



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNCIL**

**CABINET**  
25<sup>th</sup> June 2020

### **Report of the Director of Environment and Regeneration Nicola Pearce**

#### **Matter for Decision**

**Wards Affected:** All

**Neath Port Talbot Local Development Plan (LDP) 2011-2026 –  
Consideration of: the comments received following consultation on  
the draft LDP Review Report; and the publication procedures to be  
implemented.**

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

To consider the responses to the comments received following consultation on the Draft LDP Review Report and the publication procedures to be implemented.

#### **Executive Summary**

The Neath Port Talbot LDP (2011-2026) was formally adopted by the Council on 27<sup>th</sup> January 2016. The LDP sets out the Council's vision and objectives, together with a series of policies and proposals which together sets the framework for the development and use of land up to 2026.

To ensure the LDP is kept up-to-date, the Council has an obligation to undertake a full review of the plan at intervals not longer than every four years from initial adoption – the LDP is now the subject of this four year review cycle.

The first stage of the review is to prepare and publish a 'Review Report' which identifies the key issues to be considered when taking the existing LDP forward, setting out areas where the current LDP is delivering and

performing well, in addition to those areas where changes may be required.

The Draft Review Report was subject to a formal consultation running for 6 weeks from 3<sup>rd</sup> February 2020 to 16<sup>th</sup> March 2020. This report seeks endorsement of the responses to the comments received and approval of the final LDP Review Report for publication.

## **Background**

The Neath Port Talbot LDP (2011-2026), formally adopted by the Council on 27<sup>th</sup> January 2016, sets the policy framework for the development and use of land up to 2026.

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

The LDP is now the subject of the statutory four year full review cycle and as such all aspects of the Plan will need to be reassessed to consider if they remain sound and fit for purpose. It is important therefore that the Council now progresses with the statutory review of the LDP, to address in particular the policy issues that have been highlighted by the monitoring undertaken to date.

Any revision to a LDP must begin with the preparation of a 'Review Report'. The Review Report identifies the key issues to be considered when taking the existing LDP forward and sets out areas where the current LDP is delivering and performing well, in addition to those areas where changes may be required. It does not detail changes that should be made to the plan, as the detail and extent of changes will be identified through the process of the Replacement Plan (RLDP).

## **LDP Review Report – Consultation**

Members will recall that a report was presented to Council on 29<sup>th</sup> January 2020 seeking authorisation to undertake a consultation on the *draft* LDP Review Report. The consultation was undertaken for a period of 6 weeks, from 3<sup>rd</sup> February 2020 to 16<sup>th</sup> March 2020.

The Council received a total of 57 comments from 11 different individuals or organisations. A further 2 submissions were received after the close of

the consultation (National Grid and Aggregate Industries UK Ltd), both of which have been classified as 'not duly made' and therefore do not form part of this report. Whilst neither submission raised any significant issues, the comments will nevertheless be kept on file for future reference with contact details added to the consultee database.

Of the comments received, there was overall support for undertaking a full review of the plan and the main points raised are summarised as follows:

- **Contextual Changes** – the need to consider contextual changes and new legislation that has been introduced since LDP adoption, such as the Well-being of Future Generations Act and changes to the Environment Act.
- **Development Strategy** – the existing LDP is ineffective due to the changing economic environment, albeit there is support for continuing with an employment-led growth strategy.
- **Strategic Regeneration Areas** – the existing LDP is too reliant on the two Strategic Regeneration Area which have not delivered (Coed Darcy and Harbourside).
- **Housing (Large Sites)** – the need for undelivered housing allocations to be re-assessed.
- **Housing (Small Sites)** – percentage wise, small housing sites have been more effective in delivery compared to large sites and therefore there is a need to allocate more smaller sites in the Replacement LDP.
- **Housing Density** – the housing density requirements of Policy BE1 (Design) are too rigid.
- **Infrastructure** – the need to consider the impact on existing infrastructure.
- **New Policy Areas** – the need to consider new policy areas, in particular Green Infrastructure.
- **Renewable Energy** – the need to consider specific sites for renewable energy and to also consider hydro-electric power in addition to wind and solar energy.

Responses and recommendations to all comments received are presented in Appendix 1. Members should note that there are no recommendations to make any changes to the draft LDP Review Report, as all issues raised are matters that will be fully considered in the preparation of the Replacement LDP along with the updates required to the evidence base. Section 6 of the Review Report details the evidence base studies that are required to support the review of the LDP.

## **Adoption and Publication Procedures**

Following formal approval by Council, the Review Report will be published on the Council's website and submitted to the Welsh Government. Additionally, in accordance with the Council's Welsh Language Standards Policy the LDP Review Report will also be made available in Welsh.

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

## **Next Steps**

Once approved, the LDP Review Report will become a critical part of the review process and ultimately will be an integral part of the evidence base. Work has already commenced on the preparation of a Delivery Agreement (DA) which will, with agreement from Welsh Government, formally set out the review timetable, the Community Involvement Scheme (CIS), and the resources the Council will commit to developing the Replacement LDP.

## *Impacts of Covid-19*

Since the preparation of the draft Review Report, the Covid-19 pandemic has resulted in the suspension of much normal activity. The impact of Covid-19 is restricting the movement of people, accessibility to public buildings and cancellation of engagement events.

The CIS is an integral part of LDP delivery, setting out who will be consulted, at what stage in the plan preparation process and by what medium. This will include highlighting the important role Members will play in the process moving forward and Members will be encouraged to continue to engage with officers to inform them of the important issues facing their communities. Ensuring conformity with the CIS is a key test of 'soundness' and failure to comply with the CIS can result in plans being unable to be found 'sound' and therefore adopted.

On 18<sup>th</sup> March 2020, the Welsh Government issued a letter to all Local Planning Authorities (LPAs) acknowledging the impact of Covid-19 on the plan preparation process, with the letter confirming that *'...those LPAs who are currently, or are about to consult on a draft Delivery Agreement, should give careful consideration to the formal start date of LDP preparation. The exceptional circumstances may mean that the commencement of plan preparation may have to be postponed for several months to enable effective engagement in the process, as set out in the CIS and DA'*.

Although it is considered reasonable to finalise and publish the contents of the LDP Review Report, for the reasons outlined above it is not considered possible to finalise and issue for consultation a draft Delivery Agreement at this time. Moving forward, this position will be kept under constant review as restrictions are lifted and whilst the formal commencement of the review process will now be delayed, important work on the LDP evidence base will continue to progress as planned.

On the wider implications of Covid-19, at present it is not feasible to predict the longer term impacts on local businesses, employment levels, retail provision and economic activity generally, or on the health and well-being of residents. The current situation is however liable to have far reaching implications on attitudes and approaches to a wide range of matters including transport and travel, recreation and leisure provision and the environment generally.

The review of the LDP will need to address all of these matters and their longer term implications for the economy and well-being of our communities. These matters will be addressed as part of the review of the LDP strategy, policies and proposals in the light of the evolving economic and social situation.

## **Financial Impacts**

In terms of the wider costs associated with completing the LDP Review, it is estimated that such costs will amount to circa £500k. These potential costs have been highlighted for some time and a reserve has therefore been established for LDP preparation. Whilst the funds held within this reserve are currently insufficient, it has been recognised that regular payments to this reserve will be required in line with the proposed trajectory of spend to ensure delivery of the Replacement LDP.

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

The financial implications and resources required to prepare a Replacement LDP will be set out in more detail in a new DA which will be the subject of a separate report.

## **Integrated Impact Assessment**

In order to comply with the relevant legislation and guidance, the preparation of the Replacement LDP will need to be subjected to a number of assessments.

Sustainability Appraisal (SA) is an assessment of the economic, environmental and social effects of a plan which is carried out from the outset of the plan-making process to ensure that decisions are made that accord with sustainable development principles. SA is therefore an iterative process that identifies and reports on the extent to which implementation of the plan will achieve sustainable development objectives and identifies opportunities for improving plan performance in relation to these.

One of the 'ways of working' that forms part of the sustainable development principle is the need to take an integrated approach. Given the nature and scope of the LDP therefore, the assessments will be amalgamated integrating SA with other statutory and non-statutory assessments including Strategic Environmental Assessment (SEA), health, equalities and the impact on the Welsh language.

The integration of these assessments will ensure that the Council discharges its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Furthermore, the approach will ensure that a collaborative approach is taken on different issues, recognising the links between topics and providing a robust and thorough mechanism for identifying issues and opportunities, assessing impacts including cumulative and indirect effects.

## **Valleys Communities Impacts**

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

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

## **Workforce Impacts**

It is anticipated that the review of the LDP will be accommodated mainly by utilising the existing staff structure within the Planning Policy team. This however will need to be kept under review, subject to the nature and scope of the review process.

The staff resources required to prepare a Replacement LDP will be set out in more detail in a new Delivery Agreement which will be the subject of a separate report.

## **Legal Impacts**

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

## **Risk Management Impacts**

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

## **Consultation**

This item has been the subject of external consultation.

## **Recommendations**

That subject to any amendments made at Cabinet on 25<sup>th</sup> June 2020, it is resolved to commend the following to Council for approval:

1. That the responses and recommendations to the representations received as set out in Appendix 1 be agreed.
2. That the final Review Report as set out within Appendix 2 be agreed.

## **Reasons for Proposed Decisions**

The recommendations are needed to:

1. Ensure compliance with Section 69 of the Planning and Compulsory Purchase Act 2004; The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015; and the Development Plans Manual (Edition 3) 2020.

2. That the adoption and publication procedures as set out in the report are implemented.

## **Implementation of Decisions**

The decisions are proposed for implementation after the three day call in period.

## **Appendices**

Appendix 1 – Responses to the Draft LDP Review Report Representations  
Appendix 2 – LDP Review Report (July 2020)

## **List of Background Papers**

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

Planning and Compulsory Purchase Act 2004.  
Well-being of Future Generations (Wales) Act 2015.  
Environment (Wales) Act 2016.  
The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.  
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.  
The Conservation (Natural Habitats, &c.) Regulations 1994.  
EC Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).

### ***Planning Policy / Guidance:***

Neath Port Talbot LDP (2011-2026) (January 2016).  
Planning Policy Wales Edition 10 (2018).  
Technical Advice Notes (TANs).  
Minerals Technical Advice Notes (MTANs).  
Development Plans Manual (Edition 3) 2020.

## **Officer Contact**

Lana Beynon – Planning Policy Manager  
Tel: 01639 686314 or e-mail: [l.beynon@npt.gov.uk](mailto:l.beynon@npt.gov.uk)



## APPENDIX 1 – Responses to the Draft LDP Review Report Representations

Full details of the comments received and the Council's responses are provided in the table below and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

ID	Name	Organisation	Section	Para	Representation	Council Response
<a href="#">1</a>	Mr R W Ebley		LDP Review Report (Consultation Draft - January 2020)		International Standards Organisation standards need to be used to achieve the required result.	The comment is noted.
<a href="#">2</a>	Ryan Norman	Dwr Cymru Welsh Water	LDP Review Report (Consultation Draft - January 2020)		Dwr Cymru offers its support to the LPA in progressing through the replacement LDP.	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WBFG Act and LDP Regulations.
<a href="#">16</a>	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Yes, we would suggest that this should be reviewed in line with the principles of Sustainable Management of Natural Resources as set out in the Environment Act. We would raise the opportunities for collaboration on green infrastructure projects with neighbouring authorities as species and habitats connectivity should be considered on a landscape scale.</p> <p>We also wish to emphasise the opportunities within the review to consider priorities for habitat connectivity for key species at a landscape scale.</p>	The support is welcomed. The need for collaborative working is key and is part of the LDP Regulations.
<a href="#">23</a>	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Are there any other comments in respect of the Draft Review Report?</p> <p>We welcome the opportunity to engage formally through the review process.</p>	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WBFG Act and LDP Regulations.
<a href="#">54</a>	Tata Steel		LDP Review Report (Consultation Draft -		Tata Steel is supportive of a continued economic-led growth strategy for the Neath Port Talbot LDP. The approach suggested above in respect of any amendments to policies EC3, EC4 and	The Council welcomes the support. The consultation frequency and extent will be set out and agreed in the forthcoming Delivery

ID	Name	Organisation	Section	Para	Representation	Officer Response
			January 2020)		<p>EN8 will help to ensure the replacement LDP continues to support existing important employment facilities such as the Steelworks and retains the appropriate flexibility to allow the sector to flourish and diversify.</p> <p>We would welcome the opportunity to discuss any proposed policy amendments and renewable energy approaches with the Council in advance of the next round of consultation.</p>	Agreement for the Replacement Plan.
<a href="#">56</a>	Mr Peter Horsley		LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Changes in legislation and government policy, together with consideration as to why housing delivery has fallen short of expected, are justification for a full review of the Plan.</p>	The comment is noted.
<a href="#">3</a>	Mrs Chris Thomas		LDP Annual Monitoring Reports - Key Findings	3	<p>I wish to disagree with the comments in the report up for consultation. Namely that in paragraph 3.0.23 it states that no developments were planned in VSA areas which were outside a settlement area, but adjacent to. I believe this to be wrong on the grounds of an appeal being dismissed on application A2016 /0014, this development was planned directly alongside McDonalds drive-thru and the A465. This site is known as the Glyn Neath Business Park, and owned by Welsh Assembly, so would have had a return for the public purse.</p>	<p>Paragraph 3.0.23 refers to 'live work units' and states that there have been no applications for such units since the LDPs adoption. Policy EC6 provides the policy framework for Live-work units, which are defined as properties designed for dual use, combining residential and employment space.</p> <p>The application referred to was for a road side service area comprising petrol filling station and kiosk, drive-thru coffee shop, car parking, access, landscape and associated works which was refused planning permission and dismissed on appeal by the Planning Inspectorate.</p>
<a href="#">30</a>	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports Key Findings	3	<p>Paragraph 3.0.9 HBF suggests the Council consider rewording this paragraph to make the point that all the land allocated may not actually be suitable, correctly located or viable.</p>	The comment is noted. At the time of adoption all sites were deemed to be suitable, correctly located and viable. All sites will be reassessed as part of the review process.
<a href="#">31</a>	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	<p>Paragraph 3.0.12 HBF suggests the Council consider re-wording this paragraph as not all affordable housing is delivered through S106. Many affordable housing sites are delivered directly by RSL's as 100% affordable</p>	The comment is noted. Paragraph 3.0.12 relates to the findings of the Annual Monitoring Report (AMR), and the delivery of affordable housing through Policy AH1.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					and therefore not reliant on the delivery of market homes.	This policy only reports on affordable housing delivered through the planning system (via Section 106 agreements) and therefore whilst RSLs are delivering 100% affordable housing schemes, these are not recorded in this section of the AMR.
<a href="#">32</a>	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	Paragraph 3.0.18 HBF suggests adding the reasons for delays more specifically than paragraph 3.0.20 and adding commentary what is likely to happen if known.	Paragraph 3.0.20 acknowledges that the large scale redevelopment of these sites is complex and has been delayed due to factors including site constraints, viability and in some cases land ownership. It is considered that this provides the broad reasons for delayed development. All Strategic Regeneration Areas (SRA) will be re-assessed and re-evaluated as part of the review process.
<a href="#">17</a>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	<p>Are there any matters that should be considered as part of the contextual review?</p> <p>The review document appears to highlight all relevant policy and legislative changes that require consideration in the context of the review. From a biodiversity perspective, the Section 6 duty introduced by the Environment Act and the well-being goals set out in the Well-being of Future Generations Act must be key considerations of the revised LDP in delivering sustainable development.</p>	The comment is noted. Delivering sustainable development is a key requirement of the LDP review. All relevant legislation including the Environment Act and Well-being of Future Generations Act will be considered.
<a href="#">18</a>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	<p>With regard specifically to paragraph 5.0.21 "The Well-Being of Future Generations Act 2015" we feel it is important to raise and emphasise that a "resilient" Wales refers to the "resilience of ecosystems". This links directly with the newly enhanced duty of public authorities to "maintain and enhance biodiversity wherever possible with the proper exercise of their functions". This enhanced duty should be a core issue as part of the review.</p> <p>Consideration should be given to the</p>	The comment is noted. The Well-being of Future Generations Act, biodiversity enhancement and the emerging NDF will all be considered as part of the Review process.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					Outcomes and Policies proposed in the National Development framework, due for release in September 2020.	
<a href="#">52</a>	Tata Steel		Contextual Changes	5	<p>Question 7: Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraphs 5.0.34 and 5.0.35 of the LDP Review Report recognises the important context of the Port Talbot Waterfront Enterprise Zone as a distinct location for cutting edge and world class industries and as a catalyst for growth. Tata Steel is supportive of a Replacement LDP which is set within this context and recognises these aspirations.</p>	The support is noted.
<a href="#">59</a>	Mr Peter Horsley		Contextual Changes	5	<p>Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraph 5.0.27 - This paragraph states that "the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be meeting the region for a 15 year period". Whilst MTAN states "The RAWP's provide a suitable forum for informed discussions on the provision of aggregates", the RTS is commissioned by WG and not the SWRAWP. MTAN1 requires the RTS to provide a strategy for the provision or aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development plans.</p> <p>Further, the requirement is for each individual Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years in the case of land-based sand & gravel which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
<a href="#">33</a>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.13 HBF asks for this to be re-worded as we currently consider that it suggests that the number of homes that the revised LDP plans for could be affected by "Placemaking". Placemaking is not directly linked to	The comment is noted, however, the Council believes there is a relationship between Placemaking and future housing development, with Placemaking a key

ID	Name	Organisation	Section	Para	Representation	Officer Response
					housing numbers so it should not be referred to in this paragraph which is dealing with the factors that do affect the number of new homes planned for. Placemaking should have an impact on the number of homes that the plan needs to plan for this should be about the identified need alongside the growth aspirations of the Council.	consideration in accordance with Planning Policy Wales, Edition 10.
<a href="#">34</a>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.16 Building on the comments above to paragraph 6.0.13 the HBF do not agree that placemaking should be a reason to plan for less homes as suggested by the current wording. In order for the plan to meet the Placemaking aspirations of national guidance it needs to ensure that the right sites are located in the right locations and that policies are in place to ensure the mix of development appropriate and that the infrastructure required to serve the development is in place. The HBF state again that we do not consider that placemaking is about the number of houses planned for.	The comment is noted. However, the comment is stating that the replacement plan will have a fully evidenced housing requirement, and that delivery of housing is a priority. Placemaking will be a key consideration for the plan, and ensuring that the housing requirement can be achieved by development in the right places, in the interests of well-being and sustainable development. The Council does not therefore, recommend any changes to the paragraph.
<a href="#">40</a>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 8.1.3.4 HBF notes the reference to the Draft NDF which identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. It is suggested that this same reference should be used in Section 6 of the report where the Council look at the factors affecting future population growth and demand for new housing.	Section 6 does contain a reference to the NDF and future housing growth across the Swansea Bay Region.
<a href="#">24</a>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	It was disappointing to see that very few of the objectives had been achieved however, this was due to the change in the economic environment since the creation of the plan rather than any other factors.	The comment is noted. The Replacement LDP will review the existing key issues and objectives to establish if these are still relevant. The Review process will also assess new data / information which highlights any new key issues and consider how the plan can address these.
<a href="#">26</a>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	Planning and development should begin at a local level and follow a bottom up, rather than top down approach. The Town Council is soon to create a strategic "Place Plan" in order to identify the overall direction required by the community and hopes that the County Borough would like to work	The approach taken in development plans follows National Planning Policy, Guidance (Development Plans Manual) and Regulations set by the Welsh Government. The Welsh Government has recently

ID	Name	Organisation	Section	Para	Representation	Officer Response
					together to achieve the communities plan.	<p>published a draft National Development Framework (NDF), which will be the highest tier of development plans, with LDPs coming under this.</p> <p>Whilst this could be classed as a 'top down' approach, a critical part of preparing a LDP is community involvement. The Council will in due course publish its Delivery Agreement which will include a Community Involvement Scheme (CIS), identifying how the Council will engage with the local community and organisations throughout the plan preparation process. The Council would welcome future dialogue with the Town Council and other community members.</p>
<a href="#">27</a>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	The Committee felt that the original Local Development Plan was now ineffective as the economic position had changed so radically since its creation (for example, Austerity and Brexit). They felt that the direction being followed was unlikely to be successful in this new economic environment and action should be taken now to alter the plan. They felt that there needed to be more flexibility to change direction in plans of this nature.	The comment is noted. The LDP evidence base, including the economic-led growth strategy will be reviewed and updated as part of the preparation of the Replacement Plan, to take account of any contextual changes and ensure that the strategy and policies within the plan are robust and can address the key issues identified.
<a href="#">28</a>	Mr Mark Harris	HBF Wales	LDP Vision, Objectives and Strategy	7	<p>Does the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>This is for the Council to decide however the significant under delivery of private and affordable housing is of real concern, simply reducing the number of homes required as suggested by the document is not the answer and will not support the wider economic and well-being both at a national and local level.</p>	The comment is noted. A number of studies will be undertaken as part of the LDP Review, which will form the evidence base for the Replacement LDP. Future studies will determine a suitable level of future housing provision whilst considering the economy and well-being of residents.
<a href="#">19</a>	Rhian Isaac	Natural Resources Wales	Key Issues, Vision and Objectives	7.1	<p>Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>We feel that nature based solutions</p>	The comments are noted. There have been a number of contextual changes since the preparation of the LDP, such as the Well-being of Future

ID	Name	Organisation	Section	Para	Representation	Officer Response
					should be embedded as a cross cutting objective within both the LDP and the local Well-Being Plan and form part of the vision for the revised plan. Appropriate mechanisms are also required to secure delivery of green infrastructure within development and consider habitat connectivity on a landscape scale. Undelivered allocated sites should be re-assessed using up to date environmental constraints e.g. revised flood map information. We can provide advice on existing constraints.	Generations Act, which has led to the development of local Well-Being plans. These will be considered within the formation of the vision for the Replacement LDP, in addition to mechanisms to support well-being, such as green infrastructure. The Review Report acknowledges that undelivered allocations will be re-assessed to determine if they are still appropriate, or if they should be deallocated.
<a href="#">55</a>	Mr Peter Horsley		Key Issues, Vision and Objectives	7.1	Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?  However, changes in legislation and government policy (Well-Being and Future Generations; Environment Act; PPW (v10); etc.) must be reflected in the Key Issues, Vision and Objectives.	The comment is noted. Contextual and legislative changes, including those mentioned within the representation, will be reviewed as part of the formulation and establishment of the RLDP's Key Issues, Vision and Objectives.
<a href="#">20</a>	Rhian Isaac	Natural Resources Wales	Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised plan?  The current Growth and Spatial strategies need to reflect the requirements of the Draft NDF which includes "sustainable urban growth". The strategies should include biodiversity enhancement and ecosystem resilience by maximising the use of green infrastructure and nature-based solutions, and safeguarding areas which provide important ecological networks.	The comments are noted. The NDF, biodiversity enhancement and green infrastructure will all be fully considered in the preparation of the Replacement LDP.
<a href="#">47</a>	Tata Steel		Growth Strategy	7.2	Question 4; Do the existing Growth and Spatial Strategies remain appropriate for the revised plan?  Tata Steel is supportive of an economic-led growth strategy. It recognises the important role that the company plays in investment, growth and economic development in Neath Port Talbot. Economic growth should remain a fundamental part of any strategy moving forward NPTCBC and can also facilitate wider investment to improve housing delivery.  As highlighted in paragraph 7.4.3 of the NPTCBC Review Report, Tata	The support for an economic-growth strategy is noted. As part of the preparation of the Replacement LDP, the evidence base will be updated to determine an appropriate and up to date strategy based on robust evidence. Through additional evidence-based studies, the Council will determine if an economic-led strategy is still appropriate for Neath Port Talbot and will determine a suitable level of future growth. The Council welcomes the work TATA Steel are undertaking,

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>Steel would be pleased to work with NPTCBC to establish the impact changes in the global steel market have had on local investment and the opportunities for growth which exist in the region to inform any revised growth strategy.</p> <p>Tata Steel is working internally and closely with other economic stakeholders and employers in the region to invest in, and diversify, the function and role of the steelworks. This includes significant investment in improving and modernising existing facilities with consideration to future growth and environmental responsibility.</p>	<p>particularly in relation to investment and diversification and modernisation and recognises the importance of the steelworks to the local economy.</p>
<a href="#">29</a>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	<p>HBF supports the current plans growth and spatial strategies in principle but notes that this does not mean that the right sites are currently allocated. The current plan is also to be heavily reliant on one or two large strategic sites which have as accepted by the report failed to deliver.</p>	<p>The comment is noted, all existing allocations will be reassessed as part of the review and only sites that are deemed to be viable, deliverable and can contribute towards the overall strategy will be included within the Replacement LDP.</p>
<a href="#">35</a>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	<p>Paragraph 7.2.13 HBF do not agree that this paragraph can conclude that the demand for new housing has not therefore materialised. Economic growth is one of the factors that drives housing demand, there are others such as population growth and the number of potential homeowners living at home while saving to buy a house. This final sentence should be reworded to say "the expected level of demand from employment growth has therefore not been as strong".</p>	<p>The comment is noted, however, this section of the Review Report provides an analysis of the existing strategy and how this has been implemented since the base date. Whilst it is agreed that economic growth is only one factor that drives housing demand, within the economic-led strategy, the majority of housing growth was projected to support the increases in working age population, directly linked to the number of jobs. In this context, as job numbers have not reached the projected target, the subsequent housing growth has not materialised.</p>
<a href="#">36</a>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	<p>Paragraph 7.2.19 HBF do not agree that from the evidence provided in the report that the Council can simply say that the current level of growth cannot be carried forward. HBF members consider that there is demand for new housing in the area but their attempts to deliver these new homes have been</p>	<p>Paragraph 7.2.19 states that both the housing requirement and the existing allocations cannot be carried forward into the new plan and will need to be reconsidered. Housing delivery has fallen significantly below target and therefore the</p>



ID	Name	Organisation	Section	Para	Representation	Officer Response
					frustrated by the allocated site not coming forward particular the large Coed Darcy strategic site on which the plan is heavily reliant. The Council in this document admit that there have been a number of reasons why sites have not come forward but then do not accept that this has affected annual delivery rates. Using the low delivery rates as a suggested justification to lower the housing requirements in the revised LDP is not the way to plan for the future, particular when the wider strategy plans for economic growth.	Council would not be able to continue with a high housing requirement that was not delivering, therefore an assessment of up to date evidence is required to determine a suitable, robust and evidenced based housing target. In addition, existing allocations will also require reassessment to determine if these sites are deliverable and viable within the plan period, or whether they should be deallocated to allow for deliverable alternatives. The Council therefore considers that a reassessment of the growth strategy and housing allocations is required as part of the review.
<a href="#">57</a>	Mr Peter Horsley		Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised Plan?  The evidence base should review why the economy has "stagnated" within the area and put forward remedies to address this.	The comment is noted and will be considered as part of the updated evidence base for the Replacement LDP.
<a href="#">60</a>	Mr Peter Horsley		Growth Strategy	7.2	Are there any other comments in respect of the Draft Review Report?  Paragraph 7.2.17 - This paragraph states that "there are a number of reasons why sites (housing) have not come forward as anticipated". The evidence base to support the plan should consider in detail why this is the case and identify remedies to address this to ensure the plan delivers on its objectives.	The comment is noted. The evidence base for the Replacement LDP will consider why housing sites have not come forward and will reassess allocations to determine if they are deliverable. The level of growth will also be reviewed to determine if this is still appropriate.
<a href="#">25</a>	Mrs D Phillips	Pontardawe Town Council	Spatial Strategy	7.3	The Western Valley Strategy received a great deal of input from Pontardawe and the local community at inception however there was very little feedback provided at the time and the plan does not seem to have taken their views on board.	The LDP strategy of reinvigorating the valleys considered all relevant programmes and strategies within the area, including the Western Valley Strategy. As this Strategy has now come to an end, the replacement plan will consider any existing, relevant work within the area and consult with the community and partner organisations throughout the plan preparation process.

ID	Name	Organisation	Section	Para	Representation	Officer Response
<a href="#">37</a>	Mr Mark Harris	HBF Wales	Spatial Strategy	7.3	Paragraph 7.3.11 This paragraph should include some indication of likely timescales associated with the proposed metro infrastructure. HBF's understanding is that this is unlikely to be within the near future, so its impact on the first few years of the plan is unlikely to be significant.	There is still no clarification on the timing of the Swansea Metro.
<a href="#">38</a>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.1 - 7.4.3 Identifies lots of negatives and reasons why a reduction in housing numbers and moves away from an economic led strategy should be considered. However, although the City Deal is mentioned the wording does not really identify it as a positive reason why an economic-led growth strategy could actually now be more relevant/needed. HBF requests that the role of the City Deal is better explained in the document.	This section states that given the plan has not achieved a number of its objectives, the strategy needs to be reconsidered to determine whether an economic-led strategy is still appropriate, or whether alternative strategies should be considered. In the context of the findings of the Annual Monitoring Report, the Council considers that the strategy should be reviewed, to take account of up to date evidence and therefore it is felt the wording used is appropriate.
<a href="#">39</a>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.5 The wording should be amended to make it clearer that existing H1 allocated sites which have not come forward to date and where evidence cannot be provided to show that they are deliverable and viable in the next plan period will be removed and not simply "rolled over" as a commitment which has traditionally happened with plans in Wales.	The paragraph states that existing sites will be reassessed and with a greater emphasis on viability, some sites may be deallocated and new sites included. The Council considers this to be clear that existing sites will not be 'rolled over' and will emphasise this during the call for candidate sites.
<a href="#">7</a>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure  The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the infrastructure policy and agrees with the need to provide further clarity on its definitions. We particularly welcome the need to consider other forms, such as Green Infrastructure. We would welcome inclusion in the LDP review as the Swansea Canal and its towpath should be considered as multi-functional green infrastructure.	The support for a review of the infrastructure policy and green infrastructure is welcomed. The preparation of the Replacement LDP will include an assessment of Green Infrastructure throughout the County Borough and the opportunities for its use.
<a href="#">10</a>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure  We also ask that the impact of development on existing infrastructure is considered, and mitigation agreed where appropriate. New development	The preparation of the Replacement LDP will assess the impact on existing infrastructure and consider the need for mitigation.

ID	Name	Organisation	Section	Para	Representation	Officer Response
					may require the provision of new infrastructure but consideration of its impact on existing infrastructure is important to ensure existing facilities are not degraded as a result of an increase in use following development nearby.	
<a href="#">11</a>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>Policy SP16</p> <p>The Canal &amp; River Trust (Glandwr Cymru in Wales) welcomes the review of the Environmental Protection Policy, SP 16. The proposal to separate land stability and pollution into two topic areas seems sensible. Developers should be required to properly consider the risk associated with development in areas affected by land instability or pollution and include robust mitigation measures before determination.</p> <p>We suggest that prior to allocation all sites are reviewed in relation to these issues due to the possible impact of remediation costs on viability and thus deliverability.</p>	The support for separating land stability and pollution in Policy SP16 is noted. A robust assessment of candidate sites will address the concerns raised.
<a href="#">12</a>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 18</p> <p>Glandwr Cymru note that the policy at present relates mainly to wind and solar power. Water may be used for heating and cooling new developments, or for electricity generation through hydro-electric power schemes. These sources should be included as options within studies of renewable energy potential.</p>	The comment is noted. A Renewable Energy Assessment (REA) will be undertaken as part of the evidence base for the Replacement LDP.
<a href="#">9</a>	Mr Vic Price		LDP Topic Area Reviews	8	<p>The Review Document overlooks the importance, within the housing provision, of small sites for 3/5 units each for houses of distinction. These will give a variety to the availability of new housing stock in the area. They need to be in immediate proximity to existing residential areas, close to bus routes and within a reasonable time distance from the rail network, already served by adjoining adopted highway and with availability of all services; they need to be in a location capable of being extensively landscaped yet enjoying good vistas but being capable with landscaping to be almost invisible from nearby adopted highways. By way of example my client's land, part of</p>	<p>The comment is noted. Housing delivery within the LDP has been delivered on a variety of sites, from large housing developments on land allocated in Policy H1, to small sites and windfalls. It is therefore recognised that the housing supply should be made up of a variety of components to ensure that there is sufficient land to meet the needs of the area over the plan period and to allow choice for both housebuilders and homebuyers.</p> <p>As part of the preparation of</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>the land surrounding his home at "The Old Stables" Broomhill, would be ideal for this although part of the land he occupies is owned by the Council so to bring this site forward (although not strictly a planning issue) the Council's agreement as landowner will be needed to be a party to any sale.</p>	<p>the Replacement LDP, there will be the opportunity for land owners to submit sites (during the 'Call for Candidate Sites') for consideration.</p>
<p><a href="#">13</a></p>	<p>Mrs Jane Hennell</p>	<p>Canal and River Trust</p>	<p>LDP Topic Area Reviews</p>	<p>8</p>	<p>SP 20 &amp; 21</p> <p>The text explains that the Active Travel (Wales) Act 2013 places a legal requirement on local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities.</p> <p>Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.</p> <p>Policy BE3, which is part of SP21 relates to the safeguarding of the Swansea canal. Officers suggested that no review was necessary of the policy. Whilst this may be correct in relation to the canal itself, the opportunity should be taken to look at whether the policy should be widened to reflect other proposed changes within in the plan and whether the towpath should also be safeguarded. It is noted that other policies such as Strategic Policy 8 and 10 relating to open space and infrastructure are also relevant as well as policy SP20. Part of the towpath is National Cycle route 43, and sections of it are currently undergoing improvement as a result of Active Travel funding.</p> <p>Policy BE3 at present makes no mention of the benefits that the canal towpath can bring to the area by linking residential areas, by providing health and well-being benefits, access to both land and water-based recreation opportunities, nor does it recognise it as a sustainable transport route. Surely now that Active Travel and Green infrastructure gain more recognition in</p>	<p>The comments are noted and will be considered during the preparation of the Replacement LDP. The development of a clearer relationship between Active Travel, Green Infrastructure and the well-being gained from the use of open space / accessible natural greenspace will be a key theme in the Replacement LDP.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>the plan, Policy BE3 should be widened to be more than just a safeguarding policy? The canal &amp; towpath are one of the best examples of multi-functional green infrastructure in the borough and already recognised in part as an active travel route. Policy BE3 should be reviewed and altered to reflect this.</p>	
<a href="#">14</a>	<p>Mr Vic Price</p>		<p>LDP Topic Area Reviews</p>	<p>8</p>	<p>The Review document overlooks allocating specific sites for renewable energy. The priority given in the review report document to such use is welcome but it would be stronger with specific sites identified, especially for solar energy. The sites are best to be south facing and on marginal land in agricultural terms, of an extent of some 30 acres plus and within close proximity to the electrical connection points, and capable of being landscaped so as not to be visible from housing. My client owns a 40 site just west of Bryn which would be ideal for such use.</p>	<p>The purpose of the Review Report is not to allocate specific sites. It is the first stage of the LDP review process. This Report reviews the existing LDP and assesses if the strategy and policies have been successful or if (due to a number of factors) a new strategy and policies will be needed for the Replacement LDP (RLDP).</p> <p>With regard to specific sites for renewable energy, there will be the opportunity for land owners to submit sites during the 'Call for Candidate Sites' which will be considered as part of the preparation of the RLDP.</p>
<a href="#">21</a>	<p>Rhian Isaac</p>	<p>Natural Resources Wales</p>	<p>LDP Topic Area Reviews</p>	<p>8</p>	<p>Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>We note the summary of the proposed LDP Policy review which refers to possible amendments to policies;</p> <p>SP1 - Climate Change</p> <p>SP4 - Infrastructure - we support the inclusion of green infrastructure</p> <p>SP10 - Open Space - we support the need to allocate land for open space</p> <p>SP14 - The Countryside and Undeveloped Coast</p> <p>SP15 - Biodiversity and Geodiversity - with the main finding of the annual monitoring reports being the continuing net loss of biodiversity as a result of planning decision we strongly suggest</p>	<p>The comment is noted. National Policy context changes through the introduction of the Environment (Wales) Act (2016) and the Well-being of Future Generations (Wales) Act (2015) will be fully considered in the preparation of the Replacement LDP.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>a strengthening of this policy</p> <p>SP16 - Environmental Protection</p> <p>SP18 - Renewable and Low Carbon Energy</p> <p>SP19 - Waste Management</p> <p>We would wish to reiterate the fundamental change to maintain and enhance under Section 6 of the Environment Act which needs to be considered in the LDP Review. In addition, we wish to reiterate the focus towards ecosystem resilience which is a key goal of The Principles of Sustainability within the Well-Being of Future Generations Act 2015 which also needs to be given consideration as part of the LDP Review.</p>	
50	Tata Steel		LDP Topic Area Reviews	8	<p>Question 5; Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>Strategic Policy 11 Employment Growth</p> <p>Paragraph 8.4.1.7 of the LDP Review Report identifies the potential for combining existing policies EC3 (Employment Land Uses) and EC4 (Protection of Existing Employment Land Uses) into one policy covering both elements. The intention is for this to provide clarity and encourage more development.</p> <p>Tata Steel is supportive of opportunities to encourage economic development in the region. It does not agree that the policies should be merged. Both policies EC3 and EC4 are highly relevant for any development which takes place at the steelworks. Any policy amendments could have implications for the future of the site. Tata Steel would welcome the opportunity to be directly involved and consulted on any proposed policy amendments at the earliest opportunity.</p> <p>Any amendments or combinations of existing policies EC3 and EC4 should</p>	<p>The comments are noted. The Review Report identified some areas of the plan where further clarity may be required. During the Officer Working Group, it was suggested that the employment policies, EC3 and EC4 could be merged, or re-written to ensure there is greater clarity over their use and interpretation. Any potential amendments would fully consider their use and would not intend to deter economic development or prevent the continued operation of employment areas. The policy review, as part of the Replacement LDP will carefully consider any amendments to policy and the impacts of such amendments.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>continue to recognise;</p> <ul style="list-style-type: none"> <li>• The ancillary facilities and services which will be appropriate at Tata Steel's site will be different to that of other general employment uses. The flexibility currently provided in supporting paragraph 5.2.22 in the adopted LDP for a range of uses on heavy industrial sites should be retained in any future policy. This will continue to support investment and diversification in the steelworks.</li> <li>• The protection of the steelworks and associated land as an existing and significant employment area.</li> </ul>	
51	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 16 - Environmental Protection</p> <p>Paragraph 8.5.4.3 of the LDP Review Report states that existing Policy EN8 may be divided into separate pollution and land stability policies. This paragraph also highlights that links between requirements for sustainable drainage systems on new development (SAB) and water quality criteria in existing policy EN8 will be taken into account.</p> <p>Tata Steel's Port Talbot Steelworks is a large, heavy industrial site with an existing private drainage system. The drainage required from different types of development at the site can vary greatly, is often bespoke and does not reflect the drainage approach seen on many "typical" types of development in Neath Port Talbot. In many instances, the highest priority levels set out in Standard S1 are not practicable or viable. Tata Steel has been working closely with NPTCBC's SAB team on a number of projects to ensure appropriate drainage and SAB approval is secured.</p> <p>Any links made between SAB and the water quality criteria of Policy EN8 should not impose impractical or</p>	<p>The comments are noted. It is recognised that the operations at TATA are unique and it would not be the intention of any policy amendments to restrict operations. That said, any future amendments to policy would need to ensure that it complies with National Policy and SAB requirements.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>unviable requirements on Neath Port Talbot's heavy industrial sites. Doing so could restrict, and have implications for, bringing further economic development in the region. This would be contrary to the aims of existing Policies EC3 and EC4. Tata Steel would be pleased to work with NPTCBC on any future policy wording.</p>	
53	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 18 - Renewable and Low Carbon Energy</p> <p>Paragraph 5.0.37 refers to the recent draft De-Carbonisation and Renewable Energy Strategy (DRES), noting that a strategy / action plan will be published shortly to set out a framework for carbon footprint reduction aspirations. The replacement LDP will be a key in facilitating the implementation of the strategy.</p> <p>Tata Steel is a core part of the South Wales Industrial Cluster leading the way on sustainable industry in the region, including the development of regional de-carbonisation projects, energy efficiency and low carbon power generation. The draft DRES recognises the work currently underway with the Council to develop sustainable forms of energy at the Port Talbot site. Tata Steel would be grateful for early involvement with the Council to discuss and assist with any amendments to the existing renewable energy policies and the action plan for the DRES.</p>	<p>The comments are noted and the work being undertaken by TATA is recognised and supported. TATA will be consulted at each stage of plan preparation in accordance with the Delivery Agreement.</p>
4	Mrs Chris Thomas		LDP Topic Area Reviews	8	<p>This review seems not to have provision for the future of the above named business park (Glynneath Business Park).</p>	<p>The Review Report refers to the performance and delivery of sites allocated within the existing LDP. As part of the Review process, a number of evidence base studies will be undertaken, including as assessment of future employment requirements and an Employment Land Review, to establish how much employment land will be required over the replacement plan period and the most appropriate locations for such development. Once such options have been established, these will be</p>



ID	Name	Organisation	Section	Para	Representation	Officer Response
						subject to future public consultations.
<a href="#">5</a>	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Land Supply; It is noted that land supply has fallen below 5 years and as such it is considered that additional land is needed to provide dwellings.</p> <p>Within the LDP Small sites are to deliver 180 dwelling which is 9.4% of the overall total. Therefore, in simple terms for every 1 dwelling on a small site 10 should be built on larger sites. Since 2013 small sites have provides 14% of all housing however, in the last 2 years of the 447 dwellings completed 89 (20%) were completed on smaller sites.</p> <p>This evidence would suggest that smaller site are being delivered faster. It is also likely that they are being delivered by local developers who retain more income within the local economy. As such it is considered that in allocating additional sites greater emphasis should be given to smaller sites.</p>	<p>The comment is noted. The Review Report acknowledges that development on large sites has fallen below the targets set out in the monitoring framework. The level of growth, and how growth is distributed will be considered as part of the review process.</p> <p>The allocation of housing sites between large sites and small sites will be a key part of the LDP review process. No further action required.</p>
<a href="#">6</a>	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Density BE1 (Design) Whilst it is recognised that there is a need to provide more housing it is considered that the requirement of BE1 are too rigid. The policy limits the opportunity to trade up to a larger house, provide a variety of housing and places unnecessary restraint on small sites. It is therefore consider that a review of the policy should be undertaken with a view to applying it to sites, for example, over a specific area.</p>	<p>The comment is noted. The density requirements of Policy BE1 are used to ensure that land is used efficiently, in recognition of it being a scarce resource.</p> <p>As part of the review process, the density requirements will be reviewed to determine if they are still appropriate.</p>
<a href="#">41</a>	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	<p>Paragraph 8.1.4.6 The HBF objects to the suggestion that affordable housing is an infrastructure need. Unlike other infrastructure such as roads, or schools, new homes do not generate a need for affordable housing, the need already exists, requiring developers to contribute to the affordable housing supply is a policy requirement subject to consideration of the viability of the scheme.</p>	<p>Policy I1 'Infrastructure Requirements', lists the types of infrastructure new developments will need to consider. Affordable housing is included within this policy and therefore the Council considers the wording of 8.1.4.6 to be correct.</p> <p>Policy I1 is an overarching policy from which strategic policy SP8 Affordable Housing (AH) and AH topic based policies such as Policy AH1 and AH2 flow from, and set</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
						out the specific policy requirement.
<a href="#">42</a>	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.2 Again the HBF consider that there is no direct link between housing requirement and placemaking, so reference to it in this section of the report should be removed.	In the context of Planning Policy Wales, Edition 10, the Council believes that there is a direct correlation between Placemaking and the amount of housing each settlement will require.
<a href="#">43</a>	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.4 The HBF suggest that this is misleading as the plan review will extend the life of the plan from 2026 to 2035 so there is additional time in which to deliver the previous level of growth.	The Council is proposing a full review to the existing LDP, therefore the Replacement LDP (RLDP) will in effect be a new plan and will not simply extend the life of the existing plan. The RLDP will therefore need to establish a new level of growth for the revised plan period, based on up to date evidence.
<a href="#">44</a>	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.2 Strategic Policy 8 - Affordable Housing - HBF suggests that this section should also include commentary on the recent letter from the Housing Minister regarding the use of publicly owned land to deliver affordable housing led schemes with a minimum 50% housing.	Affordable Housing will remain an important consideration for the Replacement LDP. The letter from the Housing Minister will be considered during the Replacement LDP, as will the affordable housing policies within the emerging NDF.
<a href="#">61</a>	Mr Peter Horsley		LDP Topic Area Reviews	8	<p>Paragraph 8.5.4.3 - please refer to the comments on paragraph 5.0.27 above. MTAN 1 requires the RTS to provide a strategy for the provision of aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development.</p> <p>Further, the requirement is for each individual Local Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years, in the case of land-based sand & gravel – which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
<a href="#">62</a>	Mr Peter Horsley		LDP Topic Area Reviews	8	Paragraph 8.5.4.4 states "evidence set out in the AMR's to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations	The comment is noted – the Council will provide the necessary policy support and narrative to demonstrate how the adequate supply of aggregates will be met. The

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>will be required". Whilst this may be the case, it is important to recognise that the SWARP Annual Report confirms that Mineral Extraction ends at the two sandstone sites, Cwm Nant Lleici and Gilfach in 2026 and 2028 respectively, with mineral review (ROMP) dates of 2024 and 2027. These dates are within the replacement plan period. More importantly, these sites supply High Specification Aggregates (high PSV), which are of national importance and are not confined to local markets. The Council must therefore provide narrative and policy support in the review to demonstrate how the adequate supply of minerals, including PSV aggregates will be met on a local, regional and national scale throughout the plan period and for the requisite period beyond.</p>	<p>emerging Regional Technical Statement (RTS) 2<sup>nd</sup> Review will set out the requirements for Neath Port Talbot Council [and all other Mineral Planning Authorities (MPAs)] to demonstrate how local and regional supply of aggregates will be met. As part of the process for preparing the new RTS, seven new sub-regions have been created specifically for the purpose of facilitating strategic minerals planning and collaborative approaches. Neath Port Talbot, along with Swansea and Carmarthenshire have been grouped as the Swansea City Sub Region.</p> <p>Notably, the RTS 2<sup>nd</sup> Review introduces a new requirement for all MPAs to agree 'Statements of Sub-Regional Collaboration' (SSRC) in respect of their contributions to the future provision of land-won primary aggregates. SSRCs are required to be prepared, collaboratively, by all constituent MPAs within each sub-region (as defined by the RTS 2<sup>nd</sup> Review) as part of the evidence base needed to support each Replacement Local Development Plan (RLDP). Once agreed, an SSRC will remain in force until it becomes superseded by the requirements of future reviews of the RTS. The SSRC will confirm that all constituent MPAs within the sub-region accept the individual minimum requirements for aggregate apportionments and allocations for their individual Authority areas, as set out in the latest review of the RTS, and that (as a minimum) the RTS requirements for that sub-region as a whole will be met.</p>

ID	Name	Organisation	Section	Para	Representation	Officer Response
<a href="#">22</a>	Rhian Isaac	Natural Resources Wales	Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>It would be beneficial if a joint LDP was undertaken with neighbouring authorities. Many of our strategic planning interests are better considered on a cross boundary level. This will also fit in with the Area Statements.</p> <p>However, we appreciate the difficulties you may have undertaking a joint LDP.</p>	The comment is noted. Whilst presently, due to the variances in stages of preparation between authorities it is not considered possible to undertake a joint LDP, the Council will however, continue to undertake regional working and studies where possible.
<a href="#">58</a>	Mr Peter Horsley		Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>The document identifies the Regional Technical Statement (RTS) as a key document under which the Plan Review will be considered to provide a strategy for the provision of aggregates in the region and within each local authority area. There are shortfalls in aggregate provision, there will be a need for local authorities within the sub-region or an adjacent sub-region to ensure minimum provisions are met and production capacity is maintained to deliver the steady and adequate supply of aggregates. This will need to be confirmed through Sub-Regional Statements of Regional Collaboration. It is expected that guidance on these SSRC's will be delivered alongside the RTS 2nd review.</p>	The comment is noted and will be considered as part of the evidence base for the Replacement LDP.
<a href="#">45</a>	Mr Mark Harris	HBF Wales	Status of LDP Allocations	Appendix C:	<p>Appendix C Status of LDP Allocations</p> <p>Paragraph C.2 HBF would suggest that "sites with planning permission but not within the current five year land supply should also be re-assessed. There are many site in LDP's across Wales which have planning permission that has either been renewed several times or is extant by virtue of a start on site being made however, many of these will never be developed.</p>	The Review Report refers to all sites in the H1 portfolio being reassessed during the review, regardless of whether they are within the 5 year land supply.

## **APPENDIX 2**

LDP Review Report (July 2020)

Blank



Neath Port Talbot Council  
Local Development Plan  
2011 - 2026

# Local Development Plan Review Report (July 2020)







## PART 1 - Introduction and Background

<b>1 Introduction</b> .....	<b>5</b>
<b>2 The Review Report</b> .....	<b>7</b>
2.1 Structure and Content .....	7

## PART 2 - Factors Informing the Review

<b>3 LDP Annual Monitoring Reports - Key Findings</b> .....	<b>11</b>
<b>4 Sustainability Appraisal Monitoring - Key Findings</b> .....	<b>15</b>
<b>5 Contextual Changes</b> .....	<b>17</b>
<b>6 Evidence Base Changes and Requirements</b> .....	<b>25</b>

## PART 3 - Detailed Review

<b>7 LDP Vision, Objectives and Strategy</b> .....	<b>31</b>
7.1 Key Issues, Vision and Objectives .....	31
7.2 Growth Strategy .....	32
7.3 Spatial Strategy .....	36
7.4 Reconsideration of the Strategy .....	39
<b>8 LDP Topic Area Reviews</b> .....	<b>43</b>
8.1 Overarching Policies .....	43
8.1.1 Strategic Policy 1 - Climate Change .....	43
8.1.2 Strategic Policy 2 - Health .....	43
8.1.3 Strategic Policy 3 - Sustainable Communities .....	44
8.1.4 Strategic Policy 4 - Infrastructure .....	45
8.2 Area Based Policies .....	46
8.2.1 Strategic Policy 5 - Development in the Coastal Corridor Strategy Area .....	46
8.2.2 Strategic Policy 6 - Development in the Valleys Strategy Area .....	47
8.3 Communities and Housing .....	47

# Contents

8.3.1	Strategic Policy 7 - Housing Requirement .....	47
8.3.2	Strategic Policy 8 - Affordable Housing .....	48
8.3.3	Strategic Policy 9 - Gypsies and Travellers .....	50
8.3.4	Strategic Policy 10 - Open Space .....	50
8.4	The Economy .....	52
8.4.1	Strategic Policy 11 - Employment Growth .....	52
8.4.2	Strategic Policy 12 - Retail .....	53
8.4.3	Strategic Policy 13 - Tourism .....	54
8.5	Environment and Resources .....	54
8.5.1	Strategic Policy 14 - The Countryside and Undeveloped Coast .....	54
8.5.2	Strategic Policy 15 - Biodiversity and Geodiversity .....	56
8.5.3	Strategic Policy 16 - Environmental Protection .....	57
8.5.4	Strategic Policy 17 - Minerals .....	57
8.5.5	Strategic Policy 18 - Renewable and Low Carbon Energy .....	58
8.5.6	Strategic Policy 19 - Waste Management .....	60
8.6	Transport and Access .....	61
8.6.1	Strategic Policy 20 - Transport Network .....	61
8.7	Culture and Heritage .....	62
8.7.1	Strategic Policy 21 - Built Environment and Historic Heritage .....	62
8.7.2	Strategic Policy 22 - Welsh Language .....	62

## PART 4 - Other Considerations

<b>9</b>	<b>Reconsideration of the SA/SEA and HRA .....</b>	<b>65</b>
9.1	Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) .....	65
9.2	Habitats Regulations Assessment (HRA) .....	65
<b>10</b>	<b>Opportunities for Collaborative Working .....</b>	<b>67</b>
10.1	Joint LDPs and Collaborative Studies .....	67
10.2	Strategic Development Plans .....	69

## Appendices

<b>A LDP Policy Review .....</b>	<b>71</b>
<b>B Sustainability Appraisal Monitoring - Key Findings .....</b>	<b>77</b>
<b>C Status of LDP Allocations .....</b>	<b>83</b>
<b>D General and Specific Consultation Bodies .....</b>	<b>89</b>
<b>E Consultation Comments and Responses .....</b>	<b>93</b>
<b>F Glossary .....</b>	<b>113</b>

# Contents

## 1 Introduction

**1.0.1** The Council is required under the Planning and Compulsory Purchase Act 2004 (*the Act*) to prepare a Local Development Plan (LDP) for its administrative area.

**1.0.2** The current Neath Port Talbot LDP<sup>(1)</sup> was adopted by the Council on 27<sup>th</sup> January 2016. The LDP sets out the Council's vision and objectives, together with a series of policies and proposals which together sets the framework for the development and use of land in the County Borough up to 2026.

**1.0.3** The Council also has a statutory obligation to prepare an Annual Monitoring Report (AMR) to assess the extent to which the LDP strategy, policies and allocations are being delivered, the sustainability credentials of the Plan and to identify any significant contextual changes that might influence its implementation.

**1.0.4** In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is also statutorily required, under Section 69 of the Act, to undertake a full review of the adopted LDP at intervals not longer than every four years from the date of adoption.

**1.0.5** **As four years has now passed since the LDP was adopted, the LDP will be subject to a full review and all aspects of the Plan will need to be assessed to consider if they remain sound and fit for purpose.** This will include the key issues, vision and objectives, the strategy, policies and land use allocations / designations.

# 1 . Introduction

### 2 The Review Report

**2.0.1** Any revision to a LDP must begin with the publication of a Review Report and its submission to the Welsh Government. The Review Report will form a key part of the Council's evidence base when the Replacement LDP is submitted to the Welsh Government for examination.

**2.0.2** This Review Report therefore sets out areas where the current LDP is delivering and performing well, in addition to those areas where changes may be required. Importantly, **it is not the purpose of the Review Report to detail any changes that may be made to the Plan. The detail and extent of any changes will only be identified through the preparation process of the Replacement Plan.**

**2.0.3** In developing this Review Report, the Council has taken the following considerations into account:

- Content of the published LDP Annual Monitoring Reports (AMRs) (2017, 2018 and 2019) including the Sustainability Appraisal (SA) monitoring findings;
- Updated evidence and surveys, including the Joint Housing Land Availability Studies that have been published post LDP adoption;
- Relevant contextual information, including changes to legislation, the national/regional policy framework and local strategies and policies; and
- Internal Officer Working Group engagement and Member discussion.

**2.0.4** The Council consulted with specific and general consultation bodies (a list has been provided within Appendix D)<sup>(2)</sup> on its findings and conclusions and the Review Report was published on the Council's website as part of a stakeholder and public consultation undertaken between 3rd February and 16th March 2020. Full details of the comments received and the Council's responses are provided in Appendix E, and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

**2.0.5** It is proposed that the Replacement LDP will cover a 15 year plan period (2020-2035), with a base date of 1<sup>st</sup> April 2020.

#### 2.1 Structure and Content

**2.1.1** The Review Report is structured around the following key parts:

##### **Part 1 - Introduction and Background (Chapters 1-2)**

**2.1.2** **Chapter 1** briefly summarises the legislative requirements to monitor and review the LDP and **Chapter 2** sets out the importance, scope and structure of the Review Report.

<sup>2</sup> General and Specific Bodies are defined in Regulation 2 of the Town and Country Planning Wales, Town and Country Planning LDP (Wales) Regs 2005 as amended by LDP (Wales) Amendment Regs 2015.

## 2 . The Review Report

### Part 2 - Factors Informing the Review (Chapters 3-6)

**2.1.3 Chapter 3** highlights the key findings of the three LDP Annual Monitoring Reports (AMRs) published since Plan adoption. These reports include detailed assessments of the performance of all the Plan policy areas and constitute important evidence in assessing the success of the Plan in meeting its aims and objectives and the delivery of the strategy.

**2.1.4 Chapter 4** summarises the main findings of the Sustainability Appraisal (SA) monitoring to provide an overview of the effects of the Plan in sustainability terms. The SA monitoring is also undertaken on an annual basis and is reported as part of the AMR.

**2.1.5** The main contextual changes that have taken place since the adoption of the Plan at national, regional and local level are outlined in **Chapter 5**. These include changes to national policy and guidance, regional collaborative working / studies and changes to the policies and approaches of the local authority and other local bodies.

**2.1.6 Chapter 6** covers potential changes to the evidence base that underpins and informs the development of the strategy and policies. Some important changes that are evident are outlined together with other anticipated changes. All evidence base information will however need to be revisited as part of the review process.

### Part 3 - Detailed Review (Chapters 7-8)

**2.1.7** This part of the report addresses all the detailed elements of the Plan in turn, starting with the key issues, vision and objectives including consideration of how these may require amendment as a result of the factors outlined in Part 2. Consultation and involvement with stakeholders and consultation bodies will form an important part of the review of these aspects.

**2.1.8** The LDP growth and spatial strategies are addressed in **Chapter 7**. The growth strategy was underpinned by an economic-led growth model which used the projected increase in jobs and aspirations to increase the economic activity rate in order to identify the required working age population to support the projected number of jobs.

**2.1.9** The projected increase in working age population was then translated into the need for new housing, ensuring that the housing and employment forecasting was aligned and that there was a direct correlation between the number of jobs, houses, labour supply and employment land. The appropriateness of this strategy will be reconsidered as part of the review in the light of the other factors outlined in Part 2.

**2.1.10** The LDP spatial strategy divided the administrative area into two distinct strategy areas to identify the broad locations for meeting the growth and development needs of the growth strategy and in recognition of the unique identity, varying characteristics and the market demand of the different areas of Neath Port Talbot.



**2.1.11** Within the 'Coastal Corridor Strategy Area', development was facilitated along the M4 corridor in the urban areas of Neath and Port Talbot, while the 'Valleys Strategy Area' (an area comprising Pontardawe and the five valley areas) was to be reinvigorated employing a variety of policy interventions. The outcomes of this approach are also detailed in **Chapter 7**.

**2.1.12** All the LDP policies (overarching, area and topic based), are considered in **Chapter 8**, and are presented under each of the strategic policy headings. These have been considered principally in the light of the AMR findings, but also take into account amendments that may be needed as a result of contextual changes and discussion in the Officer Working Groups.

**2.1.13** Reconsideration of some housing and employment allocations will be required as part of the review. An overview of the policies and findings of this section are detailed in Appendix A '*LDP Policy Review*' and Appendix C '*Status of LDP Allocations*'.

### **Part 4 - Other Considerations (Chapters 9-10)**

**2.1.14** This part of the report addresses other matters that are relevant to the approach that will be taken to the review. **Chapter 9** addresses the changes that will be needed to the SA/SEA and HRA, including baseline information, assessment frameworks and methodology.

**2.1.15** **Chapter 10** considers collaborative working with other local authorities and addresses the possibility of the preparation of a Strategic Development Plan (SDP) for Mid and South West Wales (M&SWW) as detailed in the draft National Development Framework (NDF). Whilst the section concludes that collaboration is unlikely to be feasible in respect of preparing a Joint LDP with adjoining authorities based on the respective timescales for preparing Replacement Plans, significant work is however underway in the form of collaborative studies that will inform the development of the Replacement LDP.

# 2 . The Review Report

### 3 LDP Annual Monitoring Reports - Key Findings

**3.0.1** In line with national guidance, the review of the LDP should along with other factors, draw on the findings of the published LDP Annual Monitoring Reports (AMRs). The LDP Monitoring Framework<sup>(3)</sup> forms the basis of the AMR and over time enables the assessment of how the Plan's strategic policies and supporting detailed policies are performing against the identified targets and outcomes.

**3.0.2** The framework contains a total of 89 indicators, comprising a small number of core indicators (prescribed by LDP Regulations), along with a range of local and contextual indicators identified by the Council. Each indicator has a specified target along with a 'trigger' which identifies the point or level at which any deviation will trigger the need for further action to be considered and/or taken.

**3.0.3** Since LDP adoption, a total of three AMRs have been published. The latest AMR was published in October 2019 and covers the monitoring period 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019. A brief summary of the outcome of the latest year's monitoring is provided below, along with an overview of the key findings of the monitoring completed to date.

**Table 3.0.1 LDP Monitoring Framework (2019)**

Assessment	Action	Number of Indicators Within Category
The indicators point to the successful implementation of the Policy	No further action required. Monitoring to continue	60
LDP Policies are not being implemented in the intended manner	Officer and/or Member training may be required	1
Indicators suggest the need for further guidance in addition to those identified in the Plan	Supplementary Planning Guidance may be required	2
The indicators are suggesting that the LDP strategic policy is not proving to be as effective as originally expected	Further research and investigation required	0
The indicators are suggesting that the strategic policy is not being implemented	Following confirmation, the policy will be subject to a review process	26
The indicators are suggesting that the LDP strategy is not being implemented	Following confirmation, the LDP will be subject to a review process	0

**3.0.4** The third phase of monitoring has shown that in broad terms the objectives of the LDP continue to be largely achieved. The majority of indicators continue to show that the plan policies are being implemented successfully, while contextual indicators show that most are resulting in the anticipated benefits to communities across the administrative area.

## 3 . LDP Annual Monitoring Reports - Key Findings

**3.0.5** There are however, several key policy indicator targets and monitoring outcomes relating primarily to housing delivery and employment related development that are not currently being achieved. This indicates that these policies are not always having the required effect and as a consequence provides an indication that the LDP strategy (i.e. the level and spatial distribution of growth) is not being fully implemented.

**3.0.6** The more notable areas of concern are briefly summarised below and it is imperative that the Council progresses with the statutory review of the LDP in order to address these issues.

### **Housing Delivery (General Market and Affordable)**

**3.0.7** A total of 299 housing completions were recorded in Neath Port Talbot over the latest 2019 monitoring period. Although an improvement on previous annual delivery rates, this figure remains significantly lower than the year target of 686 dwellings.

**3.0.8** Since the LDP base date (2011), the number of housing completions totals 2,126 dwellings. Compared against the annual cumulative target of 3,582, this shows that completions have now fallen 1,456 below target and that just 59.4% of the cumulative annual target has been delivered to date.

**3.0.9** Although there is sufficient housing land allocated in the LDP to meet the identified housing requirement over the Plan period, for a variety of reasons (including those that are independent of the planning system), sites are not coming forward and progressing as anticipated.

### ***Affordable Housing Delivery***

**3.0.10** Over the latest monitoring period, no affordable housing units were recorded as being delivered through the planning system (i.e. via Section 106 agreements). This is against the year target of 130 units.

**3.0.11** Since the LDP base date, the number of affordable housing completions delivered totals 50 units. Compared against the annual cumulative target of 478, this shows that completions have now fallen 428 below target and that just 10.5% of the cumulative annual target has been delivered to date.

**3.0.12** The delivery of affordable housing is directly linked to broader housing delivery and the position reflects the fact that LDP allocated sites are not coming through the planning system as originally anticipated.

### ***Housing Viability***

**3.0.13** There has been a substantial decrease in residual values over the Plan period, which has had a negative impact on the ability of housing allocations to deliver affordable housing and other planning obligations. Since LDP adoption, there has been a significant increase in build costs, which has not been met with the required uplift in sales values, which has had a detrimental impact on viability across each of the sub-market areas of Neath Port Talbot.

### ***Affordable Housing Exception Sites***

**3.0.14** There have been no applications for affordable housing exception sites over the Plan period to date. Although no applications have been received, Registered Social Landlords (RSLs) have developed a number of sites within the area, providing affordable housing on sites allocated within the H1 portfolio and windfall sites within settlement limits.

### ***Housing Land Supply***

**3.0.15** The latest 2019 'Joint Housing Land Availability Study' shows that Neath Port Talbot has a housing land supply, assessed against the housing requirement of the adopted LDP, of 4.5 years.

**3.0.16** In the previous three studies completed since Plan adoption, the Council had demonstrated a land supply of 5.0 years (2016), 5.3 years (2017) and 5.0 years (2018) respectively. This latest study therefore is the first occasion post-adoption where the Council's land supply figure has dropped below the required 5 years.

### **Strategic Regeneration Areas**

**3.0.17** There has been limited progress in regard to the delivery of the two allocated 'Strategic Regeneration Areas' at Coed Darcy (Neath) and Harbourside (Port Talbot) respectively.

**3.0.18** At Coed Darcy Urban Village, 291 dwellings have been completed since the LDP base date. The continued low rate of housing delivery has seen the cumulative delivery of housing for the site fall 509 units below target. The slower than anticipated rate of housing and infrastructure delivery has also resulted in a delay in the progression of the employment related element of the mixed use regeneration scheme, with no new land developed for employment uses to date. Road improvements including the provision of a southern access road and additional improvements to M4 Junction 43 have also been delayed.

**3.0.19** At Harbourside, 34 dwellings and 1.8 hectares of employment land have been developed since the LDP base date. This is a shortfall of 41 residential units below target with no employment development for three consecutive years. Consequently, the cumulative delivery of both elements has fallen behind targets identified for the site.

**3.0.20** The redevelopment of both these former industrial areas is proving complex and challenging and over time, progress has been frustrated by a number of factors including the nature of existing site constraints, viability issues and in some cases land ownership.

### **Employment Sites and Economic Activity**

#### ***Land Developed for Employment Purposes***

## 3 . LDP Annual Monitoring Reports - Key Findings

**3.0.21** There has been no new development on allocated employment sites over the past two years which constitutes a trigger point for Policy SP11 (Employment Growth). Further research and investigation will therefore be required in respect of this issue as part of the review process to establish the reasons and whether changes to the policy framework are required.

### ***Workplace Employment***

**3.0.22** One of the fundamental elements of the LDP economic-led strategy is to create 3,850 jobs in Neath Port Talbot over the Plan period. The number of jobs has fluctuated over the initial period, increasing from 49,400 jobs in 2011 to 50,900 jobs in 2015, an increase of 1,500, which indicated that the Plan was progressing well in achieving the overall target of 3,850 jobs by 2026. Since 2015 however, the number of jobs has decreased to 49,600 jobs in 2018, which represents an increase of just 200 jobs since the base-date of the Plan.

### ***Live-work Units***

**3.0.23** In order to encourage economic development in the Valleys Strategy Area (VSA), Policy EC6 allows development of live-work units outside (but immediately adjacent to) settlement limits within the VSA. To date however, there has been no such development proposed under this policy and its lack of effect on economic development and local economies will need to be taken into account in the LDP review.

## **Environment and Resources**

### ***Protection of the Undeveloped Coast, Green Wedges and Special Landscape Areas***

**3.0.24** Although in previous years all proposals within designated areas have been determined in accordance with the policy framework, during the most recent monitoring period two applications have been determined contrary to policy (one an appeal decision). This has raised questions about the effectiveness and appropriateness of these policies which will need to be addressed in detail as part of the review.

### ***Biodiversity and Geodiversity***

**3.0.25** Targets of preventing net loss of biodiversity are not being achieved, partly due to adverse effects on locally designated protection areas and partly due to a lack of mitigation and/or compensation measures delivered as part of development schemes.

### 4 Sustainability Appraisal Monitoring - Key Findings

**4.0.1** The main issues identified in the Sustainability Appraisal (SA) monitoring related to the following SA topics:

#### **Climate Change**

**4.0.2** The indicators in respect of the SA climate change objectives suggest that the LDP is not fully meeting aspirations in respect of climate change adaptation or mitigation. In particular, since Plan adoption, there have been instances where proposals have been approved within flood risk and protected areas contrary to policy; the LDP density requirements are often not being met; and the number of renewable / low carbon energy schemes has been lower than expected.

#### **Natural Resources**

**4.0.3** In respect of the SA natural resources objectives, there are concerns that low density development has an unnecessarily large impact per unit on natural resources generally.

#### **Biodiversity and Geodiversity**

**4.0.4** Targets of preventing net loss of biodiversity are not being met, partly due to developments having adverse effects on locally designated and protected areas and partly due to a lack of biodiversity enhancement within development sites or funded through developer contributions.

#### **Landscape, Townscape and Historic Character**

**4.0.5** A small number of developments have been permitted contrary to LDP policy on landscape and green wedges, giving rise to concerns about meeting the SA objective to protect and enhance the area's landscape and townscape.

#### **Community Cohesion**

**4.0.6** Indicators showing the loss of community facilities, approvals for new 'town centre uses' in out-of-centre locations and shortfalls in delivery of new housing and affordable housing, open space, employment floorspace and small scale local retail suggest some mixed impacts in respect of the SA social cohesion objective.

#### **Health and Well-being**

**4.0.7** Indicators showing loss of community facilities, shortfalls in open space provision and decreasing levels of workplace employment and economic activity suggest some mixed or negative impacts in respect of the SA objectives concerning health and poverty.

## 4 . Sustainability Appraisal Monitoring - Key Findings

### The Economy

**4.0.8** Indicators showing shortfalls in housing delivery, new employment floorspace and new small local retail development suggest mixed impacts in respect of the SA Economy objectives.

**4.0.9** A full summary of the SA monitoring findings is contained in the table in Appendix B.



## 5 Contextual Changes

**5.0.1** As reported in the published AMRs, since LDP adoption there has been a range of new contextual material published which sets the framework within which planning policy is developed at the local level. In addition, Welsh Government (WG) has recently consulted on and will shortly be publishing an updated **Development Plans Manual (Edition 3)** which will guide the preparation of the Replacement LDP.

**5.0.2** The review of the LDP will therefore need to take account of the various new Acts, policy frameworks, updated guidance, initiatives and evidence that has emerged at the national, regional and local level. Whilst not exhaustive, the following sets out those elements that will have the most significant influence on the review of the Plan.

### National Context

**5.0.3 *Planning (Wales) Act 2015*** - the Act sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. One of the objectives is to strengthen the plan led approach in Wales and accordingly the Act has introduced the legal basis to prepare the **National Development Framework (NDF)** and also Strategic Development Plans (*refer to Section 10.2*).

**5.0.4** Replacing the 'Wales Spatial Plan'<sup>(4)</sup>, the NDF will set out a clear 20 year spatial direction for government policy, action and investment. The WG issued the Draft NDF for public consultation in August 2019 with the final publication of the NDF scheduled for September 2020. The Replacement LDP will ultimately need to conform with the NDF, so there will be a need for the Council to closely consider the implications of the NDF as the new national policy direction emerges.

**5.0.5 *Planning Policy Wales (PPW) Edition 10 (December 2018)*** - PPW has been extensively revised and restructured to reflect the Well-being of Future Generations Act. It consequently takes the seven well-being goals and the five ways of working as overarching themes and embodies a placemaking approach throughout with the aim of delivering *Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places*.

**5.0.6** The document has significant implications for the planning system in Wales and identifies that the planning system is one of the main tools to create sustainable places, and that placemaking principles are a tool to achieving this through both plan making and the decision making process. The revisions to PPW will have an impact on the future development and delivery of Strategic Development Plans, Local Development Plans and Place Plans.

**5.0.7 *Technical Advice Notes (TANs)*** - associated with PPW and those issued/amended since LDP adoption include:

- **TAN 1: *Joint Housing Land Availability Studies (January 2015)*** - in June 2018, the WG issued notification that for the duration of a national review into the delivery

4 Wales Spatial Plan - People, Places, Futures' (2004/Updated 2008).

## 5 . Contextual Changes

of housing through the planning system, Paragraph 6.2 of TAN 1 would be temporarily dis-applied. This means that currently housing land supply figures of Council's across Wales are not being treated as a material consideration in determining housing planning applications;

- **TAN 4: Retail and Commercial Development (November 2016);**
- **TAN 12: Design (March 2016);**
- **TAN 20: Planning and the Welsh Language (October 2017);**
- **TAN 21: Waste (February 2017);**
- **TAN 24: The Historic Environment (May 2017).**

**5.0.8 Welsh Government 'Prosperity for All: A Low Carbon Wales' (March 2019)** - the document sets out the WG's approach to cut emissions and increase efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society. It sets out policies and proposals that are intended to reduce emissions and support the growth of the low carbon economy.

**5.0.9** Of particular note in relation to planning are the targets and policies introduced in the following sectors: power; buildings; transport; industry; land use, land use change and forestry; agriculture; and waste management. The implications of the Plan will be considered through the LDP review process.

**5.0.10 Implementation of Schedule 3 to the Flood and Water Management Act 2010: the Mandatory Use of Sustainable Drainage Systems (SuDS)** - as of 7<sup>th</sup> January 2019, all new developments of more than 1 dwelling house or where the construction area is 100 square metres or more will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards (published by the Welsh Ministers) and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins.

**5.0.11 Welsh Government Circular (005/2018): Planning for Gypsy, Traveller and Showpeople Sites (June 2018)** - the circular provides updated guidance on the planning aspects of identifying sustainable sites for Gypsies and Travellers and outlines how planning authorities and Gypsies and Travellers can work together to achieve this aim. The circular outlines the duty to provide sites, the necessity of involving Gypsies and Travellers proactively in the process and the steps required to assess the need for sites, identify suitable sites, and include policies in development plans.

**5.0.12 Noise and Soundscape Action Plan (2018-2023)** - the plan outlines the Welsh public sector's strategic policy direction in relation to noise and soundscape management for the next five years. It has a broader focus than just reducing noise levels alone, recognising also the need to create appropriate soundscapes, meaning the right acoustic environment in the right time and place.

**5.0.13 Welsh Government 'Prosperity for All': the National Strategy' (2017)** - takes the commitments of their 5 year programme for Government, 'Taking Wales Forward: 2016-2021', and places them in a long-term context, setting out how they will be delivered

by bringing together the efforts of the whole Welsh public sector. The four key Themes of the strategy are: 'Prosperous & Secure'; 'Healthy & Active'; 'Ambitious & Learning'; and 'United & Connected'.

**5.0.14 *National Natural Resources Policy (NNRP) (2017)*** - focusing on the sustainable management of Wales' natural resources, the NNRP sets out three national priorities: delivering nature based solutions; increasing renewable energy and resource efficiency; and taking a place-based approach. The NNRP sets the context for Natural Resources Wales (NRW) to produce 'Area Statements' to ensure that the national priorities inform the approach at the local level. The implications of the NNRP and relevant Area Statement will be considered as part of the LDP review.

**5.0.15 *Welsh Government Valleys Task Force: Our Valleys, Our Future (July 2017)*** - this Ministerial Taskforce for the South Wales Valleys published a high level action plan outlining priorities for the future of the Valleys. The key themes/priorities in the Plan include good quality jobs and the skills to do them; better public services; and my local community. Associated Delivery Plans subsequently outline a range of actions linked to each priority and include the creation of new, fair, secure and sustainable jobs and exploring the development of a Valleys Landscape Park.

**5.0.16** Notably, Neath has been identified as one of seven strategic hubs where public money is to be focused to provide opportunities for the private sector to invest and create new jobs. The focus of each hub reflects the opportunities and demand in the particular area along with the aspirations for the future - the Neath hub will focus on industrial, residential, digital and energy related development.

**5.0.17 *Welsh Government Future Trends Report (2017)*** - this report identifies key future social, economic, environmental and cultural future trends for Wales under six themes. Whilst identifying future trends, it is hoped it will help change the way authorities think about decision making and long term planning. The report is an attempt to take a wider and longer view, bringing trends together and examining the interactions and inter dependencies between them.

**5.0.18 *Environment (Wales) Act 2016*** - the Act establishes the legislative framework needed to plan and manage the natural resources of Wales in a more proactive, sustainable and joined-up way. The Act requires that NRW report on the state of Wales' natural resources and detail their ability to respond to pressures and adapt to climate change, and also requires the WG to produce a 'Natural Resources Policy' that sets out the priorities, risks and opportunities for sustainably managing Wales' natural resources.

**5.0.19 *Historic Environment (Wales) Act 2016*** - the Act makes important improvements to existing systems for the protection of the historic environment by giving more effective protection to listed buildings and scheduled monuments; enhancing existing mechanisms for the sustainable management of the historic environment; and introduces greater transparency and accountability into decisions taken on the historic environment.

## 5 . Contextual Changes

**5.0.20** *Energy Efficiency in Wales – A Strategy for the Next Ten Years (2016 – 2026)* - the strategy considers the role of authorities in driving this agenda as well as the role of other organisations, businesses and householders. It also highlights the vision to ensure that Wales can realise its full energy efficiency potential and become a major exporter of energy efficiency technology and know-how.

**5.0.21** *Well-being of Future Generations Act (2015)* - the Act strengthens existing governance arrangements for improving the well-being of Wales by ensuring that 'sustainable development' is at the heart of decision making across Government and all public bodies and identifies seven well-being goals: a prosperous, resilient, healthier, more equal and globally responsible Wales, and a Wales of cohesive communities, vibrant culture and thriving Welsh language. The Act has also provided the legislative framework for the preparation of 'Local Well-being Plans'.

**5.0.22** The Act defines 'sustainable development' as the process of improving the economic, social, environmental and cultural well-being of Wales and sets out five governance principles (or five ways of working) to aid in the consideration of this work (i.e. long term, integration, collaboration, prevention and involvement).

**5.0.23** The Replacement LDP will need to be underpinned by sustainable development principles and accordingly the review will need to be informed by an 'Integrated Sustainability Appraisal / Strategic Environmental Assessment' (ISA/SEA). Clear linkages and associations will also need to be made between the aims and objectives of the Local Well-being Plan and the emerging Replacement LDP.

### Regional Context

**5.0.24** *Swansea Bay City Region and City Deal* - although the City Region was formally launched in 2013, the key change at the regional level since the adoption of the LDP has been the signing of the 'City Deal' on 20<sup>th</sup> March 2017. The City Deal comprises the local authorities of Neath Port Talbot, Swansea, Carmarthenshire and Pembrokeshire, together with Abertawe Bro Morgannwg and Hywel Dda University Health Boards, Swansea University, the University of Wales Trinity St David and private sector companies.

**5.0.25** The City Deal Investment Programme is intended to transform the regional economy, establish and maintain an effective and aligned skills base, create, prove and commercialise new technologies and ideas, and be a recognised regional centre of excellence in the application of digital technologies, life science and well-being, energy and advanced manufacturing. This Council is the lead authority on the following three City Deal projects:

1. Homes as Power Stations;
2. Swansea Bay Technology Centre; and
3. Centre of Excellence for Next Generation Services (CENGS) - located within the Swansea Bay Technology Centre.

**5.0.26** The preparation of the Replacement LDP will need to be set firmly in the context of the City Region/City Deal aspirations.

**5.0.27 Regional Technical Statement (RTS) 2<sup>nd</sup> Review (2020)** - under the provisions of Mineral Technical Advice Note 1 (MTAN1): Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be met in the region for a 15 year period.

**5.0.28** The RTS assesses the demand and supply of aggregates within the South Wales region and considers the environmental capacity of each Mineral Planning Authority (MPA) to make a contribution to meeting the regional demand. The SWRAWP has recently consulted on and will shortly be publishing an updated RTS 2<sup>nd</sup> Review and the implications of the statement will be considered as part of the LDP review.

### Local Context

**5.0.29 Neath Port Talbot Public Services Board (PSB) Well-being Plan (2018-2023) 'The Neath Port Talbot We Want'** - replacing the Single Integrated Plan (SIP), the Well-being Plan published in May 2018 sets out the PSB's long term vision for Neath Port Talbot. The Plan sets out the following six objectives to improve the well-being of people in Neath Port Talbot and identifies priorities for action:

- Support children in their early years, especially children at risk of adverse childhood experiences;
- Create safe, confident and resilient communities, focusing on vulnerable people;
- Put more life into our later years - ageing well;
- Promote well-being through work and in the workplace;
- Value our green infrastructure and the contribution it makes to our well-being (*cross-cutting*); and
- Tackle digital exclusion (*cross-cutting*).

**5.0.30 Neath Port Talbot Corporate Plan (2019-2022) 'Shaping NPT'** - the Plan sets out an overarching vision along with three well-being objectives: to improve the well-being of children and young people; to improve the well-being of all adults who live in the County Borough; and to develop the local economy and environment so that the well-being of people can be improved.

**5.0.31** The Replacement LDP will need to give a spatial expression of the land use implications of the Neath Port Talbot Well-being Plan and Corporate Plan, and the LDP vision in particular will need to complement those within the published documents.

**5.0.32 Neath Port Talbot Biodiversity Duty Plan (2017)** - the plan demonstrates how the Council will fulfil the biodiversity duty set out under the Environment (Wales) Act 2016 and will act as a driver for conservation activities throughout Neath Port Talbot. Through meeting the Biodiversity Duty, the Council is delivering against well-being objectives and the ways of working under the Well-Being of Future Generations Act 2015 and contributing towards the delivery of the Nature Recovery Action Plan for Wales. The Replacement LDP will need to complement the Biodiversity Duty Plan and set an appropriate framework to deliver ecosystems resilience and the protection and enhancement of biodiversity.

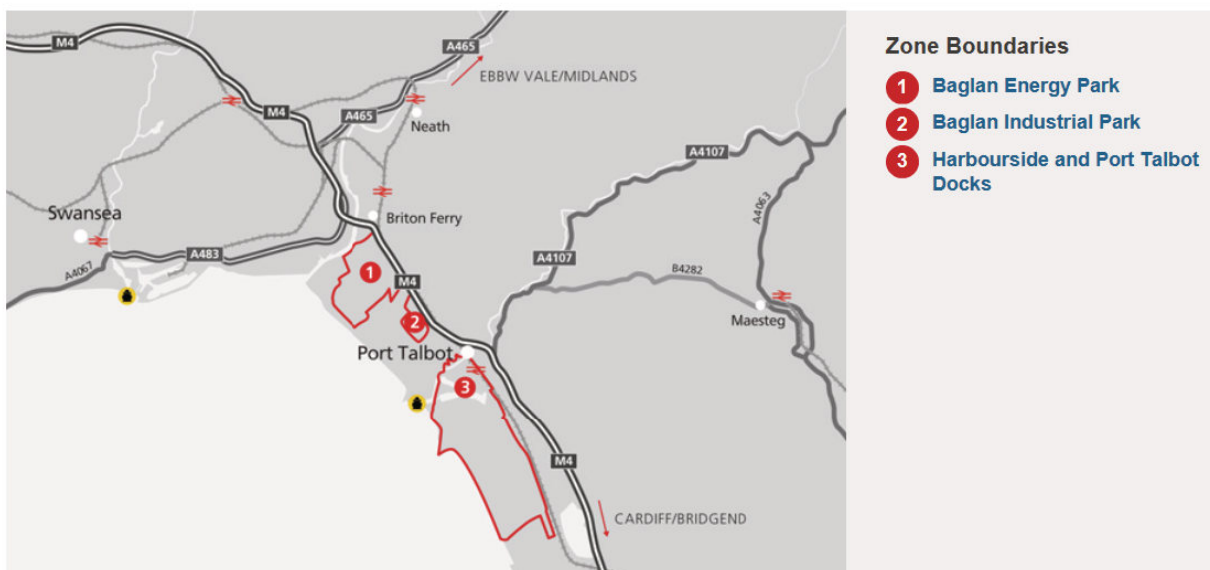
## 5 . Contextual Changes

**5.0.33 Neath Port Talbot Local Biodiversity Action Plan (LBAP)** - the Plan is currently under review by the Neath Port Talbot Nature Partnership and will be replaced by a new 'Neath Port Talbot Nature Plan'; this will set out the state of nature, highlight priorities for conservation action in the future and ensure nature recovery in NPT. An action plan will also be produced to set out key projects and activities that will contribute to nature recovery and feed in to the implementation of the Welsh Nature Recovery Action Plan. The NPT Nature Plan is intended to be published in 2020 and will feed in and inform the review of the LDP.

**5.0.34 Port Talbot Waterfront Enterprise Zone (2016)** - in March 2016, the WG confirmed that Port Talbot Waterfront would receive Enterprise Zone status. Its unique combination of factors in terms of location, infrastructure and its connectivity to the knowledge economy has attracted some of the UK's top manufacturers, including TATA Steel, BOC, SPECIFIC, TWI and ThyssenKrupp.

**5.0.35** The area covered by the designation includes: Harbourside, Port Talbot Docks, Baglan Energy Park and Baglan Industrial Estate. There is now a firm focus on continuing to develop cutting edge, world class industries in sectors such as Advanced Materials and Manufacturing, Construction and Green Energy. Businesses moving to the area will profit from the inherent strengths and the existing growth potential of the region, and the momentum of the Economic Regeneration Strategy of Swansea Bay City Region which is a catalyst to improving the prospects of communities, businesses and the economy. The preparation of the Replacement LDP will need to be set firmly in the context of these aspirations.

**Figure 5.1 Port Talbot Waterfront Enterprise Zone**



Source: Business Wales - Enterprise Zones in Wales

**5.0.36 Neath Port Talbot Active Travel 'Existing Route Map' (ERM) and 'Integrated Network Map' (INM)** - WG Ministers approved the Council's revised ERM and INM in February 2018. The ERM identifies the existing routes in Neath Port Talbot that the Council considers suitable for active travel and the INM sets out the Council's aspirations for the

next 15 years, identifying either improvements that could be made to existing routes or where new routes could be developed and added to the active travel network. The Replacement LDP will need to provide an appropriate policy framework to enable the aspirations of the INM to be met.

**5.0.37 Neath Port Talbot Decarbonisation and Renewable Energy Strategy** - in light of the recent declaration by the WG of a 'climate emergency', the Council has recently consulted on and will shortly be publishing a strategy / action plan that will set the framework to achieve the Council's carbon footprint reduction aspirations. The strategy is developed around three key themes: transportation; buildings and spaces; and influencing behaviour. The Replacement LDP will therefore have a key role in facilitating the implementation of this overarching corporate strategy.

# 5 . Contextual Changes



### 6 Evidence Base Changes and Requirements

**6.0.1** To inform the review of the LDP and in addition to accounting for the contextual changes set out above, there will be a need to update various elements of the evidence base that informed the current LDP.

**6.0.2** The table below provides a list of studies (*albeit not exhaustive*), that will be required to inform the Replacement LDP. As this data is not yet available however, the following section focuses on the WG Population and Household Projections that have been released and the changes that have occurred since the current LDP was formulated.

**Table 6.0.1 Replacement LDP - Evidence Base Studies**

Topic Areas	Evidence Base Studies
Overarching Policies	Strategic Flood Consequences Assessment (SFCA) Settlement Hierarchy and Boundary Review
Communities and Housing	Annual Joint Housing Land Availability Studies Audit of Communities Facilities Affordable Housing Viability Assessment Urban Capacity Study Open Space Assessment Population & Household Projections Local Housing Market Assessment (LHMA) Gypsy and Traveller Accommodation Needs Assessment
The Economy	Economic Assessment and Employment Land Provision Study Employment Land Review Retail Study Annual Retail Survey
Environment and Resources	Green Infrastructure Assessment Energy Needs Assessment, Renewable Energy Assessment and District Heat Network Assessment
Transport and Access	Strategic Transport Assessment

## 6 . Evidence Base Changes and Requirements

### Population and Household Projections

#### Adopted LDP - Current Position

**6.0.3** Based on the projected economic-led growth scenario of 3,850 jobs for the area, the current LDP makes provision for an additional 7,800 new residential units. Delivering this level of housing need over the Plan period will lead to an increase of approximately 7,500 people and a total population of 147,400 by 2026.

**6.0.4** Initially, at the time of preparing the Deposit Plan, the 2008 based WG Household Projections were used as a starting point and were incorporated into an aspirational economic-led scenario which aimed to maximise job growth within the local economy. The method enabled the Authority to forecast how economic changes over the Plan period equated to the requirements for employment land and the number of new homes needed to accommodate the projected total population and required labour supply. Prior to the Examination in Public, the 2011 based projections were published and the level of growth was then reassessed using these updated projections.

**6.0.5** Over time, there has been a slight change in emphasis by WG on how the household projections should be used. During the preparation of the LDP, PPW stated that the WG's latest household projections should form the starting point for assessing the level of growth and housing requirement in LDPs. The latest version of PPW (2018) however now states that these projections will form a fundamental part of the evidence base and will therefore remain a key consideration in the LDP Review.

**6.0.6** The purpose of the following section is to analyse the projections published since the LDP was adopted and the implications of the most recent projections on the formulation of housing need for the extended Plan period.

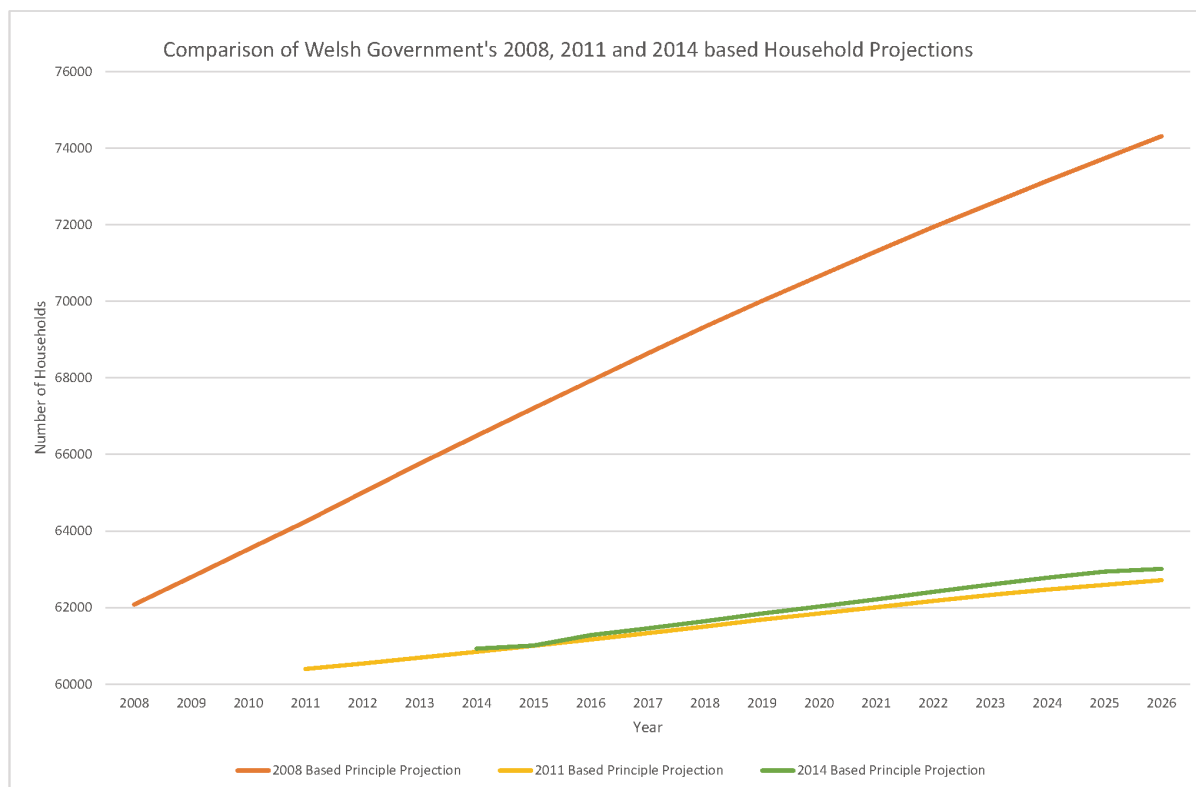
#### Revised Household Projections

**6.0.7** The WG release population and household projections every three years (broken down by Local Authority). The most recent projections released since the adoption of the LDP are the 2014 based projections. The following table illustrates the comparisons between the 2008, 2011 and 2014 based principle projections.

**6.0.8** As illustrated in Figure 6.1 below, there is a large variation between the 2008 projections and the 2011 and 2014, with the number of households at 2026 estimated to be 74,307 under the 2008 projections, 62,715 under the 2011 based projections and 63,009 under the 2014 projections. The 2008 projections indicate a high level of growth, whereas the 2011 and 2014 projections follow a similar pattern with marginal variance between the two sets of projections.

## 6 . Evidence Base Changes and Requirements

**Figure 6.1 Comparison of Welsh Government's 2008, 2011 and 2014 Based Household Projections**



**6.0.9** As projections are trend based, the assumptions underlying the 2011 based projections were founded on a period of economic decline following the global economic crisis, which resulted in a significantly lower projected level of growth than the 2008 projections. Using the principle projection, it was estimated that 10,066 new homes would be required using the 2008 projections, with the projections under the 2011 significantly lower at 2,319 new homes by 2026.

**6.0.10** As the 2011 principle projections were founded on a period of low economic growth, and as they do not make any allowance for the effects of government policy, the WG re-emphasised the expectation of using the projections as a starting point, whilst considering all sources of evidence available. For this reason, the 2011 based 10 year migration variant was used, which covered a period of both high and low economic growth, which increased the number of households at 2026 from 2,319 under the principle variant to 4,331. This variant was then considered in the context of the aspirational economic growth scenario to form the growth strategy in the adopted LDP.

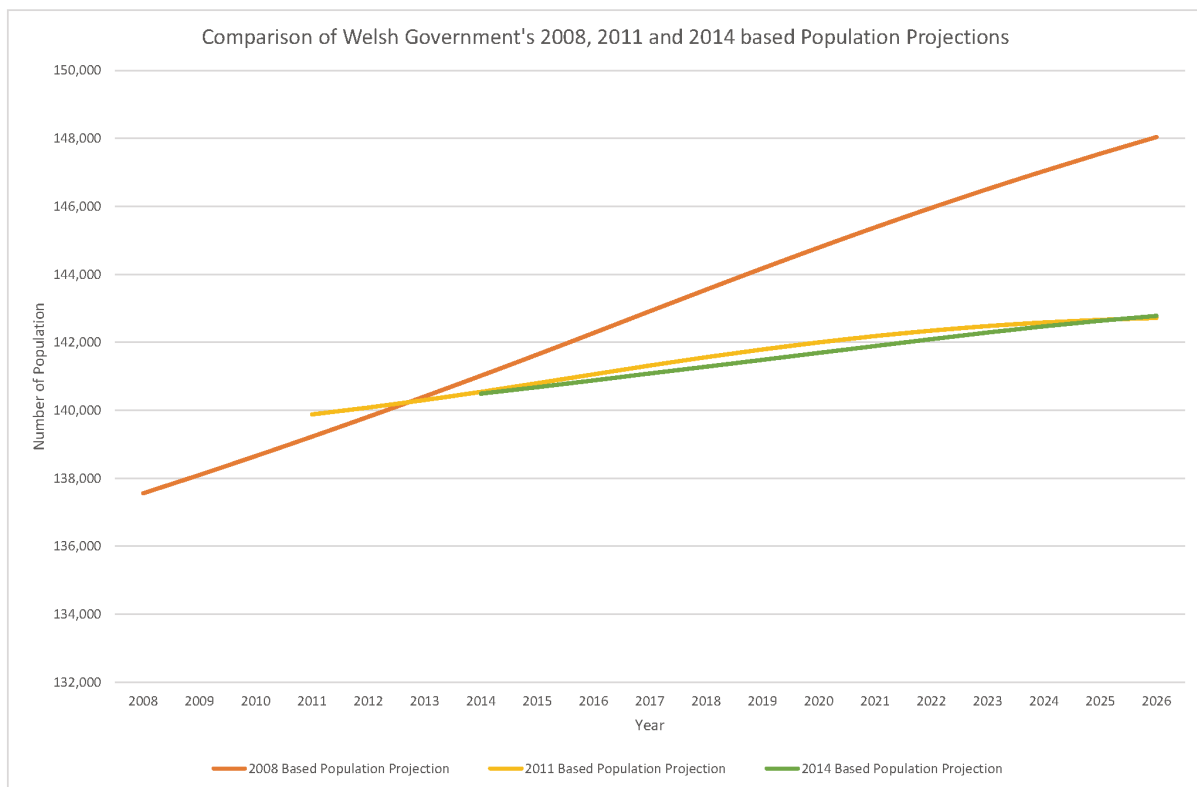
**6.0.11** More recently, the WG have made the decision not to publish the 2017 based projections and it is anticipated that the 2018 based projections will be published in 2020. Whilst the projections by authority are yet to be released, the national 2018 based projections have been published, which estimates that housing need will gradually decrease over the next 15 years, and by mid 2030s (which would be the end date of the Replacement LDP), 6,500 new homes will be required annually in Wales.

## 6 . Evidence Base Changes and Requirements

### Revised Populations Projections

**6.0.12** The 2008 based population projections estimated the total population at 2026 to be 148,038, slightly higher than the LDP's economic-led growth scenario (which estimated the population to be 147,400). Based on the 2011 Census, 2011 based projections were published prior to the LDP adoption and estimated that the population at 2026 would be 142,716, which was 5,322 less than the 2008 based projection. By comparison, the 2014 based projections indicate a population of 142,779 at 2026, which is just 63 people lower than the 2011 based. Figure 6.2 below illustrates the comparisons between the projections.

**Figure 6.2 Comparison of Welsh Government's 2008, 2011 and 2014 Based Population Projections**



**6.0.13** The housing requirement within the Replacement LDP will therefore need to be reconsidered in the context of: the 2018 based WG population and household projections; the City Deal; the provisions of corporate strategies, viability and constraints (such as flooding and topography); the key issues that the plan will seek to achieve; links between homes and jobs; the need for affordable housing; and achieving the holistic objective of the planning system: 'Placemaking'.

### Placemaking

**6.0.14** PPW continues to stress the importance of clearly identifying the housing requirement in the development plan, and states : *'These requirements must be based on evidence and clearly express the number of market and affordable homes the planning authority considers will be required in their area over the plan period'*.

## 6 . Evidence Base Changes and Requirements

**6.0.15** However, there is a now also an emphasis on *Placemaking* and the creation of sustainable places: *'Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plan policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being'*.

**6.0.16** The LDP will therefore need to continue to ensure that a fully evidenced housing requirement is identified and that the delivery of housing remains a priority, but this should not be at the expense of the need for effective placemaking and the creation of sustainable places.

### **Regional Planning - Assessing Housing Need at the Regional Level**

**6.0.17** Planning and coordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. The *Draft* NDF (August 2019) uses the 2014 projections and under the WG's central estimates, identifies that 114,000 homes are needed across Wales by 2038 with almost a quarter (23,400) in Mid and South West Wales (M&SWW).

**6.0.18** The Cross Border Local Housing Market Assessment (LHMA) (2019) undertaken by ORS on behalf of the M&SWW region <sup>(5)</sup> was based on the 2014 projections. Accommodating each of the Local Planning Authorities (LPAs) preferred population projections and covering a 15 year period (2018-2033) is nearing completion and will be published early in the new year (2020).

**6.0.19** Previously, Neath Port Talbot worked jointly with the City & County of Swansea and commissioned Peter Brett Associates (PBA) to project the number of homes needed over each of the respective Plan periods based on an employment-led strategy which aligned job numbers with homes.

**6.0.20** As part of the review, the Council will need to consider whether to undertake a similar exercise, either with Swansea or on a larger geographical scale which could encompass LPAs further west to align with the forthcoming SDP.

5 Based on ORS' methodology and applied consistently across all of the Local Planning Authorities within the M&SWW region.

# 6 . Evidence Base Changes and Requirements

### 7 LDP Vision, Objectives and Strategy

#### 7.1 Key Issues, Vision and Objectives

##### Key Issues

**7.1.1** The LDP Key Issues were identified following a significant amount of evidence gathering and an extensive programme of community involvement including a number of stakeholder events held across the County Borough. A total of 18 key issues were identified, covering a wide range of topic areas including climate change, the need for affordable housing, erosion of the Welsh language and air quality.

**7.1.2** The key issues then fed into the development of the LDP objectives which were grouped according to the themes set out in the Wales Spatial Plan.

**7.1.3** All the key issues will need to be reconsidered in the light of updated evidence and changes in national legislation and guidance, including in particular the requirements of the Well-being of Future Generations (Wales) Act (2015) relating to the five 'ways of working' and the seven 'well-being goals', together with the vision and objectives set out in the Neath Port Talbot PSB Local Well-being Plan and Corporate Plan respectively.

**7.1.4** To accord with the ways of working, the close involvement of the community (*public and stakeholders*) will be necessary in order to assess the continued relevance of the existing key issues or whether changes or additions are required. This process will need to be informed by up-to-date information on all aspects of life in Neath Port Talbot in order to identify areas where issues have now been addressed as well as those where issues remain an ongoing concern.

##### Vision

**7.1.5** The LDP vision was developed from public participation and evidence gathering and was prepared to seek to address the key issues that had been identified. The vision consisted of several iterations as the development of the Plan progressed, from initial consultation and stakeholder engagement sessions to its development through the Preferred Strategy and then finalised at Deposit stage.

**7.1.6** As with the key issues, the vision will need to be reconsidered in the light of updated background evidence, the new legislation and national policy that has emerged, along with the new corporate priorities and objectives that have been developed.

##### Objectives

**7.1.7** The LDP vision is supported by 25 objectives, cross referenced to the relevant key issues. Of the 25 objectives, there are four overarching, two area-based and the remaining are grouped under the Wales Spatial Plan themes.

**7.1.8** Again, the objectives will need to be reconsidered as part of the LDP Review in the light of any changes to the key issues and vision, and to account for new evidence from updated information and revised legislation and guidance. Given that the Wales

## 7 . LDP Vision, Objectives and Strategy

Spatial Plan will be superseded upon adoption of the NDF, it is anticipated that the new set of objectives will be grouped to align with the NDF and/or the themes as set out in the new updated PPW.

### 7.2 Growth Strategy

**7.2.1** The current LDP Strategy aims to:

**Facilitate growth within Neath Port Talbot, with a focus on the coastal corridor whilst reinvigorating the valley communities.**

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; and
- Providing a flexible approach to development within the valley communities.

### **Economic-led Growth Strategy - *Aligning jobs, houses, labour supply and employment land***

**7.2.2** The LDP strategy is underpinned by an economic-led growth model that uses the projected increase in jobs and an aspiration to increase the economic activity rate to identify the required working age population to support the projected number of jobs. The projected increase in working age population is then translated into the need for new housing, which ensures that the housing and employment forecasting is aligned and that there is a direct correlation between the number of jobs, houses, labour supply and employment land within Neath Port Talbot.

**7.2.3** Prior to the LDP base date economic growth in Neath Port Talbot had stagnated, which provided an opportunity for the Plan to try and address a number of fundamental issues within the area, maximising the opportunities likely to be created through key regeneration and infrastructure projects. The economic-led scenario is aspirational in its approach, aiming to maximise job creation within the local economy, seeking to increase economic activity rates and reduce unemployment levels in line with the Welsh average, thereby addressing some of the key issues identified within the LDP.

**7.2.4** The economic growth model projected that 3,850 jobs would be created over the Plan period, increasing the number of jobs in Neath Port Talbot to 53,250 jobs by 2026, with the population growth for the area derived from the ratio of working age population



## 7 . LDP Vision, Objectives and Strategy

to total population. The number of jobs created over the Plan period is therefore one of the major indicators that can monitor how the LDP strategy is being implemented and to determine how successful the Plan has been in addressing some of the main issues in Neath Port Talbot.

**7.2.5** Data releases for jobs numbers are subject to revision and can sometimes have fluctuations and variances year on year. There can also be time delays before the release of the current year's data, which can make the monitoring of workplace employment more difficult than other economic indicators. The original economic growth model projected that there would be an increase in jobs from 48,200 in 2011 to 52,050 in 2026, representing the 3,850 increase. However, by the time of the Examination in Public (2015), the latest data release showed that there had actually been a decrease in the number of jobs from 48,200 in 2011 to 46,300 in 2013 and as a consequence, for the Plan to achieve 52,050 jobs by 2026, the annual target for job creation would need to increase in order to make up for the reduction in jobs between 2011 and 2013.

**7.2.6** The next statistical release revised the figures further, actually indicating that the number of jobs at the base position (2011), was actually higher than the previous data release had suggested, and the number of jobs in 2011 was 49,400 (as opposed to the original release figure of 48,200), and whilst there had been a reduction of jobs in 2013 (47,100), by 2014 the number of jobs had increased to 50,500, which provided a positive reflection on the local economy and potentially illustrating a more resilient economy.

**7.2.7** A further increase in jobs was then seen over the next 12 month period, increasing to 50,900 jobs by 2015. Since 2015, there has been a reduction in the number of jobs, with a dramatic decrease to 46,600 jobs in 2017, which was 2,800 fewer jobs than at the LDP base date. The latest release (2018) shows a vast improvement, increasing by 3,000 jobs to 49,600. Whilst this is positive, the overall increase between the base date, 2011 and 2018 is just 200 jobs, against a 3,850 jobs target over the Plan period. The following table illustrates the annual fluctuations in workplace employment in Neath Port Talbot.

**Table 7.2.1 Workplace Employment in Neath Port Talbot**

Year	2011	2012	2013	2014	2015	2016	2017	2018
Workplace Employment	49,400	50,200	47,100	50,500	50,900	49,800	46,600	49,600

Source: Annual Population Survey, Office for National Statistics

**7.2.8** Whilst the level of workplace employment has fallen significantly below the Plan's aspirations, other LDP objectives, such as increasing the economic activity rate to align with the Welsh average and reducing the unemployment rate have been more positive.

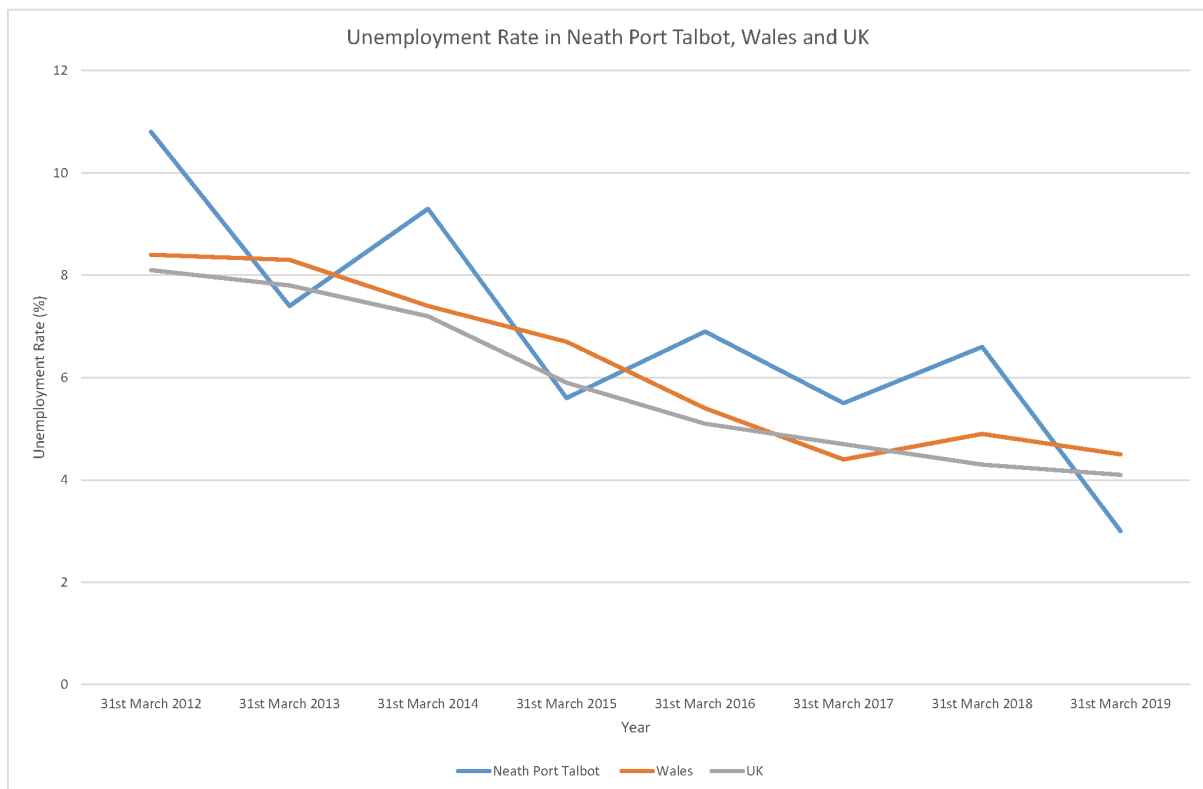
**7.2.9** One of the Plan's objectives is to increase the economic activity rate to 76% by 2026, to align with the Welsh average. There has been an increase in the rate of economic activity in Neath Port Talbot, increasing from 69.7% in 2011 to 74% in 2019, with the gap

## 7 . LDP Vision, Objectives and Strategy

between Neath Port Talbot and Wales reducing slightly from being 3% behind the Welsh average in 2011 to 2.7% behind in 2019. The gap between Neath Port Talbot and the UK average has also reduced from 6.3% to 4.5% over the same period.

**7.2.10** A further objective is to reduce the unemployment rate in line with the long term Welsh average of 6.9%. The graph below illustrates the rate of unemployment for Neath Port Talbot, Wales and the UK. Wales and the UK follow a similar pattern, with a steady decline over the period. By contrast, Neath Port Talbot has seen more fluctuation over the period, with a significant decline of 6.9% between the base date and 2019 and is now 3%, which is lower than the Welsh (4.5%) and UK average (4.1%).

**Figure 7.1 Unemployment Rate in Neath Port Talbot, Wales and UK**



**7.2.11** The increase in economic activity and the reduction in unemployment provides a positive outlook for the area and shows a more resilient economic base. However, one of the fundamental elements of the LDP strategy is to maximise job growth within the local economy, in order to address a number of key issues the areas experiences, with wealth creation through job growth required to meet the Plan's overall vision. Whilst economic activity has increased, the jobs do not appear to have been created within the area, and could possibly mean there are more people commuting outside of the area for employment purposes.

**7.2.12** Integral to increasing the number of jobs in the area, the Plan allocated sufficient employment land to deliver an adequate supply, mix and range of high quality employment sites at Baglan Bay, J38 of the M4, Coed Darcy and Harbourside. A total of 96 hectares

## 7 . LDP Vision, Objectives and Strategy

of land was allocated for employment, comprising of 32 hectares for conventional B Class uses and space to accommodate the needs of the growing energy sector. To date, only 5.1 hectares has been developed across these four strategic employment allocations.

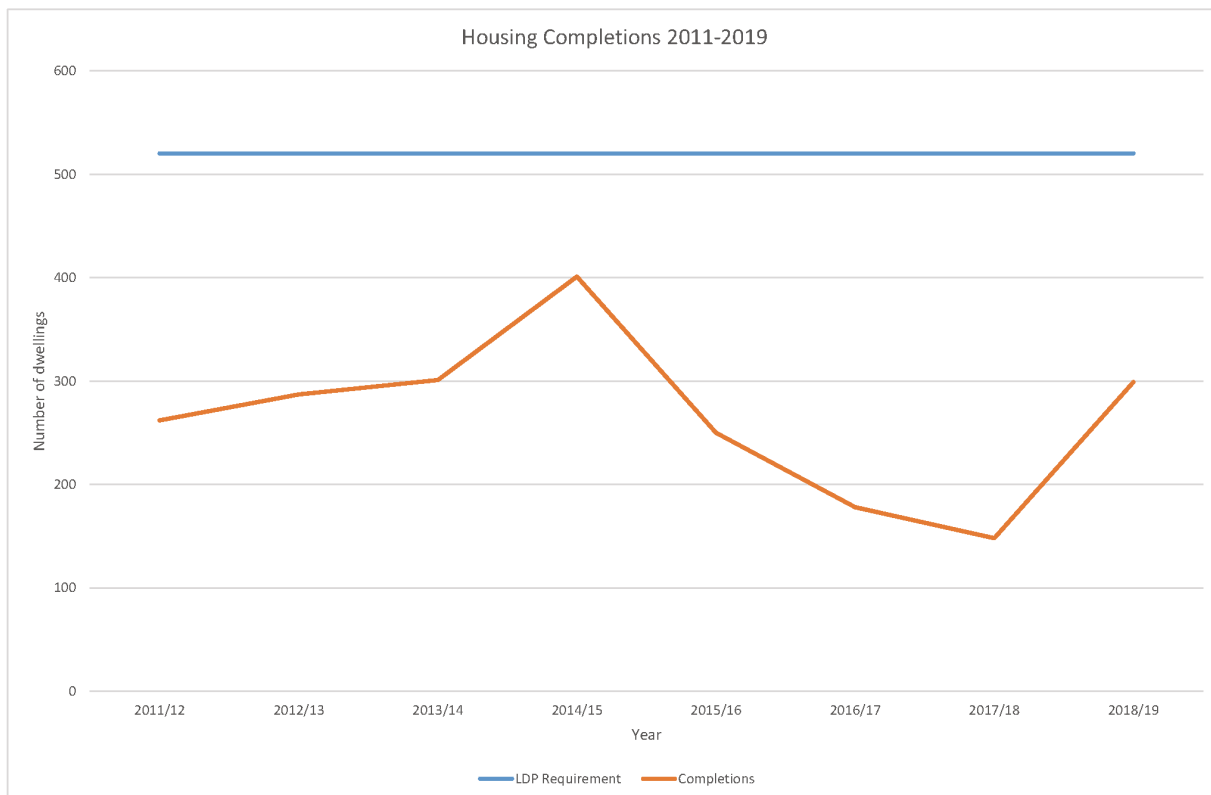
**7.2.13** As the LDP housing requirement was based on housing to support a projected increase in the working age population to support new job creation and as jobs are not being created, the demand for new housing has not therefore materialised.

### Housing

**7.2.14** The LDP makes provision to deliver 7,800 new dwellings over the Plan period. Over the period 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2019, a total of 2,126 new housing units have been developed, against the target of 3,582 equating to 59% of the target for the period.

**7.2.15** The table below illustrates the annual requirement of the LDP compared to the delivery of housing against the target, showing that housing completions have been below the LDP dwelling requirement every year since the base date. Housing completions were at their lowest in 2016/17 and 2017/18 where total completions were just 178 and 148 units respectively, significantly below the annual target of 520 units.

### Housing Completions in Neath Port Talbot (2011-2019)



**7.2.16** As a consequence of low housing delivery over the initial years of the Plan, to meet the LDP housing target of 7,800 new dwellings, an annual build rate of 810 new homes will now be needed from 2019 to 2026. This level of house building has never been

## 7 . LDP Vision, Objectives and Strategy

achieved in Neath Port Talbot, with average build rate since the base date at a level of 265 units per year. It is therefore considered that the level of housing need is unrealistic and not deliverable over the remainder of the Plan period.

**7.2.17** Up to 31<sup>st</sup> March 2019, a total of 2,126 units have been delivered, which equates to 27.3% of the overall housing need over the first 8 years of the LDP. There are a number of reasons why sites have not come forward as anticipated, some of which are independent of the planning system, with other reasons such as viability having an influence on whether sites will come forward in the remaining Plan period.

**7.2.18** The LDP has sufficient land allocated to meet the identified housing requirement and until recently, the Authority was able to evidence a 5 year land supply based on the anticipated level of future delivery, given early discussions with landowners and progress made on a number of sites. However more recently, housing delivery has been slower than anticipated and a number of the LDP allocations have not progressed to the planning application / development stage for a number of reasons. This has resulted in the available land supply falling below the required 5 years.

**Table 7.2.2 Land Supply in Neath Port Talbot**

Year	Land Supply
2011/12	6 years
2012/13	2.6 years
2013/14	2.5 years
2014/15	5.5 years
2015/16	5.0 years
2016/17	5.3 years
2017/18	5.0 years
2018/19	4.5 years

**7.2.19** In light of delivery to date, it is evident that the current level of growth and the housing allocations contained within the current LDP cannot be carried forward and the growth strategy will need to be reconsidered during the review.

### 7.3 Spatial Strategy

**7.3.1** The LDP spatial strategy divided the administrative area into two distinct strategy areas to identify the broad locations for meeting the growth and development needs of the growth strategy and in recognition of the unique identity, varying characteristics and market demand the different areas of Neath Port Talbot possess.

**7.3.2** The spatial strategy facilitates development along the M4 'coastal corridor' in the urban areas of Neath and Port Talbot, whilst reinvigorating the 'valleys', an area comprising of Pontardawe and the five valley areas.

### Coastal Corridor

**7.3.3** The coastal corridor contains the areas of the strongest market demand and where the greatest proportion of house building and economic investment is concentrated. To deliver the growth strategy and deliver development in the most sustainable locations, major new developments are focused along the corridor to maximise the potential of the area, capitalising on strategic transport networks to achieve the Plan's vision.

**7.3.4** To achieve more sustainable patterns of development, the re-use of brownfield land is utilised where possible, and spatially, large scale regeneration is focused on brownfield land at Coed Darcy and Harbourside through identification of Strategic Regeneration Areas (SRAs).

**7.3.5** The Coed Darcy development aims to create a sustainable urban village comprising of residential, education and employment, whilst the Harbourside allocation provides an opportunity for major regeneration and mixed use development of retail, education, residential and employment.

**7.3.6** In addition to these areas, strategic employment allocations at Junction 38 (M4) and Baglan Bay are identified due to the market demand and their ability to accommodate a range of employment, including the requirements of the growing energy sector and to accommodate spin off developments from the new Swansea Bay University Campus (Bay Campus), to encourage a shift from traditional manufacturing towards a knowledge based economy.

**7.3.7** Whilst the development of the Bay Campus has been successfully implemented and there have been some expansions of employment uses into Baglan Bay, overall development at the strategic employment sites and strategic regeneration areas has been limited over the Plan period, falling below the anticipated levels of development.

**7.3.8** By the 31<sup>st</sup> March 2019, the LDP housing trajectory anticipated Coed Darcy to have delivered in the region of some 800 dwellings and 2 hectares (ha) of employment floorspace. To date, there has been no development for employment uses and only 36% (291 units) of the anticipated level of housing delivered. Similarly, at Harbourside delivery has also fallen significantly below the Plan's trajectory, with 34 out of the projected 75 housing units delivered and 1.8ha of employment floorspace developed against a target of 4.92ha.

**7.3.9** In terms of infrastructure to deliver the strategy, a number of key improvements are identified to support the growth strategy and to address issues such as congestion and encourage a modal shift to more sustainable forms of transport. The redevelopment of Port Talbot Parkway Station, Integrated Transport Hub, Baglan Energy Park Link Road, Harbour Way and Ffordd Amazon have all been successfully implemented over the Plan period. Therefore, whilst development has been limited, key infrastructure has been put in place that could facilitate future development and address the key issues in Neath Port Talbot.

## 7 . LDP Vision, Objectives and Strategy

**7.3.10** Based on the low levels of delivery to date, the review will need to reconsider whether these regeneration initiatives will deliver growth within the coastal corridor, or whether focused development in alternative locations will be more effective in delivering the LDP Strategy, considering new initiatives such as the allocation of the Port Talbot Waterfront Enterprise Zone in 2016.

**7.3.11** The emerging NDF identifies opportunities for enhancement and a different focus on planning for future infrastructure. The potential for a new 'Swansea Bay Metro' will improve connectivity across the region and maximise the opportunities for inward investment and growth. The Metro would be one of the largest infrastructure developments seen across the region and could bring considerable economic benefit, whilst improving accessibility. Due to the scale of the proposals, the strategy will need to reflect the potential opportunities associated with the development and consider how the Metro will complement the NDF identification of the Swansea Bay and Llanelli National Growth Area (NGA). Other forms of new infrastructure will also need to be considered in the context of the strategy, key elements will include electric vehicle charging infrastructure, mobile communications infrastructure and green infrastructure.

### Valleys

**7.3.12** The valley areas have a strong cultural heritage and distinct identity and are steep in natural resources. Communities have however faced a decline in traditional industries, poor health and out-migration, which has resulted in a cycle of deprivation in some areas. The strategy to reinvigorate the Valleys recognises the challenges and key issues within these areas and aims to diversify away from traditional industries, maximising on regeneration initiatives and providing a more flexible approach to new development.

**7.3.13** The areas of Pontardawe and the Upper Neath Valley were identified as 'Strategic Growth Areas' for the valleys in recognition of their status as key and supporting settlements in the Wales Spatial Plan and as they were the most sustainable settlements within the valleys area to focus development. The benefits of managed growth and regeneration in these areas has the ability to promote wider benefits to ripple throughout other valley communities.

**7.3.14** Pontardawe is the largest settlement within the Valleys Strategy Area (VSA), functioning as a town centre with close links to the M4 and as a gateway to some of the valley areas. With the ability and demand to accommodate a significant amount of new housing development, a total of 11 housing sites are allocated, with a capacity of 664 units. Of these allocations, 240 units have been developed (up to 30<sup>th</sup> March 2019), with delivery of housing expected to increase based on the current progress being made on a number of sites.

**7.3.15** The growth point in the Upper Neath Valley primarily centres around Glynneath, which is situated adjacent to the A465, a key transport corridor linking to Neath, Swansea, Cardiff and the Midlands. The retail district centre of Glynneath acts as a hub with a broad range of services, and during the formation of the strategy had recently benefitted from the Glynneath Town Centre Regeneration Scheme. To complement this and support the town centre, a retail-led regeneration scheme at Park Avenue was allocated, which comprises a mixed residential and retail allocation.

## 7 . LDP Vision, Objectives and Strategy

**7.3.16** A tourism-led mixed use regeneration development at Rheola is also allocated to provide holiday accommodation and ancillary facilities to promote growth within the tourism sector, due to the increasing status of the areas as a tourism destination. The developments at Park Avenue and Rheola have not commenced during the initial years of the Plan and the revised strategy will need to explore how growth across the valley communities can be promoted and delivered.

**7.3.17** The Strategy also 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. Live-work units are encouraged outside of, but immediately adjacent to settlement limits and retail proposals up to 200m<sup>2</sup> of gross floorspace being acceptable outside of designated town, district and local centres to support new and existing employment, create jobs and revitalise the area.

**7.3.18** There have however been no live-work developments within the VSA to date. There were three relevant applications for small retail developments of less than 200m<sup>2</sup> in the VSA in 2018, but none in 2017 or 2019. These policies and the effectiveness of the reinvigoration approach taken for the VSA will need to be reassessed as part of the review.

**7.3.19** The emerging NDF identifies areas of the VSA as priority areas for renewable energy. The growing energy sector and the potential for the valleys to accommodate a number of wind and solar energy proposals will need to be considered during the review. The potential for growth in other industries, such as tourism will also need to be considered.

### 7.4 Reconsideration of the Strategy

**7.4.1** Although the economic-led growth strategy has seen some positive improvements in the rate of economic activity and a reduction in unemployment, given the limited growth in job numbers and the inability to meet the housing requirement, will mean that the strategy will need to be reconsidered as part of the review.

**7.4.2** A critical element of the LDP strategy is the job creation within the local economy, which in turn feeds into the requirement for new housing, with the creation of new jobs an integral element in achieving the overall vision. Given the Plan has fallen considerably short in achieving job growth and employment development, the review will need to consider whether an economic-led approach is still appropriate for Neath Port Talbot. Whilst the existing strategy has addressed some of the Plan's objectives, such as reducing the unemployment rate, some of the key issues identified still remain to be addressed.

**7.4.3** Further analysis is required to determine why job growth has decreased since 2015, and whether the uncertainty around the future of TATA Steel or Brexit have had any impact on attracting new investment to the area. New economic forecasting will be required to establish where the potential growth sectors will be over the period of the Replacement Plan and how contextual changes such as the Swansea Bay City Deal, Enterprise Zone at Port Talbot, potential for the Swansea Bay Metro and the emerging NDF will have on future economic development.

## 7 . LDP Vision, Objectives and Strategy

**7.4.4** The level of development across both strategy areas (i.e. 'Coastal Corridor' and 'Valleys') has fallen below the anticipated levels of growth set out within the adopted Plan (as illustrated below). The review process will need to determine a revised level of housing growth over the extended Plan period, taking account of the latest Welsh Government projections and consider whether the spatial strategy remains the appropriate mechanism for the distribution of growth.

**Table 7.4.1 Housing Allocations & Completions by Strategy Area**

	LDP Policy H1	Proportion Allocated	Housing Completions H1 Allocations (up to 31 <sup>st</sup> March 2019)	Completions Against Target (up to 31 <sup>st</sup> March 2019)
Coastal Corridor Strategy Area	5,690	82%	1,189	21%
Valleys Strategy Area	1,275	18%	457	36%
Total	6,695	100%	1,646	-

**7.4.5** The H1 portfolio of housing allocations will be reappraised and any undelivered housing allocations will be reassessed to ensure that sites are deliverable and viable within the extended Plan period. Notably, the new edition of PPW requires site viability to be demonstrated prior to a site's allocation within the Plan, so there is now a greater emphasis on viability which could potentially lead to the de-allocation of some sites and the inclusion of new sites to meet the overall housing requirement.

**7.4.6** The spatial distribution of the updated level of growth will also need to be considered in the context of the draft NDF, with the emerging document suggesting there will be a different focus for areas within the area. Draft proposals indicate that the coastal corridor will feature within the designated Swansea Bay and Llanelli NGA, which will be the main focus for larger scale growth and investment across the M&SWW region in recognition of its status as the location of the main centres for population, employment, services and connectivity.

**7.4.7** The emerging national policy to focus strategic growth, essential services and facilities, transport and digital infrastructure to the main centres, will need to be reflected within the strategy of the Replacement LDP. Furthermore, the draft NDF recognises the potential for the region to play a key role in supporting decarbonisation and the exploitation of renewable energy sources such as wind, tidal and solar. A significant proportion of the existing Valleys Strategy Area is identified within a priority area for wind and solar energy development. These areas also have the potential to expand and diversify the tourism industry.

**7.4.8** In parallel, the revised PPW also sets out a number of planning principles that will need to be a key focus for the Replacement Plan, in order to ensure that placemaking is at the heart of new developments, and that the Plan creates places that promote prosperity



## 7 . LDP Vision, Objectives and Strategy

for all, promoting healthier, active, social and accessible places for people to live and work. All of these elements will need to be considered when assessing the current position, and cumulatively could result in a number of changes to the overall strategy.

# 7 . LDP Vision, Objectives and Strategy

## 8 LDP Topic Area Reviews

### 8.1 Overarching Policies

#### 8.1.1 Strategic Policy 1 - Climate Change

**8.1.1.1** Policy SP1 Climate Change is an overarching policy that is intended to be implemented throughout all the themes and topic policies of the LDP. In the years since the adoption of the LDP, all the indications are that climate change is becoming an ever more pressing issue with effects and implications that are becoming more evident as time passes. Following the Welsh Government's declaration of a climate emergency<sup>(6)</sup>, it is considered appropriate that this policy is retained as an overarching consideration that will have overriding influence throughout the Plan.

**8.1.1.2** Due to the overarching nature of the policy, a number of evidence base documents are relevant to climate change, in terms of both causes and consequences, for example the Environment Topic Paper, Strategic Flood Consequences Assessment and the Renewable and Low Carbon Energy Topic Paper. The evidence base generally relating to climate change in the context of Neath Port Talbot will need updating.

**8.1.1.3** The draft NDF re-affirms the importance of climate change, stating that both the NDF and PPW aim to ensure that the planning system focusses on delivering a decarbonised and resilient Wales through '*...the places we create, the energy we generate and use, circular economy, the houses we live in and the way we travel*'. This is taken forward through the placemaking theme embodied in PPW.

**8.1.1.4** At the Officer Working Group, no specific issues were identified in respect of the terms of the policy or its overarching role in the Plan. The main issue identified in the AMRs relates to a shortfall in the density of developments within the coastal corridor, which is an issue dealt with under Policy BE1 (Design).

**8.1.1.5** At present the policy is split into measures to deal with the causes of climate change (mitigation measures) and measures relating to the consequences of climate change (adaptation measures). It is proposed to retain this basic structure but to review the specific policy criteria to ensure that the latest information and approaches are incorporated.

#### 8.1.2 Strategic Policy 2 - Health

**8.1.2.1** Similarly, Policy SP2 Health is an overarching policy that is intended to be implemented throughout all the themes and topic policies of the LDP:

- *Sustainable Settlements* - well designed, adequately resourced and well-connected neighbourhoods can provide positive health benefits;
- *Housing Allocations* - siting sensitive developments such as housing away from sources of noise, air pollution and flood risk and building to strict environmental standards to increase energy efficiency;

## 8 . LDP Topic Area Reviews

- *Protection of Community Facilities* - seeking the retention of a range of accessible leisure, recreational, health, social, cultural and community facilities encourages healthier, more active and safer lifestyles;
- *Provision and Protection of Open Space* - ensure that all residents have access to adequate open space to improve physical and mental health;
- *Accessibility* - improve accessibility between communities and encourage active travel wherever possible;
- *Employment* - provide new employment opportunities to reduce unemployment and economic inactivity rates; and
- *Environment* - the quality of the natural and built environment can influence the health and well-being of the population.

**8.1.2.2** Health is the principle element embedded within the Well-being of Future Generations Act which places an emphasis on taking a holistic, long term and collaborative approach to achieving well-being through placemaking. One of the seven goals is to achieve a healthier Wales. The new theme of placemaking and sustainable places in PPW are relevant to this topic area and improved health is one of the objectives of the Draft NDF. Health and well-being is therefore presented as a key objective in WG policy.

**8.1.2.3** It is considered appropriate therefore that a health and well-being policy is retained as an overarching consideration that will have overriding influence throughout the Plan. The review however will need to consider whether it should remain as a stand alone overarching policy or whether it should be amalgamated under a new overarching theme of sustainable placemaking.

### 8.1.3 Strategic Policy 3 - Sustainable Communities

**8.1.3.1** Policy SP3 Sustainable Communities is intended to facilitate the delivery of a network of sustainable, healthy and cohesive communities through the identification and implementation of a settlement hierarchy, defined settlement limits and protection of community facilities.

**8.1.3.2** The evidence base informing the development of these policies includes the Settlement Hierarchy (Table 3.1 of the LDP) and the Settlement Topic Paper, with information in other topic papers and documents also relevant. An audit of community facilities and an urban capacity study will need to be undertaken to establish the current baseline information on which to assess the capacity of settlements and the opportunities that exist for them to grow.

**8.1.3.3** In broad terms, the Settlement Hierarchy is unlikely to have changed to any significant degree, but it will need updating to reflect any notable changes that have taken place. Furthermore, the identified settlement limits will need amendment to reflect any minor changes that have arisen since the Plan was adopted. Consideration will also need to be given as to whether a revised, more flexible approach could be applied to the identification of settlement limits within the valley areas in order to encourage more smaller scale developments and to further facilitate reinvigoration.

**8.1.3.4** The new placemaking theme embedded within PPW sets an even greater emphasis on the creation of sustainable, healthy places, while the draft NDF identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. These aspects will need to be reflected in the reviewed policies.

**8.1.3.5** At the Officer Working Group, issues were also raised in respect of the detailed wording of the criteria set out in Policy SC1 (Settlement Limits) that define the circumstances under which development outside settlement limits would be acceptable. The policy will need to be reviewed and amendments made to address these issues. In respect of Policy SC2 (Protection of Existing Community Facilities), officers noted there was some confusion concerning the definition of what constitutes a *community facility*. It was also noted that there is currently no policy that relates specifically to the development of *new* community facilities. Again, these issues will need to be considered as part of the review.

### 8.1.4 Strategic Policy 4 - Infrastructure

**8.1.4.1** Policy SP4 Infrastructure, Policy I1 (Infrastructure Requirements) and the Planning Obligations Supplementary Planning Guidance (SPG) seek to ensure that new development proposals make efficient use of existing infrastructure and provide the necessary planning obligations (as set out in Section 106 (S106) of the Town and Country Planning Act 1990) to mitigate the impacts of the development. At the time of adoption of the LDP, a Community Infrastructure Levy (CIL) was not progressed as funding had been identified through other mechanisms to deliver the LDP strategy.

**8.1.4.2** The evidence base which informed the formulation of these policies will be reviewed as part of the process. The Infrastructure Delivery Plan (IDP) (2014) established the scale of infrastructure that currently exists but also identified the level of infrastructure that will be provided and required in future years, the organisations responsible for providing the infrastructure, the means (financial and otherwise) by which this infrastructure will be provided and when it is anticipated the provision will be made.

**8.1.4.3** As part of the review, an assessment of infrastructure provision and needs will be undertaken to identify the capacity and availability of existing and planned infrastructure. There will be a need to work closely with utility providers to have regard to their most recent plans for improvement and the availability of funding so that infrastructure and development are aligned. The strategy will need to reflect the availability of existing and planned infrastructure.

**8.1.4.4** Infrastructure directly relates to a number of placemaking principles identified in the revised PPW. Both PPW and the draft NDF now place more of a focus on new types of infrastructure, such as electric vehicle charging infrastructure, digital infrastructure, mobile telecommunications and green infrastructure, all of which will need to be considered during the review.

**8.1.4.5** During the review of the infrastructure policies, the Officer Working Group expressed some concern that the policy, in its current form, lacked clarity which could impact on its implementation. The use of the term 'infrastructure' can cover a range of planning considerations and can generally be interpreted as physical infrastructure, such

## 8 . LDP Topic Area Reviews

as roads and utilities rather than planning obligations. During the review, the policy will need to be amended to ensure there is sufficient clarity in the terminology used that will allow the effective interpretation of the policy.

**8.1.4.6** The AMR indicators have shown that a considerable number of applications have not met their infrastructure needs (mainly relating to affordable housing and open space provision). Due to issues with viability, the amount of S106 contributions being secured has been significantly below the thresholds set within the LDP.

**8.1.4.7** As viability has become a major issue in the determination of planning applications, the review will need to consider the most appropriate and effective method of securing planning obligations and ensuring that there is sufficient infrastructure in place to deliver the strategy. PPW states that the financial viability of development sites must be demonstrated prior to their inclusion within the Plan to ensure sites are deliverable and can comply with other policies to deliver infrastructure and plan requirements.

**8.1.4.8** Updated high level viability testing is required to consider whether the targets within the Plan should be amended and whether CIL should be considered. A Regional Viability Model for the M&SWW Region is currently being developed to create a consistent methodological approach when setting affordable housing targets and undertaking site specific viability assessments.

**8.1.4.9** Alternative means of securing planning obligations and essential infrastructure will also be explored, such as site specific targets and masterplanning of strategic sites.

### 8.2 Area Based Policies

#### 8.2.1 Strategic Policy 5 - Development in the Coastal Corridor Strategy Area

**8.2.1.1** Policy SP5 Development in the Coastal Corridor Strategy Area sets out how the spatial strategy to facilitate growth within Neath Port Talbot will be applied in the coastal corridor. It will be implemented through a number of area-specific measures and policies, including a number of housing allocations, employment allocations, mixed use regeneration schemes, university campus and a number of highway schemes.

**8.2.1.2** The two Strategic Regeneration Areas (SRAs) provide opportunities for large scale redevelopment and regeneration of significant areas of brownfield land and these will be developed over the LDP period and beyond. The SRAs will make a significant contribution to delivering the LDP strategy, will promote economic growth, meet the objectives of the Plan and are fundamental to the delivery of the Authority's key regeneration proposals. They are strategically located in the urban areas of Neath and Port Talbot and are proposed for mixed use development to promote significant regeneration to take place that will bring wider benefits to Neath Port Talbot.

**8.2.1.3** Section 7.3 of the report reviews the spatial strategy and documents the contextual changes relevant to the coastal corridor, the findings from the previous three AMRs and the completions on housing allocations against the targets.

### 8.2.2 Strategic Policy 6 - Development in the Valleys Strategy Area

**8.2.2.1** Policy SP6 Development in the Valleys Strategy Area sets out the main measures that will be taken to implement the spatial strategy of reinvigorating the Valleys areas. The strategy is centred on improving economic resilience with the encouragement of tourism, small scale employment and other economic developments, the diversification away from traditional industries and the identification of growth areas where development will be concentrated with the aim of spreading the regeneration effects over a wider area.

**8.2.2.2** Section 7.3 of the report reviews the spatial strategy and documents the contextual changes relevant to the VSA, the findings from the previous three AMRs and the completions on housing allocations against the targets.

### 8.3 Communities and Housing

#### 8.3.1 Strategic Policy 7 - Housing Requirement

**8.3.1.1** The LDP strategy aligns the employment and housing growth, with Policy SP7 making provision to deliver 7,800 new dwellings to meet the projected increase in the working age population. Delivering the required level of housing is therefore an integral part of the LDP growth strategy.

**8.3.1.2** The revised PPW introduces the concept of placemaking, which is a key element in developing sustainable places that will promote healthier lifestyles and meet the requirements of the Well-being of Future Generations Act. Authorities should understand their local housing market and should identify a housing requirement that is realistic and deliverable and considers all members of the community. Future plans should therefore cater for the housing needs of all and allocate sufficient land in the most appropriate places to create inclusive communities that are attractive, accessible, active and healthy, creating prosperity for all. The focus is therefore not just about meeting housing demand, but ensuring that placemaking is at the heart of new development. The emerging NDF places Neath Port Talbot within the M&SWW region, and estimates that 23,400 homes are needed across the area by 2038.

**8.3.1.3** There are two monitoring indicators that measure whether the LDP is meeting the housing need identified within the Plan, these are housing completions and housing land availability. Housing delivery has fallen significantly below the targets set within the monitoring framework, with an average delivery rate on large sites between 2011/12 and 2018/19 of 230 homes per annum, compared with a requirement of 448 homes per annum, as indicated below.

**Table 8.3.1.1 Actual & Target Housing Completions on Large Sites 2011/12 to 2018/19**

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Totals
Actual	231	243	262	344	231	166	113	245	1,835
Target	262	287	301	386	486	549	625	686	3,582

## 8 . LDP Topic Area Reviews

**8.3.1.4** Given that the delivery of housing development has fallen significantly below target and the annual housing requirement has not been reached in any given year since Plan adoption, to meet the LDP identified housing need, over the latter years of the Plan period there would be a need to build housing units at a rate that has never been achieved in Neath Port Talbot. Therefore, the existing level of growth is no longer deliverable, and will require reconsideration during the review. This is detailed further within Section 7.2: Growth Strategy.

**8.3.1.5** In respect of land availability, the Council was able to demonstrate a 5 year land supply in the first three years post adoption. However, the latest 2019 JHLAS Study has shown that the land supply has fallen to 4.5 years.

**8.3.1.6** Review of the policies with the Officer Working Group found that viability has become an increasing concern within the area, with a number of applications unable to meet the level of planning obligations required by the existing LDP policies. The group has also found that there has been limited interest in development across Neath Port Talbot, with a number of allocations within the H1 portfolio either making no progress towards delivery, or where sites have not progressed beyond pre-application stage.

**8.3.1.7** Therefore, the review will need to review all allocations within Policy H1, in the context of any revised level of growth and determine which allocations are deliverable and which sites should be de-allocated. All sites, whether existing H1 allocations or new candidate sites will be required to demonstrate they are viable, deliverable within the LDP timeframe and able to deliver planning obligations to mitigate the impacts of the development, to ensure that developments promote sustainable places and meet the placemaking principles. The Officer Working Group suggested that in particular, the review should consider smaller scale house building in the valleys area.

**8.3.1.8** The review will need to consider the revised Local Housing Market Assessment to ensure that the needs of all members of the community are assessed. The potential for revision to settlement limits and consideration of smaller allocations within the valleys strategy area will also be assessed, to ensure there are opportunities for varying scales of housing development.

### 8.3.2 Strategic Policy 8 - Affordable Housing

**8.3.2.1** The LDP aims to deliver an appropriate mix and supply of housing, with Policy SP8 setting out the approach to the delivery of affordable housing. The policy framework sets out targets and thresholds for requiring private residential developments to contribute to affordable housing and allows small scale affordable housing developments outside of defined settlement limits. The policy framework relating to affordable housing was informed by the Affordable Housing Viability Study (2012) and the Local Housing Market Assessment (2013), both of which will need to be updated as part of the review.

**8.3.2.2** Affordable housing will remain an important consideration during the review, with PPW requiring authorities to create sustainable places and ensure an adequate mix of house types to meet the identified housing need. Plans must understand all aspects of the housing market and appreciate the demand for different types of affordable housing. The emerging NDF identifies providing sufficient housing to meet identified need as one



of the main priorities and estimates that 47% of new homes should be affordable. The NDF aims to increase the delivery of affordable housing by ensuring funding is effectively utilised and development plans have sufficient policy frameworks to deliver affordable housing.

**8.3.2.3** The AMR monitors the number of affordable homes delivered through the planning system, the changes in residual values and applications for affordable housing exception sites. New affordable housing delivered through the planning system has fallen significantly below the targets set in the monitoring framework. By the 31<sup>st</sup> March 2019, only 50 new affordable homes had been delivered through the planning system, against a target of 478, representing just 10.5% of the target. Whilst any amount of new, affordable housing is positive, the shortfall in delivery will create a backlog of need and place more pressure on the future resources to deliver affordable homes.

**8.3.2.4** There are a number of reasons why delivery has fallen so far behind target, the main reasons being the shortfall in development of general market housing and viability. A large number of housing sites within the H1 portfolio have not progressed as anticipated, and therefore have not delivered the level of affordable housing through S106 agreements. On sites that have progressed, there has been the need to renegotiate the level of affordable housing provided on sites due to viability issues.

**8.3.2.5** Viability has become an increasing concern within Neath Port Talbot, with the AMR concluding that the changes in residual value since Plan adoption having a negative impact. Across the 6 sub-market areas, residual value has decreased substantially. Within the 2019 AMR, the changes in residual value across the spatial areas where affordable housing is sought were -21.46% in Neath, -28.1% in Port Talbot and -23.1% in Pontardawe. These changes are significantly greater than the 5% trigger point within the monitoring framework. One reason for the change is the large increase in build costs since the Affordable Housing Viability Study was undertaken, which has not been met by an uplift in house prices thereby having a detrimental impact on viability,

**8.3.2.6** The Officer Working Group reconfirmed the findings of the AMR, and highlighted viability as an issue in developing sites in the area, with the majority of planning applications having to renegotiate the required planning obligations due to viability, with certain types of developments, such as small scale conversion schemes rarely able to provide financial contributions.

**8.3.2.7** As part of the review, updated viability testing will be required to reflect changes in development costs and the market since the original viability work was undertaken to determine a suitable target and threshold for the Replacement Plan and to ensure that targets are realistic and achievable. PPW now requires sites to demonstrate their financial viability prior to their inclusion within the Plan, this should help to ensure that sites allocated are deliverable within the Plan period and able to deliver the necessary planning obligations to ensure developments create sustainable places. An updated Local Housing Market Assessment is also required to identify the housing need in the area and assess the requirements for niche groups, to ensure housing for all members of the community is considered.

## 8 . LDP Topic Area Reviews

**8.3.2.8** There have been no applications for affordable housing exception sites over the Plan period. The current threshold is restricted to 9 units, and during the review the existing threshold will be reviewed in discussion with the Officer Working Group and Registered Social Landlords active within the area. The group also highlighted the increase in applications for Houses in Multiple Occupation (HMO) which will also need to be considered during the review.

### 8.3.3 Strategic Policy 9 - Gypsies and Travellers

**8.3.3.1** Neath Port Talbot has a well established Gypsy and Traveller Community. Policy SP9 provides the policy framework for ensuring there is adequate pitch provision to accommodate the needs of the community over the Plan period, through the allocation of a site and providing a criteria policy to assess applications for new sites.

**8.3.3.2** The policy was informed by the findings of the 2012 Gypsy and Traveller Accommodation Assessment (GTAA) which identified a need of 20 pitches: 4 pitches by 2017; 7 pitches by 2022; and 9 pitches by 2026. To accommodate the short to medium term need (11 pitches by 2022) an extension to the existing site at Cae Garw, Margam was allocated, with the longer term need (9 pitches 2023-26) to be addressed through the monitoring framework based on updated GTAAs.

**8.3.3.3** Under the requirements of the Housing (Wales) Act (2014), a new GTAA was completed and approved by Welsh Ministers in 2016. This most recent assessment concluded that the 11 pitches accommodated at Cae Garw was sufficient to meet the needs of the community, with an additional 4 pitches required by the end of the Plan period (2026); lower than the need identified in the 2012 study.

**8.3.3.4** GTAAs are required at intervals of at least 5 years, with the next assessment due by 2021. This study will identify the needs of the Gypsy and Traveller Community over the period of the Replacement Plan and will be used to form a new policy if a need is identified. The extension of 11 pitches at Cae Garw was completed in 2016 and therefore Policy GT1 will need to be amended during the review to reflect the new assessment.

**8.3.3.5** The Officer Working Group found the general policy approach to be working effectively. Since LDP adoption, Planning Circular 005/2018 *'Planning for Gypsy, Traveller and Showpeople Sites'* was published, providing guidance on the duty to provide sites, engaging the community in the process and policies to include within development plans. Policy GT2 may require some minor amendments to ensure conformity with the new Circular.

### 8.3.4 Strategic Policy 10 - Open Space

**8.3.4.1** The Strategic Policy (SP10) , Policy OS1 (Open Space Provision), OS2 (Protection of Existing Open Space) and the Open Space and Greenspace SPG seek to ensure that new development proposals make provision for the open space needs of its future occupiers and employees, by providing on or off-site provision or making S106 contributions to enable provision or enhancement to be made locally. In addition, existing open space is afforded protection from development unless specified criteria can be met.

**8.3.4.2** The Open Space Topic Paper and Open Space Assessment (2013) provided the evidence base which underpinned the policies contained within the LDP. The assessment identified deficiencies in the quantity and quality of existing provision in relation to the Fields in Trust (FIT) Six Acre Standard adopted in the LDP. The FIT Standard has now been revised since the adoption of the LDP: *Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard (2017)* recommends benchmark guidelines for both formal and informal outdoor space. The Review will need to fully consider whether to implement these requirements in the light of TAN 16: *Sport, Recreation and Open Space (2009)* which promotes evidence based locally generated standards.

**8.3.4.3** Open Space directly relates to a number of the placemaking principles identified in PPW, and in respect of the requirements for Green Infrastructure as well as being embedded in the well-being principles: a 'Healthier Wales' and a 'Wales of vibrant culture and thriving Welsh Language', directly reference physical and mental health and behaviours or encouraging participation on sports and recreation. These principles will need to be considered as part of the review, especially the multi-functional and multi-generational use of open space.

**8.3.4.4** The Officer Working Group indicated that further consideration should be given to the threshold in the policy, particularly in light of the viability issues on some sites and whether this may impact on site delivery. Some minor rewording of the policies may also be appropriate to improve clarity.

**8.3.4.5** The AMR monitors both the provision and loss of open space. In respect of the provision of open space, the indicator shows that the policy is largely working to secure open space although this is often affected by viability considerations. The latest AMR identifies that the policy should be reviewed. In respect of the protection of open space, this is generally applied consistently, but may have the potential to be strengthened.

**8.3.4.6** As indicated under Policy SP4 (Infrastructure) viability has become a major issue in the determination of planning applications. The review will need to consider the most appropriate and effective method of securing planning obligations and ensuring that there is sufficient infrastructure in place to deliver the strategy. PPW now states that the financial viability of development sites must be demonstrated prior to their inclusion to ensure sites are deliverable and can comply with other Plan policies to deliver infrastructure and plan requirements. Whilst this may assist on allocated sites, viability may still be an issue on smaller sites or windfall sites. The review of Policy SP4 does have linkages to SP10 so careful consideration will need to be given to how any changes may impact on the policies.

**8.3.4.7** Over the course of the review, consideration will also need to be given to whether there is a need to allocate land for open space and whether the open space policy should be located in a different section of the Plan under a placemaking theme.

## 8 . LDP Topic Area Reviews

### 8.4 The Economy

#### 8.4.1 Strategic Policy 11 - Employment Growth

**8.4.1.1** Policy SP11 Employment Growth aims to promote a sustainable economy through a number of measures including the allocation of sites for economic development, safeguarding existing employment sites and providing a more flexible approach to development in the valley areas.

**8.4.1.2** The policy framework was informed by the Economic Assessment and Employment Land Provision Study (2012), which used macro-economic trends to forecast the requirements for employment land over the Plan period. The recommended amount of floorspace was then adjusted to make allowances for alternative plot ratios, to account for stock losses and to ensure there was sufficient flexibility. Employment allocations and areas of safeguarding were based on the conclusions of the Employment Land Review (2014).

**8.4.1.3** One of the key components of the updated PPW is '*Productive and Enterprising Places*', with the economy an important component of placemaking and creating sustainable places. The economy will remain one of the fundamental elements of the Plan including, allocating sufficient land to meet market demand and ensuring there is appropriate economic infrastructure in place (i.e. physical, electronic or digital).

**8.4.1.4** The draft NDF identifies the areas of Neath and Port Talbot within the Swansea Bay and Llanelli NGA for the M&SWW Region, which will influence where employment provision is directed within the spatial strategy of the Replacement Plan.

**8.4.1.5** The AMR has identified a number of issues relating to the delivery of employment development within the area. Of the four sites allocated for economic development in Policy EC1 (Employment Allocations), there has been no development for employment uses at J38 (M4) or Coed Darcy. Whilst there has been some development at Baglan Bay and Harbourside, this has been limited and fallen significantly behind the anticipated delivery rates within the monitoring framework. Policy EC1 allocated 96ha of employment land, of which 32ha was for traditional B Class uses, whilst the remainder (64ha) to meet the needs of the growing energy sector. To date, there has been a total of 5.1ha of development across the allocations, of which 1.8ha has been for B class uses and 3.3ha for a solar photovoltaic scheme.

**8.4.1.6** A number of the monitoring indicators measure the performance of the economy as a whole, in terms of job numbers, economic activity and unemployment. These are key elements of the Plan strategy and are examined in further detail within section 7.2: Growth Strategy. The AMR also found that there have been no applications for live-work units since Plan adoption, and therefore the review will need to consider if the policy is still necessary, or whether there are amendments required that would encourage its use.

**8.4.1.7** The Officer Working Group suggested that some elements of the policy framework could be amended to provide further clarity and to encourage more development. Existing policies EC3 (Employment Area Uses) and EC4 (Protection of Existing Employment Uses) currently define appropriate uses in employment areas (EC3) and protect employment

uses from development that would result in the loss of employment land or buildings (EC4). The group suggested that the policies could be combined into one policy that would be able to cover both elements. Policies EC5 (Employment Uses in the Valleys) allows a more flexible approach to development in the valleys. It was suggested that whilst development is permitted outside of settlement limits, considerations should be given to whether this could be relaxed further to promote employment development in the valleys, providing it was balanced with principles of sustainable development.

**8.4.1.8** The review will need to consider the findings of the updated evidence base, namely the Economic Assessment Study and the Employment Land Review to establish the need for employment floorspace over the Plan period, based on projected growth sectors and identify the most suitable locations for development. Existing allocations will need to be reassessed to determine if they are viable and able to deliver the Plan's revised strategy. Contextual changes, such as the identification of the Port Talbot Enterprise Zone, and a number of the emerging NDF policies such as the Swansea Bay Metro, mobile action zones, and the identification of the growth area will all need to be considered during the review.

### 8.4.2 Strategic Policy 12 - Retail

**8.4.2.1** The Strategic Retail Policy (SP12) and Policies R1 (Retail Allocations), R2 (Proposals Within Retail Centres) and R3 (Out of Centre Retail Proposals), seek to protect, enhance and support the retail centres across the area through the planning process.

**8.4.2.2** The evidence base informing the development of these policies includes the Retail Topic Paper, the Retail Hierarchy Paper and the Retail Study. In the years since these documents were prepared (2013/14), the retail climate nationally has changed significantly with the growing popularity of internet shopping and the closure of a significant number of important retail businesses, and these documents and studies will need to be updated. An annual retail survey is also undertaken that will help to inform policy development.

**8.4.2.3** The draft NDF includes policies intended to support urban centres and ensure that significant developments are located within town and city centres, while PPW promotes retail and commercial centres as being the most appropriate location for a range of activities in addition to retail services. The emphasis on placemaking within PPW is also significant in respect of managing change and in the development of retail and commercial centres.

**8.4.2.4** At the Officer Working Group meeting held to discuss this topic it was noted that whilst the retail hierarchy was effective, it was acknowledged that boundaries will need to be reviewed and amended based on evidence including changes from retail studies. It was suggested that there might be a need for bulky goods allocations on edge of centre sites, although this would need to be justified through a new retail study. In respect of Policy R2 criteria (3) and (4), these have not always been successfully applied and these and the extent of the primary street designations will need to be reviewed. Policy for dealing with 'pop-up' businesses and retail kiosks should also be considered.

## 8 . LDP Topic Area Reviews

**8.4.2.5** The AMR has identified no specific issues with retail policy implementation, but the overall need for the policies and their effectiveness should be considered, in particular in respect of the necessity for and usefulness of R2 Retail Centre policy restrictions. In addition, although the R2 small shops policy concession has had a small but positive effect, the policy thresholds should be reviewed.

**8.4.2.6** Other issues that should be considered as part of the review include the general refocussing of the topic to relate to retail *and commercial* development and the placemaking theme, in accordance with more recent national policy and guidance.

### 8.4.3 Strategic Policy 13 - Tourism

**8.4.3.1** Over recent years, the tourism industry has been growing in Neath Port Talbot, with considerable investment in some areas. To support the growing industry, the policy approach in the LDP provided flexibility to encourage sustainable tourism development. The Valley Strategy Area in particular benefits from existing visitor attractions, such as mountain biking at the Afan Valley and Waterfall Country in the Vale of Neath.

**8.4.3.2** PPW recognises that the role of tourism is vital to economic prosperity and job creation in parts of Wales, and requires plans to provide a framework to maintain and develop well-located, good quality tourism facilities. The emerging NDF identified tourism as a potential growth area for the M&SWW region, and supports high quality development across the region to ensure all communities are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to grow their economies.

**8.4.3.3** The AMRs have not identified any issues relating to tourism indicators and have not identified that any action is required. A number of tourism related proposals have been approved since Plan adoption, and all walking and cycling routes identified in Policy TO4 have been implemented. The tourism led regeneration scheme at Rheola has had planning approval, subject to the signing of a S106 agreement. Given that the S106 is yet to be signed and development has not progressed, the status of the allocation and the potential for future delivery will be considered as part of the review.

**8.4.3.4** The Officer Working Group found that the policies relating to tourism are functioning effectively and identified areas where clarity could be improved. Policy TO2 protects existing tourism facilities, and will only permit changes to residential use where it is demonstrated tourism or other employment generating uses are no longer viable. The group suggested the policy should be expanded to provide a sequential approach to allow conversion to other uses, not just residential. This will be considered during the review.

## 8.5 Environment and Resources

### 8.5.1 Strategic Policy 14 - The Countryside and Undeveloped Coast

**8.5.1.1** The Strategic Policy (SP14) and Policies EN1 (The Undeveloped Coast), EN2 (Special Landscape Areas), EN3 (Green Wedges), EN4 (Replacement Dwellings in the Countryside) and EN5 (Conversion and Extension of Existing Dwellings in the Countryside), supplemented by the Landscape and Seascape SPG, seek to ensure that the countryside

and important landscapes and undeveloped coast across the area are protected from inappropriate development and are conserved, while supporting rural enterprise including tourism and leisure activities.

**8.5.1.2** The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on the Countryside and Undeveloped Coast), the NPT LANDMAP Landscape Assessment (2004) and the Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment (2017). On the whole, the character of the countryside and landscape across Neath Port Talbot is unlikely to have changed significantly in respect of the evidence base, but it may be appropriate to consider updating the LANDMAP Landscape Assessment (to assess the need for changes to the extent and possible additions to the Green Wedge and Special Landscape Areas). The need for these updates will require assessment in the light of changing national policy as this emerges (refer below).

**8.5.1.3** Countryside and Rural Economy policy contained within PPW and relevant TANs is largely unchanged since LDP adoption. However, one of the major impacts on the countryside and landscapes of Neath Port Talbot is likely to be from the development of renewable energy schemes, in particular wind and solar farms. Only proposals below 10MW are now determined by LPAs and covered by LDP policy, and draft NDF Policy 10 is proposed to cover larger schemes which will be determined by the Welsh Government. Draft Policy 10 indicates a presumption in favour of schemes within the identified *Priority Areas* as shown in the draft NDF. The Priority Areas are areas within which landscape change is deemed to be acceptable and may therefore be essentially incompatible with LDP Special Landscape Area designations. This issue will need to be addressed as national policy emerges over the LDP preparation period.

**8.5.1.4** At the Officer Working Group meeting held to discuss these policies, it was noted that the Special Landscape Area designations and Policy EN2 are likely to need reassessment in the light of emerging NDF policy on renewable energy (refer above). Policy EN3 (Green Wedges) was considered to be effective and only likely to need minor amendments to the boundaries of some designations. Policies EN4 (Replacement Dwellings in the Countryside) and EN5 (Conversion and Extension of Existing Buildings in the Countryside) were generally considered to be effective in principle, but amendments and clarification may be required in relation to the guideline sizes given for extensions and replacement dwellings.

**8.5.1.5** The main finding of the AMR in respect of the Countryside and Undeveloped Coast policies was that of mixed impacts in respects of development in Green Wedges and Special Landscape Areas, where developments have been permitted contrary to policy. It was also noted that there appears to be a conflict between EN2 SLA policy and policy relating to the refined Strategic Search Areas for renewable energy (Policy RE1).

**8.5.1.6** Other issues that may need to be considered as part of the review include addressing potential overlaps between policies relating to development outside settlement limits (Policy SC1), Special Landscape Areas (EN2), Green Wedges (EN3), biodiversity designations (SP15, EN6 and EN7) and new approaches to green infrastructure.

## 8 . LDP Topic Area Reviews

### 8.5.2 Strategic Policy 15 - Biodiversity and Geodiversity

**8.5.2.1** The Biodiversity and Geodiversity Strategic Policy (SP15) and Policies EN6 (Important Biodiversity and Geodiversity Sites) and EN7 (Important Natural Features), supplemented by the Biodiversity and Geodiversity SPG, seek to protect, conserve and enhance important biodiversity and geodiversity sites and features within the area through the planning process.

**8.5.2.2** The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on Biodiversity and Geodiversity). Although geodiversity matters are unlikely to have changed significantly, the information will require updating in respect of the area's biodiversity.

**8.5.2.3** Biodiversity and Geodiversity policy within the draft NDF and PPW embodies a strengthening of the role and importance of biodiversity considerations within the planning system, following on from the Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities requiring them to seek to maintain and enhance biodiversity in the exercise of all their functions. The emphasis on placemaking within PPW is also likely to be relevant in respect of complying with this duty.

**8.5.2.4** At the Officer Working Group meeting held to consider these policies the following matters were discussed: It was indicated that there had been some issues with identifying suitable sites for biodiversity compensation in relation to certain schemes. A number of the LDP allocations are on sites designated as SINC's this causes problems and should ideally be avoided. Sites should be surveyed to identify features of interest to be retained as part of the placemaking approach. Previously there was a policy to require one tree to be planted for each new dwelling and consideration should be given to reintroducing this. PPW now requires biodiversity enhancement: this may require the integration of Green Infrastructure (GI) and placemaking approaches together with more information about the biodiversity present on allocated sites. Policy EN7 is useful and frequently used and it may be appropriate to strengthen it as part of a placemaking approach.

**8.5.2.5** The main finding of the AMR in respect of the Biodiversity and Geodiversity policies was the continuing net loss of biodiversity as a result of planning decisions, without adequate mitigation or compensation being secured in all cases.

**8.5.2.6** Other issues that should be considered as part of the review include consideration of the approach to the overlap between biodiversity policy and policies relating to development outside settlement limits (Policy SC1), Special Landscape Areas (EN2), Green Wedges (EN3) and new approaches to GI. Consideration should also be given to the possible need to designate areas as National Forest, as proposed in the draft NDF.



### 8.5.3 Strategic Policy 16 - Environmental Protection

**8.5.3.1** The Environmental Protection Strategic Policy (SP16) and Policies EN8 (Pollution and Land Stability), EN9 (Developments in the Central Port Talbot Area) and EN10 (Quiet Areas), supplemented by the Pollution SPG, seek to protect the quality of air, water and soil and the environment generally and ensure that developments do not increase the number of people exposed to significant levels of pollution.

**8.5.3.2** The evidence base informing the development of these policies includes the Environment Topic Paper (Environmental Protection section). The evidence base information and documents for this topic will need to be updated to take into account the latest information on pollution and land stability issues and in the light of any changes to national policy but there are not anticipated to be any major changes in these respects with regard to this topic.

**8.5.3.3** Environmental protection policies within PPW re-emphasises the importance of pollution and stability issues and introduces some revised approaches and terminology including the need to achieve appropriate soundscapes rather than simply address noise pollution, and advocates the adoption of a de-risking approach. These changes will need to be reflected in the LDP policies.

**8.5.3.4** At the Officer Working Group meeting held to discuss these policies issues with land stability in parts of Neath Port Talbot were discussed. The possibility of dividing Policy EN8 should be considered to provide separate policies for pollution and land stability, referring to areas having historic land stability issues. This could include a requirement for developers to provide information to justify development in such areas. Problems with air quality in relation to specific LDP allocations were discussed together with the possibility of strengthening consideration of impacts that new development would have on existing uses in terms of exacerbating existing pollution issues. Links between requirements to provide sustainable drainage systems in new developments (SuDS) and the water quality criterion of Policy EN8 should also be taken into account.

**8.5.3.5** No specific issues were identified in the AMR in respect of the application of LDP pollution and land stability policies.

### 8.5.4 Strategic Policy 17 - Minerals

**8.5.4.1** Neath Port Talbot is underlain by a significant amount of mineral resources with a number of sites operational within the area. The Minerals Strategic Policy (SP17) and Policies M1 (Development in Mineral Safeguarding Areas), M2 (Surface Coal Operations), M3 (Development in Mineral Buffer Zones) and M4 (Criteria for the Assessment of Mineral Development), seek to regulate the exploitation of mineral resources in order to make a proportionate contribution to meeting the national, regional and local demand for minerals while achieving an acceptable and sustainable balance with protecting the environment and local communities.

## 8 . LDP Topic Area Reviews

**8.5.4.2** The evidence base informing the development of these policies includes the Minerals Topic Paper. Guidance for mineral extraction and related development in Wales is set out in the updated PPW and supplemented by Minerals Technical Advice Notes (MTANs).

**8.5.4.3** Under the provisions of MTAN1: Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a Regional Technical Statement (RTS) setting out how aggregates demand will be met in the region for a 15 year period. The RTS assesses the demand and supply of aggregates within the region and considers the environmental capacity of each Mineral Planning Authority (MPA) to make a contribution to meeting the regional demand.

**8.5.4.4** The SWRAWP has recently consulted on and will shortly be publishing an updated RTS 2<sup>nd</sup> Review and the implications of the statement will need to be fully considered as part of the LDP review. The Replacement LDP will need to continue to show evidence that the Authority has the necessary landbank of aggregate reserves to meet the identified need. Evidence set out in the AMRs to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations will be required.

**8.5.4.5** Whilst in general terms the mineral policies are considered to remain sound, the need to respond to changing circumstances will need to be considered. Given the declaration of a 'climate emergency' and the need to decarbonise the economy, the policy of the Welsh Government is to no longer support the working of coal. PPW has therefore been updated setting out the position that new applications for the working of coal should now be resisted unless there are identified exceptional circumstances, and that there is no longer a requirement for LDP policies to safeguard coal resources or to indicate where coal operations would not be acceptable (i.e. Policy M2).

**8.5.4.6** In addition, the draft NDF sets out the policy framework for determination of renewable energy proposals including the introduction of Priority Areas within which there will be a presumption in favour of wind and solar schemes (refer below). A large part of Neath Port Talbot is within the draft wind and/or solar priority areas, so the question of sterilisation of mineral resources / reserves by renewable energy developments will need to be clarified as part of the review.

### 8.5.5 Strategic Policy 18 - Renewable and Low Carbon Energy

**8.5.5.1** The Strategic Policy (SP18) and Policies RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development) and RE2 (Renewable and Low Carbon Energy in New Development), supplemented by the Renewable and Low Carbon Energy SPG, seek to ensure that the area makes a proportionate contribution to renewable energy generation while balancing the impact of renewable energy developments on the environment and communities.

**8.5.5.2** The evidence base informing the development of these policies includes the Renewable and Low Carbon Energy Topic Paper, the LDP Renewable Energy Assessment, the TAN 8 Annex D Study of Strategic Search Areas E and F: South Wales Valleys, and the Provision of Landscape Advice Report. The evidence base information and documents

for this topic will need to be reconsidered and revisited in the light of changes to national policy and consenting regimes and changes in renewable energy technologies. Additional information may be required in respect of the following:

- Study into the potential for developing district heat networks, particularly in the Neath area;
- Assessments of the energy needs of all new proposed development and need for additional generating capacity;
- Identify *challenging but achievable* targets for renewable energy (absolute energy installed capacity/resource potential); and
- Implement the Low Carbon Toolkit (including assessment of resource potential, impacts and opportunities, cumulative impacts and connection issues).

**8.5.5.3** All proposals for onshore generating projects between 10MW and 50MW capacity (and greater for wind energy) are now dealt with by Welsh Ministers with Local Authorities dealing only with proposals below 10MW.

**8.5.5.4** The draft NDF sets out the policy framework for determination of renewable energy proposals including the introduction of Priority Areas within which there will be a presumption in favour of wind and solar schemes. Other draft NDF policies cover other aspects of renewable energy development and district heat networks. A large part of Neath Port Talbot is within the draft wind and/or solar priority areas, where there would be a presumption in favour of Renewable Energy (RE) developments. Neath is identified as a priority area for District Heat Networks where opportunities should be identified and implemented.

**8.5.5.5** National policy in respect of renewable energy is therefore currently under review. PPW currently promotes the development of renewable energy resources, introduces the Energy Hierarchy and requires planning authorities to plan positively for local power generation including providing for the co-location of developments to enable local heat opportunities, maximising the use of waste heat, district heating and combined heat and power. Both PPW and TAN8 (Renewable Energy) will be reviewed once NDF policy is finalised and LDP policies will need to reflect and comply with this emerging framework.

**8.5.5.6** At the Officer Working Group meeting held to discuss the LDP policies it was noted that Policy RE1 would need to be amended but that the form it would take will depend on the finalised national policy framework. It was considered that the need to split RE1 to have separate policies for wind and solar power should be assessed as part of the review. The question of sterilisation of mineral reserves by renewable energy developments has been an issue in the past and this issue will also need to be clarified.

**8.5.5.7** In respect of Policy RE2 (Renewable and Low Carbon Energy in New Development) it was recommended that consideration should be given to amending the thresholds for the requirement of Energy Assessments and whether the threshold of 100 dwellings for residential developments in particular should be reduced although this will need to be considered in the light of development viability issues.

## 8 . LDP Topic Area Reviews

**8.5.5.8** No specific issues were identified in the AMR in respect of the Renewable and Low Carbon Energy LDP policies. However, the SA monitoring has identified mixed impacts in relation to the thresholds for requiring the submission of renewable energy assessments (Policy RE2).

**8.5.5.9** In addition to the above, consideration will need to be given to the need for a separate policy for district heat networks, particularly in the Neath area, and the formal identification of renewable energy targets.

### 8.5.6 Strategic Policy 19 - Waste Management

**8.5.6.1** The Waste Management Strategic Policy (SP19) and Policies W1 (In-Building Waste Treatment Facilities), W2 (Deposit of Inert Waste on Agricultural Land) and W3 (Waste Management in New Development), seek to take a sustainable approach to waste management and contribute to making provision for an integrated and adequate network of waste management facilities.

**8.5.6.2** The evidence base informing the development of these policies includes the Waste Topic Paper and the Waste Planning Monitoring Reports (WPMRs) which are published annually by the South West Wales Region. PPW indicates that *Circular Economy* principles should underpin all developments and encourages design approaches that prevent waste. It also sets out the waste hierarchy for dealing with waste materials with disposal as the last option.

**8.5.6.3** Furthermore, PPW supplemented by TAN 21 (Waste) requires that progress towards establishing an integrated and adequate network of facilities is monitored to identify whether sufficient landfill capacity is being maintained; sufficient treatment capacity is being maintained; whether the spatial pattern of provision is appropriate to address identified needs; and whether any further action is needed by LPAs to address unforeseen issues.

**8.5.6.4** Central to the process of preparing the WPMR is the collection and analysis of information regarding the waste situation within the region. The principle role of the WPMR is to collate and present all available data to enable the effective monitoring of both the region's waste arisings and waste management facilities and to assess the region's performance against the targets set out in the National Waste Strategy for Wales – 'Towards Zero Waste' (TZW).

**8.5.6.5** Whilst the evidence set out in the AMRs to date indicates that in general terms the waste policies are considered to remain sound, the need to respond to changing circumstances will need to be considered throughout the review. The information and analysis presented in the WPMRs will inform this process and provide a basis to take action on the waste arising's within each local authority area and by implication the region as a whole.

### 8.6 Transport and Access

#### 8.6.1 Strategic Policy 20 - Transport Network

**8.6.1.1** The Transport Network Strategic Policy (SP21) and policies TR1 (Transport Proposals), TR2 (Design and Access of New Development), TR3 (Safeguarding of Disused Railway Infrastructure) and TR4 (Safeguarding Freight Facilities), supplemented by the Parking Standards SPG seek to support and develop the transport network to safely and effectively facilitate the movement of people and freight within the area, reduce reliance on the private car and improve connectivity.

**8.6.1.2** The evidence base informing the development of these policies includes the Transport Topic Paper. All the information and documents relating to this topic will need to be updated to take into account transport infrastructure changes and other developments that have taken place since the Plan was adopted, together with general updating of the information available. Regard will be had to the Joint Local Transport Plan (LTP) for South West Wales 2015-2020. Replacing the Regional Transport Plan (prepared by the SWWITCH consortia) the four authorities in South West Wales have worked collaboratively in preparing the LTP as an overarching City Region LTP. Consideration needs to be given to the policy and land use implications of the schemes identified in the LTP.

**8.6.1.3** The draft NDF emphasises the growing importance of ultra low emission vehicles (ULEVs), active travel and public transport and includes a policy supporting development of the Swansea Bay Metro system. The placemaking theme embodied in PPW is of significance in relation to transport policy, and enabling more sustainable travel choices is emphasised, together with making best use of existing capacity and managing demand. The Sustainable Transport Hierarchy is set out as a key principle for development plans, favouring walking and cycling first, followed by public transport, then ULEVs with other private motor vehicles at the bottom of the hierarchy.

**8.6.1.4** The Active Travel (Wales) Act 2013 places a legal requirement on local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities. Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.

**8.6.1.5** At the Officer Working Group meeting to discuss these policies it was noted that some of the developments/sites listed in policies TR1 (Transport Proposals) and TR4 (Safeguarding Freight Facilities) need to be reconsidered and updated where appropriate to take into account the completion of some proposals, reconsider of others that have not come forward as expected and to add any new schemes. The possibility of new specific policies for ULEVs, Active Travel and Green Infrastructure were discussed. The proposed Swansea Bay Metro has potential positive and negative implications for Neath Port Talbot which will need to be assessed as more detailed proposals come forward.

**8.6.1.6** The AMR identifies the schemes (listed in Policy TR1) that have not been completed and indicates that TR1 will need to be subject to a review process to take into account the current situation. No specific issues have been identified with the other policies.

## 8 . LDP Topic Area Reviews

### 8.7 Culture and Heritage

#### 8.7.1 Strategic Policy 21 - Built Environment and Historic Heritage

**8.7.1.1** Strategic Policy (SP21), Policies BE1 (Design), BE2 (Buildings of Local Importance) and BE3 (The Canal Network), the Design SPG and the Historic Environment SPG seek to ensure that new development is undertaken to a high design standard and that the important existing historic environment of the area is conserved and enhanced wherever possible.

**8.7.1.2** The evidence base informing the development of these policies includes the Environment Topic Paper (Sections on the Built Environment and Historic Heritage) and the Schedules of Buildings of Local Importance and of Designated Canal Structures (contained within the Historic Environment SPG). For the most part, the built and historic environment is unlikely to have changed significantly in respect of the evidence base, but areas that may require updating include the Schedule of Buildings of Local Importance (to take into account losses and possible additions as part of the review of the SPG) and the undertaking of Conservation Area Appraisals.

**8.7.1.3** The placemaking theme introduced by PPW10, together with TAN12 (Design) amended in 2016 together have significant implications for design issues in particular, and will have to be taken into account. Similarly, the new TAN24 (The Historic Environment) consolidates and expands significantly on the previous guidance and will need to be reflected in the review.

**8.7.1.4** At the Officer Working Group meeting held to discuss these policies, concerns were expressed that the design policy (BE1) is insufficiently clear and effective when used to determine applications. The need and usefulness of Policy BE2 (Buildings of Local Importance) was also debated, given the lack of resources available to deal with the conservation of the historic environment generally.

**8.7.1.5** No specific issues were identified in the AMR in respect of the operation of the LDP policies for the Built Environment and Historic Heritage.

**8.7.1.6** Other issues that may need to be considered as part of the review include changing the terminology used to bring it in line with the latest guidance (e.g. *Historic Environment* rather than *Historic Heritage* and *Historic Assets of Special Local Interest* rather than *Buildings of Local Importance*). The new emphasis on placemaking and design issues also suggests that consideration should be given to splitting design policy from historic matters and the addition of a new placemaking/design strategic policy.

#### 8.7.2 Strategic Policy 22 - Welsh Language

**8.7.2.1** The Strategic Policy (SP22), Policy WL1 (Development in Language Sensitive Areas) and the Development and the Welsh Language SPG seek to ensure that development in the designated 'Language Sensitive Area' (LSA) mitigate any negative impacts of the development on the Welsh language and culture, through the provision of Section 106 contributions to protect, promote and enhance the Welsh language.

**8.7.2.2** A Wales of vibrant culture and thriving Welsh language is one of the seven well-being goals identified in the Well-being of Future Generations Act, which is also embedded in PPW and its sustainable placemaking principles. The importance of the Welsh Language is also highlighted by the Welsh Government's ambitious target to achieve one million Welsh speakers by the year 2050<sup>(7)</sup>.

**8.7.2.3** The evidence base informing the development of these policies includes the Welsh Language Topic Paper and the Welsh Language Impact Assessment. For the most part, the evidence base is unlikely to have changed significantly, but a review of the latest statistical data will be needed to determine whether there will be a need to amend the extent of the designated LSA or whether the policy thresholds require revision. Consideration may also be given to a bilingual signage policy.

**8.7.2.4** No specific issues have been identified in the AMR in respect of the operation of the LDP policies for the Welsh language and no concerns were expressed in terms of the clarity and wording of the policies at the Officer Working Group. In general, the policy appears to be working well and will be retained within the Replacement LDP.

# 8 . LDP Topic Area Reviews



### 9 Reconsideration of the SA/SEA and HRA

#### 9.1 Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)

**9.1.1** The Planning and Compulsory Purchase Act 2004 requires that the process of drawing up and developing an LDP is informed throughout by an iterative process of Sustainability Appraisal (SA). The SA also incorporates Strategic Environmental Assessment (SEA) required under European Directive 2001/42/EC. This is intended to ensure that policies in the LDP all promote 'sustainable development' through integrating economic, environmental, social and cultural objectives into the development of all aspects of the LDP.

**9.1.2** The findings of the SA monitoring are summarised annually in the AMR to give an assessment of the impacts of the implementation of the LDP policies, and a summary of the main findings is set out in Section 4 above.

**9.1.3** The SA/SEA will need to be the subject of a thorough review process to take into account all broader contextual changes in terms of national policy and guidance, changes and updates to baseline information and other new approaches and information. The SA Scoping Report will be reviewed accordingly, including the SA methodology and monitoring framework. Consideration will also need to be given to integrating the Well-being of Future Generations Act 2015 requirements, Equalities Act, Welsh Language and Health Impact Assessment into a single Integrated Sustainability Appraisal (ISA).

#### 9.2 Habitats Regulations Assessment (HRA)

**9.2.1** The LDP was also the subject of Habitats Regulations Assessment (HRA) to assess whether its implementation would have any impacts on any European sites of nature conservation importance (i.e. Special Areas of Conservation and Special Protection Areas, including Ramsar Sites). This involves an extensive screening process relating to all LDP policies and proposals and a detailed assessment of likely impacts.

**9.2.2** The Replacement LDP will again need to be subject to HRA, and this will require the HRA screening process and methodology to be reviewed and revisited and applied to developing LDP proposals in an iterative process to ensure that the relevant legislation and regulations are complied with and any issues are fully addressed.

# 9 . Reconsideration of the SA/SEA and HRA

## 10 Opportunities for Collaborative Working

### 10.1 Joint LDPs and Collaborative Studies

**10.1.1** Collaboration is a requirement of the Well-being of Future Generations Act and part of the first LDP test of soundness (i.e. Does the Plan Fit?). In addition, the updated draft '*Development Plans Manual (Edition 3)*', indicates that LPAs will need to demonstrate that all opportunities for joint working and collaboration on both plan preparation and the evidence base have been exhausted. This is particularly relevant where the LDPs of neighbouring authorities are on similar preparation timescales and where there are strong cross-boundary linkages.

#### Joint Local Development Plans

**10.1.2** Neath Port Talbot Council shares its administrative boundary with six other Local Planning Authorities (LPAs): Swansea, Carmarthenshire, Powys, Rhondda Cynon Taf, Bridgend and Brecon Beacons National Park. The following table summarises each LPA's current position in respect of their LDP preparation cycle.

**Table 10.1.1 LDP Status in Adjoining Local Planning Authorities**

Local Authority	Date of LDP Adoption	Plan Period	Progress of Review
Swansea	2019	2010 - 2025	Not required at present
Carmarthenshire	2014	2006 - 2021	Work started on Replacement LDP with recent consultation on the Preferred Strategy.
Powys	2018	2011 - 2026	Not required at present
Rhondda Cynon Taf	2011	2006 - 2021	N/A
Bridgend	2013	2006 - 2021	Work started on Replacement LDP with recent consultation on the Preferred Strategy.
Brecon Beacons National Park	2013	2007 - 2022	Work started on Replacement LDP with recent consultation on the Preferred Strategy.

**10.1.3** The above information highlights that in terms of timescales, there is little opportunity to prepare a Joint LDP with any adjoining authority, as all are at significantly different stages in the plan preparation process. Despite the incompatible timescales, collaboration with all neighbouring authorities will nevertheless be a central part of the work to prepare the Replacement LDP which will need to align as far as possible with existing and/or emerging strategies and proposals of adjoining areas.

## 10 . Opportunities for Collaborative Working

### Collaborative Initiatives and Studies

**10.1.4** Recognising that the most effective focus and use of resources at this stage would be to build on joint working opportunities on cross-boundary issues and key areas of evidence, a significant amount of collaborative work involving all authorities affiliated to the Mid and South West Wales Strategic (M&SWW) Planning Group has already commenced.

**10.1.5** To date, discussions and progress have centred on three key studies: a 'Regional Employment Study' (RES), a 'Joint Local Housing Market Assessment' (LHMA) and a 'Regional Viability Study' (RVS). All three studies will not only inform reviews of individual LDPs but will also contribute positively as a potential baseline for future work on SDPs (refer below).

**10.1.6** The work associated with the RES has currently been put on hold primarily due to resource / capacity issues within those LPAs that are focusing their efforts and attention on putting in place an evidence base for their respective LDPs. Notably, 'Regional Officer' posts have recently been created within the Welsh Government and as such, it is the intention that the RES be re-visited in the future, with a potentially greater SDP focus, in conjunction with WG officers.

**10.1.7** Following the appointment of Opinion Research Services (ORS), the Joint LHMA study is nearing completion. The final regional report and sub area (LPA) reports are expected at the end of December 2019. The aim of the commission was to ensure that a consistent methodological approach was established to assess the housing needs across the M&SWW region in accordance with best practice, to provide robust data to inform forthcoming LHMA's.

**10.1.8** The RVS, lead by Andrew Burrows of 'Burrows-Hutchinson' is also nearing completion: with the Development Viability Model (DVM) currently in the process of being made available on each respective LA's website. The DVM is a spreadsheet based appraisal tool capable of testing the suitability of sites for inclusion in a Plan/Strategy and also to assist the assessment of financial viability of a specific development proposal at application stage. Use of the DVM can be used as part of submissions to the Council for pre-application advice, planning applications and 'Candidate Sites' submitted as part of the LDP review process.

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

# 10 . Opportunities for Collaborative Working

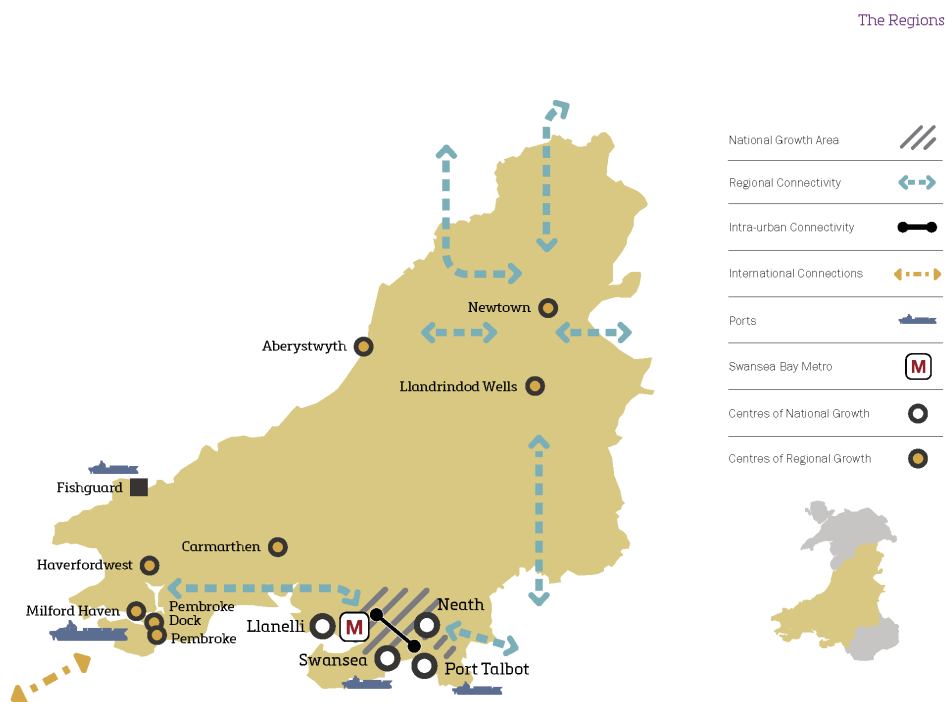
## 10.2 Strategic Development Plans

**10.2.1** The Planning (Wales) Act 2015 introduced the legal framework to strengthen the plan led approach in Wales by introducing the legal basis to prepare the National Development Framework (NDF) and also Strategic Development Plans (SDPs). LDPs or LDP *Lites* (i.e. a shorter, more focused version of an LDP where a SDP is in place), will ultimately need to conform with these higher tier plans.

**10.2.2** The *Draft* NDF policy framework requires SDPs to come forward in each of the three identified regions: North Wales; Mid and South West Wales (M&SWW) and South East Wales. These areas will be the focus for WG policy and future investment. The SDP will need to address cross-boundary issues at a regional level and must be in general conformity with the NDF. Notably, in respect of the *Draft* NDF policy framework specific to the M&SWW region:

- Swansea, Neath, Port Talbot and Llanelli are identified as 'Centres of National Growth' with these areas being the main focus for investment and growth;
- Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four haven towns are identified as 'Centres of Regional Growth' and will be the focus for managed growth reflecting their important sub-regional functions;
- As a proportion of national need, 23,400 homes are needed by 2038 and over the initial 5 years (2018/19 to 2022/23) 44% of the homes needed should be affordable; and
- The policy framework also specifically supports the continued development of the Haven Waterway and Swansea Bay Metro.

**Figure 10.1 Mid and South West Wales Region**



## 10 . Opportunities for Collaborative Working

**10.2.3** In light of this new emerging planning regime in Wales, SDP related discussions are now taking place on a regular basis across the M&SWW region to establish the future role of authorities and the scope of the work required. Following the publication of the *Draft* NDF, discussions between the constituent LPAs will now be gathering pace to determine how the preparation of a SDP should progress, including agreeing the geographical footprint, the governance arrangements, the resources available and the timing of plan preparation.

**10.2.4** Over the course of preparing the Replacement LDP therefore, there will be a need for the Council to closely consider the implications of the SDP as and when the new regional policy direction emerges.

## Appendix A: LDP Policy Review

**A.1** The following provides an overview of the LDP Policies (Strategic Policies are in **Bold**):

**Table A.0.1 Overarching Policies**

Policy Ref	Title	Overview
SP1	<b>Climate Change</b>	The Policy will be retained but the individual policy criteria will be reviewed to ensure that the latest information and approaches are incorporated.
SP2	<b>Health</b>	This Policy will be subject of review to consider whether the Policy considerations should be widened in the light of legislative changes and a greater focus on a holistic approach to development.
SP3	<b>Sustainable Communities</b>	No specific issues identified in relation to Policy SP3. The need for an additional detailed policy relating to new community facilities should be given consideration.
SC1	Settlement Limits	The policy will be reviewed in respect of the wording of the criteria.
SC2	Protection of Existing Community Facilities	Consideration to be given to providing additional clarification about the definition/scope of the term Community Facilities.
SP4	<b>Infrastructure</b>	This Policy will be the subject of a review as it is not delivering the benefits anticipated. The term 'infrastructure' can cover a range of planning considerations and therefore the policy text will require amendments to ensure physical infrastructure and planning obligations can be readily separated to provide clarity.
I1	Infrastructure Requirements	The Policy is essential in ensuring that there is sufficient infrastructure to mitigate the impacts of new development and should be carried forward in the new plan. However, as with the Strategic Policy, the policy needs to be amended to provide further clarify on the requirements for planning obligations. Viability testing will determine the scope for developer contributions in new developments and an assessment of the key issues will determine if the list of potential requirements are still appropriate.

**Table A.0.2 Area Based Policies**

Policy Ref	Title	Overview
SP5	<b>Development in the Coastal Corridor Strategy area</b>	The policy requires amendment to reflect the revised spatial and growth strategies. The policy will need to consider the emerging NDF, updated evidence base and will require an assessment of existing and potential new allocations to determine their ability to accommodate future development.
SRA1	Coed Darcy Strategic Regeneration Area	Revise policy to reflect reconsideration of spatial and growth strategy.
SRA 2	Harbourside Strategic Regeneration Area	Revise policy to reflect reconsideration of spatial and growth strategy.
CCRS 1	Coastal Corridor Regeneration Schemes	Revise policy to reflect reconsideration of spatial and growth strategy.
CCRS 2	Coastal Corridor University Campus	Campus mostly developed, consider whether a specific policy is still relevant.

## Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
SP6	<b>Development in the Valleys Strategy area</b>	Whilst, in view of the emerging NDF, it is likely that the coastal/ valley split will be retained, there are a number of indicators relevant to this Policy, which have had mixed success. Those relating to overall housing delivery and that in Pontardawe SGA have not delivered as anticipated. Whilst the housing indicators for Glynneath SGA and the Neath Valley have not raised issues, this is because the delivery date has not been reached. It is likely that new allocations within the Valleys will need to be made to help enable its growth, which will include residential development, safeguard employment, cultural heritage and regeneration opportunities.
VRS 1	Valleys Strategy Regeneration Scheme	Revise policy to reflect reconsideration of spatial and growth strategy.

**Table A.0.3 Communities and Housing Topic Based Policies**

Policy Ref	Title	Overview
SP7	<b>Housing Requirement</b>	Policy will be subject to amendment to reflect the updated spatial and growth strategies and the level of housing need required over the plan period.
H2	Housing Sites	Revise housing allocations to reflect the spatial and growth strategies and the spatial distribution of housing over the plan.
SP8	<b>Affordable Housing</b>	The policy will be subject to amendment to reflect the updated strategy, viability evidence, and national policy relating to affordable housing.
AH1	Affordable Housing	The policy will require amendment to reflect updated viability work.
AH2	Affordable Housing Exception Sites	No relevant applications since LDP adoption. Further investigation and discussion with RSL partners and possible amendments required.
SP9	<b>Gypsies and Travellers</b>	The policy is functioning effectively. Amendments required to reflect the next Gypsy and Traveller Accommodation Assessment.
GT1	Gypsy and Traveller Site	The allocation has been delivered. Policy to either be removed or updated to reflect the requirements of the next Gypsy and Traveller Accommodation Assessment.
GT2	Proposals for New Gypsy and Traveller Sites	The policy is functioning effectively. Some minor amendments required to align with updated national policy guidance.
SP10	<b>Open Space</b>	The strategic policy may not require any revision, as the issues it covers are still relevant and appropriate.
OS1	Open Space Provision	This Policy requires review, there have been changes to the FIT standard, which a review will need to consider. In addition the requirement for Green Infrastructure may need to feature in this Policy, if it is not included elsewhere. In addition some amendments required in response to the Officer Working Group comments to improve clarity.
OS2	Protection of Existing Open Space	Policy seems to be working relatively well on the whole, it may need some slight revision to add further clarity, but should be carried forward into the new Plan. In addition some amendments required in response to the Officer Working Group comments to improve clarity.



**Table A.0.4 The Economy Topic Based Policies**

Policy Ref	Title	Overview
<b>SP11</b>	<b>Employment Growth</b>	Policy will be reviewed in line with updated economic assessment to ensure the policy reflects the plan's strategy.
EC1	Employment Allocations	Review to establish the expected demand for employment floorspace required to deliver the strategy. Review of the employment allocations to determine if allocations are deliverable and viable.
EC2	Existing Employment Areas	Review to establish the expected demand for employment floorspace required to deliver the strategy. Consider whether the protection of all employment areas listed are required based on conclusions of Employment Land Review.
EC3	Employment Area Uses	The policy is functioning effectively. Consider some minor amendments to improve clarity and consider whether policies EC3 and EC4 can be combined.
EC4	Protection of Existing Employment Uses	The policy is functioning effectively. Following comments from Officer Working Group, consider some minor amendments to improve clarity and consider whether policies EC3 and EC4 can be combined.
EC5	Employment Uses in the Valleys	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
EC6	Live work Units	No relevant applications since LDP adoption. Consider whether policy is still necessary.
<b>SP12</b>	<b>Retail</b>	The Policy is functioning effectively, with the issues covered still relevant. Some minor amendments may be required to reflect changes to national retail policy. The retail hierarchy and retail boundaries will be subject to review and amendment to ensure designations are up to date and appropriate.
R1	Retail Allocations	The policy will require amendment to reflect the revised assessment of need.
R2	Proposals within Retail Centres	The policy is functioning effectively. Where necessary, there may be some minor revisions to the policy required to reflect changes to national retail policy.
R3	Out of Centre Retail Proposals	The policy is functioning effectively. Where necessary, there may be some minor revisions to the policy required to reflect changes to national retail policy.
<b>SP13</b>	<b>Tourism</b>	The policy is functioning effectively.
TO1	Tourism Development in the Countryside	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
TO2	Protection of Existing Tourism Facilities	The policy is functioning effectively. Following comments from Officer Working Group, consideration needed as to whether the policy should be expanded to cover the conversion to other uses, not just residential.
TO3	Tourism Led Regeneration Scheme	The allocation has not been delivered. Consider whether the allocation is still appropriate and deliverable within the plan period and consider whether other allocations are required to meet the strategy.
TO4	Walking and Cycling Routes	The routes identified have been delivered. Consider the allocation of alternative walking and cycling routes required to deliver the strategy.

## Appendix A: . LDP Policy Review

**Table A.0.5 Environment and Resources Topic Based Policies**

Policy Ref	Title	Overview
<b>SP14</b>	<b>The Countryside and Undeveloped Coast</b>	The policy is functioning effectively.
EN1	The Undeveloped Coast	The policy is functioning effectively.
EN2	Special Landscape Areas	The policy may need to be reviewed in the light of national policy changes and application decisions.
EN3	Green Wedges	The policy may need to be reviewed in the light of application decisions.
EN4	Replacement Dwellings in the Open Countryside	The policy is functioning effectively.
EN5	Conversion and Extension of Existing Buildings in the Countryside	The policy is functioning effectively.
<b>SP15</b>	<b>Biodiversity and Geodiversity</b>	The policy will be reviewed in the light of the on-going loss of biodiversity as a result of planning decisions.
EN6	Important Biodiversity and Geodiversity Sites	The policy is functioning effectively.
EN7	Important Natural Features	The policy is functioning effectively.
<b>SP16</b>	<b>Environmental Protection</b>	The policy is functioning effectively.
EN8	Pollution and Land Stability	The policy is functioning effectively. Following comments from the Officer Working Group, consider splitting the policy to have separate policies for Pollution and Land Stability to improve clarity.
EN9	Developments in the Central Port Talbot Area	The policy is functioning effectively. Consider some minor amendments to improve clarity, in response to Officer Working Group comments.
EN10	Quiet Areas	The policy is functioning effectively.
<b>SP17</b>	<b>Minerals</b>	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.
M1	Development in Mineral Safeguarding Areas	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.
M2	Surface Coal Operations	The policy is no longer required due to changes to national minerals policy.
M3	Development in Mineral Buffer Zones	The policy is functioning effectively.
M4	Criteria for the Assessment of Mineral Development	The policy is functioning effectively. Amendments are required to reflect changes to national minerals policy.

## Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
<b>SP18</b>	<b>Renewable and Low Carbon Energy</b>	The policy is functioning effectively. Amendments are required to reflect changes to national renewable energy policy.
RE1	Criteria for the Assessment of Renewable and Low Carbon Energy Development	The policy is functioning effectively. Amendments are required to reflect changes to national renewable energy policy.
RE2	Renewable and Low Carbon Energy in New Development	The policy functioning effectively. Consider amending the threshold for submitting assessments in response to Office Working Group comments.
<b>SP19</b>	<b>Waste Management</b>	The policy is functioning effectively. Amendments are required to reflect changes to national waste policy.
W1	In-Building Waste Treatment Facilities	The policy is functioning effectively.
W2	Deposit of Inert Waste on Agricultural Land	The policy is functioning effectively.
W3	Waste Management in New Development	The policy is functioning effectively.

**Table A.0.6 Transport and Access Topic Based Policies**

Policy Ref	Title	Overview
<b>SP20</b>	<b>Transport Network</b>	The policy is functioning effectively. Amendments are required to reflect changes to national transport policy.
TR1	Transport Proposals	The policy is functioning effectively. Amendments are required to reflect the fact that schemes have been completed.
TR2	Design and Access of New Development	The policy is functioning effectively.
TR3	Safeguarding of Disused Railway Infrastructure	The policy is functioning effectively.
TR4	Safeguarding Freight Facilities	The policy is functioning effectively.

**Table A.0.7 Culture and Heritage Topic Based Policies**

Policy Ref	Title	Overview
<b>SP21</b>	<b>Built Environment and Historic Heritage</b>	The policy is functioning effectively.
BE1	Design	The policy will be reviewed in order to consider amendments in response to officer working group comments.
BE2	Buildings of Local Importance	The policy is functioning effectively.

## Appendix A: . LDP Policy Review

Policy Ref	Title	Overview
BE3	The Canal Network	The policy is functioning effectively.
<b>SP22</b>	<b>Welsh Language</b>	The Policy may require some minor revision, if any other Language Sensitive Areas are identified from research.
WL1	Development in Language Sensitive Areas	The Policy will remain, but may require some minor revision, if the thresholds need revision. Some minor revision may be required in response to the Officer working group comments e.g. In respect of thresholds, or the inclusion of an Advertisement / Signage Policy.

## Appendix B: Sustainability Appraisal Monitoring - Key Findings

**Table B.0.1 SA Monitoring Findings (Summary Table)**

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
1A	Climate Change Adaptation	6	Flooding: 3 Approvals in Zone C2	N/A	N/A	There have been approvals contrary to policy within flood zone C2. This was addressed through officer/member training. Monitoring of this issue should continue.
		62	N/A	N/A	Development in GW and SLA	Areas of GW/SLA have not been protected. The policies should be reviewed to ensure designated areas/controls are appropriate.
1B	Climate Change Mitigation	1	CCSA Density - 50% compliance	CCSA Density - 32% compliance	CCSA Density - 17% compliance	Significant (& increasing) shortfalls in density requirements are unsustainable in terms of resources and env impact. The terms and operation of the policy should be reviewed.
		2	VSA Density - 27% compliance	VSA Density - 24% compliance	VSA Density - 16% compliance	
		75	No REAs submitted	N/A	1 REA submitted	There have been significant shortfalls in the number of REAs submitted, and therefore in the provision of Renewable/low carbon energy technologies. The terms and operation of the policy should be reviewed.
1C	Climate Change Energy	74	N/A	No RE Proposals	N/A	Concerns at low number of RE/LC proposals although this appears to be improving. Policy should be reviewed, but national policy appears to be changing in respect of larger proposals.
		75	No REAs submitted	N/A	1 REA submitted	There have been significant shortfalls in the number of REAs submitted, and therefore in the provision of Renewable/low carbon energy technologies. The terms and operation of the policy should be reviewed.
2A	Natural Resources	1	CCSA Density - 50% compliance	CCSA Density - 32% compliance	CCSA Density - 17% compliance	Significant (& increasing) shortfalls in density requirements are unsustainable in terms of resources and env impact. The terms and operation of the policy should be reviewed.

## Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		2	VSA Density - 27% compliance	VSA Density - 24% compliance	VSA Density - 16% compliance	
		62	N/A	N/A	Developments approved in GW and SLA contrary to policy	Areas of GW/SLA have not been protected in accordance with policy. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
3A	Loss of Biodiversity	SA8	N/A	N/A	0.15ha SINC lost	Biodiversity targets not being met. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
3B	Biodiversity Improvements	12	N/A	N/A	No biodiversity enhancements made as a result of developer contributions	No biodiversity enhancements achieved through planning process (info only available for 2019): The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
4A	Landscape & Townscape	62	N/A	N/A	Developments approved in GW and SLA contrary to policy	Areas of GW/SLA have not been protected in accordance with policy. The terms and operation of the relevant policies should be reviewed to ensure designated areas and controls are appropriate.
6A	Social Cohesion	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to prevent losses of community facilities wherever possible.
		10	1 application was approved for town centre uses in an out of town location	1 application was approved for town centre uses in an out of town location	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to support communities.

## Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		14	N/A	Delivery of housing on allocated sites behind targets	Delivery of housing on allocated sites behind targets	Shortfalls in housing delivery are likely to have detrimental impacts on the local economy and affordable housing provision and therefore may adversely affect community cohesion. The relevant policies should be reviewed to ensure that benefits for social cohesion are maximised.
		31	N/A	Delivery of housing on allocated sites in VSA behind targets	Delivery of housing on allocated sites in VSA behind targets	
		32	N/A	Delivery of housing on allocated sites in Pontardawe behind targets	Delivery of housing on allocated sites in Pontardawe behind targets	
		39	N/A	Delivery of all types of housing behind target	Delivery of all types of housing behind target	
		41	N/A	Delivery of affordable housing behind target	Delivery of affordable housing behind target	
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on social cohesion. The relevant policies should be reviewed to ensure that benefits are maximised.
		52	N/A	Targets for the provision of new employment floorspace not fully met	Targets for the provision of new employment floorspace not met for two consecutive years	Shortfalls in employment floorspace provision are likely to have negative impacts on social cohesion. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	Lack of new small scale local retail provision is likely to have a negative impact on social cohesion. The policy should be reviewed to ensure that benefits are maximised.
7A	Physical and mental health outcomes	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to prevent adverse outcomes wherever possible.

## Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on health outcomes. The relevant policies should be reviewed to ensure that benefits are maximised.
		49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on health outcomes. Relevant policies should be reviewed to ensure that benefits are maximised.
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on health outcomes. Relevant policies should be reviewed to ensure that benefits are maximised.
7B	Minimise the incidence and impacts of ill health	7	10 Community facilities lost	3 Community facilities lost	N/A	The effectiveness of the policy appears to be improving, but it should be reviewed to ensure that measures are employed to minimise adverse effects wherever possible.
		46	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Targets for the provision of open space not fully met	Shortfalls in open space provision are likely to have negative impacts on health. The relevant policies should be reviewed to ensure that benefits are maximised.
		49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on health. Relevant policies should be reviewed to ensure that benefits are maximised.
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on health. Relevant policies should be reviewed to ensure that benefits are maximised.
7C	Minimise the incidence and impacts of poverty	49	N/A	Decreasing levels of workplace employment	Decreasing levels of workplace employment	Reductions in workplace employment are likely to have negative impacts on poverty. Relevant policies should be reviewed to ensure that benefits are maximised.



## Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
		53	N/A	Decreasing rates of economic activity	N/A	Rates of economic activity appear to have fluctuated, with likely mixed results on poverty. Relevant policies should be reviewed to ensure that benefits are maximised.
8A	Economic Infrastructure	14	N/A	Delivery of housing on allocated sites behind targets	Delivery of housing on allocated sites behind targets	Shortfalls in housing delivery are likely to have detrimental implications for economic infrastructure.
		31	N/A	Delivery of housing on allocated sites in VSA behind targets	Delivery of housing on allocated sites in VSA behind targets	
		39	N/A	Delivery of all types of housing behind target	Delivery of all types of housing behind target	
		41	N/A	Delivery of affordable housing behind target	Delivery of affordable housing behind target	
		52	N/A	Targets for the provision of new employment floorspace not fully met	Targets for the provision of new employment floorspace not met for two consecutive years	Shortfalls in employment floorspace provision are likely to have negative impacts on economic infrastructure. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	Lack of new small scale local retail provision is likely to have a negative impact on economic infrastructure. The policy should be reviewed to ensure that benefits are maximised.
8B	Use of local resources and assets	15	N/A	N/A	Delivery of housing at Coed Darcy below target for 2 consecutive years	Shortfalls in housing delivery are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		16	N/A	N/A	No new employment developments at Coed Darcy	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The

## Appendix B: . Sustainability Appraisal Monitoring - Key Findings

SA Objective		Ind Ref	Issues 2017	Issues 2018	Issues 2019	SA Finding/ Recommendation
Ref						
						relevant policies should be reviewed to ensure that benefits are maximised.
		19	N/A	N/A	Delivery of housing at Harbourside below target for 2 consecutive years	Shortfalls in housing delivery are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		20	N/A	N/A	No new employment developments at Harbourside for 3 consecutive years	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		21	N/A	N/A	No new retail developments at Harbourside for 3 consecutive years	Lack of retail development is likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		58	N/A	N/A	No small scale local retail proposals approved	
8C	Use of local skills and knowledge	16	N/A	N/A	No new employment developments at Coed Darcy	Shortfalls in employment development are likely to have mixed impacts on the economic use of local resources. The relevant policies should be reviewed to ensure that benefits are maximised.
		20	N/A	N/A	No new employment developments at Harbourside for 3 consecutive years	
		58	N/A	N/A	No small scale local retail proposals approved	Lack of small scale local retail proposals likely to have adverse impacts on the use of local skills and knowledge. The relevant policies should be reviewed to ensure that benefits are maximised.

## Appendix C: Status of LDP Allocations

**C.1** The following tables provides an up-to-date summary of the status of the current LDP allocations.

**C.2** As part of the LDP review, all allocations not yet commenced will be reassessed to determine if they remain deliverable. Those sites that are no longer considered deliverable will be de-allocated and removed from the LDP. In addition, those existing allocations with no current planning approval will need to be re-submitted as part of the Candidate Sites stage so their suitability can be reassessed.

**Table C.0.1 Policy H1 - Current Status of Housing Allocations**

Ref	Site Name	Estimated Number of Units	Commentary
H1/1	Gorffwysfa, Bryncoch	15	No planning application received
H1/2	Leiros Park Extension, Bryncoch	200	No planning application received. Site has been subject to pre-application discussions
H1/3	Groves Road (Phase 2), Neath	42	Site under construction
H1/4	Ocean View, Jersey Marine	81	Site complete
H1/5	Dwr Y Felin Lower School, Longford	100	No planning application received
H1/6	Hafod House Care Home, Neath	12	Site under construction
H1/7	Neath Town Centre Redevelopment	50	Site has full planning permission for 12 units. No planning application received for remainder of site
H1/8	Crymlyn Grove (Phase 2) to the rear of Crymlyn Parc, Skewen	75	Site complete
H1/9	Crymlyn Grove (Phase 3) to the rear of Crymlyn Parc, Skewen	150	No planning application received
H1/10	Wern Goch, Crymlyn Road, Skewen	50	Site complete
H1/11	Neath Road / Fairyland Road, Tonna	300	Part of site has permission for 138 units. No planning application received for remainder of site
H1/LB/1	Waunceirch, Neath	13	Site complete

## Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/LB/2	Groves Road (Phase 1), Neath	34	Site complete
H1/LB/3	Elba Crescent, Crymlyn Burrows	50	Application allowing extension of time for submission of reserved matters lapsed
H1/LB/4	Area 1, Coed Darcy Urban Village, Llandarcy	157	Site has full planning permission for 140 units
H1/LB/5	Coed Darcy Urban Village, Llandarcy	2,400	Site has outline consent. Reserved matters application for 75 units awaiting decision. No reserved matters applications received for remainder of site
H1/LB/6	Eaglesbush, Melincryddan	50	Application to extend the period for submission of reserve matters undetermined
H1/LB/7	Garthmor (Phase 2), Melyncryddan	34	Site complete
H1/LB/8	Briton Ferry Road, Neath	28	Site complete
H1/LB/9	Barrons Court, Neath	12	Site complete
H1/LB/10	The Rope Walk, Neath	15	Site complete
H1/LB/11	Cardonnel Road, Skewen	16	Site complete
H1/LB/12	Crymlyn Grove (Phase 1), Skewen	81	Site complete
H1/12	Blaenbaglan School (land to the rear of), Baglan	141	No planning application received
H1/13	Hawthorn Close, Cwmafan	100	No planning application received
H1/14	Western Logs, Cwmafan	130	No planning application received
H1/15	Neath Port Talbot College (Margam Campus)	70	No planning application received
H1/16	Glanafan Comprehensive School, Port Talbot	50	Site complete
H1/17	Harbourside, Port Talbot	385	Phase 1 complete. No planning application received for remainder of site
H1/18	Afan Lido and land to the rear of Tywyn School, Sandfields	150	No planning application received. Site has been subject to pre-application discussions

## Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/19	Bay View Social Club, Sandfields	23	Site complete
H1/20	Purcell Avenue, Sandfields	115	Current outline application P2013/1047 undetermined
H1/21	Morfa Afan Care Home, Sandfields	10	Site complete
H1/22	Tir Morfa Road, Sandfields	75	No planning application received
H1/LB/13	Land at Blaenbaglan Farm, Baglan	160	The site has an extant planning consent
H1/LB/14	Thorney Road, Baglan	10	Site complete
H1/LB/15	Stycyllwen, Baglan	24	Site under construction
H1/LB/16	Abbottsmoor, Baglan Moors	42	Site complete
H1/LB/17	Farteg Fawr, Bryn	25	Site under construction
H1/LB/18	Copperminers, Cwmafan	90	Site complete
H1/LB/19	Forest Lodge Lane, Cwmafan	12	Site under construction
H1/LB/20	Groeswen, Margam	39	Site complete
H1/LB/21	Station Road, Port Talbot	14	Site complete
H1/LB/22	Royal Buildings Talbot Road, Port Talbot	46	Site complete
H1/LB/23	Dyffryn Road	14	Site complete
H1/LB/24	Maes Marchog, Banwen	16	Site complete
H1/LB/25	Glyn Dulais Care Home, Crynant	21	The site has full permission for 22 units
H1/LB/26	Heol Y Waun, Seven Sisters	68	Planning consent P2007/1376 lapsed
H1/23	Park Avenue, Glynneath	150	No planning application received
H1/LB/27	Heol y Glyn, Glynneath	81	The site has an extant planning consent

## Appendix C: . Status of LDP Allocations

Ref	Site Name	Estimated Number of Units	Commentary
H1/LB/28	Welfare Hall, Glynneath	17	Current application P2011/0486 undetermined
H1/LB/29	Ynys Y Nos Avenue, Pontwalby	16	Site complete
H1/24	Bryn Morgrug (Phase 2), Alltwen	52	Site complete
H1/25	Ynysymond Road, Alltwen	50	No planning application received
H1/26	Cwmtawe School (Phase 2), Pontardawe	32	Site complete
H1/27	Waun Sterw / Waun Penlan, Rhydyfro	115	Current application P2019/5543 undetermined
H1/28	Bryn Brych Farm, Rhos	150	Part of site has permission for 79 units. No planning application received for remainder of site
H1/29	Parc Ynysderw, Pontardawe	50	No planning application received
H1/LB/30	Bryn Morgrug (Phase 1), Alltwen	56	Site complete
H1/LB/31	Cwmtawe School (Phase 1), Pontardawe	80	Site complete
H1/LB/32	Holly Street, Pontardawe	45	Planning consent P2007/0215 lapsed
H1/LB/33	Waun Penlan, Rhydyfro	19	Planning consent P2007/0281 lapsed
H1/LB/34	Glan Yr Afon (Phase 2), Ynysmeudwy	15	Site complete
H1/30	Compair/GMF, Ystalyfera	70	Current application P2013/0737 undetermined
H1/31	Tirbach Washery, Ystalyfera	160	No planning application received
H1/LB/35	Golwg Y Mynydd, Godre'r Graig	64	Site complete
H1/LB/36	Graig Newydd (Phase 1), Godre'r Graig	42	Site complete
H1/LB/37	Graig Newydd (Phase 2), Godre'r Graig	66	Site complete

## Appendix C: . Status of LDP Allocations

**Table C.0.2 Policy GT1 - Current Status of Gypsy and Traveller Site Allocation**

Ref	Site Name	Commentary
GT1	Cae Garw, Margam	Site complete

**Table C.0.3 Policy EC1 - Current Status of Employment Allocations**

Ref	Site Name	Site Area (ha)	Commentary
EC1/1	Baglan Bay, Port Talbot	75	Limited amount of employment land developed
EC1/2	Junction 38 (M4) Margam	6	No planning application received
EC1/3	Land within Coed Darcy SRA	4	No planning application received
EC1/4	Land within Harbourside SRA	7	Limited amount of employment land developed

**Table C.0.4 Policy R1 - Current Status of Retail Allocations**

Ref	Site Name	Commentary
R1/1	Neath Town Centre Regeneration Scheme	Part complete
R1/2	Glanafan Comprehensive School, Port Talbot	Complete
R1/3	Harbourside, Port Talbot	No planning application received
R1/4	Park Avenue, Glynneath	No planning application received

**Table C.0.5 Policy TO3/1 - Current Status of Tourism Allocation**

Ref	Site Name	Commentary
TO3/1	Rheola Estate, Glynneath	Planning Application awaiting the signing of a S106 agreement

**Table C.0.6 Policy TR1 - Current Status of Transport Proposals**

Ref	Scheme Name	Commentary
TR1/1	Baglan Energy Park Link Road	Complete.
TR1/2	Coed Darcy Southern Access Road	Not started
TR1/3	Ffordd Amazon (Stage 2)	Complete
TR1/4	Junction 43, M4 Improvements	Part complete
TR1/5	Harbour Way (PDR), Port Talbot	Complete
TR1/6	Integrated Transport Hub, Port Talbot	Complete

## Appendix C: . Status of LDP Allocations

Ref	Scheme Name	Commentary
TR1/7	Amman Way Cycle Way	Part complete
TR1/8	Afan Valley Trail (Port Talbot - Afan Valley)	Complete
TR1/9	Junction 38 (M4) Margam (Park and Share)	Not started



## Appendix D: . General and Specific Consultation Bodies

### Appendix D: General and Specific Consultation Bodies

Specific Consultees	General Consultees
Betws Community Council	Action For Children
Blaengwrach Community Council	Action on Hearing Loss
Blaenhonddan Community Council	Adult Learning Wales
Brecon Beacons National Park Authority	Afan Tawe Nedd Crime Prevention Panel
Bridgend County Borough Council	Age Concern, Port Talbot
British Telecom	Aggregates Industries UK Ltd
Briton Ferry Town Council	Business in Focus
BT Openreach HQ	Business Wales
Cadw	Calan D V S
Carmarthenshire County Council	Canolfan Maerdy
Cefn Cribwr Community Council	Childrens Commissioner For Wales
Centrica Energy	Church in Wales
Cilybebyll Community Council	Citizens Advice Bureau (NPT)
Clydach Community Council	Coalfields Regeneration Trust
Clyne & Melincourt Community Council	Community Lives Consortium
Coedffranc Community Council	Confederation of British Industry
Cornelly Town Council	Country Land & Business Association Ltd
Crynant Community Council	Dansa Ltd
Cwmamman Town Council	Dewis Ltd
Cwmllynfell Community Council	Diocese of Menevia
Department For Business Energy & Industrial Strategy	Disability Forum (NPTCVS)
Department For Transport	Disability Wales Ltd
Dwr Cymru Welsh Water	Disabled Persons Advisory Group
Dyffryn Clydach Community Council	Disabled Persons Transport Advisory Committee
E E	DOVE Workshop
Ecotricity	E Y S T
EDF Energy	Eco-Schools
Garw Valley Community Council	Elim Pentecostal Church
Glynneath Town Council	Ethnic Minority Foundation

## Appendix D: . General and Specific Consultation Bodies

Good Energy	Farmers' Union of Wales
Gwaun Cae Gurwen Community Council	Federation of Master Builders Cymru
Home Office	Federation of Small Business
Hutchinson 3 G UK Ltd	Freight Transport Association
Llangynwyd Lower Community Council	Friends, Families and Travellers
Llangynwyd Middle Community Council	Future Generations Commissioner for Wales
Maesteg Town Council	Guide Dogs
Mawr Community Council	Gypsies and Travellers Wales
Ministry of Defence	HBF Wales
National Grid	Mineral Products Association
Natural Resources Wales	Muslim Council of Wales
Neath Port Talbot Local Health Board	National Farmers' Union Cymru
Neath Town Council	National Federation of Gypsy Liaison Groups
Network Rail Ltd	National Youth Agency
O2	Neath and District Trades Council
Ogmore Valley Community Council	Neath Area Economic Forum
Onllwyn Community Council	Neath Port Talbot Community Transport
Pelenna Community Council	Neath Port Talbot Council For Voluntary Service
Pontardawe Town Council	Neath Port Talbot Methodist Circuit
Powys County Council	Neath Port Talbot Youth Council
Public Health Wales	Neath YMCA
Pyle Community Council	New Sandfields Aberafan and Afan-Community Regeneration
Quarter Bach Community Council	NPT BME Community Association
Resolven Community Council	Older Persons' Council Forum
Rhigos Community Council	Presbyterian Church of Wales
Rhondda Cynon Taff County Borough Council	Princes Trust Volunteers
Senedd Cymru / Welsh Parliament (formely known as the National Assembly)	Private Landlords Forum
Seven Sisters Community Council	R N I B Cymru
SWALEC	Race Council Cymru
Swansea Bay University Health Board	Rail Freight Group

## Appendix D: . General and Specific Consultation Bodies

Swansea Council	Renewable UK Association
Tawe Uchaf Community Council	Road Haulage Association
Tesco Mobile LMT	Royal Voluntary Service
Tonna Community Council	RSVP Wales
United Utilities	Scope
Utilita Energy	Showmen's Guild of Great Britain (Wales)
Virgin Media	South Wales Chamber of Commerce
Vodafone Group plc	South Wales Chamber of Trade
Wales & West Utilities Ltd	South West Wales Economic Forum
Wales Office	Stonewall Cymru
Welsh Health Estates	Swansea Bay Racial Equality Council
Western Power	Swansea Hebrew Congregation
Ystalyfera Community Council	Tata Steel
Ystradfellte Community Council	The Gypsy Council
Ystradgynlais Town Council	Thrive Women's Aid
	Travellers Law Reform Project
	Wales Council For Deaf People
	Wales Council of the Blind
	Welsh Womens Aid
	West Wales Exporters' Association
	Workways +
	Young Enterprise (South & Mid Wales)
	Young Wales
	Youth Access
	Youth Cymru
	Ystalyfera Development Trust

# Appendix D: . General and Specific Consultation Bodies

## Appendix E: . Consultation Comments and Responses

### Appendix E: Consultation Comments and Responses

Full details of the comments received and the officer's responses are provided in the table below and whilst no changes have been made to the Review Report as a result of the comments, all issues raised are matters that will be fully considered in the preparation of the Replacement LDP (RLDP) along with the updates required to the evidence base.

ID	Name	Organisation	Section	Para	Representation	Officer Response
1	Mr R W Ebley		LDP Review Report (Consultation Draft - January 2020)		International Standards Organisation standards need to be used to achieve the required result.	The comment is noted.
2	Ryan Norman	Dwr Cymru Welsh Water	LDP Review Report (Consultation Draft - January 2020)		Dwr Cymru offers its support to the LPA in progressing through the replacement LDP.	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WCFG Act and LDP Regulations.
16	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Yes, we would suggest that this should be reviewed in line with the principles of Sustainable Management of Natural Resources as set out in the Environment Act. We would raise the opportunities for collaboration on green infrastructure projects with neighbouring authorities as species and habitats connectivity should be considered on a landscape scale.</p> <p>We also wish to emphasise the opportunities within the review to consider priorities for habitat connectivity for key species at a landscape scale.</p>	The support is welcomed. The need for collaborative working is key and is part of the LDP Regulations.
23	Rhian Isaac	Natural Resources Wales	LDP Review Report (Consultation Draft - January 2020)		<p>Are there any other comments in respect of the Draft Review Report?</p> <p>We welcome the opportunity to engage formally through the review process.</p>	The comment is noted. The Council is committed to fully engaging with all stakeholders and the public in the LDP Review process in accordance with the principles and requirements of the WCFG Act and LDP Regulations.
54	Tata Steel		LDP Review Report (Consultation Draft - January 2020)		Tata Steel is supportive of a continued economic-led growth strategy for the Neath Port Talbot LDP. The approach suggested above in respect of any amendments to policies EC3, EC4 and EN8 will help to ensure the replacement LDP	The Council welcomes the support. The consultation frequency and extent will be set out and agreed in the forthcoming Delivery Agreement for the Replacement Plan.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>continues to support existing important employment facilities such as the Steelworks and retains the appropriate flexibility to allow the sector to flourish and diversify.</p> <p>We would welcome the opportunity to discuss any proposed policy amendments and renewable energy approaches with the Council in advance of the next round of consultation.</p>	
56	Mr Peter Horsley		LDP Review Report (Consultation Draft - January 2020)		<p>Do you agree that a Full Review is the most appropriate option?</p> <p>Changes in legislation and government policy, together with consideration as to why housing delivery has fallen short of expected, are justification for a full review of the Plan.</p>	The comment is noted.
3	Mrs Chris Thomas		LDP Annual Monitoring Reports - Key Findings	3	<p>I wish to disagree with the comments in the report up for consultation. Namely that in paragraph 3.0.23 it states that no developments were planned in VSA areas which were outside a settlement area, but adjacent to. I believe this to be wrong on the grounds of an appeal being dismissed on application A2016 /0014, this development was planned directly alongside McDonalds drive-thru and the A465. This site is known as the Glyn Neath Business Park, and owned by Welsh Assembly, so would have had a return for the public purse.</p>	<p>Paragraph 3.0.23 refers to 'live work units' and states that there have been no applications for such units since the LDPs adoption. Policy EC6 provides the policy framework for Live-work units, which are defined as properties designed for dual use, combining residential and employment space.</p> <p>The application referred to was for a road side service area comprising petrol filling station and kiosk, drive-thru coffee shop, car parking, access, landscape and associated works which was refused planning permission and dismissed on appeal by the Planning Inspectorate.</p>
30	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports Key Findings	3	<p>Paragraph 3.0.9 HBF suggests the Council consider rewording this paragraph to make the point that all the land allocated may not actually be suitable, correctly located or viable.</p>	<p>The comment is noted. At the time of adoption all sites were deemed to be suitable, correctly located and viable. All sites will be reassessed as part of the review process.</p>
31	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	<p>Paragraph 3.0.12 HBF suggests the Council consider re-wording this paragraph as not all affordable housing is delivered through S106. Many affordable housing sites are</p>	<p>The comment is noted. Paragraph 3.0.12 relates to the findings of the Annual Monitoring Report (AMR), and the delivery of affordable housing through Policy AH1.</p>

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					delivered directly by RSL's as 100% affordable and therefore not reliant on the delivery of market homes.	This policy only reports on affordable housing delivered through the planning system (via Section 106 agreements) and therefore whilst RSLs are delivering 100% affordable housing schemes, these are not recorded in this section of the AMR.
<u>32</u>	Mr Mark Harris	HBF Wales	LDP Annual Monitoring Reports - Key Findings	3	Paragraph 3.0.18 HBF suggests adding the reasons for delays more specifically than paragraph 3.0.20 and adding commentary what is likely to happen if known.	Paragraph 3.0.20 acknowledges that the large scale redevelopment of these sites is complex and has been delayed due to factors including site constraints, viability and in some cases land ownership. It is considered that this provides the broad reasons for delayed development. All Strategic Regeneration Areas (SRA) will be re-assessed and re-evaluated as part of the review process.
<u>17</u>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	Are there any matters that should be considered as part of the contextual review?  The review document appears to highlight all relevant policy and legislative changes that require consideration in the context of the review. From a biodiversity perspective, the Section 6 duty introduced by the Environment Act and the well-being goals set out in the Well-being of Future Generations Act must be key considerations of the revised LDP in delivering sustainable development.	The comment is noted. Delivering sustainable development is a key requirement of the LDP review. All relevant legislation including the Environment Act and Well-being of Future Generations Act will be considered.
<u>18</u>	Rhian Isaac	Natural Resources Wales	Contextual Changes	5	With regard specifically to paragraph 5.0.21 "The Well-Being of Future Generations Act 2015" we feel it is important to raise and emphasise that a "resilient" Wales refers to the "resilience of ecosystems". This links directly with the newly enhanced duty of public authorities to "maintain and enhance biodiversity wherever possible with the proper exercise of their functions". This enhanced duty should be a core issue as part of the review.  Consideration should be given to the Outcomes and Policies proposed in the National Development	The comment is noted. The Well-being of Future Generations Act, biodiversity enhancement and the emerging NDF will all be considered as part of the Review process.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					framework, due for release in September 2020.	
<u>52</u>	Tata Steel		Contextual Changes	5	<p>Question 7: Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraphs 5.0.34 and 5.0.35 of the LDP Review Report recognises the important context of the Port Talbot Waterfront Enterprise Zone as a distinct location for cutting edge and world class industries and as a catalyst for growth. Tata Steel is supportive of a Replacement LDP which is set within this context and recognises these aspirations.</p>	The support is noted.
<u>59</u>	Mr Peter Horsley		Contextual Changes	5	<p>Are there any other comments in respect of the Draft Review Report?</p> <p>Paragraph 5.0.27 - This paragraph states that "the South Wales Regional Aggregates Working Party (SWRAWP) is charged with preparing a RTS setting out how aggregates demand will be meeting the region for a 15 year period". Whilst MTAN states "The RAWP's provide a suitable forum for informed discussions on the provision of aggregates", the RTS is commissioned by WG and not the SWRAWP. MTAN1 requires the RTS to provide a strategy for the provision or aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development plans.</p> <p>Further, the requirement is for each individual Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years in the case of land-based sand & gravel which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.
<u>33</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	<p>Paragraph 6.0.13 HBF asks for this to be re-worded as we currently consider that it suggests that the number of homes that the revised LDP plans for could be affected by "Placemaking". Placemaking is not directly linked to housing numbers so it should not be referred to in this paragraph which is dealing with the factors that do affect the number of</p>	The comment is noted, however, the Council believes there is a relationship between Placemaking and future housing development, with Placemaking a key consideration in accordance with Planning Policy Wales, Edition 10.



## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					new homes planned for. Placemaking should have an impact on the number of homes that the plan needs to plan for this should be about the identified need alongside the growth aspirations of the Council.	
<u>34</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 6.0.16 Building on the comments above to paragraph 6.0.13 the HBF do not agree that placemaking should be a reason to plan for less homes as suggested by the current wording. In order for the plan to meet the Placemaking aspirations of national guidance it needs to ensure that the right sites are located in the right locations and that policies are in place to ensure the mix of development appropriate and that the infrastructure required to serve the development is in place. The HBF state again that we do not consider that placemaking is about the number of houses planned for.	The comment is noted. However, the comment is stating that the replacement plan will have a fully evidenced housing requirement, and that delivery of housing is a priority. Placemaking will be a key consideration for the plan, and ensuring that the housing requirement can be achieved by development in the right places, in the interests of well-being and sustainable development. The Council does not therefore, recommend any changes to the paragraph.
<u>40</u>	Mr Mark Harris	HBF Wales	Evidence Base Changes and Requirements	6	Paragraph 8.1.3.4 HBF notes the reference to the Draft NDF which identifies Swansea Bay (including the towns of Neath and Port Talbot) as a national growth area. It is suggested that this same reference should be used in Section 6 of the report where the Council look at the factors affecting future population growth and demand for new housing.	Section 6 does contain a reference to the NDF and future housing growth across the Swansea Bay Region.
<u>24</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	It was disappointing to see that very few of the objectives had been achieved however, this was due to the change in the economic environment since the creation of the plan rather than any other factors.	The comment is noted. The Replacement LDP will review the existing key issues and objectives to establish if these are still relevant. The Review process will also assess new data / information which highlights any new key issues and consider how the plan can address these.
<u>26</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	Planning and development should begin at a local level and follow a bottom up, rather than top down approach. The Town Council is soon to create a strategic "Place Plan" in order to identify the overall direction required by the community and hopes that the County Borough would like to work together to achieve the communities plan.	The approach taken in development plans follows National Planning Policy, Guidance (Development Plans Manual) and Regulations set by the Welsh Government. The Welsh Government has recently published a draft National Development Framework (NDF), which will be the highest tier of development plans, with LDPs coming under this.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
						Whilst this could be classed as a 'top down' approach, a critical part of preparing a LDP is community involvement. The Council will in due course publish its Delivery Agreement which will include a Community Involvement Scheme (CIS), identifying how the Council will engage with the local community and organisations throughout the plan preparation process. The Council would welcome future dialogue with the Town Council and other community members.
<u>27</u>	Mrs D Phillips	Pontardawe Town Council	LDP Vision, Objectives and Strategy	7	The Committee felt that the original Local Development Plan was now ineffective as the economic position had changed so radically since its creation (for example, Austerity and Brexit). They felt that the direction being followed was unlikely to be successful in this new economic environment and action should be taken now to alter the plan. They felt that there needed to be more flexibility to change direction in plans of this nature.	The comment is noted. The LDP evidence base, including the economic-led growth strategy will be reviewed and updated as part of the preparation of the Replacement Plan, to take account of any contextual changes and ensure that the strategy and policies within the plan are robust and can address the key issues identified.
<u>28</u>	Mr Mark Harris	HBF Wales	LDP Vision, Objectives and Strategy	7	Does the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?  This is for the Council to decide however the significant under delivery of private and affordable housing is of real concern, simply reducing the number of homes required as suggested by the document is not the answer and will not support the wider economic and well-being both at a national and local level.	The comment is noted. A number of studies will be undertaken as part of the LDP Review, which will form the evidence base for the Replacement LDP. Future studies will determine a suitable level of future housing provision whilst considering the economy and well-being of residents.
<u>19</u>	Rhian Isaac	Natural Resources Wales	Key Issues, Vision and Objectives	7.1	Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?  We feel that nature based solutions should be embedded as a cross cutting objective within both the LDP and the local Well-Being Plan and form part of the vision for the revised plan. Appropriate mechanisms are also required to secure delivery of green infrastructure within development and consider habitat connectivity on a landscape scale. Undelivered allocated sites should	The comments are noted. There have been a number of contextual changes since the preparation of the LDP, such as the Well-being of Future Generations Act, which has led to the development of local Well-Being plans. These will be considered within the formation of the vision for the Replacement LDP, in addition to mechanisms to support well-being, such as green infrastructure. The

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					be re-assessed using up to date environmental constraints e.g. revised flood map information. We can provide advice on existing constraints.	Review Report acknowledges that undelivered allocations will be re-assessed to determine if they are still appropriate, or if they should be deallocated.
<u>55</u>	Mr Peter Horsley		Key Issues, Vision and Objectives	7.1	<p>Do the existing LDP Key Issues, Vision and Objectives remain appropriate for the Revised Plan?</p> <p>However, changes in legislation and government policy (Well-Being and Future Generations; Environment Act; PPW (v10); etc.) must be reflected in the Key Issues, Vision and Objectives.</p>	The comment is noted. Contextual and legislative changes, including those mentioned within the representation, will be reviewed as part of the formulation and establishment of the RLDP's Key Issues, Vision and Objectives.
<u>20</u>	Rhian Isaac	Natural Resources Wales	Growth Strategy	7.2	<p>Do the existing Growth and Spatial Strategies remain appropriate for the Revised plan?</p> <p>The current Growth and Spatial strategies need to reflect the requirements of the Draft NDF which includes "sustainable urban growth". The strategies should include biodiversity enhancement and ecosystem resilience by maximising the use of green infrastructure and nature-based solutions, and safeguarding areas which provide important ecological networks.</p>	The comments are noted. The NDF, biodiversity enhancement and green infrastructure will all be fully considered in the preparation of the Replacement LDP.
<u>47</u>	Tata Steel		Growth Strategy	7.2	<p>Question 4; Do the existing Growth and Spatial Strategies remain appropriate for the revised plan?</p> <p>Tata Steel is supportive of an economic-led growth strategy. It recognises the important role that the company plays in investment, growth and economic development in Neath Port Talbot. Economic growth should remain a fundamental part of any strategy moving forward NPTCBC and can also facilitate wider investment to improve housing delivery.</p> <p>As highlighted in paragraph 7.4.3 of the NPTCBC Review Report, Tata Steel would be pleased to work with NPTCBC to establish the impact changes in the global steel market have had on local investment and the opportunities for growth which exist in the region to inform any revised growth strategy.</p>	The support for an economic-growth strategy is noted. As part of the preparation of the Replacement LDP, the evidence base will be updated to determine an appropriate and up to date strategy based on robust evidence. Through additional evidence-based studies, the Council will determine if an economic-led strategy is still appropriate for Neath Port Talbot and will determine a suitable level of future growth. The Council welcomes the work TATA Steel are undertaking, particularly in relation to investment and diversification and modernisation and recognises the importance of the steelworks to the local economy.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					Tata Steel is working internally and closely with other economic stakeholders and employers in the region to invest in, and diversify, the function and role of the steelworks. This includes significant investment in improving and modernising existing facilities with consideration to future growth and environmental responsibility.	
<u>29</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	HBF supports the current plans growth and spatial strategies in principle but notes that this does not mean that the right sites are currently allocated. The current plan is also to be heavily reliant on one or two large strategic sites which have as accepted by the report failed to deliver.	The comment is noted, all existing allocations will be reassessed as part of the review and only sites that are deemed to be viable, deliverable and can contribute towards the overall strategy will be included within the Replacement LDP.
<u>35</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.13 HBF do not agree that this paragraph can conclude that the demand for new housing has not therefore materialised. Economic growth is one of the factors that drives housing demand, there are others such as population growth and the number of potential homeowners living at home while saving to buy a house. This final sentence should be reworded to say "the expected level of demand from employment growth has therefore not been as strong".	The comment is noted, however, this section of the Review Report provides an analysis of the existing strategy and how this has been implemented since the base date. Whilst it is agreed that economic growth is only one factor that drives housing demand, within the economic-led strategy, the majority of housing growth was projected to support the increases in working age population, directly linked to the number of jobs. In this context, as job numbers have not reached the projected target, the subsequent housing growth has not materialised.
<u>36</u>	Mr Mark Harris	HBF Wales	Growth Strategy	7.2	Paragraph 7.2.19 HBF do not agree that from the evidence provided in the report that the Council can simply say that the current level of growth cannot be carried forward. HBF members consider that there is demand for new housing in the area but their attempts to deliver these new homes have been frustrated by the allocated site not coming forward particular the large Coed Darcy strategic site on which the plan is heavily reliant. The Council in this document admit that there have been a number of reasons why sites have not come forward but then do not accept that this has affected annual delivery rates. Using the low delivery rates as a suggested justification to lower the housing requirements in the revised LDP is not the way to	Paragraph 7.2.19 states that both the housing requirement and the existing allocations cannot be carried forward into the new plan and will need to be reconsidered. Housing delivery has fallen significantly below target and therefore the Council would not be able to continue with a high housing requirement that was not delivering, therefore an assessment of up to date evidence is required to determine a suitable, robust and evidenced based housing target. In addition, existing allocations will also require reassessment to determine

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					plan for the future, particular when the wider strategy plans for economic growth.	if these sites are deliverable and viable within the plan period, or whether they should be deallocated to allow for deliverable alternatives. The Council therefore considers that a reassessment of the growth strategy and housing allocations is required as part of the review.
<u>57</u>	Mr Peter Horsley		Growth Strategy	7.2	Do the existing Growth and Spatial Strategies remain appropriate for the Revised Plan?  The evidence base should review why the economy has "stagnated" within the area and put forward remedies to address this.	The comment is noted and will be considered as part of the updated evidence base for the Replacement LDP.
<u>60</u>	Mr Peter Horsley		Growth Strategy	7.2	Are there any other comments in respect of the Draft Review Report?  Paragraph 7.2.17 - This paragraph states that "there are a number of reasons why sites (housing) have not come forward as anticipated". The evidence base to support the plan should consider in detail why this is the case and identify remedies to address this to ensure the plan delivers on its objectives.	The comment is noted. The evidence base for the Replacement LDP will consider why housing sites have not come forward and will reassess allocations to determine if they are deliverable. The level of growth will also be reviewed to determine if this is still appropriate.
<u>25</u>	Mrs D Phillips	Pontardawe Town Council	Spatial Strategy	7.3	The Western Valley Strategy received a great deal of input from Pontardawe and the local community at inception however there was very little feedback provided at the time and the plan does not seem to have taken their views on board.	The LDP strategy of reinvigorating the valleys considered all relevant programmes and strategies within the area, including the Western Valley Strategy. As this Strategy has now come to an end, the replacement plan will consider any existing, relevant work within the area and consult with the community and partner organisations throughout the plan preparation process.
<u>37</u>	Mr Mark Harris	HBF Wales	Spatial Strategy	7.3	Paragraph 7.3.11 This paragraph should include some indication of likely timescales associated with the proposed metro infrastructure. HBF's understanding is that this is unlikely to be within the near future, so its impact on the first few years of the plan is unlikely to be significant.	There is still no clarification on the timing of the Swansea Metro.
<u>38</u>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.1 - 7.4.3 Identifies lots of negatives and reasons why a reduction in housing numbers and moves away from an economic led strategy should be considered.	This section states that given the plan has not achieved a number of its objectives, the strategy needs to be reconsidered to determine

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					However, although the City Deal is mentioned the wording does not really identify it as a positive reason why an economic-led growth strategy could actually now be more relevant/needed. HBF requests that the role of the City Deal is better explained in the document.	whether an economic-led strategy is still appropriate, or whether alternative strategies should be considered. In the context of the findings of the Annual Monitoring Report, the Council considers that the strategy should be reviewed, to take account of up to date evidence and therefore it is felt the wording used is appropriate.
<u>39</u>	Mr Mark Harris	HBF Wales	Reconsideration of the Strategy	7.4	Paragraph 7.4.5 The wording should be amended to make it clearer that existing H1 allocated sites which have not come forward to date and where evidence cannot be provided to show that they are deliverable and viable in the next plan period will be removed and not simply "rolled over" as a commitment which has traditionally happened with plans in Wales.	The paragraph states that existing sites will be reassessed and with a greater emphasis on viability, some sites may be deallocated and new sites included. The Council considers this to be clear that existing sites will not be 'rolled over' and will emphasise this during the call for candidate sites.
<u>7</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure  The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the infrastructure policy and agrees with the need to provide further clarity on its definitions. We particularly welcome the need to consider other forms, such as Green Infrastructure. We would welcome inclusion in the LDP review as the Swansea Canal and its towpath should be considered as multi-functional green infrastructure.	The support for a review of the infrastructure policy and green infrastructure is welcomed. The preparation of the Replacement LDP will include an assessment of Green Infrastructure throughout the County Borough and the opportunities for its use.
<u>10</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Infrastructure  We also ask that the impact of development on existing infrastructure is considered, and mitigation agreed where appropriate. New development may require the provision of new infrastructure but consideration of its impact on existing infrastructure is important to ensure existing facilities are not degraded as a result of an increase in use following development nearby.	The preparation of the Replacement LDP will assess the impact on existing infrastructure and consider the need for mitigation.
<u>11</u>	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	Policy SP16  The Canal & River Trust (Glandwr Cymru in Wales) welcomes the review of the Environmental Protection Policy, SP 16. The proposal to separate land stability	The support for separating land stability and pollution in Policy SP16 is noted. A robust assessment of candidate sites will address the concerns raised.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>and pollution into two topic areas seems sensible. Developers should be required to properly consider the risk associated with development in areas affected by land instability or pollution and include robust mitigation measures before determination.</p> <p>We suggest that prior to allocation all sites are reviewed in relation to these issues due to the possible impact of remediation costs on viability and thus deliverability.</p>	
12	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 18</p> <p>Glandwr Cymru note that the policy at present relates mainly to wind and solar power. Water may be used for heating and cooling new developments, or for electricity generation through hydro-electric power schemes. These sources should be included as options within studies of renewable energy potential.</p>	The comment is noted. A Renewable Energy Assessment (REA) will be undertaken as part of the evidence base for the Replacement LDP.
9	Mr Vic Price		LDP Topic Area Reviews	8	<p>The Review Document overlooks the importance, within the housing provision, of small sites for 3/5 units each for houses of distinction. These will give a variety to the availability of new housing stock in the area. They need to be in immediate proximity to existing residential areas, close to bus routes and within a reasonable time distance from the rail network, already served by adjoining adopted highway and with availability of all services; they need to be in a location capable of being extensively landscaped yet enjoying good vistas but being capable with landscaping to be almost invisible from nearby adopted highways. By way of example my client's land, part of the land surrounding his home at "The Old Stables" Broomhill, would be ideal for this although part of the land he occupies is owned by the Council so to bring this site forward (although not strictly a planning issue) the Council's agreement as landowner will be needed to be a party to any sale.</p>	<p>The comment is noted. Housing delivery within the LDP has been delivered on a variety of sites, from large housing developments on land allocated in Policy H1, to small sites and windfalls. It is therefore recognised that the housing supply should be made up of a variety of components to ensure that there is sufficient land to meet the needs of the area over the plan period and to allow choice for both housebuilders and homebuyers.</p> <p>As part of the preparation of the Replacement LDP, there will be the opportunity for land owners to submit sites (during the 'Call for Candidate Sites') for consideration.</p>
13	Mrs Jane Hennell	Canal and River Trust	LDP Topic Area Reviews	8	<p>SP 20 &amp; 21</p> <p>The text explains that the Active Travel (Wales) Act 2013 places a legal requirement on local authorities</p>	The comments are noted and will be considered during the preparation of the Replacement LDP. The development of a clearer

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities.</p> <p>Any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.</p> <p>Policy BE3, which is part of SP21 relates to the safeguarding of the Swansea canal. Officers suggested that no review was necessary of the policy. Whilst this may be correct in relation to the canal itself, the opportunity should be taken to look at whether the policy should be widened to reflect other proposed changes within in the plan and whether the towpath should also be safeguarded. It is noted that other policies such as Strategic Policy 8 and 10 relating to open space and infrastructure are also relevant as well as policy SP20. Part of the towpath is National Cycle route 43, and sections of it are currently undergoing improvement as a result of Active Travel funding.</p> <p>Policy BE3 at present makes no mention of the benefits that the canal towpath can bring to the area by linking residential areas, by providing health and well-being benefits, access to both land and water-based recreation opportunities, nor does it recognise it as a sustainable transport route. Surely now that Active Travel and Green infrastructure gain more recognition in the plan, Policy BE3 should be widened to be more than just a safeguarding policy? The canal &amp; towpath are one of the best examples of multi-functional green infrastructure in the borough and already recognised in part as an active travel route. Policy BE3 should be reviewed and altered to reflect this.</p>	relationship between Active Travel, Green Infrastructure and the well-being gained from the use of open space / accessible natural greenspace will be a key theme in the Replacement LDP.
14	Mr Vic Price		LDP Topic Area Reviews	8	The Review document overlooks allocating specific sites for renewable energy. The priority given in the review report document to such use is welcome but it would be stronger with specific sites identified, especially for solar energy. The sites	The purpose of the Review Report is not to allocate specific sites. It is the first stage of the LDP review process. This Report reviews the existing LDP and assesses if the strategy and



## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					are best to be south facing and on marginal land in agricultural terms, of an extent of some 30 acres plus and within close proximity to the electrical connection points, and capable of being landscaped so as not to be visible from housing. My client owns a 40 site just west of Bryn which would be ideal for such use.	<p>policies have been successful or if (due to a number of factors) a new strategy and policies will be needed for the Replacement LDP (RLDP).</p> <p>With regard to specific sites for renewable energy, there will be the opportunity for land owners to submit sites during the 'Call for Candidate Sites' which will be considered as part of the preparation of the RLDP.</p>
21	Rhian Isaac	Natural Resources Wales	LDP Topic Area Reviews	8	<p>Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>We note the summary of the proposed LDP Policy review which refers to possible amendments to policies;</p> <p>SP1 - Climate Change</p> <p>SP4 - Infrastructure - we support the inclusion of green infrastructure</p> <p>SP10 - Open Space - we support the need to allocate land for open space</p> <p>SP14 - The Countryside and Undeveloped Coast</p> <p>SP15 - Biodiversity and Geodiversity - with the main finding of the annual monitoring reports being the continuing net loss of biodiversity as a result of planning decision we strongly suggest a strengthening of this policy</p> <p>SP16 - Environmental Protection</p> <p>SP18 - Renewable and Low Carbon Energy</p> <p>SP19 - Waste Management</p> <p>We would wish to reiterate the fundamental change to maintain and enhance under Section 6 of the Environment Act which needs to be considered in the LDP Review. In addition, we wish to reiterate the focus towards ecosystem resilience which is a key goal of The Principles of Sustainability within the Well-Being of Future Generations Act 2015</p>	<p>The comment is noted. National Policy context changes through the introduction of the Environment (Wales) Act (2016) and the Well-being of Future Generations (Wales) Act (2015) will be fully considered in the preparation of the Replacement LDP.</p>

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					which also needs to be given consideration as part of the LDP Review.	
50	Tata Steel		LDP Topic Area Reviews	8	<p>Question 5; Do the Topic Area Reviews identify those Policies which are likely to require revision?</p> <p>Strategic Policy 11 Employment Growth</p> <p>Paragraph 8.4.1.7 of the LDP Review Report identifies the potential for combining existing policies EC3 (Employment Land Uses) and EC4 (Protection of Existing Employment Land Uses) into one policy covering both elements. The intention is for this to provide clarity and encourage more development.</p> <p>Tata Steel is supportive of opportunities to encourage economic development in the region. It does not agree that the policies should be merged. Both policies EC3 and EC4 are highly relevant for any development which takes place at the steelworks. Any policy amendments could have implications for the future of the site. Tata Steel would welcome the opportunity to be directly involved and consulted on any proposed policy amendments at the earliest opportunity.</p> <p>Any amendments or combinations of existing policies EC3 and EC4 should continue to recognise;</p> <ul style="list-style-type: none"> <li>● The ancillary facilities and services which will be appropriate at Tata Steel's site will be different to that of other general employment uses. The flexibility currently provided in supporting paragraph 5.2.22 in the adopted LDP for a range of uses on heavy industrial sites should be retained in any future policy. This will continue to support investment and diversification in the steelworks.</li> <li>● The protection of the steelworks and associated land as an existing and significant employment area.</li> </ul>	<p>The comments are noted. The Review Report identified some areas of the plan where further clarity may be required. During the Officer Working Group, it was suggested that the employment policies, EC3 and EC4 could be merged, or re-written to ensure there is greater clarity over their use and interpretation. Any potential amendments would fully consider their use and would not intend to deter economic development or prevent the continued operation of employment areas. The policy review, as part of the Replacement LDP will carefully consider any amendments to policy and the impacts of such amendments.</p>
51	Tata Steel		LDP Topic Area Reviews	8	Strategic Policy 16 - Environmental Protection	The comments are noted. It is recognised that the operations at TATA are

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					<p>Paragraph 8.5.4.3 of the LDP Review Report states that existing Policy EN8 may be divided into separate pollution and land stability policies. This paragraph also highlights that links between requirements for sustainable drainage systems on new development (SAB) and water quality criteria in existing policy EN8 will be taken into account.</p> <p>Tata Steel's Port Talbot Steelworks is a large, heavy industrial site with an existing private drainage system. The drainage required from different types of development at the site can vary greatly, is often bespoke and does not reflect the drainage approach seen on many "typical" types of development in Neath Port Talbot. In many instances, the highest priority levels set out in Standard S1 are not practicable or viable. Tata Steel has been working closely with NPTCBC's SAB team on a number of projects to ensure appropriate drainage and SAB approval is secured.</p> <p>Any links made between SAB and the water quality criteria of Policy EN8 should not impose impractical or unviable requirements on Neath Port Talbot's heavy industrial sites. Doing so could restrict, and have implications for, bringing further economic development in the region. This would be contrary to the aims of existing Policies EC3 and EC4. Tata Steel would be pleased to work with NPTCBC on any future policy wording.</p>	<p>unique and it would not be the intention of any policy amendments to restrict operations. That said, any future amendments to policy would need to ensure that it complies with National Policy and SAB requirements.</p>
53	Tata Steel		LDP Topic Area Reviews	8	<p>Strategic Policy 18 - Renewable and Low Carbon Energy</p> <p>Paragraph 5.0.37 refers to the recent draft De-Carbonisation and Renewable Energy Strategy (DRES), noting that a strategy / action plan will be published shortly to set out a framework for carbon footprint reduction aspirations. The replacement LDP will be a key in facilitating the implementation of the strategy.</p> <p>Tata Steel is a core part of the South Wales Industrial Cluster leading the way on sustainable industry in the region, including the development of regional de-carbonisation projects, energy efficiency and low carbon power generation. The draft DRES</p>	<p>The comments are noted and the work being undertaken by TATA is recognised and supported. TATA will be consulted at each stage of plan preparation in accordance with the Delivery Agreement.</p>

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					recognises the work currently underway with the Council to develop sustainable forms of energy at the Port Talbot site. Tata Steel would be grateful for early involvement with the Council to discuss and assist with any amendments to the existing renewable energy policies and the action plan for the DRES.	
4	Mrs Chris Thomas		LDP Topic Area Reviews	8	This review seems not to have provision for the future of the above named business park (Glynneath Business Park).	The Review Report refers to the performance and delivery of sites allocated within the existing LDP. As part of the Review process, a number of evidence base studies will be undertaken, including as assessment of future employment requirements and an Employment Land Review, to establish how much employment land will be required over the replacement plan period and the most appropriate locations for such development. Once such options have been established, these will be subject to future public consultations.
5	Mr Rob Bowen		LDP Topic Area Reviews	8	<p>Land Supply; It is noted that land supply has fallen below 5 years and as such it is considered that additional land is needed to provide dwellings.</p> <p>Within the LDP Small sites are to deliver 180 dwelling which is 9.4% of the overall total. Therefore, in simple terms for every 1 dwelling on a small site 10 should be built on larger sites. Since 2013 small sites have provides 14% of all housing however, in the last 2 years of the 447 dwellings completed 89 (20%) were completed on smaller sites.</p> <p>This evidence would suggest that smaller site are being delivered faster. It is also likely that they are being delivered by local developers who retain more income within the local economy. As such it is considered that in allocating additional sites greater emphasis should be given to smaller sites.</p>	<p>The comment is noted. The Review Report acknowledges that development on large sites has fallen below the targets set out in the monitoring framework. The level of growth, and how growth is distributed will be considered as part of the review process.</p> <p>The allocation of housing sites between large sites and small sites will be a key part of the LDP review process. No further action required.</p>
6	Mr Rob Bowen		LDP Topic Area Reviews	8	Density BE1 (Design) Whilst it is recognised that there is a need to provide more housing it is considered	The comment is noted. The density requirements of Policy BE1 are used to

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					that the requirement of BE1 are too rigid. The policy limits the opportunity to trade up to a larger house, provide a variety of housing and places unnecessary restraint on small sites. It is therefore consider that a review of the policy should be undertaken with a view to applying it to sites, for example, over a specific area.	ensure that land is used efficiently, in recognition of it being a scarce resource.  As part of the review process, the density requirements will be reviewed to determine if they are still appropriate.
41	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.1.4.6 The HBF objects to the suggestion that affordable housing is an infrastructure need. Unlike other infrastructure such as roads, or schools, new homes do not generate a need for affordable housing, the need already exists, requiring developers to contribute to the affordable housing supply is a policy requirement subject to consideration of the viability of the scheme.	Policy I1 'Infrastructure Requirements', lists the types of infrastructure new developments will need to consider. Affordable housing is included within this policy and therefore the Council considers the wording of 8.1.4.6 to be correct.  Policy I1 is an overarching policy from which strategic policy SP8 Affordable Housing (AH) and AH topic based policies such as Policy AH1 and AH2 flow from, and set out the specific policy requirement.
42	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.2 Again the HBF consider that there is no direct link between housing requirement and placemaking, so reference to it in this section of the report should be removed.	In the context of Planning Policy Wales, Edition 10, the Council believes that there is a direct correlation between Placemaking and the amount of housing each settlement will require.
43	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.1.4 The HBF suggest that this is misleading as the plan review will extend the life of the plan from 2026 to 2035 so there is additional time in which to deliver the previous level of growth.	The Council is proposing a full review to the existing LDP, therefore the Replacement LDP (RLDP) will in effect be a new plan and will not simply extend the life of the existing plan. The RLDP will therefore need to establish a new level of growth for the revised plan period, based on up to date evidence.
44	Mr Mark Harris	HBF Wales	LDP Topic Area Reviews	8	Paragraph 8.3.2 Strategic Policy 8 - Affordable Housing - HBF suggests that this section should also include commentary on the recent letter from the Housing Minister regarding the use of publicly owned land to deliver affordable housing led schemes with a minimum 50% housing.	Affordable Housing will remain an important consideration for the Replacement LDP. The letter from the Housing Minister will be considered during the Replacement LDP, as will the affordable housing policies within the emerging NDF.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
61	Mr Peter Horsley		LDP Topic Area Reviews	8	<p>Paragraph 8.5.4.3 - please refer to the comments on paragraph 5.0.27 above. MTAN 1 requires the RTS to provide a strategy for the provision of aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development.</p> <p>Further, the requirement is for each individual Local Planning Authority to indicate how the need for minerals will be met over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand and gravel, not the 15 years referred to in this paragraph.</p>	<p>Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years for crushed rock and 22 years, in the case of land-based sand &amp; gravel – which is sufficient to cover the MTAN1 and PPW requirements for maintaining minimum landbanks of 10 years and 7 years respectively, throughout the full 15 year period of each LDP / RLDP.</p>
62	Mr Peter Horsley		LDP Topic Area Reviews	8	<p>Paragraph 8.5.4.4 states "evidence set out in the AMR's to date indicates that Neath Port Talbot has more than an adequate landbank of aggregates to meet identified need and therefore it is highly unlikely that any new allocations will be required". Whilst this may be the case, it is important to recognise that the SWARP Annual Report confirms that Mineral Extraction ends at the two sandstone sites, Cwm Nant Lleici and Gilfach in 2026 and 2028 respectively. with mineral review (ROMP) dates of 2024 and 2027. These dates are within the replacement plan period. More importantly, these sites supply High Specification Aggregates (high PSV), which are of national importance and are not confined to local markets. The Council must therefore provide narrative and policy support in the review to demonstrate how the adequate supply of minerals, including PSV aggregates will be met on a local, regional and national scale throughout the plan period and for the requisite period beyond.</p>	<p>The comment is noted – the Council will provide the necessary policy support and narrative to demonstrate how the adequate supply of aggregates will be met. The emerging Regional Technical Statement (RTS) 2<sup>nd</sup> Review will set out the requirements for Neath Port Talbot Council [and all other Mineral Planning Authorities (MPAs)] to demonstrate how local and regional supply of aggregates will be met. As part of the process for preparing the new RTS, seven new sub-regions have been created specifically for the purpose of facilitating strategic minerals planning and collaborative approaches. Neath Port Talbot, along with Swansea and Carmarthenshire have been grouped as the Swansea City Sub Region.</p> <p>Notably, the RTS 2<sup>nd</sup> Review introduces a new requirement for all MPAs to agree 'Statements of Sub-Regional Collaboration' (SSRC) in respect of their contributions to the future provision of land-won primary aggregates. SSRCs are required to be prepared, collaboratively, by all constituent MPAs within each sub-region (as defined by the RTS 2<sup>nd</sup> Review) as part of the evidence base needed to support each</p>

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
						Replacement Local Development Plan (RLDP). Once agreed, an SSRC will remain in force until it becomes superseded by the requirements of future reviews of the RTS. The SSRC will confirm that all constituent MPAs within the sub-region accept the individual minimum requirements for aggregate apportionments and allocations for their individual Authority areas, as set out in the latest review of the RTS, and that (as a minimum) the RTS requirements for that sub-region as a whole will be met.
<u>22</u>	Rhian Isaac	Natural Resources Wales	Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>It would be beneficial if a joint LDP was undertaken with neighbouring authorities. Many of our strategic planning interests are better considered on a cross boundary level. This will also fit in with the Area Statements.</p> <p>However, we appreciate the difficulties you may have undertaking a joint LDP.</p>	The comment is noted. Whilst presently, due to the variances in stages of preparation between authorities it is not considered possible to undertake a joint LDP, the Council will however, continue to undertake regional working and studies where possible.
<u>58</u>	Mr Peter Horsley		Opportunities for Collaborative Working	10	<p>Does the Report adequately explain the potential for collaborative working as well as the reasons why a joint LDP is not appropriate at this time?</p> <p>The document identifies the Regional Technical Statement (RTS) as a key document under which the Plan Review will be considered to provide a strategy for the provision of aggregates in the region and within each local authority area. There are shortfalls in aggregate provision, there will be a need for local authorities within the sub-region or an adjacent sub-region to ensure minimum provisions are met and production capacity is maintained to deliver the steady and adequate supply of aggregates. This will need to be confirmed through Sub-Regional Statements of Regional Collaboration. It is expected</p>	The comment is noted and will be considered as part of the evidence base for the Replacement LDP.

## Appendix E: . Consultation Comments and Responses

ID	Name	Organisation	Section	Para	Representation	Officer Response
					that guidance on these SSRC's will be delivered alongside the RTS 2nd review.	
45	Mr Mark Harris	HBF Wales	Status of LDP Allocations	Appendix C:	<p>Appendix C Status of LDP Allocations</p> <p>Paragraph C.2 HBF would suggest that "sites with planning permission but not within the current five year land supply should also be re-assessed. There are many site in LDP's across Wales which have planning permission that has either been renewed several times or is extant by virtue of a start on site being made however, many of these will never be developed.</p>	The Review Report refers to all sites in the H1 portfolio being reassessed during the review, regardless of whether they are within the 5 year land supply.



## Appendix F: Glossary

**Table F.0.1 Glossary of Terms**

Term	Explanation
Annual Monitoring Report (AMR)	Report to assess the extent to which policies in the adopted LDP are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations (2005).
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the LPA as allocations in an emerging LDP.
Community Infrastructure Levy (CIL)	The CIL is a planning charge, introduced by the Planning Act (2008) as a tool for LPAs to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the CIL Regulations (2010).
Community Involvement Scheme (CIS)	Part of the Delivery Agreement which sets out the Council's scheme for involving local communities in the Plan preparation process.
Consultation	A formal process in which comments are invited on a particular topic / set of topics or a draft document.
Delivery Agreement (DA)	A document comprising the Authority's timetable for the preparation of the LDP together with its Community Involvement Scheme (CIS) and submitted to the Welsh Government for agreement.
Deposit LDP	Is the Plan the Local Planning Authority (LPA) considers is sound and able to be adopted. Subject to a formal six week consultation period in which individuals and organisations can make representations on the Plan.
Evidence Base	Interpretation of information / data to provide the foundation for the Plan's policies.
Examination in Public (EIP)	A process whereby an independent Inspector considers whether the Deposit LDP is 'sound' and any representations to it.
Green Infrastructure (GI)	<p>PPW identifies GI as: the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales.</p> <p>At the landscape scale, green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges.</p> <p>At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens.</p> <p>At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.</p>

## Appendix F: . Glossary

Term	Explanation
Inspector	The person appointed by the Planning Inspectorate to consider the LDP and undertake the Examination in Public.
Inspector's Report	Report of the Inspector specifying precise recommendations identifying required changes to the LDP, together with reasons for the changes. It will focus on whether the LDP is 'sound'.
Local Development Plan (LDP)	The required statutory Development Plan to be produced by each local authority in Wales under Part 6 of the Planning and Compulsory Purchase Act (2004).
Local Planning Authority (LPA)	A planning authority responsible for the preparation of a LDP – i.e. a County or Borough Council or National Park Authority.
National Development Framework (NDF)	The NDF will set out a 20 year land use framework for Wales, and will replace the current Wales Spatial Plan (WSP). It is presently in production and it is anticipated that the NDF will be published in the Autumn of 2020. A consultation draft was published in August 2019.
Placemaking	Is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being in the widest sense (PPW 10).
Planning Policy Wales (PPW)	A National document which sets out the land use planning policies of the Welsh Government, supplemented by Technical Advice Notes, Policy Clarification letters and Welsh Government Circulars.
Pre-Deposit Documents (LDP)	These include the vision, strategic options, preferred strategy, key policies, the Integrated Sustainability Appraisal (ISA) report, the candidate sites register and Review Report (if appropriate).
Review Report	The required statutory report under S69 of the 2004 Act and/ or Reg41 to conclude on the LDP revision procedure to be followed based on a clear assessment of what has been considered and what needs to change and why, based on evidence.
Sound	In order to be adopted, an LDP must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). The Tests of soundness and checks are identified in PPW.
Stakeholder	Individual, group or body whose interests are directly affected by the LDP.
Strategic Development Plan (SDP)	Provision is made under the Planning (Wales) Act (2015) for the preparation of SDP's at a regional level. An SDP will have regard to the NDF; responding at a regional level to strategic issues.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The SEA Directive (2001/42/EC) requires a formal 'environmental assessment of certain plans and programmes, including those in the field of planning and land use'.
Supplementary Planning Guidance (SPG)	Provides supplementary information with regard to policies in a LDP. SPG do not form part of the development plan and are not subject to independent examination but must be consistent with it and with national planning policy.

Term	Explanation
Sustainability Appraisal (SA)	A tool for appraising policies to ensure they reflect sustainable development objectives – i.e. social, economic and environmental factors. Each LPA is required by S62(6) of the Act to undertake an SA of the LDP. This form of SA fully incorporates the requirements of the SEA Directive and Regulations.
Technical Advice Notes (TAN)	A topic-based document published by the Welsh Government to supplement Planning Policy Wales (PPW).
Well-being of Future Generations Act (WBFG) (2015)	An Act which requires public bodies in Wales to take account of the long term, to prevent problems occurring or getting worse, to work collaboratively and involve people of all ages. The aim is to support and deliver a public service which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Well-being Plan	The Well-being Plan sets out the Public Services Board’s (PSB) long term vision for the area as well as priorities for action over the next 5 years.







Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council