



Neath Port Talbot County Borough Council

Local Development Plan 2011 – 2026

Examination Statement

Matter 7: Environment & Resources

(April 2015)



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1 Environment & Resources

1.1 Key Issues

KEY ISSUE: Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy? Are they based on robust and credible evidence? Are they clear, reasonable and appropriate?

1.1.1 The Council considers that this key issue has been satisfactorily addressed as set out in the detailed responses below.

1.2 The Countryside & Undeveloped Coast

1.2.1 Question 1

With regard to Policy EN 2, where are the features and characteristics for which each Special Landscape Area has been designated set out? Will the landscape study be available as SPG?

1.2.1.1 The methodology and justification for the designation of the Special Landscape Areas (SLAs) listed in Policy EN2 is set out in the 'Provision of Landscape Advice' report⁽¹⁾. For each designated SLA, the report sets out the following:

- Relevance against the strategic criteria (i.e. Need, Coherence and Consensus);
- Primary landscape qualities and features;
- Key policy and management issues; and
- Boundary justification (including a cross-reference to the underlying LANDMAP data).

1.2.1.2 Whilst it is not the intention of the Council to publish the Landscape Study in its entirety as SPG, on reflection the Council considers that in respect of Policy EN2, it would be appropriate to extract the relevant information and publish supplementary guidance on the way in which the policy will be applied. If deemed necessary by the Inspectors, this could be addressed via a Matters Arising Change.

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1.3 Environmental Protection

1.3.1 Question 2

Is the approach to flood risk consistent with national policy as set out in TAN15?

1.3.1.1 The overall development of the LDP strategy and the approach to the selection of sites was undertaken in accordance with national policy. Development has been directed towards Development Advice Map (DAM) Zones A and B and flood risk areas have been avoided as far as possible. Where allocated sites include areas of flood risk, this has been justified and is necessary in order to promote regeneration and take forward the Council's aspirations and strategies. Sites allocated within flood areas have been assessed in accordance with the requirements set out in TAN 15 and are considered to meet the requirements set out in national policy.

1.3.1.2 In general, where sites are affected by flooding issues, details are contained in the Candidate Site Assessment Report⁽²⁾ and Strategic Housing Site Assessment Report⁽³⁾. In addition, all the Plan's new allocations are covered by the two documents that comprise the LDP Strategic Flood Consequences Assessment (SFCA)⁽⁴⁾. With reference to the central Port Talbot area, further information is set out in the *Draft* Port Talbot Harbourside and Town Centre Supplementary Planning Guidance⁽⁵⁾.

1.3.1.3 The approach that will be taken to the assessment of applications for developments in flood risk areas will be as set out in national policy in PPW and TAN15 and proposals will therefore need to be fully justified, accompanied by an acceptable Flood Consequences Assessment and be of suitable design with appropriate provision for flood risk.

1.3.2 Question 3

With regard to flood risk, do the recently published⁽⁶⁾ 2015 Development Advice Maps (DAMs) have new implications for any allocations, other identified sites or policies?

1.3.2.1 The January 2015 amendments to the Development Advice Maps (DAMs) have only resulted in changes to flood zones in parts of the upper Neath Valley, central Briton Ferry and upper Swansea Valley. These revisions have resulted in changes affecting the following sites:

2 Document Ref: EB07.

3 Document Ref: EB06.

4 Strategic Flood Consequences Assessment Stage 1 & 2 [Document Ref: EB01] and Strategic Flood Consequences Assessment Stage 3 (Clarkebond) [Document Ref: EB02].

5 Document Ref: SD35.

6 January 2015

- Park Avenue, Glynneath (Policies SP6, VRS1/1, H1/23 and R1/4); and
- Compair / GMF, Ystalyfera (Policy H1/29).

1.3.2.2 All other sites and policies are unaffected by the DAM changes.

Park Avenue, Glynneath

1.3.2.3 The DAM has been amended in the Glynneath area and now shows a larger area than previously to be within Zone C2. Much of this additional flood risk area covers existing developed areas of the town, but it also includes the part of the Park Avenue allocation that is to the north of the former road embankment that traverses the site. There are also additional parts of the main (southern) part of the site which are now within flood Zone C2.

1.3.2.4 These changes have reduced the developable area of the site (i.e. that part of the site lying within Zones A and B) to some 7.9 hectares. The allocations that relate to the site envisage a residential development of 150 units (H1/23) and a retail development (R1/4). At a density of 30 dph (i.e. based on density levels set out in Paragraph 5.4.14 and Policy BE1), an area of some 5 hectares would be required for this scale of residential development. The Neath Port Talbot Retail Study ⁽⁷⁾ identifies an indicative convenience floorspace capacity of 660 sq m in Glynneath, and it is considered that this size of development can also be accommodated within flood Zones A and B including adequate space for the associated servicing, parking and access arrangements.

Compair / GMF, Ystalyfera

1.3.2.5 The DAM for the Ystalyfera area has been amended, with the area shown as being within Zone C mostly being reduced apart from a few small areas where it now covers additional ground. The Compair / GMF site is affected by this, and a larger part of the allocation is now shown as being in Zone C2.

1.3.2.6 The changes to the DAM flood zones have reduced the area of the site that lies outside Zone C to some 2.3 hectares. While it is considered that this part of the site (which is largely within Zone B) remains suitable for residential development, applying the density considerations as set out in the LDP would reduce the indicative numbers attributed to the site by 50.

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1.4 Minerals

1.4.1 Question 4

Is the policy framework sufficient to deal with all future proposals for coal mining including underground operations?

1.4.1.1 The Council is satisfied that the policy framework is sufficient to deal with all future proposals for coal mining, including underground operations.

1.4.1.2 Policy SP17 (Minerals) sets out the strategy of the Council 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.

1.4.1.3 In accordance with national guidance, the Deposit Plan sets out the following detailed policy framework:

- Policy M1 (Development in Mineral Safeguarding Areas) - safeguards the Primary and Secondary coal resource zones to protect such areas from other types of permanent development which would either sterilise them or hinder their extraction. Areas to be safeguarded are shown on the Proposals Map.
- Policy M2 (Surface Coal Operations) - identifies where surface coal operations would be unacceptable in principle and these areas are identified on the Proposals Map. Surface coal operations would include opencast working and those surface facilities associated with underground mining.
- Policy M3 (Development in Mineral Buffer Zones) - protects the permitted or proposed mineral working from new sensitive uses by establishing a separation distance between potentially conflicting land uses.
- Policy M4 (Criteria for the Assessment of Mineral Development) - sets out the criteria against which all proposals for mineral extraction and associated development will be assessed including those relating to surface operations, underground operations, new development, extensions to existing operations, the reworking of mineral tips for their mineral content, coal-bed methane extraction, shale gas extraction and any mineral review applications.
- Policy SP16 (Environmental Protection) / Policy EN8 (Pollution and Land Stability) - sets out the strategy and policy framework for protecting and improving the environment as far as possible.

1.4.1.4 In order to achieve a degree of certainty, Minerals Planning Policy Wales (MPPW) states '*Mineral Planning Authorities...should provide a set of clear criteria against which any future proposals will be assessed*'⁽⁸⁾. In light of this guidance, coupled with the fact that the issues are broadly similar for all types of mineral operation (including surface or underground), separate policies are not considered necessary.

1.4.1.5 In this regard, the Council is satisfied that the approach taken (i.e. Policy M4) is the most appropriate and reasonable and this, together with national policy, will ensure a consistent and simplified basis for the determination of mineral planning applications.

1.4.2 Question 5

Should the tertiary surface coal resource be safeguarded under Policy M1? What would be the objective of such protection? Would it be supported by evidence and consistent with national policy?

1.4.2.1 The Council does not consider that the Tertiary coal resource should be safeguarded under Policy M1 (Development in Mineral Safeguarding Areas). The Council has relied upon the guidance contained within Minerals Technical Advice Note 2: Coal (MTAN2) and the National Minerals Map of Wales in this respect.

1.4.2.2 MTAN2⁽⁹⁾ refers to the three resource zones identifying that the '*Primary*' zones constitute the main targets for opencast extraction and the '*Secondary*' zones are an important resource. The '*Tertiary*' zones are described as smaller areas of thin coal but there is no specific reference to their role. Furthermore, the guidance stipulates the steps that the Mineral Planning Authority (MPA) should take in respect of meeting the safeguarding requirement, identifying only that the MPA '*...should determine whether primary and secondary coal resource zones lie within its area*'⁽¹⁰⁾.

1.4.2.3 The Council is therefore satisfied that the approach taken to safeguarding the coal resource is entirely consistent with national policy. Safeguarding the Tertiary zones would not be supported by evidence nor consistent with national policy.

1.4.3 Question 6

Are Policies M1 and M2 sufficiently clear? Do they need rewording to be consistent with national policy?

1.4.3.1 The Council is satisfied that the wording of Policies M1 (Development in Mineral Safeguarding Areas) and M2 (Surface Coal Operations) are sufficiently clear and consistent with national policy.

8 Paragraph 15 'Minerals Planning Policy Wales' (Welsh Government - 2000).

9 Paragraph 24 'MTAN2' (Welsh Government - 2009).

10 Paragraph 36 'MTAN2' (Welsh Government - 2009).

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Policy M1 (Development in Mineral Safeguarding Areas)

1.4.3.2 In accordance with national policy, Policy M1 and supporting text is considered to be sufficiently clear in respect of (1) the fact that '*safeguarding*' does not necessarily indicate an acceptance of working or that any permission for extraction will be granted; and (2) the provisions a developer will need to meet in order for development to proceed.

1.4.3.3 More specifically, in the case of permanent development, the policy clearly requires developers to demonstrate (1) the mineral resource has no value (i.e. is of poor quality/quantity and would not be economical to exploit); (2) prior extraction can satisfactorily take place; (3) there is an overriding need for the development (i.e. over the need to protect the resource); and (4) the scale and location of the development would not impact on the possible working of the resource.

1.4.3.4 In the case of temporary development, the policy clearly requires developers to demonstrate that it can be implemented and the site restored within the timescale that the mineral is likely to be needed.

Policy M2 (Surface Coal Operations)

1.4.3.5 MPPW states Mineral Planning Authorities '*...must provide as much guidance in their plans as possible to indicate where it is likely to be environmentally acceptable for resources to be worked. To achieve this degree of certainty, policies should state where such operations would not be acceptable*'⁽¹¹⁾.

1.4.3.6 The Council has interpreted the guidance contained within MPPW and MTAN2 and made the wording of Policy M2 relevant to the County Borough based on experience with local sites. Furthermore, the Council considers the reference to '*exceptional circumstances*' both in the policy and supporting text⁽¹²⁾ to be sufficiently clear, ensuring consistency with national policy guidance⁽¹³⁾.

1.4.4 Question 7

Are mineral workings, mineral buffer zones and so on shown correctly on the Proposals Map?

1.4.4.1 The Council is satisfied that all mineral related proposals⁽¹⁴⁾ have been shown correctly on the Proposals Map:

Operational Sites

11 Paragraph 15 'MPPW' (Welsh Government - 2000).

12 Paragraph 5.3.71 'Deposit Local Development Plan' - Document Ref: SD04.

13 Paragraph 49 'MTAN2' (Welsh Government - 2009).

14 Inclusive of MEC13 and MEC14 'Schedule of Proposed Minor Editing Changes' Document Ref: SD24.

1.4.4.2 The Proposals Map shows all current operational / active mineral sites across the County Borough with a distinction made between coal, hard rock and sand & gravel operations.

Safeguarded Resources (Policy M1)

1.4.4.3 In respect of coal, MTAN2 stipulates the steps that should be taken in respect of meeting the safeguarding requirement. In accordance with this national guidance, and derived from the National Minerals Map of Wales, the Proposals Map shows the entire Primary and Secondary coal resource zones (as one block), excluding settlements and International and National designations of environmental and cultural importance.

1.4.4.4 Furthermore, coal resources within 500 metres of settlements (including those classified as 'Dormitory'), are shown as in exceptional circumstances mineral working may be justified. This approach ensures consistency with advice in MTAN2⁽¹⁵⁾.

1.4.4.5 Whilst MTAN1 does not stipulate steps in the same way as MTAN2, in safeguarding aggregate resources and to reflect both national and regional guidance, the Proposals Map shows both Category 1 and Category 2 resources⁽¹⁶⁾, excluding settlements and International and National designations of environmental and cultural importance.

1.4.4.6 For the purposes of showing the safeguarded aggregate resources on the Proposals Map, these are shown up to settlement boundaries.

Settlement Protection Zones (Policy M2)

1.4.4.7 In accordance with national policy, the Proposals Map shows clearly defined 500 metre Settlement Protection Zones [i.e. the spatial expression of Policy M2(1)], where unless there are deemed to be exceptional circumstances, surface coal operations will be considered unacceptable.

1.4.4.8 Please also refer to Question 8 below.

Buffer Zones (Policy M3)

1.4.4.9 In accordance with national policy, the Proposals Map shows clearly defined buffer zones around permitted or proposed mineral workings based on the following minimum distances as stipulated by MTAN1 and MTAN2: Coal - 500 metres; Hard Rock Quarries - 200 metres; and Sand & Gravel - 100 metres.

1.4.4.10 In respect of this proposal, there are instances across the County Borough where the full extent of the mineral buffer zones overlays that of settlements. Such instances include:

- East Pit East Revised Opencast - Tairgwaith / Cwmllynfell;

15 Paragraph 49 'MTAN2' (Welsh Government - 2009).

16 The extent of the Category 1 and Category 2 resources have been derived from the 'Aggregate Safeguarding Map of Wales' (Welsh Government - 2010).

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- Dan Y Graig Colliery - Treforgan (Crynant);
- Aberpergwm Mine (Deep Mine) - Glynneath / Cwmgwrach;
- Unity Mine (Deep Mine) - Cwmgwrach; and
- Selar Opencast - Pontwalby (Glynneath) / Cwmgwrach.

1.4.4.11 MPPW states '*Within the buffer zone, there should be...no new sensitive development, except where the site of the new development in relation to the mineral operation would be located within or on the far side of an existing built up area which already encroaches into the buffer zone*'⁽¹⁷⁾.

1.4.4.12 Whilst the Council is aware of the view that buffer zones should only be shown up to the edge of settlement boundaries, the Council considers that for clarity and in order to fully inform the determination of applications for new sensitive development in close proximity to mineral operations, the full extent of the buffer zone should be shown on the Proposals Map.

1.4.5 Question 8

How have the Settlement Protection Zones been identified? Which policy refers to them?

1.4.5.1 MPPW states Mineral Planning Authorities '*...must provide as much guidance in their plans as possible to indicate where it is likely to be environmentally acceptable for resources to be worked. To achieve this degree of certainty, policies should state where such operations would not be acceptable*'⁽¹⁸⁾. Furthermore, in respect of the Proposals Map, MTAN2 states '*...the areas where coal working will not be acceptable should be shown*'⁽¹⁹⁾.

1.4.5.2 In accordance with national policy therefore, Policy M2 (Surface Coal Operations) identifies where surface coal operations would be unacceptable in principle, stipulating that such areas are those within 500 metres of settlements (unless there are deemed to be exceptional circumstances) and those that are within International and National designations of environmental and cultural importance⁽²⁰⁾.

1.4.5.3 Consequently, the Proposals Map shows clearly defined 500 metre 'Settlement Protection Zones' [i.e. the spatial expression of Policy M2(1)], along with Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), historic landscapes, parks or gardens and Country Parks.

17 Paragraph 40 'MPPW' (Welsh Government - 2000).

18 Paragraph 15 'MPPW' (Welsh Government - 2000).

19 Paragraph 27 'MTAN2' (Welsh Government - 2009).

20 The evidence base has not identified additional areas of constraint (e.g. areas where demonstrable cumulative and in-combination effects mean that an area cannot absorb further environmental impacts; or where coal development would have an adverse effect on proposals to attract or retain investment in the area).

1.4.5.4 The 'Settlement Protection Zones' are shown around all settlements in Neath Port Talbot (including those classified as 'Dormitory'), and also take account of settlements located across administrative boundaries in neighbouring authorities.

1.4.5.5 For the purposes of improved clarity however, the Council considers that it would be appropriate to include specific reference to 'Settlement Protection Zones' in the supporting text to Policy M2, and if deemed necessary by the Inspectors, this could be addressed via a Matters Arising Change.

1.4.6 Question 9

Are all existing and potential new wharves and railheads safeguarded in the LDP? Are they protected through a policy and identified on the Proposals Map?

1.4.6.1 The Council is satisfied that all important existing and potential new wharves and railheads have been safeguarded in the LDP⁽²¹⁾.

1.4.6.2 Policy TR4 (Safeguarding Freight Facilities)⁽²²⁾ sets out the provisions in this regard and ensures that adequate provision for storage and processing facilities for minerals is made at docks, wharves and railheads. In respect of wharves and railheads, the following facilities are identified on the Proposals Map:

- Gwaun Cae Gurwen Rail Pad⁽²³⁾;
- Onllwyn Washery / Disposal Point Rail Pad⁽²⁴⁾;
- Cwmgwrach Rail Head⁽²⁵⁾;
- Neath Abbey Rail Head & Wharf⁽²⁶⁾;
- Marine Aggregate Wharf, Briton Ferry⁽²⁷⁾; and
- Baglan Energy Park Rail Head⁽²⁸⁾.

21 Justification for the fact that Margam Rail Pad / Loading Facility is not safeguarded is set out in Paragraphs 6.0.66-6.0.67 (Page 40) 'Minerals Topic Paper' - Document Ref: SD48.

22 Page 74 / Section 5.4 Transport and Access 'Deposit Local Development Plan' - Document Ref: SD04.

23 Tile 4 - Proposals Map.

24 Tile 7 - Proposals Map.

25 Tile 20 - Proposals Map.

26 Tile 34 - Proposals Map

27 Tile 35 - Proposals Map.

28 Tile 41 - Proposals Map.

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1.5 Renewable & Low Carbon Energy

1.5.1 Question 10

What is the evidence informing the LDP's renewable energy policies?

1.5.1.1 The following three documents set out the background information and evidence base that has informed the renewable and low carbon energy policies in the LDP:

Renewable & Low Carbon Energy Topic Paper (September 2014) ⁽²⁹⁾

1.5.1.2 The Topic Paper provides a summary of the key documentation and evidence that has informed the preparation of the LDP.

Renewable Energy Assessment (2012) ⁽³⁰⁾

1.5.1.3 In preparing the LDP, the Council has prepared a Renewable Energy Assessment (REA) to indicate the potential level of energy generation from renewable sources. The REA followed a toolkit⁽³¹⁾ provided by the Welsh Government and examines a wide variety of renewable energy sources.

1.5.1.4 In broad terms, the REA highlights that whilst the percentage of renewable electricity generation in Neath Port Talbot greatly exceeds the UK-wide target, the potential for generation of renewable heat sources across the County Borough falls below the national targets. This evidence has therefore identified that there is a case for requiring closer scrutiny of proposals to assess their potential for the receipt or generation of renewable energy.

1.5.1.5 Policy RE2 (Renewable and Low Carbon Energy in New Development) therefore sets the requirement for all major development proposals to examine the potential to incorporate renewable and low / zero carbon technologies on-site and, where appropriate, share that energy with the wider community.

TAN 8 Annex D Study of Strategic Search Areas E and F: South Wales Valleys (ARUP 2006) ⁽³²⁾

1.5.1.6 In accordance with national policy⁽³³⁾ and as part of a collaborative exercise, a consortium of five South Wales Local Planning Authorities⁽³⁴⁾ undertook work on future wind farm development in the sub-region. The consortium commissioned consultants to provide recommendations on the proposed refinement of the boundaries of Strategic Search Areas (SSAs) E and F as defined in TAN 8.

29 Document Ref: SD49.

30 Document Ref: EB20.

31 Planning for Renewable and Low Carbon Energy - A Toolkit for Planners (2011).

32 Document Ref: EB21.

33 Paragraph 2.4 'Technical Advice Note (TAN) 8: Planning for Renewable Energy' (Welsh Government - 2005).

34 Neath Port Talbot County Borough Council, Bridgend County Borough Council, Rhondda Cynon Taf County Borough Council, City & County of Swansea and Carmarthenshire County Council.

1.5.1.7 Policy RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development), as amended, takes account of the TAN 8 Study recommendations ensuring that the policy approach and refined SSAs as identified on the Proposals Map are entirely consistent with that of neighbouring authorities.

1.5.2 Question 11

Is the area of Strategic Search Area E, as amended through FC25 and FC38, consistent with that identified in TAN8?

1.5.2.1 In respect of the portion of Strategic Search Area (SSA) E located within Neath Port Talbot, the refined boundary⁽³⁵⁾ accords with the TAN 8 "*broad brush*" boundary, in that it now constitutes a more significant part of the area identified in the TAN. Part of the boundary is in fact concurrent with the line of the TAN8 unrefined boundary, with the remainder being within the TAN SSA.

1.5.2.2 The ARUP Study considered the full extent of the TAN SSA (E) in detail, along with adjacent land located within 5km of the boundary. Indicative capacities, impacts of development and technical suitability were all considered with the Study concluding that the refined area as proposed to be identified on the Proposals Map was appropriate to deliver the development required. This study was undertaken in accordance with the methodology recommended in the TAN and the Council is satisfied that its recommendations are robust and applicable.

1.5.3 Question 12

Are Policy SP18 and Policy RE1, as amended by FC23 and FC26, consistent with PPW, TAN8 and TAN6? Are they reasonable and appropriate? Would Policy RE1 allow proposals which constitute farm diversification?

1.5.3.1 The Council is satisfied that Policy SP18 (Renewable and Low Carbon Energy) and Policy RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development), as amended, are reasonable, appropriate and consistent with national policy.

1.5.3.2 Policy SP18 sets out the positive provisions in respect of the Council's contribution to meeting Wales' national renewable energy and energy efficiency targets. The strategy seeks to encourage renewable and low carbon energy proposals where appropriate, while achieving an acceptable and sustainable balance with protecting the environment and the amenity of local communities.

35 As amended by FC38 'Schedule of Proposed Focussed Changes' [Document Ref: SD20], and more accurately reflecting the recommendation of the ARUP TAN 8 Study.

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1.5.3.3 In regard to Policy RE1, the Council has acknowledged that further amendments are considered necessary⁽³⁶⁾ in order to ensure that the Policy is reasonable, appropriate and fully consistent with national guidance. If deemed necessary by the Inspectors, such additional amendments could be addressed via Matters Arising Changes.

1.5.3.4 The locally refined SSAs are considered by the Council to be the most appropriate locations within the County Borough for large scale wind energy developments. The additional amendments to Policy RE1 (i.e. FC23) and supporting text provide additional clarification about how large scale proposals outside the boundaries of the refined SSAs will be assessed, indicating that such proposals may be acceptable subject to amenity and impact criteria.

1.5.3.5 Furthermore, the Council acknowledges that renewable energy generation is an evolving industry and therefore Policy RE1 is intended to cover a broad range of generation types, including those proposals which may constitute farm diversification. The Council is satisfied that there is nothing in the policy which would prevent acceptable farm diversification proposals from proceeding and that Policy RE1, together with Policy SP18, will ensure that consideration of all proposals is balanced between the need to generate increased levels of renewable energy and the need to protect sensitive areas.

1.6 Waste

1.6.1 Question 13

Will the sites identified in Policy W1 be appropriate and sufficient to meet the need for new waste facilities?

1.6.1.1 Whilst the Council is no longer required to specifically quantify the amount of separate future provision likely to be needed for waste facilities over the Plan period⁽³⁷⁾, the revised TAN21: Waste states '*...LDPs should indicate where suitable and appropriate sites exist for the provision of all types of waste management facilities in order to provide some certainty for waste operators interested in fulfilling demand in an area*'⁽³⁸⁾.

1.6.1.2 Whilst there is potential for waste related development to occur on any B2 employment sites listed under Policies EC1 (Employment Allocations) and EC2 (Existing Employment Areas)⁽³⁹⁾, the 'preferred' sites listed in Policy W1 (In-Building Waste Treatment Facilities), were selected following a detailed assessment of the full portfolio of employment land. The methodology applied and results of the assessment are set out in the Waste Topic Paper⁽⁴⁰⁾, thereby providing clear evidence as to why the sites have been selected in terms of their 'availability' and 'suitability'.

1.6.1.3 In broad terms, Baglan Bay, Junction 38 (M4) Margam and Kenfig Industrial Estate offer (1) available land or vacant premises which will provide for a range of different sized plots; (2) good site infrastructure; (3) proximity to the M4 / strategic road network; and (4) the potential for co-locating energy from waste facilities with other energy consuming land uses.

1.6.1.4 Consequently, and combined with the contextual factors as referenced in the Waste Topic Paper⁽⁴¹⁾, the Council is satisfied that the sites identified in Policy W1 will be appropriate and sufficient to meet the potential need for new waste facilities over the Plan period.

1.6.1.5 In regard to monitoring the take-up of employment land with waste related activities, the Annual Monitoring Report (AMR) forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators (core and contextual / local) will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its policies and proposals are delivered within the anticipated timescales.

37 The Regional Waste Plan 1st Review had previously stipulated that the Council identify an 'upper limit' need of 11.4 hectares of land to accommodate 'in-building' waste treatment facilities.

38 Paragraph 3.21 'Technical Advice Note 21: Waste' (Welsh Government - 2014).

39 Paragraph 3.19 'Technical Advice Note 21: Waste' (Welsh Government - 2014).

40 Appendix E 'Waste Topic Paper' - Document Ref: SD50.

41 Paragraph 6.0.12 'Waste Topic Paper' - Document Ref: SD50.

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Local Development Plan
Cynllun Datblygu Lleol



Neath Port Talbot
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