: The delivery of the Junction 43 (M4) Improvements	The Junction 43 (M4) Improvements are delivered in a phased manner in accordance with the terms of the S.106	The Junction 43 (M4) Improvements are not delivered in accordance with the terms of the S.106 (Under construction 2015)	
	Local Indicator: The delivery of the Harbour Way (PDR)	The Harbour Way (PDR) is delivered by 2014	<b>COMPLETE</b>	
<b>Strategic Policy: SP20 - Transport Network / Issue: Public Transport Station Improvements</b>				
Policies:SP 2 TR1/6 Objectives: 21,22 SA Objective: 6	Local Indicator: To deliver the Integrated Transport Hub, Port Talbot	To deliver the project by 2018	The Integrated Transport Hub scheme is not delivered by 2018	NPTCBC Planning Policy  Other Council Departments
<b>Strategic Policy: SP20 - Transport Network / Issue: Walking and Cycling Routes</b>				
Policies:SP 2 TR1/7 TR1/8 Objectives: 21,22 SA Objective: 6	Local Indicator: The completion of the Amman Valley Cycle Way project	The Amman Valley Cycle Way project to be delivered by 2014	<b>PART COMPLETE</b>	NPTCBC Planning Policy  Other Council Departments
	Local Indicator: The completion of the Afan Valley Trail (Port Talbot to Afan Valley)	The Afan Valley Trail (Port Talbot to Afan Valley) to be delivered by 2013	<b>COMPLETE</b>	
<b>Strategic Policy: SP20 - Transport Network / Issue: Park &amp; Share Sites</b>				
Policies:SP 2 TR1/9 Objectives: 21,22 SA Objective: 6	Local Indicator: To deliver a Park & Share facility at Junction 38(M4) Margam	To deliver the project by 2020	The Park & Share facility at Junction 38(M4) Margam is not delivered by 2020	NPTCBC Planning Policy  Other Council Departments
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Parking	To prepare the SPG relating to Parking by April 2016	The SPG is not prepared by April 2016	NPTCBC Planning Policy
<b>THEME: RESPECTING DISTINCTIVENESS</b>				
<b>Strategic Policy: SP21 - Built Environment &amp; Historic Heritage / Issue: Safeguarding features of Local Importance</b>				
Policies:BE 2 BE 3 Objectives: 23,24 SA Objective: 4	Local Indicator: The number of applications permitted impacting upon buildings & features of local, architectural or cultural importance	No applications permitted contrary to the policy framework	One application permitted for development contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases

Cross Reference	Indicators	Target	Trigger Point	Data Source
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Buildings of Local Importance	To prepare the SPG relating to Buildings of Local Importance by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy
<b>Strategic Policy: SP21 - Built Environment &amp; Historic Heritage / Issue: Protecting Conservation Areas &amp; other designated sites</b>				
Policy:BE 1 Objectives: 23,24 SA Objective: 4	Local Indicator: The number of applications permitted within Conservation Areas & other designated sites	No applications permitted contrary to the policy framework	One application permitted for development contrary to the policy framework	NPTCBC Planning Policy & Development Management Databases
<b>Strategic Policy: SP22 - Welsh Language / Issue: Development in Language Sensitive Areas</b>				
Policy:WL 1 Objectives: 6,25 SA Objective: 6	Local Indicator: The number of applications permitted accompanied by a Language Action Plan	No applications permitted within the Language Sensitive Areas without addressing welsh language issues	One application permitted within the Language Sensitive Areas without addressing welsh language issues	NPTCBC Planning Policy & Development Management Databases
	Local Indicator: The preparation of Supplementary Planning Guidance relating to Development & the Welsh Language	To prepare the SPG relating to Development & the Welsh Language by October 2016	The SPG is not prepared by October 2016	NPTCBC Planning Policy





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Neath Port Talbot LDP Adoption Statement (January 2016)

## 1 Introduction

**1.0.1** When a Local Planning Authority adopts its Local Development Plan (LDP) it is required to produce and publish an Adoption Statement in accordance with the terms of Regulation 25(2) of the Town & Country Planning (Local Development Plan) (Wales) Regulations 2015, incorporating a Strategic Environmental Assessment (SEA) Statement in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

**1.0.2** Section 2 of this statement addresses the requirements of the Town & Country Planning (Local Development Plan)(Wales) Regulations 2015 and Section 3 relates to the requirements of Environmental Assessment of the Plans and Programmes (Wales) Regulations 2004.

## 2 Local Development Plan - Adoption Statement

### Regulation 25(2) of the Town & Country Planning (Local Development Plan) (Wales) Regulations 2015

**2.0.1** The Neath Port Talbot LDP (2011-2026) was adopted on 27th January 2016. The LDP came into force upon its adoption.

**2.0.2** The Neath Port Talbot LDP is the primary planning policy document for the County Borough. It sets out the planning policies and land use allocations that will shape the future of the County Borough area and will guide development management decisions. The LDP replaces the Neath Port Talbot Unitary Development Plan (2008).

**2.0.3** The Neath Port Talbot LDP is available to view or download from the Council's website at [www.npt.gov.uk/ldp](http://www.npt.gov.uk/ldp) and is also available for public inspection free of charge at the following locations during normal opening hours:

- Neath Civic Centre;
- Port Talbot Civic Centre; and
- Public libraries within the County Borough.

**2.0.4** In addition to the adopted Plan the following documents have been published and are also available to view at the above locations:

- The Inspectors' Report;
- Adoption Statement;
- Sustainability Appraisal Report; and
- Habitats Regulations Assessment.

**2.0.5** A charge will be made for hard copies of any document.

**2.0.6** Any person may challenge the validity of the LDP on the grounds that it is not within the powers conferred by Part 6 of the Planning and Compulsory Purchase Act 2004 or that any requirement of that Act or any regulation made under it has not been complied with. Any such challenge should be made by application to the High Court under Section 113 of the 2004 Act within six weeks of the date of adoption.

## **3 Environmental Assessment of Plans and Programmes (Wales) Regulations 2004**

**3.0.1** LDPs are required to be subject to Sustainability Appraisal (SA) under UK planning legislation and to be subject to Strategic Environmental Assessment (SEA) under European and UK legislation. In accordance with Welsh Government guidance, these assessments were combined and have been undertaken as an iterative process throughout all the LDP preparation stages. References to Sustainability Appraisal (SA) should therefore be taken to include Strategic Environmental Assessment (SEA) in all LDP related documents.

**3.0.2** When a Plan is adopted, the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 require a statement to be published that provides the following information:

1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report (the SA/SEA Report) has been taken into account;
3. How opinions expressed in relation to the consultation on the plan/programme and Environmental Report have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

**3.0.3** The LDP was also subject to a Habitat Regulations Appraisal (HRA). The HRA assessed the impacts of the LDP in combination with the effects of other plans and projects, on European sites designated for their ecological status. This appraisal also accompanied the Deposit LDP and was reported separately.

## 3.1 How Environmental considerations have been integrated into the LDP

**3.1.1** Planning legislation and guidance requires that environmental considerations be incorporated into policy development at all stages. The LDP consequently includes a wide range of policies addressing environmental issues, and all development proposals in the Plan have taken into account environmental impacts and considerations. Further details and background is contained in the relevant LDP documents<sup>(1)</sup>.

**3.1.2** The SA/SEA process provided a separate detailed assessment procedure to further ensure that environmental issues were fully taken account of and integrated into every stage of Plan preparation. The relevant information relating to each stage of Plan preparation and decision making is set out in the relevant SA documents<sup>(2)</sup>.

**3.1.3** In addition, as indicated above, the LDP was subject to Habitats Regulations Appraisal as a separate assessment under the Conservation of Habitats and Species Regulations 2010 (EC Habitats Directive 92/43/EEC).

## 3.2 How the Environmental Report (the SA/SEA Report) has been taken into account

**3.2.1** The SA Report (Environmental Report) and the LDP were developed in parallel, with each stage of the SA informing and influencing the progression of the LDP.

### Scoping Stage

**3.2.2** The SA Scoping Report established environmental issues and objectives which then had an important initial influence on the development of the LDP objectives and Preferred Strategy.

### Pre-Deposit Stage

**3.2.3** Initially, the compatibility of the proposed vision and objectives of the LDP were assessed against the sustainability objectives identified at the SA Scoping Stage. This then fed into the initial assessment of the seven strategic growth options and four strategic spatial alternatives under consideration. These assessments then informed the decisions about the most appropriate and preferred strategy. A similar assessment was undertaken of the strategic policies.

**3.2.4** Recommendations were made in relation to specific draft policies and allocations and about how the LDP could maximise its performance against the range of sustainability issues. This included recommendations about the need for additional specific policies to

1 Climate Change & Flooding Topic Paper (September 2014)(Ref: SD380); Environment Topic Paper (September 2014)(Ref: SD47); Candidate Site Assessment Report (August 2014)(Ref: EB07); Strategic Flood Consequences Assessment (September 2014)(Refs: EB01 & EB02); Provision of Landscape Advice (TACP 2011)(Refs: EB18 & EB19).

2 Stage 1: Sustainability Appraisal – Scoping Report (Revised) (February 2011)(Ref: LDP33); Stage 2: Sustainability Appraisal – LDP Pre-Deposit Plan Interim Report (September 2011)(Ref: LDP34); Sustainability Appraisal of the Deposit LDP – Main Report (August 2013)(Ref: SD05); Sustainability Appraisal of the Deposit LDP – Appendices (August 2013)(Ref: SD06); Sustainability Appraisal of the Deposit LDP – Addendum (September 2014)(Ref: SD07); Sustainability Appraisal of Proposed Focussed Changes (September 2014)(Ref: SD21); Sustainability Appraisal of the Proposed Matters Arising Changes (August 2015)(Ref: ED040).

address identified sustainability and environmental issues which were subsequently taken into account in the development of the detailed policies and allocations contained in the Deposit LDP<sup>(3)</sup>.

## Deposit Stage

**3.2.5** All the elements of the Deposit Plan were assessed in parallel with the plan development process, including all elements that had changed following the Pre-Deposit assessments and consultation process. This included the LDP vision, objectives, strategic alternatives, policies and allocations. The final selection of development allocation sites, the range of environmental protection policies and the finalised wording of all the Plan policies were fundamentally influenced by and resulted from the integrated iterative SA process. See The Sustainability Appraisal of the Deposit LDP – Main Report (August 2013)<sup>(4)</sup>.

## Focussed Changes

**3.2.6** A number of changes to the Deposit LDP were identified as a result of the Deposit LDP consultation. These changes were put forward as 'Focussed Changes' and were assessed through the SA process. Four substantive changes were consequently subjected to full detailed assessment which concluded that none of the proposed changes resulted in significant changes to the overall SA assessments, which consequently remained unchanged<sup>(5)</sup>.

## Matters Arising Changes

**3.2.7** A number of further changes were proposed in response to matters raised through the Examination process by the Inspectors and participants at the Hearing Sessions. These were termed Matters Arising Changes (MACs) and were subject to public consultation.

**3.2.8** The proposed MACs were assessed through the SA process which concluded that the changes would not result in any significant amendments to the overall conclusions of the SA<sup>(6)</sup>. The SA of the MACs informed the final deliberations of the Inspectors.

## 3.3 How opinions expressed in relation to the consultations on the plan/programme and Environmental Report have been taken into account

**3.3.1** Formal consultations have been undertaken in relation to the SA in accordance with the Environmental Assessment of Plans and Programmes (Wales) Regulations, in parallel with the LDP consultation process. The regulations stipulate the environmental consultation bodies that must be consulted: The Countryside Council for Wales, the

3 Full details are set out in Stage 2: Sustainability Appraisal – LDP Pre-Deposit Plan Interim Report (September 2011). Document Ref: LDP34.

4 Document Ref: SD05.

5 Full details of the SA of the Focussed Changes are set out in 'Sustainability Appraisal of Proposed Focussed Changes (September 2014)' - Document Ref: SD21.

6 Full details are set out in Sustainability Appraisal of Proposed Schedule of Matters Arising Changes (August 2015) - Document Ref: ED040

Environment Agency and Cadw. The first two bodies were merged into Natural Resources Wales in 2013, part way through the Plan preparation period. In addition, consultation was undertaken with a wide range of stakeholders and the general public.

**3.3.2** Consultation with the statutory bodies, stakeholders and wider public was undertaken at the following key stages in the Plan preparation and SA process:

### ***LDP Pre-Deposit Participation and SA Scoping Report***

**3.3.3** Prior to the formal Pre-Deposit LDP (Preferred Strategy) consultation stage, consultation exercises were undertaken in relation to the early stages of LDP preparation<sup>(7)</sup>. These comprised the following stages:

- Candidate Sites (2009/2010);
- Issues & Alternatives Participation (completed February / March 2009); and
- Pre-Deposit Participation (completed May 2011).

**3.3.4** Full details of these stages and the ways in which comments received were taken into account are given in the LDP Consultation Report<sup>(8)</sup>.

**3.3.5** In parallel with these stages, the SA Scoping Report was prepared in consultation with the SA Forum, (which was comprised of representatives from a range of organisations including environmental, business, disabled and community safety interests). The Scoping Report was the subject of an extensive consultation with the statutory environmental consultation bodies and the general public in July 2010. The comments received and the Council's responses were summarised<sup>(9)</sup> and a revised version of the Scoping Report was published following this consultation in February 2011.

### ***LDP Pre-Deposit Public Consultation and SA Interim Report***

**3.3.6** The LDP Pre-Deposit Plan (or 'Preferred Strategy') was the first key formal stage of the Plan preparation process<sup>(10)</sup> and the formal consultation took place from Monday 5th September to Monday 17th October 2011. A further series of stakeholder engagement events was subsequently held in September/October 2012<sup>(11)</sup>. Full details of the ways in which comments received were taken into account following these consultations are also given in the LDP Consultation Report<sup>(12)</sup>.

7 Regulation 14, Town & Country Planning (Local Development Plan) (Wales) Regulations 2015.

8 LDP Consultation Report - Volume 2: Pre-Deposit Consultation (Regulation 14 & 15) (September 2014) - Document Ref: SD11.

9 SA Scoping Report - Summary of Comments and Responses.

10 Regulation 15, Town & Country Planning (Local Development Plan) (Wales) Regulations 2015.

11 Deposit Participation (Emerging Proposals) (September / October 2012).

12 LDP Consultation Report - Volume 2: Pre-Deposit Consultation (Regulation 14 & 15) (September 2014) - Document Ref: SD11.

**3.3.7** The SA Interim Report<sup>(13)</sup> was published alongside the Pre-Deposit Plan, with comments invited during the same consultation period. The comments received as a result of this consultation and the Council's responses are contained in the Economic and Community Regeneration Cabinet Board Report<sup>(14)</sup> available on the LDP website. Amendments made as a result of the consultation were incorporated in the SA Report<sup>(15)</sup> issued at the Deposit Plan stage.

### ***LDP Deposit Public Consultation and SA Report***

**3.3.8** The full draft LDP was formally placed 'on deposit'<sup>(16)</sup> in August 2013. The formal consultation period ran from Wednesday 28th August to Tuesday 15th October 2013 and full details of the comments received and the Council's responses are again summarised in the LDP Consultation Report<sup>(17)</sup>. This consultation resulted in the proposal of a number of 'Focussed Changes' by the Council (see below).

**3.3.9** At the same time as the LDP was placed on deposit, the SA Report<sup>(18)</sup> was published for consultation and sent directly to the environmental consultation bodies. The comments received as a result of this consultation and the Council's responses are set out in the SA Addendum report<sup>(19)</sup>.

### ***LDP Focussed Changes Consultation and SA of the Proposed Focussed Changes***

**3.3.10** Following on from the Deposit Plan consultation, the Council proposed a number of 'Focussed Changes' to the Plan, taking into account the comments received. Details are contained in the Schedule of Proposed Focussed Changes<sup>(20)</sup>. A consultation was undertaken on the proposed Focussed Changes between 29th August 2014 and 13th October 2014. The proposed Focussed Changes and the comments received following the consultation were submitted to the Welsh Government (as part of the submission documents) in September 2014.

**3.3.11** A further SA of the proposed Focussed Changes was undertaken prior to the formal submission of the LDP, and this document<sup>(21)</sup> was submitted to the Welsh Government alongside the other documents.

### ***Matters Arising Changes and SA of the Matters Arising Changes***

**3.3.12** The Matters Arising Changes (MACs) were the subject of a public consultation between 30th June and 10th August 2015. Comments received as a result of this consultation were considered by the Inspectors as part of their deliberations on the Plan.

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13 Stage 2: Sustainability Appraisal - LDP Pre-Deposit Plan Interim Report (September 2011) - Document Ref: LDP34.

14 ECRB Report (Dec 11): Schedule of Comments & Responses.

15 Sustainability Appraisal of the Deposit LDP (August 2013) - Document Ref: SD05.

16 Regulation 17, Town & Country Planning (Local Development Plan) (Wales) Regulations 2015.

17 LDP Consultation Report - Volume 3: Deposit Consultation (Regulation 17) (September 2014) - Document Ref: SD12.

18 Sustainability Appraisal of the Deposit LDP (August 2013) - Document Ref: SD05.

19 Sustainability Appraisal of the Deposit LDP - Addendum (September 2014) - Document Ref: SD07.

20 Schedule of Proposed Focussed Changes – An Addendum to the Deposit LDP (September 2014) - Document Ref: SD20.

21 Sustainability Appraisal of Proposed Focussed Changes (September 2014) - Document Ref: SD21.



**3.3.13** The MACs were also assessed through the SA process<sup>(22)</sup>, which also informed the Inspectors' decision making process.

### **3.4 How the results of any transboundary consultations have been taken into account**

**3.4.1** The SA process did not indicate that the LDP is likely to have any significant effects on the environment of any other EU Member State. Consequently, no transboundary consultation was entered into under Regulation 14 of the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

### **3.5 The reasons for choosing the plan or programme as adopted in the light of the other reasonable alternatives dealt with**

**3.5.1** A range of options were considered as part of the LDP preparation process, in particular a number of growth level options, alternative spatial strategies and more detailed choices about specific development sites and policies. These were tested against the SA objectives.

**3.5.2** At the Pre-Deposit / Preferred Strategy stage, a 'moderate' growth level was chosen as the preferred option, but this was amended as a result of responses received to the Preferred Strategy consultation and following further work, research and information from the 2011 census. The new growth option chosen was a 'medium/high' level of growth. Full details of the processes and reasons behind these choices are given in the LDP and relevant background papers and the SA Pre-Deposit Interim Report<sup>(23)</sup> and SA Deposit Report<sup>(24)</sup>. The preferred spatial option chosen was to focus development on the M4 coastal corridor while making increased levels of intervention to reinvigorate the Valleys area. Full details of the processes and reasons behind these choices are also available in the above documents.

### **3.6 The measures that are to be taken to monitor the significant effects of the plan or programme**

**3.6.1** The LDP Regulations<sup>(25)</sup> requires that implementation of the Plan must be monitored through the publication of an Annual Monitoring Report (AMR) which must be submitted to the Welsh Government. Regulation 17 of the SEA Regulations requires that the significant environmental effects of the Plan must be monitored in order to identify any unforeseen adverse effects and take appropriate remedial action. These monitoring requirements will be complied with through the LDP Monitoring Framework, set out in Section 6 of the adopted LDP. The specific indicators of the Monitoring Framework that will be specifically relevant to the monitoring of the environmental effects of the Plan are given in the SA Deposit Report<sup>(26)</sup>.

22 Sustainability Appraisal of Proposed Matters Arising Changes (August 2015) - Document Ref: ED040.

23 Stage 2: Sustainability Appraisal: LDP Pre-Deposit Plan Interim Report (September 2011) - Document Ref: LDP34.

24 Sustainability Appraisal of the Deposit LDP (August 2013) - Document Ref: SD05.

25 Regulation 37, The Town & Country (Local Development Plan) (Wales) Regulations 2015.

26 Sustainability Appraisal of the Deposit LDP (August 2013) - Document Ref: SD05.

## 4 Further Information

**4.0.1** If you have any queries or would like further information then please contact the Planning Policy Team on **(01639) 686821** or e-mail **[ldp@npt.gov.uk](mailto:ldp@npt.gov.uk)**