Neath Port Talbot Replacement Local Development Plan Review

**Integrated Sustainability Appraisal Scoping Report**

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|  | **Name** | **Position** | **Signature** | **Date** |
| **Prepared by:** | Helen SkimmingMichael O’Sullivan | PlannerSenior Planner | HSMO | 27.03.202030.03.2020 |
| **Reviewed by:** | Duncan Smart | Associate Planner | DS | 31.03.2020 |
| **Approved by:** | Nick Skelton  | Director: Planning & Economics | NS  | 29.05.2020  |
| **For and on behalf of Stantec UK Limited** |

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# Introduction

## Background

* + 1. Stantec UK has been commissioned by Neath Port Talbot Council (NPTC) to undertake an Integrated Sustainability Appraisal (ISA) of the NPT Local Development Plan (LDP) Review and the emerging NPT Replacement LDP (RLDP) (‘the emerging RLDP’).
		2. This report is the first stage of an ISA process to identify, assess and address in an integrated manner any likely significant effects on the environment (including European Sites), sustainability, health and equalities of undertaking the NPT LDP Review (resulting in the preparation of the RLDP). The report outlines the proposed approach to undertaking the ISA process, incorporating a suite of statutory and non-statutory assessment processes:
* **Sustainability Appraisal (SA)** as required under the Planning and Compulsory Purchase Act 2004 (‘the 2004 Act’) and the Development Planning (Wales) Regulations 2005 (‘the 2005 Regulations’);
* **Strategic Environmental Assessment (SEA)** as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (‘the SEA Regulations’);
* Supporting the implementation of **wellbeing goals and wellbeing objectives** (and the discharge of associated duties) as required under **the Wellbeing of Future Generations (Wales) Act 2015**. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
* Equalities Impact Assessment (EqIA) under the Equality Act 2010 – covering the Public Sector Equality Duty and the Socio-economic Duty;
* Health Impact Aassessment (HIA) – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,
* **Welsh Language Impact Assessment** as required under the 2004 Act, the Welsh Language Standards (No.1) Regulations 2015 and PPW 11th Edition.

## Purpose and Objectives

* + 1. The purpose of this ISA process is to identify, assess and, where appropriate, address the likely significant effects from the NPT LDP Review (‘the LDP Review) on the environment (including European Sites), health, equalities issues, wellbeing and the use of the Welsh language. The ISA should be viewed as a key planmaking tool and it will be used throughout the LDP Review to inform the preparation of the RLDP in order to maximise its effectiveness, rather than simply providing retrospective reporting of likely impacts.
		2. The dual purpose of this report is to:
* Seek the views of the SEA Consultation Bodies[[1]](#footnote-2) and other relevant consultees on the proposed methodology and assessment framework for undertaking a robust and legally compliant ISA of the Neath Port Talbot LDP Review in accordance with relevant statutory requirements; and in doing so; and,
* Seek the views of the SEA Consultation Authorities on a draft SEA screening determination to satisfy procedural requirements and to confirm that a SEA needs to be incorporated within the SA.
	+ 1. This version of the ISA Scoping Report has been updated post consultation to address pertinent matters raised by consultees, as summarised within the Review of ISA Scoping Technical Note which has been prepared in tandem.

## Overview of the Neath Port Talbot LDP Review

* + 1. NPTC is the unitary authority responsible for local government across a 442km2 area of South Wales, as shown in **Figure 1.1** NPTC is located within the South West Wales Region (as identified within the National Development Framework (NDF) - Future Wales 2040) and Strategic Development Plan area. This includes the LA areas of Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot. The neighbouring authorities are Swansea, Bridgend, Rhondda Cynon Taff, Powys and Carmarthenshire.
		2. NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major projects across Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot. Since the end of May 2019, NPTC is also the host authority for the Joint Scrutiny Committee to promote and facilitate projects between authorities involved in the City Deal.

Figure 1.1 Neath Port Talbot Council Boundary



* + 1. NPTC have undertaken regular monitoring since the first LDP was adopted in 2016. Between January – March 2020 NPTC consulted on a Draft LDP Review Report in accordance with statutory requirements. This Draft LDP Review Report identified that the current NPT LDP should be subject to a ‘Full Review’, to be carried out in accordance with the 2005 Regulations. The LDP Review Report was subsequently approved and published by NPTC in July 2020.
		2. The review (‘the LDP Review’) is needed to allow NPTC to prepare and adopt a RLDP to ensure that the statutory Development Plan for the NPTC area remains up to date, taking account of Future Wales 2040 which also now forms part of the Development Plan. In particular, a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the current LDP.

## Statutory Requirements

* + 1. This section provides a succinct review of the range of statutory requirements which will be addressed through undertaking an ISA of the LDP Review.

****LDP Preparation and Review****

* + 1. The publication of the Draft LDP Review Report (NPTC, 2020) has triggered a process through which a RLDP will be prepared and then adopted for the NPTC area. Statutory requirements relating to the preparation of LDPs are therefore now applicable to the LDP Review, including in respect of SA and SEA. The proposed approach, timescales and consultation arrangements for the LDP Review are set out within the Draft Neath Port Talbot LDP Delivery Agreement accompanying this ISA Scoping Report in accordance with the 2005 LDP Regulations (as amended).
		2. This ISA Scoping Report has been prepared in the context of the consultation on the Draft LDP Review Report, including taking account of relevant consultation responses. Whilst each report fulfils separate statutory requirements, read together they provide a comprehensive and up to date evidence base of the key issues (spatial planning, sustainability, equalities, health, social, economic, cultural, etc) which all need to be addressed in the LDP Review and associated impact assessment processes.

****Sustainability Appraisal****

* + 1. Under Section 62(6) of the 2004 Act, emerging LDPs need to be subject to Sustainability Appraisal, which is statutorily required to guide the selection and development of policies and proposals for inclusion in LDPs in terms of their potential social, environmental and economic effects. The SA presently required for the LDP Review will need to build upon the SA, incorporating SEA, prepared for the Neath Port Talbot LDP 2011-2026 (adopted January 2016). As the ‘Full Review’ procedure is being used, the LDP Review will effectively mirror the original LDP preparation process and will result in the preparation and adoption of a RLDP (rather than the existing LDP only being subject to individual changes).
		2. When undertaking a SA, the Welsh Government asks Local Planning Authorities to consider the value and opportunities for an integrated assessment approach to preparing an LDP. Paragraph 4.5 of the Development Plans Manual Edition 3 (2020) considers that “*The integration of statutory and key elements such as WBFGA 2015 requirements, Equalities Act, Welsh language, and Health Impact Assessment (HIA) (when relevant) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals*”. Accordingly, to achieve these benefits whilst meeting applicable statutory requirements, an ISA is to be carried out for the NPT LDP Review. This ISA Scoping Report represents the first stage of this process.

****Strategic Environmental Assessment****

* + 1. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 as amended (‘the SEA Regulations’) require Responsible Authorities, including local authorities such as NPTC, to assess the likely significant environmental effects of implementing relevant plans and programmes, as defined within the regulations. The SEA Regulations also require Responsible Authorities to examine the likely significant environmental effects of reasonable alternatives to the plan or programme under consideration. Where required, the assessment is to be prepared following a staged reporting process known as Strategic Environmental Assessment (SEA).
		2. In line with the requirements of the SEA Regulations, the following terms are used throughout this report:
* ‘Environmental effects’ refers to effects on all environmental factors prescribed in Schedule 2 of the SEA Regulations, including “*population*”, “*health*” and “*material assets*” in the broadest sense, which therefore includes coverage of social, economic and infrastructure related issues. Cultural, including Welsh Language, issues are also covered under the cultural heritage SEA topic. This approach helps to ensure assessment proportionality and integration between SEA and other statutory assessment processes undertaken as part of this ISA; and,
* The term ‘likely significant effects’ refers to all likely effects which, when assessed on an objective basis, are considered significant (as opposed to not significant) and therefore need to be reported within the context of the SEA Regulations. Such effects may also need to be reported in accordance with other relevant statutory requirements (see below).

****Wellbeing of Future Generations (Wales) Act 2015****

* + 1. The Well-being of Future Generations (Wales) Act 2015 (WBFG Act) seeks to directly place Wales on a sustainable path to improving well-being. The WBFG Act requires that public bodies carry out sustainable development which is defined[[2]](#footnote-3) as:

“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”

* + 1. The WBFG Act prescribes seven national Wellbeing Goals to be achieved through Five Ways of Working which public bodies need to demonstrate they have carried out in undertaking their sustainable development duty (see section 5 of this report). Furthermore, it requires Public Service Boards (comprising local authorities and partner agencies) to define local wellbeing objectives.
		2. In response to this duty, the Neath Port Talbot We Want (Well-being Plan 2018-2023) sets out the NPT Public Services Board’s long-term vision for the area as well as priorities for action over the plan period. It identifies six wellbeing objectives which are to be used to guide and bring about wellbeing improvements for local people in the area. These are detailed in section 5 of this report.
		3. Therefore, whilst there is not a specific statutory requirement to publish a WFG Assessment in respect of the LDP Review, there is a need for NPTC to demonstrate throughout the LDP Review how their emerging RLDP complies with the Section 3 duty (Well-being duty on public bodies to carry out sustainable development). In practice this means that the ISA should include specific reporting of likely effects from the emerging RLDP on wellbeing, the national wellbeing goals and local wellbeing objectives.
		4. The Development Plans Manual 2020 (3rd Edition) requires LDPs to demonstrate how it contributes towards the achievement of the well-being goals, objectives and five ways of working, noting that these goals should be integral to the preparation of the Scoping Report and subsequent development of the final SA framework to assess the Plans growth options, objectives, policies and proposals (Para 4.10 & 4.12). Each decision-making body must demonstrate compliance with the requirements of WBFGA 2015.

****Equalities Impact Assessment****

* + 1. Statutory requirements to avoid discrimination and to assess the likely equalities impacts of emerging policies, programmes and projects are set out in the Equality Act 2010. This legislation was enacted by the UK Parliament to consolidate previous anti-discrimination legislation and to implement the four major European Union (EU) Equal Treatment Directives[[3]](#footnote-4).
		2. Insofar as LDP policies and proposals affect access to services, amenities, economic opportunities and social activities, the implementation of the LDP Review (resulting in the adoption of a RLDP) is likely to result in different impacts upon different demographic groups, persons with protected characteristics and those facing socio-economic disadvantage. It may also help to tackle intersectional inequalities and impact the delivery of other policies and organisations working to address societal inequalities. The Public Sector Equality Duty and Socio-economic Duty under the Equality Act 2010 are applicable to the LDP Review, meaning that the ISA will incorporate a proportionate equalities impact assessment (EqIA) to address the requirements of both duties.

Public Sector Equality Duty

* + 1. Section 149 of the Act sets out a ‘public sector equality duty’ which requires public authorities, in exercising their functions, to *“have due regard to the need to:*
			1. *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
			2. *advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
			3. *foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*
		2. The protected characteristics referenced within this duty are specified within Section 4 of the Act, namely: Age; Disability; Gender reassignment; Marriage and Civil partnership; Pregnancy and maternity; Race; Religion or belief; Sex; and Sexual orientation.

Socio-economic Duty

* + 1. In March 2021 the Welsh Government commenced the Socio-economic Duty under Sections 1 – 3 of the Equality Act 2010. The Socio-economic Duty places a legal responsibility on public bodies in Wales to actively consider how through their strategic decision making they can reduce inequalities of outcome caused by socioeconomic disadvantage. This differs from the Public Sector Equality Duty which considers only reducing inequalities of opportunity. However, the Socio-economic Duty identifies a need to consider both ‘communities of place’ and ‘communities of interest’ in terms of people who share an experience and are particularly impacted by socio-economic disadvantage.
		2. Demographic groups who share one or more of the protected characteristics listed in Section 4 of the Equality Act 2010 can be considered ‘communities of interest’, meaning there is a direct link between the Socio-economic and Public Sector Equality Duties.
		3. The Socio-economic Duty applies to the LDP Review as local authorities are prescribed bodies for implementing the duty under the Equality Act 2010 and the preparation of a RLDP clearly constitutes the making of decisions of a strategic nature by NPTC regarding their statutory functions.

****Health Impact Assessment****

* + 1. Whilst there are no statutory requirements to undertake a health impact assessment of emerging plans or programmes, the SEA Regulations do require any likely significant effects on human health to be assessed as part of a wider environmental assessment. Any identified likely significant adverse effects on the environment, including in respect off human health, should also be addressed through the implementation of suitable mitigation where appropriate. The assessment of likely health effects is also of direct relevance to the Public Sector Equality Duty set out within the Equality Act 2010, as socio-economic inequalities are recognised to be a key determinant of health.
		2. Paragraph 4.16-4.17 in The Development Plans Manual 2020 (3rd Edition) highlights the requirement in The Public Health (Wales) Act 2017 for a Health Impact Assessment (HIA) to be carried out by public bodies. Although there is no statutory requirement stating when a HIA should be carried out, it outlines the role of the HIA in Wales to assist policy makers to maximise potential benefits and identify/mitigate against potential negative effects on health and wellbeing . In future plan-making, LPAs must have regard to the requirement and content of a HIA as stated in further legislation and guidance once published.
		3. This ISA will therefore incorporate a proportionate health impact assessment (HIA) in order to demonstrate compliance with SEA and EqIA requirements relating to the assessment of likely health effects from the emerging LDP Review.

****Welsh Language Impact Assessment****

* + 1. The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:
* What effect, if any, the LDP would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
* How the LDP could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and,
* How the LDP could be developed so that it doesn’t have or reduces any adverse effects which the policy decision would have on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language.
	+ 1. In line with statutory requirements, PPW – 11th Edition and Welsh Government expectations, the ISA incorporates a proportionate assessment of likely effects on the use of the Welsh language.

****Habitats Regulations Assessment****

* + 1. Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (‘the HRA Regulations’) requires that a HRA must be undertaken to demonstrate compliance with applicable statutory duties where a plan or project is considered likely to have significant effects on European Sites and is not directly connected with or necessary for the management of the site. Caselaw has established that HRA requirements apply to the preparation of ‘local plans’ prepared for town and country planning purposes including LDPs, meaning that an HRA process must be undertaken for the LDP Review.
		2. Whilst there are linkages between SEA and HRA, in view of the specific assessment requirements prescribed by the HRA Regulations and associated European legislation and caselaw, the HRA for the NPT LDP Review will be reported separately from the ISA. However, at this initial stage, and in the absence of any formal HRA Scoping requirements, it is considered appropriate for this ISA Scoping Report to identify relevant European Sites for consideration in subsequent ISA and HRA processes.
		3. To differentiate between effects assessed in the context of the SEA and HRA Regulations, the term “*Likely Significant Effects*” (capitalised) is used throughout this report to refer to only those effects which are considered significant in the context of Regulation 63 of the HRA Regulations.

## ISA Process

* + 1. By according with the above statutory requirements through a holistic approach, Integrated Sustainability Appraisal is one of the key methods by which plan-making can deliver sustainable development. When used in this way from the outset of the LDP process, ISA Scoping is a plan-making tool rather than simply a reporting mechanism and can be considered as 3 main steps;
* **Screening and Scoping**:
	+ Whereas Regulation 5(3) has the effect that a SEA will always be required in relation to the preparation of an LDP, Regulations 5(6) and 9(1) require “minor modifications” to an existing plan or programme to first be screened to determine whether the modifications are likely to have significant effects on the environment and therefore whether a full SEA needs to be undertaken. The Welsh LDP Manual 3nd Edition (2020) continues to make it clear that SEA screening is required for all LDP Reviews as in legal terms the existing LDP is simply being reviewed and this could result in “minor modifications”, although the SEA Regulations do not define the scope of that term. This ISA Scoping Report sets out a draft SEA Screening Determination for the consideration of the SEA Consultation Bodies (Section 3).
	+ In terms of Scoping, Responsible Authorities must provide the SEA Consultation Bodies with sufficient information to enable them to consider the proposed scope, level of detail and consultation period for an ‘Environmental Report’ (ER) to accompany the emerging plan or programme. Where SEA is incorporated within a wider SA the term ER is interchangeable with SA Report as the latter necessarily includes all of the information that would be required within a standalone ER. Whilst there is no specific statutory requirement to undertake Scoping in relation to EqIA, HIA, WFG Act Assessment and Welsh Language Impact Assessment, the SA Scoping process raises a similar need for ‘assessment framing’ to undertake proportionate assessment of these. Thus, there is a need to confirm the scope of the ISA in all respects, ensuring robustness and proportionality throughout the process. The approach taken with the ISA Scoping Report responds to all statutory requirements, with the proposed ISA Framework, ISA methodology and ISA consultation arrangements detailed in Sections 5 and 6.
* **Assessment**:As noted above, in terms of SA, Section 62(6) of the 2004 Act requires Responsible Authorities preparing LDPs in Wales to “*to carry out a sustainability appraisal of the proposals*” within it and to “*prepare a report of the findings of the appraisal*”. Given that the LDP Review will be an iterative process and in legal terms is a review of the existing LDP, an ISA Report will need to accompany each substantive element of the RLDP as it emerges, in particular the preparation of LDP Pre-Deposit and subsequently LDP Deposit Documents. Each ISA Report must be consulted on in tandem with the emerging RLDP, with the ISA Report for the final LDP Deposit Document then submitted to the Welsh Assembly Government to support an independent examination of the RLDP. Similarly, Regulation 12 of the SEA Regulations requires Responsible Authorities to prepare and consult on an ER to “*identify, describe and evaluate the likely significant effects on the environment of implementing*” each iteration of a relevant and qualifying plan, as well as the effects of its reasonable alternatives. As above, the scope, level of detail and consultation period of the ISA, fully incorporating all SEA requirements, should first be defined through screening and scoping. In line with best practice established in Development Plans Manual 3rd Edition 2020, the ISA brings together the statutory requirements under one joined-up process. This offers the opportunity to iteratively assess each stage of the emerging LDP in terms of EqIA, HIA, WFG Act Assessment (as well as Welsh Language Assessment which legally must be incorporated into SA); and,
* **Post Adoption**:By the end of the LDP Review process, a RLDP will have been adopted for the extent of the NPTC area. As detailed in Appendix A.4, this is required by January 2026 to avoid a planning policy vacuum. In terms of SA, once a RLDP is adopted, NPTC must prepare a statement setting out, amongst other matters, how the SEA’s environmental considerations have been taken into account in the adopted LDP, and how the likely significant effects of the LDP on the environment (as predicted through the SA/SEA) will be monitored. Whilst there is no statutory requirement to prepare a SA (as opposed to SEA) Post Adoption Statement, in practice the incorporation of SEA within SA means this is necessary to ensure that all of the SEA findings and consultation responses from previous stages of the process are addressed. Following best SA practice, the Post Adoption process will be extended incorporating the SEA post adoption requirements alongside a demonstration of how the ISA (covering all assessment undertaken) has, as a plan-making tool, informed the preparation of the NPT RLDP.

## Report Structure

* + 1. The remainder of this report is structured as follows:
* Section 2 – LDP Review Context and Proposed Content describes the context in which the LDP Review is being undertaken and outlines the proposed form of the RLDP that will result, all of which requires to be assessed through this ISA;
* Section 3 – In the context of SA/SEA only, this section consider the need for SEA (undertaken within the ISA) and provides a draft determination to explain why NPCBC considers it necessary to undertake a SEA as part of the ISA for the LDP Review. The section also provides relevant information to enable the SEA Consultation Authorities to advise on whether, at this stage, the RLDP is likely to generate significant effects. Section 3 is not a requirement for the other constituent assessments which are to be carried out through the ISA process;
* Section 4 – Environmental Information and Key Sustainability Issues summarises pertinent environmental, equalities and health issues and conditions which must be taken account of within the emerging LDP Review and therefore within this ISA. It considers the evolution of the baseline in the absence of the LDP Review and notes the relationship between the Neath Port Talbot LDP and other relevant plans and programmes. Further relevant details are provided in Appendices A and B;
* Section 5 – Proposed ISA Framework describes the assessment framework which will be used to identify and assess the likely significant environmental (incorporating socio-economic and cultural effects), health, wellbeing, Welsh language impact, and equalities effects from the LDP Review (i.e. the preparation of a RLDP). This section sets out a proposed ISA Framework to assess these as they emerge, including proposed ISA Objectives and guide questions;
* Section 6 – Proposed ISA Methodology and Consultation Arrangements builds upon Section 5 by detailing the proposed method of assessing the likely significant environmental (incorporating economic, social and cultural), health, wellbeing, Welsh language impact, and equalities effects, health, wellbeing, and equalities effects (and through this the broader sustainability effects) of each emerging substantive component of a RLDP. The section also outlines the proposed consultation arrangements for the SA reports which will be published in tandem with each substantive proposal for the emerging RLDP, namely the LDP Pre-Deposit and LDP Deposit Documents; and,
* Section 7 – Next Steps outlines next steps to be followed in the ISA process and confirms how comments in respect of this ISA Scoping Report should be submitted.
	+ 1. The Scoping Report is supported by two appendices:
* Appendix A – Baseline Analysis supports Section 4 by providing a review of relevant environmental (including social, economic and cultural) baseline characteristics. With reference to all environmental topics prescribed in Schedule 2 of the SEA Regulations (including population, health and material assets), Appendix A describes aspects of the environment likely to be significantly affected by the LDP Review and identifies relevant environmental, economic, social, and cultural issues, problems and environmental protection objectives which should be taken account of in the LDP Review and this SA process; and,
* Appendix B – Review of Plans and Programmes supports Section 4 by providing a review of all other plans and programmes of relevance to the LDP Review. Appendix B identifies the relationship between these other documents, the existing Neath Port Talbot LDP and the LDP Review to identify key policy issues which should be considered in both the LDP Review itself and this SA process.

# Neath Port Talbot LDP Review Context

## Introduction

* + 1. This section provides a brief outline of the LDP Review, including its key facts, proposed form and expected content of the RLDP. This is to allow the SEA Consultation Bodies to understand the scope and purpose of the RLDP which is being subject to ISA.

## Neath Port Talbot Review Key Facts

* + 1. Planning legislation requires all local planning authorities to commence a review of a LDP not later than 4 years from the date of adoption and to consider the need for a review following the publication of the National Development Framework (Future Wales 2040 – February 2021).
		2. This LDP Review is being undertaken to replace the NPTC LDP (2011-2026), adopted in January 2016. To undertake the LDP Review, Stantec UK is acting as the SEA Assessor on behalf of the Responsible Authority. The purpose of the Review is to inform the development of the new LDP for Neath Port Talbot and to update the SEA Consultation Bodies on the scope and progress of the new Plan as it progresses.
		3. The Neath Port Talbot LDP Review will result in the preparation and adoption of a RLDP for the NPTC area. This will set out new detailed planning policies and proposals for the future development and the use of all land. The RLDP will set a long-term strategic planning framework, helping to tackle the key sustainability and regeneration issues and realise the main development opportunities across the NPTC area. It will cover a wide range of topics, including but not limited to housing land, economic development, regeneration, sustainable design, renewable energy, town centres, tourism, infrastructure provision and transport.
		4. The expected date of adoption for the Replacement Plan is July 2025.April 2024. The Plan will cover a time period of 15-years (2021 – 20362036).

## Proposed Form and Content of the Replacement Neath Port Talbot LDP

* + 1. The 2004 Act stipulates the process which must be undertaken for the LDP Review, in particular the preparation of LDP Pre-Deposit and Deposit Documents by the Local Planning Authority (LPA), followed by an independent examination.
		2. The 2004 Act and the 2005 Regulations prescribe the minimum content which must be included within any LDP, namely:
* The name of the area of the LPA for which the LDP is prepared;
* The date of adoption and period of the LDP;
* The LPA’s objectives in relation to the development and use of land in their area;
* The LPA’s general policies for the implementation of those objectives;
* A proposals map of the LPA’s area showing the proposals for the development and use of land; and,
* A reasoned justification of the policies contained within the LDP.
	+ 1. In addition, LDPs typically include an overarching vision, suite of objectives and a spatial strategy, although none are specifically required under the 2004 Act or the 2005 Regulations.
		2. In line with statutory requirements, two iterations of the emerging RLDP will be consulted on by NPTC, namely a Preferred Strategy – LDP Pre-Deposit Document and then a full LDP Deposit Plan (Deposit Document). This LDP Deposit Plan will subsequently be subject to an independent examination, following which it will be considered for formal adoption as the |RLDP for the NPTC area. The ISA methodology will be applied and the findings reported within iterative ISA Reports which will accompany the Preferred Strategy (LDP Pre-Deposit) and Deposit Documents, with the ISA Report updated between these stages to reflect changes to the emerging LDP:
* The ISA Report for the Preferred Strategy will focus on assessing likely significant effect (LSE ) from the proposed LDP options, spatial strategy and strategic policies; and,
* The ISA Report for the LDP Deposit Document will identify and assess all LSE from each substantive component of the LDP Deposit Document, including all proposed site allocations and policies.
	+ 1. Following the completion of an independent examination of the LDP Deposit Document, all binding recommendations made by the appointed Inspector will be subject to ISA (incorporating SEA) screening to determine whether they would give rise to any new or different LSE not previously reported within the ISA Report for the LDP Deposit Document. This SEA Screening will be documented specifically within a ISA Addendum. At this stage it is envisaged that the RLDP for the NPTC area will comprise the following substantive components:
* Proposed LDP vision and LDP objectives;
* A spatial strategy (and potential sub-area strategies) to implement the LDP vision and objectives;
* Strategic policies to implement the spatial strategy and LDP objectives and to respond to key sustainability issues (Section 4.2 and Appendix A) and legislative requirements (Section 4.3 and Appendix B). In particular, strategic policies will need to implement specific requirements from the 2004 Act, the 2005 LDP Regulations, Planning Policy Wales Edition 11 (2021), The Neath Port Talbot We Want (Well-being Plan 2018 – 2023) and the Well-being of Future Generations (Wales) Act 2015;
* Non-strategic policies to implement the spatial strategy and strategic policies though the development management process. This is likely to include areas based and thematic policies; and,
* Site allocations.
	+ 1. The above list of intended LDP components is not exhaustive and may change through the LDP Review. Each emerging substantive component of a replacement Neath Port Talbot LDP will need to be subject to ISA, incorporating SEA, in line with the approach set out within this Scoping Report.
		2. To comply with statutory and case law requirements, the RLDP will need to include a reasoned justification for the inclusion of each substantive component and be supported by a suite of evidence base documents. These will inform the ISA process as well as being required for plan preparation purposes.

# Draft SEA Screening Determination

## Introduction

* + 1. As described in Section 1, this section provides relevant information which is specific to SEA only. Section 3 is required to enable the SEA Consultation Authorities to advise NPTC on whether, at this stage, significant effects on the environment are considered likely to arise from the RLDP that will result from the LDP Review, in which case a formal SEA will be required.

## The Need for SEA Screening

* + 1. The adopted NPTC LDP (January 2016) was subject to a full SEA as part of the SA since it met the mandatory SEA criteria within Regulation 5(2) of the SEA Regulations in terms of being prepared for town and country planning and land use purposes and being likely to set the framework for future consent of developments listed in Annex I or II to Council Directive 85/337/EEC as amended. However, under the SEA Regulations, all proposed “*minor modifications*” to existing plans require the Responsible Authority to first determine, in consultation with the SEA Consultation Authorities, whether a SEA is required as a result of the modification being likely to have significant effects on the environment. The Welsh LDP Manual 3rd Edition (2020) advises that as the term “*minor modification*” is not statutorily defined, any review of an existing LDP (and thus any revisions to or replacement of it) should be subject to SEA screening to determine the need for a full SEA.
		2. Even at this early stage owing to the intended comprehensive nature of the LDP Review, the RLDP is likely to comprise a suite of policies and site allocations that are substantially different from those in the existing LDP and which have the potential to result in LSE on the environment. Notwithstanding any advice forthcoming from the SEA Consultation Bodies, NPTC is therefore of the view that a formal SEA should be undertaken as part of the SA for the LDP Review.
		3. Of note, even if it is determined that a formal SEA is not required this would make little difference, as likely effects in relation to the environmental topics prescribed within Schedule 2 of the SEA Regulations (including population and human health) will still need to be assessed to present a robust assessment of the sustainability of the emerging RLDP, as required separately under the 2004 Act. The question of whether a formal SEA is required as part of the SA is therefore effectively a legal formality.

## Draft SEA Screening Determination

* + 1. Having regard to the Screening criteria specified in Schedule 1 of the SEA Regulations, NPTC are of the view that, at this stage, the LDP Review (which will result in the adoption of a RLDP) has the potential to generate likely significant effects on the environment which have not previously been identified through the SEA of the existing LDP or of other plans and programmes. This is on account of:
* Geographical Coverage: As the ‘Full Review’ procedure is being adopted for the LDP Review, it will apply to the entire NPTC area rather than only to discrete sites or sub-areas. In consequence, the LDP Review will need to consider proposals for the management of environmentally sensitive areas, including sites designated at local, national and international levels for reasons of biodiversity conservation, geological importance or architectural significance. As such, the development of the RLDP is likely to result in a range of effects in relation to these sensitive areas;
* Statutory Requirements: As section 38(6) of the 2004 Act requires all planning applications to be determined in accordance with the relevant adopted Development Plan unless material considerations indicate otherwise, the RLDP resulting from the LDP Review will have a high degree of influence in setting a consenting framework for all development activities within the NPTC area. This will include any projects of a type listed in Annex I or II to Council Directive 85/337/EEC (the original EIA Directive) as amended. In addition, the RLDP will be of particular importance in determining the acceptability, including in environmental terms, of the proposed location, nature, size and operating conditions of all development proposals. It is likely that the approach taken within a RLDP to plan for these factors in relation to at least some development types will differ substantially from the approach set out within the existing LDP to reflect changes in baseline conditions and in relevant higher level legislative and policy frameworks. Any such changes in policy within a RLDP could affect the distribution or key characteristics (design, physical, construction, operational characteristics, etc.) of development proposals and could give rise to new or different likely significant effects from those previously predicted to arise from existing LDP policies;
* New Spatial Issues and Site Allocations: The preparation of a RLDP should directly address existing socio-economic and environmental issues affecting Neath Port Talbot, as identified in Appendix A, through the development of new policy approaches and site allocations. Through addressing pertinent issues and problems, the LDP Review is likely to result in LSE. For example, the Neath Port Talbot LDP Review Report (NPTC, 2020) identifies that new allocations within the Valleys and Coastal Corridor may need to be made to help enable its growth, which will include residential development, safeguard employment, cultural heritage and regeneration opportunities, while policy revisions may be required to reconsider the LDPs spatial growth strategy. Other land allocations and physical interventions may also need to be allocated within the RLDP to ensure it can appropriately respond to all identified population needs. Whilst some candidate site allocations may have previously been subject to SA in relation to the first Neath Port Talbot LDP, due to the time that has elapsed it is highly likely that a range of new candidate sites will be proposed, each of which could generate a range of significant environmental effects which have not previously been assessed;
* Plan Hierarchy: As with the existing LDP, the RLDP should seek to direct particular types of development proposals to particular locations, and this may require lower level plans, for example Development Briefs, Masterplans, Regeneration Strategies or Supplementary Planning Guidance (SPG) to be prepared to provide more locally specific guidance in conformity with the LDP. The LDP Review is therefore likely to have a high degree of influence on other plans within the Welsh planning policy hierarchy and this could itself result in a range of new or different likely significant environmental effects from those arising under the existing LDP; and,
* Potential for LSE on European Sites:As detailed in Appendix A, the NPTC area hosts three European Sites (Kenfig/Cynffig (SAC), Coedydd Nedd a Mellte (SAC) and Crymlyn Bog (also a Ramsar Site, SAC, SSSI and NNR). with an additional three European Sites identified either within 15km of or with potential connectivity to the NPTC area. This does not mean that LSE in HRA terms would necessarily occur from the LDP Review on these European Sites; indeed, in the absence of any substantive proposals or policies having been developed no evidence is yet available to indicate this. However, the possibility of the identified European Sites experiencing LSE from the LDP Review (i.e. from an emerging RLDP) cannot be ruled out at this stage and therefore requires further examination through undertaking a separate HRA process. In line with the Development Plans Manual Edition 3 (2020) an HRA Appropriate Assessment is likely to be required in respect of the RLDP Deposit Plan in due course. Under Regulation 5(3) of the SEA Regulations, this alone triggers the need for a full statutory SEA to be undertaken.
	+ 1. Subject to views obtained from the SEA Consultation Bodies, NPTC therefore intends to make a determination under Regulation 9(1) of the SEA Regulations that a formal SEA will be carried out as part of the ISA for the LDP Review. This aligns with the approach advocated within the Development Plans Manual Edition 3 (2020) .
		2. In accordance with Regulation 9(2), the SEA Consultation Bodies are invited to provide their view and associated reasons regarding the potential for LSE to arise and the need (or otherwise) to undertake a SEA. Any advice to the effect that a formal SEA is not required would need to be supported by detailed evidence, as any decision not to undertake a formal SEA could be subject to legal challenge, which in turn could affect the validity of the LDP Review.

# Key Sustainability Issues

## Introduction

* + 1. Section 4.2 below provides a summary of baseline environmental and socio-economic conditions in order to identify a suite of key sustainability issues relevant to the LDP Review. Section 4.3 then summarises the relationship between the Neath Port Talbot LDP and other relevant plans and programmes. Each section is supported by detailed baseline and policy reviews provided in Appendices A and B respectively.

## Key Sustainability Issues

* + 1. With reference to the topics prescribed within Schedule 2 of the SEA Regulations, a summary of the key sustainability issues identified in Appendix A which need to be addressed within the LDP Review (including objectives associated with the Wellbeing of Future Generations Act 2015 and Equality Act 2010) is provided in **Table 4.1** below and taken account of in the associated ISA framework. This summary has also been informed by consideration of the likely evolution of baseline conditions in the absence of the LDP Review, as detailed in Appendix A. In short, this concludes that the absence of the LDP Review is likely to result in a planning policy vacuum within the NPTC area which could lead to development coming forward in unsustainable locations and contrary to NPTC’s preferred spatial strategy simply in order to meet identified needs, principally for new housing.
		2. In most cases, it is recommended that the identified sustainability issues should be addressed within the ISA through the inclusion of relevant objectives within a framework (‘the ISA Framework’) which will be used to assess the likely sustainability and environmental effects of the RLDP. Full details regarding the proposed ISA Framework and constituent SA Objectives are set out in Section 5.
		3. The RLDP will need to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the current LDP. These can be summarised as follows:
* **Contextual Changes**: Changes deriving from economic and social fallout from the Covid-19 pandemic, the impacts of Brexit and renewed efforts to reduce societal inequalities. Evidence base changes associated with Welsh Government Population and Household projections; policy shifts through the Future Wales 2040 the regional work associated with the Swansea Bay City Deal (SBCD); and the designation of the Port Talbot Waterfront Enterprise Zone and the work of the Valleys Taskforce. Broadly, but the implementation of these economic development strategies should drive higher rates of growth;
* **Level and Spatial Distribution of Growth**: In a context of recent difficulty in achieving housing and employment development targets, the level and spatial distribution of growth needs to be reconsidered to establish the most appropriate strategic approach to land use. This will entail developing a refreshed or new spatial strategy to underpin the RLDP;
* **Housing Land Supply**. A housing land supply shortfall has emerged, albeit in the context of lower than anticipated developer demand for housebuilding. In addition, the RR has identified a shortfall in housing delivery as one of the primary issues to be addressed in the RLDP; and,
* **Strategic Regeneration Areas**: Linked to issues around demand for land for housing and economic development, and a greater policy focus on viability within PPW – 11th Edition, there will be a need to reconsider existing sites and allocate new effective sites. Future Wales 2040 identifies Neath Port Talbot, Swansea and Llanelli to be the main existing centre of population, employment and services within the Swansea Bay and Llanelli National Growth Area, acknowledging the region’s potential in decarbonisation and tourism-based diversification
	+ 1. **New Policy Areas**: PPW – 11th Edition continues a number of changes set in motion by PPW - 10th Edition including principles that will be needed to put placemaking and driving place prosperity at the heart of development. Other statutory and national policy shifts which need to be implemented via the RLDP including responding to the wellbeing objectives set out by ‘The Neath Port Talbot We Want (Well-being Plan 2018-2023) for the NPTC area in accordance with the requirements of the Wellbeing of Future Generations Act 2015, namely:
1. Improve the well-being of children and young people;
2. Improve the well-being of all adults; and,
3. Develop the local economy and environment.
	* 1. In addition, the Welsh Government has commenced the Socio-economic Duty (March 2021) under the Equality Act 2010 whilst NPTC has published their second Strategic Equality Plan (2020-2024) which focuses on enhancing health, well-being, community safety and quality of life for all. The plan also seeks to also improve staff training and implement the monitoring of data and information to identify and address disadvantages experienced by NPT residents. Overall, it seeks to improve access to services and information for all.

Sustainability Performance of the Adopted NPT LDP (2016)

* + 1. The LDP Review Report (NPTC, 2020) identifies a number of main issues which fall within the SA topics.
* **Population**: The latest 2019 ‘Joint Housing Land Supply Availability Study’ has identified a housing land supply of 4.5 years, below the required 5 years for the first time since the plan was adopted. In addition, falling residual values and increases in build costs over the Plan has impacted housing viability and associated delivery of affordable housing and other planning obligations. In the 2020 AMR, the delivery of homes has fallen short of annual targets since 2014/15, with the latest estimations (2020) showing a shortfall of 30% from the projected 8760 homes by the end of the plan period in 2026. With regard to employment, there has been no new development on allocated employment sites in the last two years, impacting the ability of NPT to meet employment targets of 3,850 jobs in the area over the Plan period. Limited progress with regard to Strategic Regeneration Areas has also contributed to the shortfall. Indicators have also shown that there is a shortfall in the delivery of new small local retail development;
* **Climate Change:** 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:** In respect of the SA natural resources objectives, NPT have expressed concerns that low density development has an unnecessarily large impact per unit on natural resources generally;
* **Biodiversity and Geodiversity:** 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:** 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:** 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:** 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; and,
* **Material Assets:** Indicators showing difficulty in regenerating major brownfield sites with market conditions favouring, easier to develop, smaller scale land opportunities.
	+ 1. In summary, these issues give rise to a number of key Sustainability Issues which have been assessed alongside a review of the baseline environmental information identified in Appendix A. These are set out in accordance with the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (‘the SEA Regulations’) criteria.

Table 4.1: Key Sustainability Issues relating to the Neath Port Talbot LDP Review

| **SEA Topic** | **Key Sustainability Issues** |
| --- | --- |
| Biodiversity, Flora & Fauna | The need to conserve, protect and enhance biodiversity including important species and sites designated for reasons of biodiversity conservation or ecological importance. This relates to the protection of designated sites located within the NPTC as well as designated sites in neighbouring authorities, all of which have the potential to be affected by the LDP Review and development activity within the NPTC area. The need to identify areas and/or opportunities to secure the maintenance and enhancement of biodiversity and deliver a net benefit while ensuring the avoidance of adverse effects on locally designated and protected areas. The need to safeguard and enhance the green infrastructure network and to maintain and enhance landscape & biodiversity connections between designated sites and habitats, both locally and at a landscape scale (i.e. within the NPTC area and to those in neighbouring authorities).The need to protect and enhance ecosystem resilience and safeguard resilient ecological networks (RENs).The need to fully consider the implications of the nature emergency. In addressing the above key issues, there is also a specific need to satisfy the biodiversity and resilience of ecosystems duty as prescribed within section 6 of the Environment (Wales) Act 2016. |
| Population (including relevant socio-economic issues) | The need to maximise socio-economic benefits from the opportunities identified in the Swansea Bay and Llanelli National Growth Area and in the implementation of the Swansea Bay City Region Deal, particularly for the advancement of energy and manufacturing technologies and related employment opportunities in the NPTC area. The need to align with the preparation of a potential Strategic Development Plan (SDP) for South West Wales in accordance with the Welsh Government’s expectations.The need to encourage co-operation between neighbouring authorities in Plan making to facilitate cross boundary growth and partnership working. The need to plan for meeting the needs of an ageing population. The need to support the achievement of the NPT Local Wellbeing Objectives as part of meeting the sustainable development requirements (as set out in Section 3 of the Wellbeing of Future Generations Act 2015). The need to deliver a sufficient quantum of good quality and well-located new housing to meet a range of identified needs. The need to deliver economic growth and increase employment opportunities, including for local residents.The need to tackle inequality of access to educational, training and employment opportunities. The need to tackle deprivation, including areas with existing deprivation linked to poor accessibility to key services, facilities and economic opportunities.The need to ensure that community facilities and services are appropriate and accessible to users to meet the diverse needs of residents and workers.The need to improve the accessibility of key destinations within the NPTC area and to other key locations through enhancing the transport network. |
| Human Health | The need to enhance all aspects of the health and wellbeing of the population, including physical health, mental health, social wellbeing, safety and security.The need to protect and enhance access to community facilities, healthcare facilities, high quality open space provision and active travel routes for all residents.The need to create safe, healthy and liveable urban environments. The need to support the achievement of the NPT Local Wellbeing Objectives to improve the health of all NPTC residents. The need to support the aims of the South West Wales Area Statement in relation to the ‘Reducing Health Inequalities’ theme. The need to address harassment and discrimination experienced by some residents with additional requirements. The need to monitor data and information with regard to the improvement in health for all residents.  |
| Soil | The need to encourage and/or facilitate development on previously developed brownfield land.The need to safeguard the best and most versatile agricultural land from development. The need to maximise the efficient use of available land and prioritise the redevelopment of brownfield land.The need to safeguard geodiversity, important soil resources and to remediate areas of known contamination, particularly at post-industrial sites.The need to reduce emissions and nitrate pollution from agriculture.The need to minimise soil erosion and the loss of soils to non-permeable surfaces.The need to protect, enhance and restore important soil resources, including peatlands.The need to support the aims of the South West Wales Area Statement in protecting, enhancing and restoring important soil resources in relation to the ‘ Ensuring Sustainable Land Management theme’.  |
| Water | The need to protect and enhance the quality of water resources and the water environment. This extends to the protection of cross-boundary watercourses which flow through the NPTC area and to the River Neath and River Afan which flow into Swansea Bay. It also requires the protection, maintenance and enhancement of drainage infrastructure. This includes the consideration of opportunities for integrated water catchment management as set out in the Swansea Bay ‘Opportunity Catchment Areas’ described in the third cycle River Basin Management Plans (RBMP) (2021-2027)The need to address impacts on water quality across the borough caused by point source pollution as a result of NPTC’s industrial profile. The need to locate new development away from areas of flood risk, to fully mitigate potential flood risks from all sources, and to future-proof flood defences. |
| Air | The need to minimise the emissions of air pollutants.The need to safeguard and improve air quality, including through addressing areas with poor air quality.The need to address the poor air quality that resulted in the announcement of a public health crisis declared by Public Health Wales, particularly with regard to ammonia.  |
| Climatic Factors | The need to ensure that the built environment and infrastructure is resilient and adaptable to the effects of climate change, taking account of the coastal location of the NPTC area.The need to ensure that ecosystems and the natural environment are resilient and able to adapt to climate change.The need to mitigate climate change including through the decarbonisation of key economic sectors.The need to ensure that the RLDP meets aspiration in respect of climate change adaptation or mitigation. In particular, proposals contrary to policy within flood risk and protected areas and those failing to meet density requirements should not be approved. The need to encourage the development of renewable/low carbon energy schemes in the NPTC area. The need to mitigate air and water quality impacts caused by industrial uses in the borough. The need to mitigate and address the climate emergency declared by the Welsh Government in April 2019. The need to support the aims of the South West Wales Area Statement in mitigating and adapting to climate change in relation to the aims of the ‘Mitigating and Adapting to a Changing Climate’ theme.The need to mitigate and address the nature emergency declared by the Welsh Government in June 2021.The need to support the aims of Shoreline Management Plans (SMPs) in addressing coastal erosion.  |
| Material Assets  | The need to maximise the efficient use of land, natural resources and existing infrastructure. This includes the need to prioritise the redevelopment of brownfield land, the re-use and recycling of materials, and the minimization of waste sent to landfill.The need to address socio-economic impacts in areas experiencing post-industrial decline through new development. The need to understand the impacts on natural resources due to footprint of development. The need to identify opportunities for action to create healthy places for people as set out in the DISRUPT framework in the Second State of Natural Resources Report (SoNaRR 2020). |
| Cultural Heritage | The need to preserve, protect and enhance historic assets and their settings within the NPTC area.The need to safeguard and support growth in the use of the Welsh language.  |
| Landscape | The need to protect and enhance landscape character, townscape character, key views and visual amenity. This extends to the protection of landscapes in the parts of NPTC within the Brecon Beacons National Park and in other neighbouring authorities. The need to protect tranquillity and address light pollution issues as set out in the draft TAN 11: Noise  |
| Inter-related effects | The need to deliver holistic improvements to wellbeing and to contribute to the delivery of sustainable development across the NPTC area, particularly with regard to the promotion of social cohesion. The need to promote access to services and information for all to ensure equality of access for residents with additional needs.  |

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

* + 1. The following types of plans and programmes were examined for their relevance to the LDP Review and this ISA:
* International conventions and treaties;
* European Directives and associated legislation;
* Legislation enacted by the UK Parliament and the Welsh Assembly; and,
* Policy documents and strategies published at the national, regional and local levels, including by the UK Government, the Welsh Assembly Government (and its agencies), NPTC and the NPT Public Service Board (NPTPSB).

Implications of Recent Changes to Welsh National Planning Policy

* + 1. On 24th February 2021, both Planning Policy Wales 11th Edition and Future Wales 2040 were published by the Welsh Government. The publication of Future Wales 2040, along with the LDP forms part of the statutory development plan for Wales. PPW 10th Edition, TAN1,,TAN8 and the Wales Spatial Plan are now revoked. The main implications of the publication of these documents are outlined below:
* **Future Wales 2040**
* The implementation of a four region approach, containing three National Growth Areas and 11 Regional Growth Areas;
* The introduction of specific climate change targets, namely that 70% of electricity consumption is to be generated from renewable energy by 2030, one gigawatt of renewable energy capacity is to be locally owned by 2030 and that new renewable energy projects to have at least an element of local ownership from 2020;
* The removal of TAN8 and Strategic Search Areas, replaced by Pre-Assessed Areas for Wind Energy, covering c. 281,0000 hectares (from a previous 77,000 ha for SSAs) and the introduction of Priority Areas for District Heat Networks;
* The need for preparation of Strategic Development Plans in conformity with Future Wales 2040 (of which NPT will form part of the South West Wales SDP). The SDPs should consider strategic regional issues including future growth areas, housing demand, economic development, transport and green infrastructure, responding to the Future Wales Outcomes in Chapter 3 of the NDF; and,
* NPT is identified as part of the Swansea Bay and Llanelli National Growth Area (Policy 28) Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.
* **Planning Policy Wales 11th Edition**
* The ability to deliver housing requirements must now be demonstrated through a housing trajectory, prepared as part of the development plan process and forming part of the plan. The housing trajectory will form part of the evidence base for the development plan Annual Monitoring Reports (AMRs) replacing Housing Land Supply and resulting in the revocation of TAN1: Joint Housing Land Availability Studies.
	+ 1. Strengthened commitment to renewable energies to address the Climate Emergency in support of the targets announced by Future Wales 2040A detailed review of the other plans and programmes identified as relevant to the LDP Review is provided in Appendix B. From this review, it is clear that the RLDP should:
* Seek to capitalise on the socio-economic opportunities presented by the Swansea Bay City Deal Project and the Swansea Bay and Llanelli National Growth Area;
* Align with the National Development Framework (NDF) for Wales and the requirement for the preparation of a SDP for South West Wales;
* Seek to enhance all aspects of health and wellbeing for the population of the NPTC area, including through providing high quality health infrastructure, improving physical and mental health and providing opportunities to enhance social wellbeing. In accordance with Section 3 of the WFG Act, the LDP Review (resulting in the adoption of a RLDP) should contribute to sustainable development and support the achievement of locally defined wellbeing objectives as set out within the Neath Port Talbot We Want (Well-being Plan 2018 – 2023);
* Secure sustainable economic growth and inward investment across the NPTC area through allocating suitable sites for development and by delivering the infrastructure required to increase connectivity, improve community and social infrastructure and increase access to high quality employment and economic opportunities. It will also be important for the RLDP to set out a spatial strategy which maximises the economic competitiveness of the NPTC area and improves social wellbeing, taking account of its position on the hinterland of the Swansea City Region and its current socio-economic conditions;
* Identify and plan to meet the needs of all residents and workers within the NPTC area, in particular with respect to the provision of adequate community infrastructure;
* Deliver well-designed and affordable homes to meet identified housing needs, including providing a range of sizes and tenures;
* Reduce car dependencies and improve active travel infrastructure;
* Deliver improved and expanded transport links, public transport and enhanced communications infrastructure, both to communities within the NPTC area and to key destinations in neighbouring authorities;
* Protect and enhance access to high quality outdoor sports facilities, parks and open spaces;
* Conserve, preserve, protect and enhance sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance, geological importance or heritage significance, in ways appropriate to their status;
* Develop effective community engagement techniques to respond to the views of wider communities and facilitate effective community cohesion;
* Promote the efficient use of resources, including moving towards a low carbon economy, use of waste as a resource, energy efficient buildings, and appropriate renewable and low carbon energy;
* Take measures to protect air quality levels and aim to mitigate any activity which could affect air quality levels across the NPTC area;
* Ensure there are no significant negative impacts on internationally and nationally designated nature sites (refer to separate Habitats Regulations Assessment Initial Screening Report for further details);
* Give full consideration to the potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management;
* Seek ways to maximise multi-functional green infrastructure coverage and ensure they provide a network of linked wildlife corridors (across a wide range of scales and increase ecosystems services including biodiversity;
* Seek ways to maximise the health benefits of green infrastructure;
* Use land efficiently by prioritising the use of previously developed land;
* Consider soil quality and agricultural land classification when assessing potential development sites;
* Recognise the different landscapes in the NPTC area and their capacity to accommodate change; and,
* Promote development that minimises landscape impacts and protects landscapes appropriate to their significance.
	+ 1. To ensure that the LDP Review addresses the key policy issues listed above, it will be necessary for them to be considered throughout the ISA. As with the identified key sustainability issues (Section 4.2 above), this will be done through the application of a holistic ISA Framework, including constituent ISA Objectives, as a core element of the ISA process. The proposed ISA Framework to support the NPT LDP Review is detailed in Section 5.

# Proposed Neath Port Talbot RLDP ISA Framework

## Introduction

* + 1. This section identifies and seeks the views of the SEA Consultation Bodies and other relevant consultees regarding a proposed assessment framework (‘the ISA Framework’) to underpin an ISA of the LDP Review. Once finalised, this ISA Framework will be applied in accordance with the assessment methodology outlined in Section 6 to assess likely significant environmental, health, equalities, Welsh language, and wider sustainability effects from all emerging substantive components of a RLDP (and any identified reasonable alternatives) throughout the LDP Review.
		2. Establishing an appropriate ISA Framework is central to identifying LSE as this allows the ISA to focus on key sustainability issues and to proportionately assess each substantive component as it emerges. Broadly, the ISA Framework should comprise a suite of related objectives which, when applied together, should define in objective terms the direction of travel and spatial outcomes required for the plan or programme to contribute positively to the delivery of sustainable development while meeting statutory requirements, and guidance, in relation to well-being, equalities, the protection of the Welsh Language, and health. These ISA Objectives are therefore distinct from, but should relate to, policy objectives defined at multiple spatial levels including within the emerging plan which is being subject to ISA.
		3. To be effective tools for assessment, ISA Objectives and the overall ISA Framework must be grounded within a detailed understanding of the socio-economic, environmental and policy contexts within which a RLDP will operate. The ISA Objectives also need to be targeted towards addressing key sustainability issues of relevance to both the spatial context of the NPTC area and the proposed content of the emerging RLDP.

## Summary of Existing SA Framework LDP Review

* + 1. **Table 5.1** below lists the Sustainability Appraisal Objectives (SA Objectives) within the existing NPTC LDP SA Framework (2016) and considers their continuing validity. This has been carried out with a view to incorporating the SA framework within a broader ISA framework to inform the LDP Review.
		2. The review of the existing NPT LDP SA Framework provided in **Table 5.1** indicates that whilst all components remain valid, a new ISA Framework is required to:
* Ensure the ISA and more widely the preparation of a RLDP responds to the identified key sustainability issues (**Table 4.1**);
* Account for policy changes at all spatial scales;
* Reflect the inclusion of wider assessment topics by changing from a ‘SA’ to a ‘ISA’;
* Respond to points which could improve the application of the framework; and,
* Respond to issues which the framework has not covered.

## Review of the Existing Neath Port Talbot LDP SA Framework

* + 1. The starting point of this ISA process is to consider whether the SA Framework devised for the SA (incorporating SEA) of the first NPTC LDP remains valid or if a revised framework is needed to allow the LDP Review ISA to proportionately and effectively respond to key sustainability issues identified in Section 4. Temporarily leaving aside the change in scope between the SA previously reported and the ISA now being undertaken, **Table 5.1** provides a review of the existing SA Framework for the adopted NPT LDP (2016). This considers the continuing validity of the current SA Objectives, including in the context of the LDP Review now being subject to a broader ISA process.

Table 5.1: Review of the Existing NPTC LDP SA Framework

| **Neath Port Talbot LDP SA Objective Title and Goal** | **Neath Port Talbot LDP SA Objective** | **Assessment of Continuing Validity** | **Overall Assessment of Continuing Validity** |
| --- | --- | --- | --- |
| Climate ChangeGoal: A community that is resilient to the likely impacts of climate change and minimises greenhouse gas production. | 1A: Ensure that all development takes into account likely future changes resulting from climate change (Adaptation). | The SA objective directly addresses climate change adaptation priorities. This remains valid. | The overall Climate Change SA Objective clearly remains valid. Climate change effects and implications have become more evident over the course of the LDP and Government targets have been increased accordingly. The preceding sections have demonstrated that the LDP has not fully met aspirations in respect of climate change adaptation of mitigation. But this is an issue with the application of LDP policy rather than the SA Objective itself.The Welsh Government set a new target of reduction of 95% from 1990 levels by 2050 in 2019 and declared a climate emergency in 2019.However, in their current form the three objectives 1a-1c risk isolating specific aspects of climate change and, in the context of now undertaking a broader ISA, undermining assessment proportionality. A more holistic approach to achieving climate change adaptation and mitigation should therefore be adopted in a new ISA Framework. This should incorporate Objectives 1a-1c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide a more holistic Climate Change SA objective. It is recommended that one Climate Change ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 1a-1c. |
| 1B: Achieve government targets for reducing greenhouse gas emissions (Mitigation). | Directly addressed the need to achieve government targets. This remains valid. Targets are now more ambitious than previously. |
| 1C: Make the area's appropriate contribution to national energy production (Mitigation). | This SA Objective usefully focuses on renewable energy generation and is appropriately supportive policy framework for the development of renewable energy schemes. This remains valid. |
| Natural Resources and WasteGoal: A community that protects and enhances natural resources and minimises the generation of waste. | 2A: Minimise loss or degradation of natural resources while ensuring that they are used only in a sustainable way. | This remains a valid element of an overall approach to the quantity of natural resources.  | The overall SA objective on Natural Resources and Waste remains valid and there remains a strong rationale to incorporate these within one objective. In its current form the three objectives 2a-2c risk isolating specific aspects of the issue of natural resources and waste. The Environment (Wales) Act 2016 and National Natural Resources Policy (NNRP) (2017) contain policy implications – such as the principles of Sustainable Management of Natural Resources - which could be reflected in the SA Objective criteria. TAN 21 and PPW have been updated, two important outcomes are a focus on circular economy and prevention via the waste hierarchy.It is recommended that one natural resources and waste ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 2a-2c. |
| 2B: Maintain and improve the chemical and biological/ecological quality of natural resources. | This remains a valid element of an overall approach to the quality of natural resources.  |
| 2C: Minimise waste and reduce amounts of waste disposed of to landfill. | This remains a valid element of an overall approach to reducing waste and landfill. |
| Biodiversity and GeodiversityGoal: A community where biodiversity and geodiversity are valued and a healthy and diverse natural ecosystem is nurtured, supported and enhanced***.*** | 3A: Prevent any further net loss of biodiversity. | This remains a valid element of an overall approach to protecting biodiversity, particularly in terms of providing an explicit commitment. | The overall SA objective on Biodiversity and Geodiversity remains valid and there remains a strong rationale to incorporate these within one objective. Changes in the Environment (Wales) Act 2016 and PPW have added further weight to the SA Objective, this now requires biodiversity enhancement and this should be recognised. The role of Green Infrastructure has also been heightened The Section 6 duty introduced by the Environment Act andthe well-being goals set out in the Wellbeingof Future Generations Act – the importance of biodiversity in ‘resilience’ - mustbe key considerations cutting across SEA objectives.In its current form the three objectives 3a-3c risk isolating specific aspects of biodiversity and geodiversity. A more holistic approach to biodiversity and geodiversity should be taken. This should incorporate Objectives 3a-3c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide a more holistic biodiversity and geodiversity objective. Other factors including green infrastructure and human-environmental relations, e.g. the provision of access to nature for all communities should also be addressed.The issue of soil quality protection is not included within the framework and should be included within a new Objective.It is recommended that one Biodiversity and Geodiversity and Soil ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 3a-3c. |
| 3B: Exploit all reasonable opportunities to secure biodiversity enhancements. | This remains a valid element of an overall approach to enhancing biodiversity. |
| 3C: Minimise adverse effects on designated geodiversity sites. | This remains a valid element of an overall approach to protecting geodiversity and biodiversity sites could also be explicitly addressed. |
| Landscape, Townscape and Historic CharacterGoal: A community where the County Borough’s distinctive and varied landscapes, townscapes and historic character are valued, conserved and enhanced. | 4A: Protect and/or enhance the area's landscape and townscape. | This remains a valid element of an overall approach to both landscape and townscape. However, it does not specifically mention historic landscapes or assets.  | This SA Objective succinctly identifies some key elements of landscape protection of relevance to the area but does not include historic landscapes. It therefore misses an opportunity to demonstrate compliance with Schedule 2 of the SEA Regulations with regards to the assessment of likely significant effects on “cultural heritage”. This is important as cultural heritage is not explicitly addressed elsewhere in the current SA Framework.Changes in the Environment (Wales) Act 2016 and PPW have added further support to the validity of each element (landscape, townscape, historic character) of the SA Objective. The principlesof Sustainable Management of NaturalResources has implications. Interlinked with biodiversity and geodiversity, opportunities for species and habitat connectivity should be considered on a landscape scale. The placemaking theme introduced by PPW10 and continued in PPW11, together with TAN12 (Design) amended in 2016 means a closer link between heritage and placemaking could be made via new criteria – criteria could be focused on protection and maintaining distinctiveness.The preceding section has demonstrated that the LDP has not fully met aspirations in respect of landscape designation protection. Whilst this is an issue with the application of LDP policy rather than the ISA Objective itself, the ISA Objective’s criteria or questions could include specific reference to landscape designations. |
| 4B: Protect and/or enhance the area's historic environment including architectural and archaeological resources. | This remains a valid element of an overall approach to protecting and enhancing the historic environment. |
| Pollution (Air Quality, Noise and Light)Goal: A community free from significant air, noise and light pollution.  | 5A: Achieve acceptable levels (meet national/European standards) of air quality throughout the County Borough. | This remains a valid. Air Quality was identified as a Key Issue for the LDP Review to address. | Given the specific land use implications of reducing and mitigating air pollution, and its specific identification within Schedule 2 of the SEA Regulations, it is recommended that a separate Air Pollution ISA Objectives is created. Light and Noise pollution are more appropriately addressed under a holistic Health and Wellbeing objective. The relevant ISA Objectives should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 5a-5c.Changes to PPW will need to be accounted for. PPW now refers to the need to promote appropriate soundscapes depending on context. |
| 5B: Achieve acceptable noise levels and protect quiet areas throughout the County Borough. | This remains valid.  |
| 5C: Reduce light pollution. | This remains valid. |
| Community CohesionGoal: A community whose culture and character are enhanced, and individuals are not limited by social exclusion. | 6A: Improve social cohesion and minimise the incidence of social exclusion by addressing the causes of social exclusion. | This remains a valid element of an overall approach to reducing social exclusion and promoting socio-economic equality of opportunity and outcome. | Both criteria remain valid, but it is recommended that these are separated into an objective on socio-economic aspect of social inclusion opportunity and another on cultural heritage and protection including the protection of the Welsh Language. PPW 11 considers protection of the Welsh language within ‘cultural considerations’, alongside the historic and cultural environment and promoting cultural value and experience. |
| 6B: Protect and enhance the culture and character of communities including cultural resources and Welsh language. | This remains valid. The importance of assessing for impacts on Welsh language have been confirmed within PPW 11th edition, TAN20), Planning Wales Act 2015 and Development Plans Manual 3rd edition 2020. |
| Health and Wellbeing (including poverty/deprivation)Goal: A community where individuals have the opportunity to realise their potential unhindered by ill health or poverty | 7A: Improve physical and mental health outcomes for all. | This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation. | The overall SA objective on Health and Wellbeing remains valid and there remains a strong rationale to incorporate these within one SA objective. The preceding section has demonstrated that the LDP has not fully met aspirations for improved economic outcomes – strongly linked to health. This is not an issue with SA framework and the validity of the overall SA Objective, which takes a holistic approach to health and wellbeing remains sound overall. To ensure that the ISA complies with Schedule 2 of the SEA Regulations, takes account of the Well-being of Future Generations (Wales) Act 2015 and fully incorporates the requirements of Wellbeing Assessment with the ISA, a new ISA Objective should incorporate 7a) to 7c) and be extended to include other criteria in order to promote a holistic interpretation of health and wellbeing, including physical health, mental health, social wellbeing, safety and security. As such, criteria should explicitly capture issues including mental health, educational attainment, crime prevention, residential amenity and multiple deprivation. |
| 7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing. | This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation. |
| 7C: Reduce/minimise the incidence and impacts of poverty by addressing the causes and consequences of poverty. | This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation. |
| EconomyGoal: A community where the local economy is resilient to global economic, social and climatic change and creates/ sustains a good quality of life for all residents within the community. | 8A: Develop and support a local economic infrastructure that is attractive to business and that meets the changing needs of the local and national community. | This remains a valid element of an overall approach to improving the local economy.  | The overall SA objective on Economy remains valid and there remains a strong rationale to incorporate these within one objective. The preceding section has demonstrated that the LDP has not fully met aspirations in respect of economic growth particularly in terms of its spatial focus. While this is an issue with the application of LDP policy rather than the SA Objective itself, the SA Objective’s criteria or questions could include specific reference to ensuring economic growth achieves regeneration aims. In its current form the three objectives 8a-8c risk isolating specific aspects of Economy. A more holistic approach to economic growth and resilience should be taken. This should incorporate ISA Objectives 8a-8c as criteria rather than separately.Regeneration strategic priorities could also be addressed through other SA Objectives regarding land use, reducing inequalities, placemaking and social wellbeing. To be more effective, a new suite of more integrated ISA Objectives focused on economic growth, regeneration, investment and employment should take account of the updated context including, the implications for NPT of the Swansea Bay City Deal , Enterprise Zone at Port Talbot, potential for the Swansea Bay Metro and the NDF. There is also the opportunity to consider the link between The Well-being of Future Generations Act which could provide an additional focus on skills and inclusion as key to sustainable economic growth. |
|  | 8B: Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and the use of, local resources and environmental assets. | This remains a valid element of an overall approach to improving the local economy. |
|  | 8C: Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community. | This remains a valid element of an overall approach to improving the local economy |

## Proposed ISA Scope and Objectives for the LDP Review

* + 1. This subsection provides an overview of the topics which need to be considered through this ISA and therefore within the ISA Framework. The scope of the ISA Framework must be sufficiently wide to enable the likely significant environmental effects and the likely equalities and health effects of the emerging LDP Review to be identified and addressed in accordance with statutory requirements (Section 1 and above at paragraph 5.3.3). From Section 4.3 it is also clear that the ISA Framework should be broader than that previously used for the NPTC LDP. Explicitly, ISA Objectives which respond to the following legal requirements need to be incorporated within the framework:
* Sustainability Appraisal (SA) as required under the Planning and Compulsory Purchase Act 2004 and the Development Planning (Wales) Regulations 2005 (‘the 2005 Regulations’);
* Strategic Environmental Assessment (SEA) as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (‘the SEA Regulations’);
* Supporting the implementation of wellbeing goals and wellbeing objectives (and the discharge of associated duties) as required under the Wellbeing of Future Generations (Wales) Act 2015. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
* Equalities impact assessment (EqIA) under the Equality Act 2010;
* Health impact assessment (HIA) – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,
* Welsh Language Impact Assessment (WLIA) as required under the Welsh Language Standards (No.1) Regulations 2015 and PPW -11th Edition.

****SEA/SA****

* + 1. The ISA Framework will need to address all environmental topics prescribed within Schedule 2 of the SEA Regulations (refer to Section 1.5), as there is potential for significant effect on all that cannot be scoped out at this stage and will therefore require further examination through the ISA process. The inclusion of ‘population’, ‘human health’ and ‘material assets’ as SEA topics provides a basis upon which to assess likely equalities and health effects using the same ISA Framework, as detailed below. In accordance with the SEA Regulations, the ISA will also assess inter-relationships between effects arising in relation to these environmental issues.

****Wellbeing of Future Generations****

* + 1. The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the **WBFGA 2015**.

*Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals*.

* + 1. The Wellbeing of Future Generations is at the heart of the planning system. Planning Policy Wales (2021) is now driven by the need for a placemaking approach at the heart of planning and is tasked with delivering the vision of the Wales as set out in the Well-being of Future Generations Act.
		2. To achieve this, the ISA Scope and the ISA Framework must therefore demonstrate how the RLDP will maximise its contribution to the achievement of the WBFGA seven well-being goals. In the first instance, the definition of sustainable development provides a clear sustainability principle at the heart of the ISA which will have to be approached consistently within the ISA framework. The ISA framework must incorporate the seven well-being goals which public bodies are required to achieve; these are:
* A prosperous Wales;
* A resilient Wales;
* A healthier Wales;
* A more equal Wales;
* A Wales of cohesive communities;
* A Wales of vibrant culture and thriving Welsh language; and,
* A globally responsible Wales.
	+ 1. These well-being goals will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce many aspects of the SEA Schedule 2 topics with a particular focus on assessing the long-term effects of the RLDP on human and population health. The ISA scope and ISA Framework will need to consider economic prosperity rather than short-term growth, this is likely to mean a focus on low carbon transition and achieving a more productive and more inclusive economy. It will need to consider how resilience can be achieved by addressing climate change, for example, and the role for and mutual benefits of biodiversity in improving human health outcomes. Health will need to be considered in terms of physical and mental wellbeing and the land use implications of this understood. The link between good health and socio-economic opportunity will need to be assessed to ensure opportunities for good growth are spread as equally as possible. The achievement of social cohesion through land use decision making, such as through investment in physical infrastructure, will therefore need to be assessed and understood. The importance of maintaining distinctiveness within NPTC area and the multiple ways in which land use decisions, in terms of their cultural, physical, linguistic, and social impacts, can impact these must be identifiable and considered. Finally, when these factors are considered together, the ISA Framework must help NPTC to identify how it will contribute to its global sustainability responsibilities.
		2. The WBFGA 2015 identifies five ways of working which public bodies must demonstrate they have carried out when undertaking their duty to achieve sustainable development:
* Looking to the long term so that we do not compromise the ability of future generations to meet their own needs;
* Understanding the root causes of issues to prevent them from occurring or getting worse;
* Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;
* Involving a diversity of the population in the decisions that affect them; and,
* Working with others in a collaborative way to find shared sustainable solutions.
	+ 1. The ISA framework through its holistic approach to the RLDP appraisal, and with the Well-being Goals integrated within, will help ingrain the five-ways of working within the plan-making process.
		2. To implement the WBFG Act at a local level, NPTC has produced a statutorily required Well-being Plan which shapes the approach taken to relevant Council policies, programmes, and strategies. The NPTC RLDP falls within this remit and there are clear implications for the ISA Scope and the content of the ISA Framework. The Neath Port Talbot We Want (Well-being Plan 2018-2025) identifies six local well-being objectives which the Public Services Board intend to pursue to improve the well-being of the people who live in the Neath Port Talbot area:
* Objective 1: To support children in their early years, especially children at risk of adverse childhood experiences;
* Objective 2: Create safe, confident and resilient communities, focussing on vulnerable people;
* Objective 3: Put more life into our later years - Ageing Well;
* Objective 4: Promote well-being through work and in the workplace;
* Objective 5: We value our green infrastructure and the contribution it makes to our Well-being; and,
* Objective 6: Tackling digital exclusion.
	+ 1. These well-being objectives will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce and provide a locally specific implementation mechanism of the WBFG Act within the NPTC area. Currently 30% of children in the NPTC area live in poverty. The ISA Framework will need to target the RLDP towards improving long term opportunities and outcomes for children. Housing, particularly ensuring safe housing for people with particular needs, will be a key focus for the RLDP. One key issue identified which has not been covered under the existing SA framework is that of Housing. Given the key issues identified in Section 4 and issues raised in the NPT Well-being Plan (2018-2025), it is recommended that a standalone housing objective is also identified in the ISA framework.
		2. Housing is a cross cutting issue and a driver of wellbeing. It is integral to meeting the needs of an ageing population which has many implications, particularly in terms of housing and access to services to improve not just life expectancy but healthy years expectancy. Across generations, the ISA Framework will need to be geared towards ensuring better employment prospects within NPTC addressing not just employment rates but the quality of employment and access to opportunities. The ISA Framework will contain biodiversity criteria, but it is important to ensure that these reinforce the human benefits of green infrastructure. The ISA Framework will need to recognise the link between sustainable economic growth and digital connectivity. The Swansea Bay City Deal is predicated on internet-based opportunities to grow quality employment opportunities across the region and so the ISA Framework will need to demonstrate how this is supported.

****Equalities Impact Assessment****

* + 1. The EqIA will be undertaken by assessing the performance of the emerging LDP Review against objectives from the ISA Framework relating to tackling inequalities and promoting equality and social inclusion. The EqIA will implement the Public Sector Equality and Socio-economic Duties under the Equality Act 2010.
		2. The objectives of the EqIA process are to integrate the consideration of relevant equalities issues and impacts into the development of the RTS from the outset and, in doing so, to demonstrate compliance with the Public Sector Equality Duty and the Socio-economic Duty. These duties will be used as tools to inform and embed key equalities issues within the LDP Review from the outset. Acting together with all other statutory assessments included within the ISA, this integrated approach allows the environmental, social, and economic implications of all strategy components to be tested at the earliest opportunity and for any uncertainties or issues identified during impact assessment processes to be addressed during the preparation of the RLDP.
		3. Insofar as the development plan affects access to services, amenities, economic opportunities and social activities, the LDP Review (resulting in the adoption of a RLDP) is likely to result in different impacts upon different demographic groups, persons with protected characteristics and those facing socio-economic disadvantage. The EqIA component of the ISA will holistically assess the likely effects on characteristics of equality, social inclusion and population and are therefore reflected within ISA Objectives in the ISA Framework (Table 5.2 below). At this point, due to the nature of the LDP Review, the identification of specific impacts on marriage, civil partnership and gender reassignment have been scoped out from the application of the Public Sector Equality Duty as the LDP Review cannot realistically secure objectives in relation to these protected characteristics.
		4. To avoid duplication or assessment gaps (including in combination with the WBFG Act), the integrated approach outlined in the ‘A More Equal Wales – Mapping the Duties’ non-statutory guidance (2021) will be adopted in this ISA. Relevant evidence generated through applying the ISA Framework to all emerging substantive plan components will therefore be used to support specific reporting against the distinct requirements of each duty.

****Health Impact Assessment****

* + 1. The purpose of HIA is to consider how a plan, programme or proposal will affect the key factors which can influence people’s health and wellbeing. The HIA approach is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore how health and social inequalities might be reduced or widened by particular proposals. More widely it should be recognised that an individual’s inherited traits interact with lifestyle, community, environmental, social and economic factors as well as a much wider range of issues to determine their health.
		2. The WBFGA aims to achieve ‘a healthier Wales’, and the planning system is key to ensuring places support the health and wellbeing of people and communities. The NPT Well-being Plan (2018-2025) has identified health improvement as a key priority. Clearly, within national and local policy, there is an increasing awareness of the links between the character and quality of the places where people live and work and their health and wellbeing. Social and economic factors are typically the main determinants of health, although the provision of health services and environmental factors such as pollution control and better design can play an important role. The legal and policy context should direct the RLDP towards better health outcomes. The Environment (Wales) Act has set stronger carbon reduction targets and the HIA and ISA should help to ensure that greener, healthier places and ways of living are achieved.
		3. The HIA process provides a systematic, yet flexible and practical, framework that can be used to consider the wider effects of local and national policies or initiatives and how they, in turn, may affect people’s health. The SEA Regulations require human health to be considered as part of the assessment of environmental effects. The health component of an SEA can be broadened to include both physical and mental health objectives of an HIA.
		4. Public Health Wales has published ‘Creating healthier places and spaces for our present and future generations’ (2018) which focuses on six priority areas:
* The walking and cycling infrastructure;
* Open green /blue spaces and green infrastructure ;
* The food growing and retail environment community;
* Health and social care services provided from local facilities;
* Low levels of air pollution; and,
* Building design.
	+ 1. The HIA element of this ISA will be undertaken firstly by assessing the performance of the emerging RLDP against objectives from the ISA Framework relating to health and wellbeing. Building on this, a second level of assessment will consider the likely impacts of the emerging RLDP as a whole specifically on identified key determinants of health within the NPTC area, taking account of the identified six priority areas.

****Welsh Language****

* + 1. Supporting Welsh Language is intrinsically part of promoting national and local culture and distinctiveness. A thriving Welsh Language is a well-being goal (WBFGA) and the role for placemaking in promoting Welsh Language is set out in PPW11. As such there is a clear role for the RLDP, and within this the ISA, to ensure this is achieved. It is now a legislative requirement that the ISA must include an assessment of the likely effects of the plan on the use of Welsh Language (section 62(6A) PCPA 2004 as inserted by section 11, PWA 2015). This will be undertaken firstly by including Welsh language Guide Questions and site assessment criteria within the ISA Framework, thereby enabling a base level of assessment. Building on this, a second level of assessment will examine the likely impacts of implementing the RLDP plan as a whole on the use of the Welsh language across the NPTC area.

****Habitats Regulations Appraisal (HRA)****

* + 1. As noted in Section 1, a separate HRA will be undertaken to assess the likely effects of the emerging RLDP on Natura 2000 sites (‘European Sites’). There are three European Sites within the NPTC area, with a further three European Sites within 15km of the NPTC area which have the potential to be affected by the emerging RLDP proposals. Full details of all international, national or local designations are provided in Appendix A. The European sites which will be considered in the assessment are:
* Within the NPTC area: Kenfig / Cynffig (SAC), Crymlyn Bog / Cors Crymlyn (SAC & Ramsar Site) and Coedydd Nedd a Mellte (SAC); and,
* Outside the NPTC area: Cefn Cribwr Grasslands (SAC), Blaen Cynon (SAC) and Cwn Calan (SAC).

## Proposed Neath Port Talbot LDP Review ISA Objectives

* + 1. Having regard to the proposed spatial scale, form and content of the RLDP (Section 2), relevant baseline characteristics and key sustainability issues (Section 4.2 and Appendix A), the objectives and requirements of other relevant plans and programmes (Section 4.3 and Appendix B) and the need for assessment proportionality, the proposed suite of ISA Objectives to be included within a new ISA Framework for the LDP Review are detailed in **Table 5.2** below. The emphasis on implementing a holistic approach to improved wellbeing across many of the SA Objectives is intended to demonstrate compliance with the Well-being of Future Generations (Wales) Act 2015 and to align with both the PPW – 11th Edition (2021) and the Future Wales 2040 NDF.
		2. The emphasis on implementing an integrated approach to improved wellbeing across many of the ISA Objectives is intended to reflect the cross-cutting nature of relevant environmental, social, economic, cultural, equalities and health issues and to provide a single focus to underpin this ISA, rather than environmental, social, economic, cultural, equalities and health issues being assessed separately.

Table 5.2: Proposed ISA Objectives for the LDP Review

| **No.** | **Proposed ISA Objective Topic** | **Proposed ISA Objective** |
| --- | --- | --- |
| 1 | Health and Wellbeing | Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety. |
| 2 | Equality and Social Inclusion  | Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion. |
| 3 | Transport and Communications | Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.  |
| 4 | Inclusive Economic Growth | Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base |
| 5 | Housing | Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs. |
| 6 | Air Quality  | Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.  |
| 7 | Climate Change | Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change. |
| 8 | Biodiversity, Geodiversity and Soil | Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources. |
| 9 | Water and Flood Risk | Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding. |
| 10 | Materials and Waste | Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and the provision of an adequate supply of minerals and materials for construction. |
| 11 | Sustainable Placemaking | Maximise the efficient use of land and enhance design quality to create great places for people. |
| 12 | Cultural Heritage (inc. Welsh Language)  | Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.  |
| 13 | Landscape | Protect and enhance the landscape character, visual amenity, distinctive sense of place and legibility of settlements in the NPTC area. |

* + 1. These proposed ISA Objectives are designed to complement each other, avoid assessment duplication and relate to the specific content of the LDP Review, to underpin a proportionate and effective ISA. **Table 5.3** below demonstrates the coverage of all statutory assessment requirements through the proposed ISA Objectives.

Table 5.3: Relationship between the Proposed ISA Objectives and the SEA Regulations

| **Proposed ISA Objective** | **SA / SEA Topic(s) as per SEA Regulations – Schedule 2** | **Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties** | **Relates to Wellbeing of Future Generations Act Wales 2015** | **Relates to Health Impact Assessment** | **Relates to Welsh Language (Planning Wales Act 2015)** |
| --- | --- | --- | --- | --- | --- |
| Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety. | B, C | Yes | Yes | Yes |  |
| Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion. | B, J | Yes - directly | Yes | Yes | Yes |
| Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.  | B, I, J | Yes | Yes |  |  |
| Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base | B, J | Yes | Yes |  | Yes? |
| Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs. | B, J, C | Yes | Yes | Yes | Yes? |
| Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality. | H, C | Yes | Yes | Yes |  |
| Climate Change: Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change. | I |  | Yes |  |  |
| Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources. | A, D, E, F |  | Yes |  |  |
| Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding. | G |  | Yes | Yes |  |
| Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction. | F, J |  | Yes |  |  |
| Sustainable Placemaking: Maximise the efficient use of land and enhance design quality to create great places for people. | B, J, L | Yes | Yes | Yes |  |
| Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.  | B, K |  | Yes |  | Yes |
| Protect and enhance the landscape character, visual amenity, distinctive sense of place and legibility of settlements in the NPTC area. | B, L |  |  |  |  |

* + 1. **Table 5.3** demonstrates that there is good coverage of all applicable statutory requirements within the proposed suite of ISA Objectives and that they will allow related issues to be addressed in tandem. This should ensure that any conflicts between either the ISA Objectives or the components of the emerging RLDP can be identified and resolved through the ISA process.

## Proposed ISA Framework for the Neath Port Talbot LDP Review

* + 1. To enable this ISA to be undertaken in a proportionate and targeted manner an ISA Framework will be used, comprising:
* The proposed ISA Objectives (see **Table 5.2**);
* A suite of relevant Guide Questions relating to each ISA Objective. Subject to views expressed by the relevant Consultation Bodies, this will be used in a qualitative assessment of each emerging substantive component of the RLDP, and any identified reasonable alternatives, to proportionately identify their LSE; and,
* A suite of sustainability indicators which are proposed to be considered in the assessment of candidate sites being carried out by NPTC. These indicators are designed to guide NPTC in the site assessment process. The indicators will support a legally compliant ISA that identifies statutory impacts assessment requirements. An integrated site selection and ISA site assessment process will be possible through the framework to avoid assessment duplication. Based on the proposed suite of sustainability indicators and responses to this ISA Scoping consultation, the criteria which will be applied to assess candidate sites will be confirmed within a Call for Sites Consultation Document at the outset of the RLDP Call for Sites period.
	+ 1. The proposed ISA Framework is detailed in Table 5.4 below. During the assessment stage of the ISA, in accordance with the SEA Regulations a further suite of indicators will be developed to provide a framework for monitoring the likely significant effects on the environment (including social, economic, cultural factors), Welsh language, health, wellbeing, of implementing a RLDP once adopted. This monitoring framework will also be used by NPTC to monitor the effectiveness of the RLDP and to assess whether key targets of the RDLP are being met.

Table 5.4: Proposed ISA Framework for the LDP Review

| **Proposed SA Objectives** | **Proposed SA Guide Questions – *Will the RLDP…*** | **Proposed Sustainability Indicators for Candidate Site Assessments** |
| --- | --- | --- |
| 1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety. | * Protect and improve access to healthcare services and facilities?
* Reduce health inequalities and improve the physical and mental health and wellbeing of communities?
* Improve accessibility to green active travel routes,high quality accessible recreational open spaces and sports facilities, in particular for those facing structural inequalities and/or socio-economic disadvantage?
* Facilitate or encourage active travel for all communities?
* Increase access to nature?
* Provide clean air and high- quality bathing beaches and rivers?
* Protect against noise pollution, delivering context appropriate soundscapes?
* Protect communities from environmental risks such as flooding using nature-based solutions?
* Protect against light pollution?
* Create urban communities that feature a network of high quality, well connected green infrastructure?
 | * Proximity to and the capacity of healthcare facilities;
* Proximity to existing active travel networks;
* Proximity to existing open space provision;
* Proximity to natural environment;
* Proposed provision of new or upgraded healthcare facilities, active travel networks or open space within candidate sites;
* Proximity to significant noise emitting land uses, such as industrial and transport infrastructure uses; and,
* Proximity to significant light emitting land uses such as industrial uses.
 |
| 2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion. | * Reduce poverty and social exclusion?
* Result in differential impacts (beneficial or adverse) on different demographic groups or persons with protected characteristics?
* Result in differential impacts (beneficial or adverse) on communities (of place or interest) facing inequality of outcome due to socio-economic disadvantage?
* Result in differential impacts (beneficial or adverse) on individuals vulnerable to social exclusion or poverty?
* Provide fair and impartial protection from environmental hazards (such as air quality, flooding)?
* Protect and enhance access to high quality community facilities, public services and key amenities to meet the diverse needs of different demographic groups, vulnerable members of the community and those facing socio-economic disadvantage?
* Protect and enhance access to natural resources, including goof quality public green and blue spaces?
* Help to reduce levels of absolute and relative income poverty, inequality in the distribution of household wealth, and levels of multiple deprivation affecting communities?
* Promote social cohesion and integration?
* Reduce fuel poverty?
 | * Impacts on different demographic groups, persons with protected characteristics, demographic groups vulnerable to social exclusion and/or poverty, and those facing socio-economic disadvantage;
* Proximity to existing community facilities, public services and key amenities; and,
* Proposed provision of new or upgraded community facilities, public services or key amenities within candidate sites.
 |
| 3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.  | * Increase the accessibility of public services, economic opportunities and markets?
* Improve connectivity within the NPTC area and to other areas?
* Reduce car dependencies and encourage a shift to more sustainable forms of travel, including for people and freight?
* Support the increased uptake of active travel by providing integrated active travel routes?
* Improve the accessibility, capacity and safety of the transport network?
* Reduce traffic flows and congestion?
* Enhance the quality and integration of public transport?
* Enhance the provision of high-quality communications infrastructure?
* Improve utilities infrastructure to support economic growth and meet population needs?
 | * Proximity to the public transport network (bus stops and train stations);
* Proximity to the strategic road network (motorways and trunk roads);
* Proximity to existing active travel networks;
* Proximity to congestion pinch points;
* Availability and the capacity of utilities infrastructure to serve the site;
* Proposed provision of new or upgraded transport or communications infrastructure within or connecting to candidate sites; and,
* Connectivity between relatively deprived communities (including those facing individual or intersectional inequalities) and socio-economic opportunities resulting from development.
 |
| 4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base. | * Enhance access to and diversify employment opportunities for local residents?
* Provide equal access to high equality employment opportunities, social and cultural activities, and public services and amenities for all?
* Improve access to employment for all demographic groups and communities, in particular for those facing structural inequalities and/or socio-economic disadvantage?
* Enhance opportunities for education, lifelong learning and the retention of skills within the local economy?
* Support the growth of further and higher education institutions?
* Deliver the right type of development and economic activities in the accessible locations to maximise economic competitiveness?
* Help to diversify and regenerate the local economy?
* Encourage inward investment and innovation?
* Promote the co-location of synergistic economic activities, industries and land uses?
* Support social and environmental wellbeing in NPTC and beyond.
* Provide the infrastructure and workspace required for new and existing businesses?
* Promote the principles of green recovery?
* Support the aims of the Swansea Bay City Region City Deal, including enhanced digital connectivity?
* Promote the sustainable use and consumption of natural resources (eg utilising the DISRUPT Framework)?
 | * Proximity to and the capacity of education infrastructure;
* Proposed provision of new or upgraded education and skills infrastructure within candidate sites;
* Employment capacity of the site;
* Site suitability for mixed use development;
* Proximity to existing and planned key employment locations (e.g. business parks, industrial estates and urban employment clusters);
* Site capability for industrial and economic uses;
* Adjacent land uses, including potential agglomeration benefits; and,
* Proximity to key public transport nodes and the strategic road network, supporting inclusive labour markets.
 |
| 5. Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs. | * Help to facilitate the increased delivery of housing to meet a range of identified needs?
* Improve the quality of the housing stock?
* Provide energy efficient housing stock which operates at close to zero emissions?
* Reduce homelessness and overcrowding?
* Increase the mix, range and affordability of housing?
* Provide housing that encourages a sense of community?
* Delivery adequate pitches and plots required for Gypsies, Travellers and Travelling Show people?
* Maximise benefits of new development using appropriate housing locations and good design?
 | * Housing capacity of the site;
* Deliverability of affordable housing as a component of any residential development;
* Site suitability for mixed use development;
* Adjacent land uses;
* Proximity to COMAH (control of major accident hazards) sites; and,
* Proximity to European Sites vulnerable to recreational pressures.
 |
| 6. Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality. | * Maintain or improve air quality?
* Reduce exposure to poor air quality?
* Prevent and reduce emissions of harmful pollutants?
* Prevent and reduce poor air quality which is in proximity to international, national and local level for reasons of biodiversity, conservation, ecological or geological importance?
 | * Proximity to Air Quality Management Areas (AQMA);
* Proximity to congestion pinch points; and,
* Potential operational emissions.
 |
| 7. Climate Change: Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change. | * Help to reduce greenhouse gas (GHG) emissions from key economic sectors?
* Support the minimisation of energy use?
* Support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources?
* Facilitate investment in and promote the use of low carbon and sustainable infrastructure?
* Implement adaptation measures to address the likely effects of climate change, including increased flood risks?
* Promote sustainable design that minimises GHG emissions and is adaptable to the effects of climate change?
* Restore or create a network of natural carbon capture environments including peatlands, grasslands, woodlands and within ‘blue carbon’ sinks?
 | * On-site provision or renewable or low carbon energy generation;
* Proximity to the public transport network; and,
* Capacity of the site to include climate change adaptation measures.
 |
| 8. Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources. | * Ensure appropriate safeguards for the integrity and conservation objectives of sites designated at international, national or local levels for reasons of biodiversity or geodiversity value or species protection?
* Protect and enhance valued species and habitats?
* Safeguard Resilient Ecological Networks (RENs)?
* Safeguard against habitat loss or fragmentation?
* Maintain and enhance urban green infrastructure?
* Protect or enhance protected trees or important woodland areas?
* Improve access to nature?
* Remediate known contamination of land and groundwater?
* Safeguard the best quality and locally important agricultural land?
* Protect and enhance important soil resources?
* Outline more direct consideration/reference to the condition of designated sites?
* Provide a clearer definition of ‘valued’ habitats and species.
* Provide a means for assessment of green infrastructure?
 | * Proximity to and potential effects on sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance or geological importance;
* Proximity to designated woodlands and important trees or hedgerows;
* Evidence of valued habitats or species on or adjacent to the site;
* Potential impacts on habitat fragmentation and connectivity;
* Agricultural land classification; and,
* Soil type and quality.
 |
| 9. Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding. | * Improve the quality of waterbodies helping to meet the objectives of the Water Framework Directive?
* Maintain or enhance the ecological and chemical status of the water environment?
* Affect the volume of surface water runoff into or abstraction from water bodies?
* Provide a means to assess the condition of waterbodies and degree of physical modification (WFD)?
* Protect and assess the number of properties at risk from flooding (taking account of the climate change scenarios outlined in the new Flood Map Wales)?
* Support improvements to water infrastructure (water supply and sewerage)?
* Minimise the risk of flooding from all sources of flooding to all people, property, infrastructure and environmental assets?
* Manage residual flood risks appropriately and avoid new flood risks?
* Review average water usage per household?
* Avoid new development in areas prone to flood risk or mitigate the potential for such risk?
* Promote the deployment of sustainable urban drainage systems and promote nature-based solutions for better management of surface water?
* Maintain and restore natural river processes to safeguard river habitats and help to mitigate the effects of climate change including flooding and droughts?
* Conserve water resources and promote water efficiency?
 | * Proximity to Flood Risk Zones; and,
* Proximity to waterbodies and aquifers.
 |
| 10. Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction. | * Minimise the production of waste?
* Promote the principles of circular economy?
* Treat and process waste with minimal environmental impact?
* Minimise the demand for raw materials and the need for minerals extraction?
* Promote the use of local resources and minimise the importation of minerals?
 | * Proximity of waste collection facilities; and,
* Establishment of locational need for minerals extraction.
 |
| 11. Sustainable Placemaking: Maximise the efficient use of land and enhance design quality to create great places for people. | * Promote high quality architecture and design which strengthens local distinctiveness, linked to historic and cultural protections, and fosters a sense of place?
* Create and maintain a safe and attractive public realm which encourages people to walk and cycle?
* Ensure appropriate siting, scale, massing and density of development?
* Make the best use of land, including through prioritising the redevelopment of brownfield sites and locating high footfall uses close to the public transport network?
* Reduce opportunities for crime and antisocial behaviour through the siting and design of new development?
* Provide public realm which feels safe to all users at all times?
* Consider nature-based solutions in sustainable placemaking?
* Make space for and integrate green infrastructure as intrinsic part of design and function of new places?
* Facilitate well connected spaces for people and nature?
 | * Previously developed brownfield land or greenfield land; and,
* Proximity to active travel networks.
 |
| 12. Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.  | * Increase availability and accessibility of culture, leisure and recreation activities/venues?
* Conserve, protect and enhance the integrity, character and setting of historic assets?
* Protect and enhance the qualities of areas of historical or cultural significance?
* Promote the sensitive re-use of historic or culturally important buildings?
* Preserve and, where appropriate, enhance important archaeological resources?
* Safeguard and increase the use of the Welsh language?
 | * Proximity to and potential effects on designated historic assets and areas;
* Proposed re-use of historic or culturally important buildings;
* Scale and type of housing within ~~catchment of Welsh primary schools and~~ Welsh language sensitive areas; and,
* Scale and type of non-residential development in Welsh language sensitive areas.
 |
| 13. Landscape: Protect and enhance the landscape character, visual amenity and legibility of settlements in the NPTC area. | * Protect and enhance landscape character, local distinctiveness and sense of place?
* Safeguard important landscape and townscape features?
* Protect visual amenity and valued views?
* Prevent urban sprawl?
 | * Proximity to and potential effects on nationally and locally designated landscapes;
* Evidence of potential impacts on visual amenity or key views; and,
* Evidence of integration or coalescence with, or separation from, existing settlements.
 |

# Proposed ISA Methodology and Consultations Arrangements

## Introduction

* + 1. Building upon the proposed ISA Framework detailed in Section 5, this section outlines and seeks the views of the relevant Consultation Bodies (for all assessments within the ISA) regarding the proposed methodology and consultation arrangements to be adopted for the ISA of the LDP Review.
		2. The ISA will identify potential beneficial as well as adverse effects on the full range of objectives (covering the environmental, social, economic, cultural, health and equalities issues). The ISA will help identify ways of mitigating or avoiding adverse effects of the proposed policies and schemes of the LDP. There is the potential for residual adverse effects to remain against some ISA objectives, and this must be weighed against the need to deliver much needed development in Neath Port Talbot.

## Proposed ISA Reporting

Overview

* + 1. Based on the intended form of the LDP Review (Section 2) it is envisaged that the ISA Framework set out in **Table 5.4** will be used to assess all proposed substantive components of the RLDP as it emerges, as well as any identified reasonable alternatives to these proposals. In general terms, the ISA will therefore need to include appraisals of a proposed RLDP vision, RLDP objectives, a spatial strategy (and potential sub-area strategies), strategic policies, development management policies and site allocations. The proposed approach to undertaking a proportionate ISA of each of these components is set out in this section.
		2. As described in Section 5.4, the assessment methodology comprises a two-stage approach at both LDP Pre-Deposit and Deposit stages. The Framework will be applied as the main, base-level, assessment considering all likely effects on a thematic basis to provide a holistic assessment of the sustainability implications of the emerging RLDP. The second level of assessment will be reporting against the specific requirements of applicable duties and requirements (e.g. Public Sector Equality and Socio-economic Duties for EqIA). This will draw upon the findings of the ISA Framework assessment. The secondary level of assessment will take the form of a series of commentaries to report conclusions against WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.
		3. The ISA methodology will be applied, and the findings reported within iterative ISA Reports which will be prepared in accordance with applicable statutory requirements to accompany the Preferred Strategy (RLDP Pre-Deposit Document) and RLDP Deposit Plan (Deposit Document). The ISA Report will be updated and expanded between these stages to reflect changes to the emerging LDP:
1. The ISA Report for the Preferred Strategy will focus on assessing effects from proposed RLDP options (including growth levels), spatial strategy (including key sites which underpin the strategy) and strategic policies; and,
2. The ISA Report for the RLDP Deposit Plan will identify and assess effects from all substantive components of the RLDP Deposit Plan, including all proposed site allocations and policies.
	* 1. All matrix-based detailed assessments of individual components of the emerging RLDP will be contained within appendices to the ISA report, with key findings set out within the main body of the report. In accordance with the SEA Regulations, and other relevant best practice, a separate Non-Technical Summary (NTS) document will be prepared to provide the information prescribed within Schedule 2 of the SEA Regulations and present the key findings of the ISA, incorporating SEA, in non-technical language.
		2. Following the completion of an independent examination of RLDP Deposit Plan, all binding recommendations made by the appointed Inspector will be subject to ISA screening to determine whether they would give rise to any new or different likely significant effects (including on the environment) not previously reported within the ISA Report for the RLDP Deposit Plan. This ISA Screening will be documented within an ISA Report Addendum.

## Proposed ISA Methodology

ISA of Vision and Objectives

* + 1. It is important that the vision and objectives of the RLDP are aligned with the ISA Framework and reflect the identified key sustainability issues, as all other LDP components will flow from them. The key attributes of the vision and objectives for the RLDP will therefore be assessed for their compatibility with each ISA Objective within the ISA Framework.
		2. Owing to the high-level nature of the LDP vision and strategic objectives it is not likely to be possible to identify the significance (in the context of the SEA Regulations) of predicted effects from their implementation, nor to assess potential differential on different demographic groups or persons with protected characteristic (in the context of the Equality Act 2010). However, the assessment will seek to provide an indication of any likely significant environmental effects and effects on different demographic groups, with any uncertainties also noted. Should the proposed vision or objectives for the RLDP be judged to be incompatible with the ISA Objectives, suitable mitigation measures in the form of revised wording will be recommended.
		3. A compatibility matrix similar to the example presented in **Table 6.1** will be used to record the first level assessment of the LDP vision and objectives within the ISA reports for the RLDP Pre-Deposit and Deposit Documents. For brevity and formatting reasons it is not proposed to reproduce the ISA Guide Questions associated with each ISA Objective (see **Table 5.4**)within the final version of the appraisal matrices in each ISA report, but they will be used where relevant to undertake the ISA. Building on the matrix, a second level assessment will comprise short commentaries to demonstrate the coverage of key issues (to provide a strategic framework for action) relevant to WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

Table 6.1: Proposed Compatibility Matrix to Assess RLDP Vision and Objectives

| ISA Objective | LDP Vision  | LDP Objective 1 | LDP Objective 2 | Etc. |
| --- | --- | --- | --- | --- |
| Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution. |  |  |  |  |
| Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion. |  |  |  |  |
| Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.  |  |  |  |  |
| Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base. |  |  |  |  |
| Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified needs. |  |  |  |  |
| **KEY** | + | Compatible |  |  |
| 0 | Neutral |  |  |
| ? | Uncertain |  |  |
| - | Incompatible |  |  |
| ~ | No Clear Relationship |  |  |

## ISA of Proposed Spatial Strategies and Policies

* + 1. At the RLDP Pre-Deposit Stage it is likely that NPTC will identify a suite of preferred high level spatial and policy options to meet identified needs (e.g. housing delivery) and challenges (e.g. the achievement of locally defined wellbeing objectives), together with potential reasonable alternatives to these options. The spatial options are likely to include potential ‘growth options’ and may extend to the identification of preferred strategic site allocations (see below regarding the ISA of candidate site allocations), whilst the policy options are likely to include a range of thematic policy approaches to address key issues.
		2. Owing to the high level nature of the spatial, growth and policy options that are likely to be included within the RLDP Pre-Deposit Document, it may in some cases be necessary to adopt the same approach as for the RLDP vision and objectives (**Table 6.1**) in terms of focusing on their compatibility with the ISA Framework. However, the ISA will also seek to identify relevant sustainability issues, disproportionate effects on groups with protected characteristics or those vulnerable to social exclusion or poverty, and mitigation or enhancement measures which should be incorporated within the spatial and policy options as they are developed further for the RLDP Deposit Document. Where possible, the ISA of the proposed spatial and policy options will determine whether they are likely to result in any significant effects.
		3. The preferred spatial and policy options will be refined to take account of representations received regarding the RLDP Pre-Deposit Document, resulting in the inclusion of a fully developed spatial strategy (potentially supported by sub-area strategies) and suite of strategic and development management policies within the RLDP Deposit Document. At this stage, these components will be subject to a first level of detailed assessment against the ISA Framework using a standard matrix and scoring system similar to that shown in **Table 6.2** and 6.3 below. For reasons of proportionality each policy grouping within the RLDP Deposit Document will be assessed together in a suite of thematic matrices.

Table 6.2: Proposed Scoring System - Spatial Strategies and Policies

| Score | Description | Symbol |
| --- | --- | --- |
| Significant (Major) Positive Effect | The proposed policy contributes significantly to the achievement of the ISA Objective. | **++** |
| Minor Positive Effect | The proposed policy contributes to the achievement of the ISA Objective but not significantly. | **+** |
| Neutral Effect | The proposed policy is related to but does not have any effect on the achievement of the ISA Objective. | **0** |
| Minor Negative Effect | The proposed policy detracts from the achievement of the ISA Objective but not significantly. | - |
| Significant (Major) Negative Effect | The proposed policy detracts significantly from the achievement of the ISA Objective. Mitigation is therefore required. | -- |
| Uncertain Effect | The proposed policy has an uncertain relationship to the ISA Objective, or the relationship is dependent on the way in which the aspect is managed. Additionally, insufficient information may be available to enable an assessment to be made. | ? |
| No Clear Relationship | There is no clear relationship between the proposed policy and the achievement of the ISA Objective, or the relationship is negligible. | ~ |

* + 1. The findings of the assessment will be presented within the ISA Report using matrices similar to that shown in Table 6.3 (the example policy grouping and titles are indicative and may be subject to change). In accordance with statutory requirements, each matrix will include a commentary to:
* Justify the assessment scoring for each assessed policy;
* Identify any likely significant environmental or other effects within the context of the SEA Regulations and other applicable statutory requirements;
* Identify any likely different or disproportionate effects on demographic groups with protected characteristics or those vulnerable to social exclusion or poverty; and,
* Identify any mitigation or enhancement measures considered necessary to either avoid significant adverse environmental and other effects (which would otherwise be expected to occur) or to enhance the performance of the proposed policies.
	+ 1. For brevity and formatting reasons it is not proposed to reproduce the Guide Questions associated with each ISA Objective (see Table 5.4) within the final version of these matrices in the ISA Report. However, the questions will be used to undertake this assessment and the ISA Framework will be appended to the RLDP ISA Report in full.
		2. Building on the ISA Framework (level 1 assessment) matrices, a second level assessment will comprise short commentaries to demonstrate the relevance and appropriateness of the proposed spatial strategy and policy framework to address WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

Table 6.3: Assessment Matrix for Proposed LDP Spatial Strategies and Policies

| Example Policy Grouping: Placemaking |
| --- |
| ISA Objective | Policy 1 Score | Policy 2 Score | Policy 3 Score | Commentary |
| Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution. | ++ | + | ++ | Assessment of Predicted EffectsMitigation and EnhancementAssumptionsUncertainties |
| Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion. | + | - | -- | Assessment of Predicted EffectsMitigation and EnhancementAssumptionsUncertainties |
| Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.  | - | ~ | ? | Assessment of Predicted EffectsMitigation and EnhancementAssumptionsUncertainties |
| Etc.  |  |  |  |  |

## ISA of Candidate Site Allocations

* + 1. As noted in Section 5, an integrated site assessment process will be carried out by NPTC to satisfy ISA requirements (including SEA) and to select site allocations for inclusion in the RLDP. This will identify the strategic sites needed to deliver the RLDP Preferred Strategy.
		2. Owing to the strategic level and nature of the candidate site allocations that are likely to be included within the LDP Pre-Deposit Document, it may in some cases be necessary to adopt the same approach as for the LDP proposed spatial strategies and policies (**Table 6.3**) in terms of focusing on their compatibility with the ISA Framework. However, the ISA will seek to identify site-specific and relevant sustainability issues, disproportionate effects on groups with protected characteristics, those vulnerable to social exclusion or poverty and those facing socio-economic disadvantage, and appropriate mitigation or enhancement measures which should be incorporated within candidate strategic site allocations as they are developed further for the RLDP Deposit Document. Where possible, the ISA of the candidate strategic site allocations will determine whether they are likely to result in any significant effects.
		3. The assessment criteria used by NPTC will relate to the sustainability indicators listed in the third column on **Table 5.4** and thus will relate to each of the ISA Objectives within the ISA Framework. The ISA Reports accompanying the LDP Pre-Deposit and LDP Deposit Documents will demonstrate that the site assessment criteria and process adopted by NPTC satisfy statutory ISA requirements and sufficiently relate to the ISA Objectives identified within the ISA Framework for the LDP Review.
		4. An iterative desktop-based appraisal utilising Geographical Information Systems software (GIS) and relevant assessment criteria will be undertaken of all candidate sites[[4]](#footnote-5) to determine whether their allocation would have any likely significant effects. Subject to any views expressed by the SEA Consultation Bodies, the proposed criteria listed within the third column of Table 5.4 will be refined before being confirmed within the NPT RLDP Call for Sites Consultation Document. At this point, a transparent scoring system will be published to allow all prospective site promoters to consider the likely performance of their candidate site against the assessment criteria. All candidate sites submitted to NPT within the defined LDP Call for Sites period and not discounted due to site size will then be subject to a proportionate level of ISA using the pre-determined appraisal criteria and scoring system, with the findings detailed within the ISA Reports for the LDP Pre-Deposit and Deposit Documents.
		5. All sites submitted to NPTC during the RLDP Call for Sites and not rejected on grounds of deliverability during the intended RLDP period will need to be treated as ‘reasonable alternatives’ and thus subject to an equal level of assessment up to RLDP Pre-Deposit stage. At this point the preferred RLDP Vision and Objectives will be published for consultation, meaning that any further site assessment carried out for the RLDP Deposit Document would only need to consider candidate sites which align with the RLDP Vision and Objectives (as all other sites would then be ‘not reasonable’).
		6. At both LDP Pre-Deposit and Deposit stages a second level qualitative assessment will also be undertaken to test the ability of all identified reasonable alternative sites at each stage, and at Deposit stage of the combined suite of proposed site allocations, to address WBFGA 2015, Equality Act 2010, Welsh language and HIA requirements.

## Assessment of Cumulative Effects and Synergistic Effects

Cumulative and Synergistic Effects

* + 1. Following from the appraisal of all individual substantive components within the LDP Pre-Deposit and Deposit Documents, a further round of ISA will be conducted to identify any likely cumulative or synergistic effects as a result of interactions between the emerging RLDP components. This will seek to demonstrate compliance with cumulative assessment requirements within the SEA Regulations, in a proportionate manner.

## ISA of Reasonable Alternatives

Identification of Reasonable Alternatives

* + 1. The SEA Regulations require the LSE of implementing both a plan or programme (i.e. the emerging RLDP) and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described. The SEA Regulations further state that to be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan or programmes’ corresponding objectives and geographical scope. To be eligible for consideration in this ISA process, reasonable alternatives must therefore be:
* Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging RLDP and are consistent with relevant national and other policy frameworks;
* Related to the objectives of the emerging RLDP; and,
* Within the geographical scope of the emerging RLDP, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within the NPTC area.
	+ 1. Given that reasonable alternatives must relate to the objectives of the plan under consideration, it is not likely to be possible to identify any clear reasonable alternatives to the LDP vision and objective, as any alternatives would change the strategic direction of the emerging RLDP. However, the following types of reasonable alternatives will be identified where possible and subject to assessment in the same way as the corresponding preferred option or proposed component of the emerging RLDP:
* Alternative policy options, criteria and tests considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. setting higher or lower housing land requirements (to inform site allocations) or the application of a higher or lower affordable housing provision requirements (to assess planning applications);
* Alternative spatial options considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. directing housing or employment growth to particular locations instead of others; and,
* Alternative site allocations – as noted above, all candidate sites submitted to NPTC during the RLDP Call for Sites period and not discounted due to either deliverability or non-compatibility with the RLDP Preferred Strategy will need to be subject to the same level of ISA, regardless of whether NPTC subsequently decides to allocate the site within the emerging RLDP. To demonstrate compliance with SEA case law, the ISA Reports for the RLDP Pre-Deposit and Deposit Documents will also provide a summary justification to explain the status of each candidate site (e.g. preferred, reasonable alternative, rejected, etc.) at each stage of the LDP Review.

Approach to Identifying Uncertainties, Assumptions and Mitigation

* + 1. The identification of any assumptions and uncertainties is an important element of the ISA process, as the emerging RLDP will need to be unambiguous to ensure the plan can be implemented as intended.
		2. The proposed ISA reporting matrices (**Table 6.1** and **6.3** above) have been designed to allow uncertainties, inconsistencies and other issues which could undermine the implementation of the emerging RLDP to be identified in relation to the proposed LDP vision, objectives, spatial strategy and policies. The iterative nature of the ISA process will enable corresponding recommendations to be devised and incorporated into the emerging RLDP to address any identified issues, in particular to avoid likely significant adverse effects from occurring.
		3. The identification of mitigation measures to avoid likely significant adverse effects from the allocation of proposed sites is also of critical importance. Such mitigation measures usually take the form of policy requirements to undertake technical assessments regarding potential environmental effects from development proposals and, depending on the outcome of these assessments, to implement mitigation, compensatory and/or offsetting measures through the implementation of any planning permission granted for the proposal. The proposed site assessment criteria listed in the third column of **Table 5.4** will enable any likely significant adverse effects from the potential allocation of each candidate site to be identified. Should the relevant candidate site be proposed for allocation, appropriate site-specific mitigation would then need to be included within the emerging RLDP such that the ISA report for the LDP Deposit Plan is able to conclude that the proposed site allocations would not result in any unmitigated likely significant adverse effects.

## Presentation of ISA Key Findings

* + 1. All matrix-based detailed assessments of individual components of the emerging RLDP will be contained within appendices to the ISA report, with key findings set out within the main body of the report. In accordance with the SEA Regulations, a separate Non-Technical Summary (NTS) document will be prepared to provide the information prescribed within Schedule 2 of the SEA Regulations and present the key findings of the ISA in non-technical language.

## Proposed ISA Consultation Arrangements

* + 1. Iterative versions of the ISA report will be published to accompany the NPT RLDP Preferred Strategy (Pre-Deposit Document) and NPT Deposit Plan (Deposit Document). Whilst the timetable for consultation on the emerging RLDP will be confirmed in the final Delivery Agreement (DA) to be published in December 2021, the draft DA outlines that consultation on the Preferred Strategy will be undertaken from January 2023-February 2023 and from February 2024-March 2024 for the Deposit Plan. each for a period not less than (and likely exceeding) 6 weeks duration. Reflecting the broad scope of this ISA, the ISA Reports will be issued to relevant stakeholders over and above the SEA Consultation Authorities and will be publicly available on the NPT LDP Review website. Representations and comments on both the emerging RLDP and associated ISA Reports can be made via the Council's website, email, or postal addresses which will be confirmed prior to the RLDP Preferred Strategy consultation period commencing.

# Summary and Next Steps

## Overview

* + 1. NPTC has recognised the value and opportunities for an integrated assessment approach to preparing the Neath Port Talbot LDP Review. The integration of SA(SEA) along with statutory and key non-statutory plan-making elements including the WBFGA 2015 requirements, Equalities Act, Welsh language, and Health Impact Assessment (HIA) into a single Integrated Sustainability Appraisal (ISA) will enable a more transparent, holistic and rounded assessment of the sustainability implications of growth options, objectives, policies and proposals.
		2. The ISA will be used as a plan-making tool used iteratively at each stage of the LDP Review process. This approach will be key to ensuring that the sustainability issues identified in this ISA Scoping Report are addressed. These issues include: contextual changes which are intended to drive additional growth in NPT and wider South Wales; reconsidering the appropriate strategic approach to land use to deliver housing and economic growth; refocusing regeneration towards new opportunities and addressing problems with the existing LDP; and, responding to policy changes including PPW11 which sets out strong placemaking principles and focuses on place prosperity.
		3. To achieve this, this ISA Scoping Report has defined a proposed ISA Framework (Section 5) and assessment methodology (Section 6) for use in undertaking the ISA in respect of the RLDP.
		4. Subject to any comments received from the SEA Consultation Bodies and other relevant consultees, this ISA Framework and methodology will be used to assess the likely significant environmental, health, equalities and wider sustainability effects arising from the LDP Review (i.e. from the preparation of a RLDP). The assessment will be an iterative process that will include the development and refinement of policy and site options by testing the strengths, weaknesses and likely effects of all emerging substantive LDP components.

## Specific Request for Comments from the SEA Consultation Authorities

* + 1. In accordance with the SEA Regulations, the SEA Consultation Bodies are specifically requested to provide:
* Their view and associated reasons regarding the potential for LSE to arise from the LDP Review and the need (or otherwise) to undertake a SEA;
* Comments regarding the proposed scope of and approach to undertaking an ISA, incorporating SEA, in respect of the LDP Review;
* Comments regarding the proposed ISA Framework detailed in **Table 5.4**. In particular, the SEA Consultation Bodies are asked to confirm that this ISA Framework sufficiently covers all key environmental and other sustainability issues and applicable policy requirements; and,
* Comments regarding the proposed scope of, level of detail and consultation arrangements for iterative ISA Reports to accompany each emerging component of a replacement Neath Port Talbot LDP (i.e. ISA Reports for the RLDP Preferred Strategy and RLDP Deposit Plan).
	+ 1. Any comments should be provided within the statutory timescales prescribed within the SEA Regulations (i.e. within 5 weeks of receiving this report) and directed to:

**Duncan Smart, Associate Planner**

**Stantec UK Ltd**

**0141 343 3319**

duncan.smart@stantec.com

1. Baseline Review
	1. Introduction
		1. This Appendix supports Section 4 of the Neath Port Talbot LDP Review ISA Scoping Report. It provides a review of current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area.
		2. In doing so this review:
* Identifies relevant baseline characteristics, including those likely to be significantly affected by the outcome of the LDP Review (i.e. the replacement Neath Port Talbot LDP). This includes the identification of sites designated at international or national levels for reasons of ecological/geological importance or heritage/landscape value which have the potential to be affected by the LDP Review;
* Identifies relevant socio-economic trends and baseline conditions, again focusing on matters likely to be significantly affected by the outcome of the LDP Review (i.e. the RNeath Port Talbot LDP); and,
* Outlines how the identified environmental and socio-economic characteristics and baseline conditions should be addressed within a replacement Neath Port Talbot LDP and considered within this ISA.
	+ 1. This evidence is then used to:
* Outline the expected evolution of baseline sustainability (including environmental) conditions in the absence of the LDP Review; and,
* Define a suite of key sustainability issues which will need to be addressed within the LDP Review and which should be considered throughout this ISA (incorporating SEA) process.
	+ 1. The purpose of this baseline review is therefore to inform both emerging proposals for the LDP Review and the content of a ISA Framework that will be used to assess all substantive components of the LDP Review (i.e. all emerging policy and site options, including reasonable alternatives to those preferred by NPTC).
	1. Overview of Designated Sites
		1. **Table A.1** identifies sites designated at international, national or local level for reasons of biodiversity conservation, geological importance, heritage or landscape value which are considered to have the potential to be affected by the LDP Review. The site-specific context of these designated sites needs to be considered when characterising the sustainability baseline position and identifying the relevance of existing issues and problems to the LDP Review, as detailed in Section A.3.

Table A.1: Designated Sites of Relevance to the Neath Port Talbot LDP Review

| **Relevant Sites** | **Designation Type** | **Qualifying Features / Interests** | **Implications for Neath Port Talbot LDP Review** | **Implications for ISA** |
| --- | --- | --- | --- | --- |
| **Biodiversity** |
| **International/European** |
| Within the NPTC area:* None

Outwith the NPTC area:* None
 | Special Protection Area (SPA) | N/A | N/A | N/A |
| Within the NPTC area:* Kenfig/Cynffig
* Crymlyn Bog / Cors Crymlyn
* Coedydd Need a Mellte
 | Special Area of Conservation (SAC) | Kenfig / Cynffig: Coastal sand dunes, sand beaches, machair, Tidal rivers, estuaries. | Any RLDP resulting from the LDP Review must support the management of all internationally designated sites (including possible or proposed new European Sites) in pursuit of their defined conservation objectives.  | Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features. |
| Crymlyn Bog / Cors Crymlyn: Bogs, Marshes, Fens, Broad leaved deciduous woodland.  |
| Coedydd Nedd a Mellte: Broad leaved deciduous woodland, heath & scrub. |
| Crymlyn Bog  | Ramsar Site | Comprises a floodplain-valley mire located within a lowland coastal context and is the most extensive wetland of its type in Wales. Also, a SAC, SSSI and NNR.  |
| Outwith the NPT Area Boundary (within 15km):* Cefn Cribwr Grasslands
* Blaen Cynon
* Cwn Calan
 | Special Area of Conservation (SAC) | Cefn Cribwr Grasslands: Bogs, marshes, humid grassland, Heath, scrub, Broad leaves deciduous woodland.  | Any RLDP resulting from the LDP Review must support the management of all internationally designated sites with the potential to be affected by development in the NPT area (including those in close proximity to the NPT boundary in neighbouring authorities and also including possible or proposed new European Sites) in pursuit of their defined conservation objectives. | Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features. |
| Blaen Cynon: Humid grassland, Bogs, Marshes, Water fringed vegetation, heath, scrub, improved grassland, dry grassland, Steppes.  |
| Cwm Calan: Humid grassland, bogs, marshes, water-fringed vegetation, Improved grassland, Broad leaved deciduous woodland.  |
| **National** |
| 21 SSSIs have been designated within the NPTC area:

|  |
| --- |
| Caeau Ton-Y-Fildre, Cefn Gwrhyd, Rhydyfro, Cilybebyllcoed Cwm Du, Cilmaengwyn, Cors Crymlyn, Crymlyn bog, Craig-Y-Llyn, Crymlyn Burrows, Cwm Gwrelych and Nant Llyn Fach Streams, Cynffig/Kenfig,Dyffrynoedd Nedd a Mellte a Moel Penderyn, Earlswood Road Cutting and Ferryboat Inn quarries, Eglwys Nunydd Reservoir, Fforest Goch Bog, Frondeg, Gorsllwyn, Onllwyn, Gwrhyd Meadows, Hafod Wennol Grasslands, Margam Moors, Mynydd Ty-Isaf, Rhondda, Pant-Y-Sais, Tairgwaith |
|  |
|  |

 | Site of Special Scientific Interest (SSSI) | The identified SSSIs have been designated owing to the presence of nationally important or rare habitat types within each. | Any RLDP resulting from this LDP Review must support the management of all nationally designated sites in pursuit of their defined conservation objectives.  | Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests. |
| Kenfig Pool and Dunes:Crymlyn Bog and Pant Y Sais | National Nature Reserve (NNR). | Kenfig Pool NNR hosts Glamorgan's largest lake whilst Crymlyn Bog and Pant Y Sais consists in part of the largest lowland fen in Wales. |
| **Local** |
| The following SINCs are currently designated at the local level within the NPTC area: Catwg Wetland, Hawthorn Close, Hafodheulog Wood East Meadow, Tennant Canal, Gorsllwyn Meadows, Rolling Mill Cwmavan, Cwm Blaenpelenna , Harbourside Law Courts, Khartoum Tip, Baglan Bay, St David's Graveyard, Briton Ferry Waste Ground, Earlswood Area, Lower River Afan Estuary, The Quays Car Park Bunds, Jersey Marine Woods, Margam Country Park, Square Pond, Earlswood Grasslands, Tyle'r Waun, GCG Common, Pandy Farm, Swansea Canal, Neath Canal, Eglwys Nunydd, Caroline Street, Junction 38 Wetland Complex, Ynysdawle, Cwm du Glen & Glanrhyd Plantation, Land behind Marigold Place, Dyffryn Woods, Tiroedd Comin Cwm Amman Uchaf, Amazon Woodlands, Baglan Brownfield Slack, Lamb & Flag, Nant Y Cafn, Heol Heddwch, Baglan Panhandle, Sarn Helen, Bwlch Road Hedges, Derwydd Avenue, White Lady's Farm Orchard, Ffynnon Dawel Selar, Aberbaiden Farm Meadows, Giant's Grave, Brunel Dock Grassland, Cilfrew Meadow, Mynydd y Garth, Mynydd Gellionnen, Abernant Road Playing Field, Jaffa Land Baglan, Gelli Dochlithe, Dyffryn Cellwen, Rhos Common, Intervalley Road, Banwen, Blaendulais Marshy Grassland, Rheola Borrow Pits Grassland, Ynys Corrwg Farm, Bryn Goytre Cycleway, Cymer Tip, Treforgan, Resolven Minewater Treatment Units, Gwynfi Street, Rheola Lowland Grassland, Riverside Industrial Estate, Hafodheulog Wood North Meadow, Ynysmeudwy Molinia Meadow, Coed Hirwaun Wetland, Rhyslyn, Neath Estuary, St John's Graveyard, Nant Y Wern, Upper Melincourt Valley, Banwen Pond, Rhos Bends Bog, Glan-Yr-Afon, Gnoll Country Park, Brunel Dock Reedbed, Shelone Woods, Pen Yr AlltwenSchool Road, Crynant, Dan-Y-Coed, Little Warren, Preswylfa Dingle, Aberbaiden Farm Small Meadow, Fields Behind Heol Y Coedcau, Scotch Street, Meadow Row, Bryn, Parc Croeserw, Bryn Tip, Cwmavon Coal Tips, Pentreffynnon, Pant-Y-Brwyn, Garth Mor, Fabian Way Wildflower Verge, The Waun, Cimla, Bryncoch Farm, Coed Bach A'r Cwm, Floristically Diverse Forestry Verge, Betony Field, Triangular Pond, Crymlyn Burrows, Caeau Ynysgeinon, Carn Llechart, Coed Darcy Gcn Area, Bryn Gwyn, Red Jacket Fen, Adjacent to Gors Llwyn, Marden Park Baglan, Llandarcy Village Green, Cwmafan Green Corridor, Gwlyptir Mynachlog Need, Resolven Alluvial Meadows, Panasonic, Land behind Pen Y Bryn, Maerdy Playing Fields, Parc Rhiwfawr, Abernant Colliery, Onllwyn Coal Washery, Waun Sterw, Morfa Glas, Tonmawr Minewater Treatment & Surrounding Habitats, Afan Mineral Railway, Fferm Alltwenganol, Roman Way Reedbed, Aberhenwaun Uchaf, Penrhys Fawr, Resolven Minewater Treatment area OMH | Sites of Importance for Nature Conservation (SINC). | The identified SINCS host a wide range of locally important habitat types and either the observed presence of or potential to support a wide range of floral and faunal species, including indicator species. A number of the SINCS overlap with higher level statutory designations. | Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for biodiversity sites designated at the local level.  | Relevant ISA objectives must afford an appropriate level of protection for all designated sites, consumerate with their status and purpose. |
| The following LNRs are currently designated at the local level within the NPTC area: Pant-Y-Sais, Eaglesbush Valley, Cwm Du Glen and Glanrhyd Plantation, Bryn Tip, Swansea Canal | Local Nature Reserve (LNR) | LNR are sites which have interesting wildlife or geology but are also important for local residents, schools and are places where people who may have no specific interest in natural history can enjoy access to nature. NPTC’s countryside team aim to make the LNRs exemplars in the management of designated sites and green space, with the goals of conserving nature, providing opportunities for study or research and allowing access and recreation. | Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for nature reserves designated at the local level.  | Relevant ISA objectives must afford an appropriate level of protection for all designated sites, consumerate with their status and purpose. |
| **Geological** |
| **National** |
| Cwmgwrelych and Nant Llyn Fach Streams | Site of Special Scientific Interest (SSSI) | Geological SSSIs are designated owing to the presence of nationally important or rare geological features.  | Any RLDP resulting from this LDP Review must support the management of all nationally designated sites to maintain or improve their current condition.  | Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests. |
| Local |
| 2 RIGS have been designated within the NPTC area: Aberdulais Falls & Melincourt Brook  | Regionally Important Geodiversity Site (RIGS) |  | Any RLDP resulting from this LDP Review should provide an appropriate level of protection for locally designated regionally important geodiversity sites.  | Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose. There is also a need to assess likely effects on important geological features under the ‘soil’ environmental topic as prescribed within Schedule 2 of the SEA Regulations. |
| **Cultural Heritage** |
| **National** |
| 97 Scheduled Monuments across the NPTC area | Scheduled Monuments (SM) | Of the 97 identified Scheduled Monuments (SM, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman. The majority are sited within Margam (15). A wide range of historic structures have been designated, including hill forts, chapels, standing stones, ironworks, castles and cairns, each of which is of historical significance and forms an important landscape feature. | Any RLDP resulting from this LDP Review must support the protection and enhancement of all nationally designated historic assets, including their setting. The identified historic assets benefit from statutory protection which must be taken account of within policies, proposals and guidance within the RLDP. | Relevant ISA objectives must afford adequate protection to nationally designated historic assets, taking account of site-specific characteristics and the relevance of historic assets to the NPTC area. |
| 395 Listed Buildings across the NPTC area | Listed Buildings | A wide range of structures and buildings have been listed owing to their features of architectural importance. |
| There are 6 Conservation Areas within the NPTC area: Cilybebyll, Neath Town Centre, Llandarcy Village, Tonna Canal Depot, Glynneath Woolen Mill, Margam Park | Conservation Areas | The designated Conservation Areas are centred upon clusters of Listed Buildings or other structures of architectural importance. |
| **Landscape** |
| **National** |
| There are no AONB designated within the Neath Port Talbot Area. However, the Gower AONB is approx.20 miles from the NPTC boundary, covering much of the peninsula and is renowned for its scenic quality, particularly the coastline, much of which is Heritage Coast.  | Area of Outstanding Natural Beauty (AONB) | N/A | N/A | N/A |
| 1 National Park which falls within the boundary of the NPTC area:Brecon Beacons National Park | National Park | National Parks are areas of exceptional natural beauty designated to conserve and enhance the natural beauty, wildlife and cultural heritage of the parks, protect the social and economic wellbeing of its communities and promote public enjoyment and understanding of their special qualities.  | Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for the Brecon Beacons National Park. The duty relating to the purposes of the National Park also applies outside the park and in its setting. | Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests. |
| **Local** |
| The following SLAs are currently designated at the local level within the NPTC area: Mynydd y Garth, Dulais Valley, Vale of Neath, Margam, Mynddy Gelli, & Foel Trawsnant | Special Landscape Areas (SLA) | Policy ENV2 within the existing Neath Port Talbot LDP identifies these 6 Special Landscape Areas (SLAs) as being unique, exceptional or distinctive to the NPTC area. | Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for landscapes designated at the local level.  | Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose. |

* 1. Environmental and Socio-economic Baseline Conditions
		1. Informed by **Table A.1**, **Table A.2** below outlines the current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area. This review also identifies associated existing environmental and socio-economic problems and issues which the LDP Review should address and which should be considered throughout this ISA process.

Table A.2: Review of Relevant Environmental Aspects, Issues and Problems

| **SEA Topic** | **Baseline Key Characteristics** | **Existing Objectives, Issues and Problems** | **Implications for Neath Port Talbot LDP Review** | **Implications for ISA** |
| --- | --- | --- | --- | --- |
| Biodiversity, Fauna and Flora | **Designated sites**: As detailed in **Table A.1**, the NPTC area hosts a number of designated sites at European, national and local levels for reasons of biodiversity conservation and value, whilst other designated sites out with the NPTC area could also be affected by the LDP Review. At the European level the NPTC area hosts 3 SACs and 1 Ramsar site. At the national level the NPTC area hosts 21 SSSI’s and 2 NNRs. At the local level, NPTC has designated 129 SINCS, 2 RIGS and 5 LNRs. | All identified sites are designated for specific reasons of ecological important or biodiversity conservation and have conservation objectives related to these, e.g. the protection of relevant qualifying features. **Table A.1** above identifies the qualifying features of relevant European sites (SACs and Ramsar sites). There is a need to safeguard these qualifying features from adverse effects, protect the integrity of designated sites and work towards the achievement of defined conservation objectives.  | Any proposals for development within the NPTC area could adversely impact designated sites and biodiversity through a range of direct and indirect effects, potentially including loss of roosting, foraging and other habitats, physical or noise disturbance, abstraction of river water, discharge of effluent, contamination and air pollution. As such, all proposals and policies within the emerging RLDP arising from the LDP Review must take account of relevant ecological sensitivities. This includes the need to support the management of all designated sites in relation to their status and in pursuit of their defined conservation objectives. Any RLDP must also provide an appropriate level of protection for protected species and non-designated ecological interests. | The ISA Framework must include objectives relating to the appropriate conservation, protection and enhancement of statutorily and non-statutorily designated sites. |
| **Priority and other notable habitats:** NPTC's habitats include ancient woodlands, unimproved wet grasslands, chalk grassland, river valleys and rocky gorges, coastal sand dunes and saltmarsh. These habitats support varied flora and fauna, including many protected, rare or declining species. | The ISA Framework should include appropriate objectives to assess potential effects on habitats and species from proposals (including cumulative development) and policies within the emerging RLDP. This should include consideration of impacts such as habitat loss, recreational impacts, water abstraction, pollution and disturbance effects.  |
| Population (including relevant socio-economic conditions) | **Governance and Statistical Geographical Units**: NPTC is the unitary authority responsible for local government across a 442km2 area of South Wales. The authority hosts five lower level Town Councils and 14 Community Councils. The unitary authority contains two whole constituencies: Aberavon & Neath. The principal towns in the NPTC area are Neath, Port Talbot and Pontardawe. The NPTC area stretches from the coast to the borders of the Brecon Beacons National Park. A large proportion of the NPTC area is characterised by uplands/semi-uplands and forestry. The upland areas are characterised by five valleys: Vale of Neath, Dulais Valley, Afan Valley, Swansea Valley and Upper Amman Valley. As a unitary authority, NPTC is also the single local planning authority (LPA) for the area. The Planning (Wales) Act 2015 provides a legal framework for the preparation of Strategic Development Plans at the regional level (refer to Appendix B for further details). An SDP is expected be prepared in due course for the South West Wales Region incorporating the NPTC area.NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major projects across Pembrokeshire, Camarthenshire, Swansea and Neath Port Talbot. In the NPTC area, this will result in the creation of the Centre for Excellence in Next Generation Services for start-up businesses, the ASTUTE Factory of the Future for smart technologies and a new National Steel Innovation Centre for research, testing and knowledge sharing.  | N/A | The preparation of any RLDP will need to be closely aligned with the preparation of the SDP to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues.  | The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, in particular with regards to the accessibility and provision of public services. The ISA Framework proposed for use in the ISA of the LDP Review (**Section 5**) should be kept under review and tested for compatibility against the SA Framework for the SDP once this has been produced.  |
| **Demographics**: NPTC has an estimated population of 143,000 (2018[[5]](#footnote-6)), around 4.6% of the total population of Wales (3,118,600). 2018 based projections[[6]](#footnote-7) suggest that the population will increase from 142,906 in 2018 to 143,621 by 2021, increasing to 144,238 by 2028, which equates to an increase of 1% over the ten-year period. Additionally, between 2018-2028, those aged 15 and under are expected to decline by 4.46%, while those aged 16-64 are projected to decline by 1.7%. Conversely, the proportion aged 65+ is projected to increase by 13.3% between 2018 and 2028. In terms of statistical units, there are 91 Lower Super Output Areas (LSOAs) within the NPTC area, representing 4.8% of the 1909 total LSOAs in Wales. | Projected population ageing is likely to create issues for long term workforce replacement and increase pressures on a range of public services. | The LDP Review must take into account the characteristics of the resident and working populations of the NPTC area, particularly with regard to current and future predicted labour supplies, employment needs, skill levels and socio-economic factors (as detailed below).It will be important for the RLDP to set out coherent strategies in respect of housing land and community infrastructure provision to meet current and expected future needs. Robust evidence to identify these needs should also therefore be collated and kept up to date throughout the LDP Review.  | The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, in particular with regards to the accessibility and provision of public services. |
| **Housing:** The JHLAS (2019) indicated that NPTC had a housing land supply, assessed against the current housing requirement of the Neath Port Talbot LDP, of 4.5-years; below the five-year target. Since the previous JHLAS (2018), the current housing land supply has declined by 0.5 years. The 2020 AMR shows that the delivery of homes has fallen short of annual targets since 2014/15, with the latest estimations (2020) showing a shortfall of 30% than the projected 8760 homes by the end of the plan period. Neath Port Talbot is split into multiple housing wards. The top 5 largest number of households are in the following Wards- Neath East (3,048), Sandfields East (3,045), Baglan (2,924), Sandfields West (2,882) and Bryn & Cwmavon (2,850). In total there are an estimated 63,978[[7]](#footnote-8) dwellings across the NPTC area, of which approximately 69% are owner occupied, 19% are social rented, 10% private rented, 2% are living rent free and 0.2% shared ownership. Average house prices within NPTC increased by 7% from March 2019 (£113,409) to March 2020 (£121,338) which is £40,346 below the average property prices for Wales at £161,684 (March 2020)[[8]](#footnote-9). Over the Plan period, there is an identified need for approximately 8,000 dwellings over to the year 2026. The sub-area of Neath requires approximately 4,100 of these, in contrast to Amman Valley which requires approximately 1% (or 100 homes).Over 2019[[9]](#footnote-10), a total of 299 housing completions were recorded in Neath Port Talbot, falling short of the 2019 target of 686 dwellings. Since the LDP base date in 2011, a total of 2,126 houses have been built, falling short of the annual cumulative target of 3,582 in the same period. This is a shortfall of 1456 units, with just 59.4% of the cumulative annual target delivered to date. With regards to affordable housing, over the latest monitoring period (2019), no affordable housing units were recorded as delivered through the planning system. 50 houses have been completed since the LDP base rate (2011) against a target of 478 in the same period, resulting in a 10.5% delivery rate. This demonstrates a significant shortfall of affordable housing delivery across Neath Port Talbot. | The identification of a current housing land shortfall means that insufficient housing is likely to be delivered through the planning system to meet identified needs. However, a RLDP must be underpinned by up to date and objective calculations of housing need, which may differ from the housing land requirements set under different economic conditions in 2016 for the existing LDP. Alongside the ageing population, housing demand is anticipated to increase with projected increases in the number of single person/lone parent households.At present the overall level of demand for affordable housing is not being met across the NPTC area. Furthermore, NPTC has identified clear shortfalls in the provision of extra care housing and smaller dwellings, in particular that of two-bedroom properties, across the affordable and general-purpose housing sectors. | The LDP Review calculates the objectively assessed housing need (OAN) level for the NPTC area over the intended period of the RLDP and set a new housing land requirement accordingly. Any RLDP resulting from this LDP Review will then need to be underpinned by a clear housing land strategy and will need to allocate a sufficient quantum and appropriate range of housing sites to satisfy the identified housing land requirement.  | The ISA Framework should include objectives relating to housing provision to meet identified needs, both in terms of the availability and quality of the housing stock.  |
| **Educational Attainment/Qualifications[[10]](#footnote-11):** In 2018 ,11% of the working age population (16 to 64yr) in the NPTC area held no qualifications, which is higher than the percentage of the population with no qualifications across Wales (8.6%).This trend was also observed each year between 2011 – 2017, although the proportion of the NPTC population with no qualifications is shrinking. The level of attainment achieved by the working age population with qualifications is also lower in Neath Port Talbot than across Wales: 48.5% in Neath Port Talbot are qualified to level NVQ3 or above compared with 55.1% across Wales and 29.2% are qualified to level NVQ4 or above compared with 35.4% at the national level.  | The latest available statistics highlight that as a whole, the working age population within the NPTC area holds fewer and less advanced qualifications than across Wales, although current educational attainment amongst school aged people is similar across both geographies. The observed high proportion of the working age population with no qualifications. This is of concern as the limits the ability of a sizeable demographic group to be economically active and restricts local access by employers to high skilled labour. | The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to education infrastructure capacity and choice. | The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the adequacy, quality and spatial distribution of education infrastructure provision. |
| **Community Infrastructure:** Neath Port Talbot CBC is split into multiple wards: Neath North, Neath South, Pelenna, Pontardawe, Resolven, Rhos, Sandfields West, Tonna, Trebanos,Ystalyfera, Baglan, Briton Ferry East, Bryn and Cwmavon, Margam, Onllwyn, Port Talbot, Sandfields East, Seven Sisters, Tai-bach, Aberavon, Aberdulais, Allt-wen, Blaengwrach, Briton, Ferry West, Bryn-coch North, Bryn-coch South, Cadoxton, Cimla, Coedffranc Central, Coedffranc North, Coedffranc West, Crynant, Cwmllynfell, Cymmer, Dyffryn, Glyncorrwg, Glynneath, Godre'r graig, Gwaun-Cae-Gurwen, Gwynfi, Lower Brynamman, Neath East.Educational facilitiesNeath Port Talbot CBC act as the education authority in the area and operate the primary and secondary schools within the County. It operates 6 infant schools, 6 junior schools, 56 primary schools, 11 secondary schools and 3 special schools. Further education institutions include St Joseph’s Catholic School & Sixth Form Centre and Ysgol Gyfun Ystalyfera who provide sixth form opportunities. Neath Port Talbot College operates across the County Borough, with main activities focused in two campuses in both Port Talbot and Neath. Higher education institutions in the area include Swansea University, which has a science and innovation campus in Crymlyn Burrows and the University of South Wales which has a campus located at Baglan Energy Park in Port Talbot. Community facilitiesThere are 8 libraries managed by Neath port Talbot Libraries and 7 community managed libraries in the NPTC area. Four areas of Neath Port Talbot were awarded Green Flag status in 2019: Gnoll Estate Country Park, Margam Country Park, Talbot Memorial Park and Neath’s Victoria Gardens. Margam Country Park is one of only seven sites in Wales to be accredited as a Green Heritage Site. The Green Flag Community Award was also given to the Amman Valley Trotting Club, Glyncorrwg Ponds and Riverside Park. |  The Neath Port Talbot Wellbeing Assessment (2017) indicates that the NPTC area is presently served by a range of good quality community infrastructure and open spaces. However, funding shortfalls for cultural facilities may affect their availability. It will be important that these are protected and where possible enhanced and that the infrastructure is capable of meeting the changing needs of the population. In addition, further community infrastructure and open space provision will be required to support projected population growth within the NPTC area. | The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to outdoor sport provision, children’s playing space, community halls, accessible natural open space and allotment provision. | The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the provision and quality of community infrastructure. |
| **Employment[[11]](#footnote-12):** In 2019, the employment rate within the NPTC area was 74.5%, which is slightly higher than across Wales (73.5%) but lower than the average across Great Britain (75.7%). In Neath Port Talbot, the percentage of the working age population that is economically active is also higher in Neath Port Talbot (77.6%) than across Wales (76.8%). The official unemployment rate in the NPTC area stood at 4.3% for 2019, which was higher than the unemployment rate across Wales (4.1%) and Great Britain (3.9%). Related to this, in 2019 the NPTC area had a jobs density of 0.60 (ratio of jobs to resident working age population) compared with 0.78 across Wales and 0.86 for Great Britain.Neath Port Talbot accommodates a number of manufacturing facilities such as steel, petrochemicals, automotive engineering and apparel; most notably Port Talbot Steelworks, capable of producing almost 5 million tonnes of steel slab per annum and a key employer in the NPTC area. The largest employment sectors in Neath Port Talbot are for manufacturing (19%) and human health and social work activities (17%). Wholesale and retail trade; repair of motor vehicles and motorcycles is the third largest employer by industry in Neath Port Talbot at 12.8%. This is comparable to that of Wales overall where human health and social work activities are undertaken by 17% of the population and wholesale and retail trade; repair of motor vehicles and motorcycles at 14%. The range of occupations within NPTC demonstrates that those employed as managers and directors, professional, associate professional and technical occupations falls below the Welsh and United Kingdom average whilst the process plant and machine operatives proportion is higher than the Wales average.ONS Annual Population Survey data indicates that over the period since 2015 there has been a small shift in the industry of employment of residents of the NPTC area, as the proportion of those who work in retail and education has decreased while the proportion who worked in health, hotels, transport and communications increased[[12]](#footnote-13).In 2019, full-time workers gross weekly pay in Neath Port Talbot averaged at £613.40, which was £78.40 above the Wales level and £26.90 above the average across Great Britain. Females in Neath Port Talbot received £85.30 less in their gross weekly pay than the total average.  | In recent years the NPTC area has consistently experienced a higher unemployment rate than the national averages for Wales and Great Britain. This indicates either that insufficient or unsuitable employment opportunities are provided for residents of the NPTC area, taking account of education and skills levels (which, as detailed below, are also below national averages).  | The LDP Review should develop and appropriate employment land and economic development strategy for the RLDP. It will be important for emerging policies, proposals and guidance to support the creation of a broad range of new employment opportunities which match the skill levels of the existing labour market, whilst also seeking to attract high value sectors such as energy, advanced manufacturing, logistics and ports.  | The ISA should assess whether the RLDP will be effective in providing increased employment opportunities in appropriate locations and appropriate sectoral diversification into high value industries. The ISA Framework should therefore include objectives relating to high quality employment, economic growth, sectoral diversification and inward investment. |
| **Inequality, Social Exclusion and Deprivation**: The Welsh Index of Multiple Deprivation (2019) identifies deprivation pockets throughout Wales. In 2019, of the 91 LSOAs in the NPTC are, 14 were in the most deprived 10% of Wales; 30 were in the most deprived 20%; 41 were in the most deprived 30% and 63 were in the most deprived 50% LSOAs[[13]](#footnote-14).The percentage of households that are workless in Neath Port Talbot is at 25.9%, considerable above the national average for Wales at 18.3%[[14]](#footnote-15). The percentage of the working age population who are claiming universal credit in NPTC is 3.4%, slightly higher than 3.1% across Wales and 3% across Great Britain. The level of worklessness is reflected through gross disposable household income (GDHI) per head, which is lower (£14,971) than the Wales average (£15,754). In 2014, GDHI in NPTC was £14,746.00. | Some parts of the NPTC area, especially in the Valley communities, are among the most deprived areas of Wales, with low levels of economic activity and access to facilities and services, particularly for children, young people and elderly populations. | A holistic strategy is needed to address multiple deprivation within parts of the NPTC area, including but not limited to the creation of new, high quality employment opportunities. Any RLDP resulting from this LDP should set out a clear employment land strategy to support the provision of new employment opportunities in appropriate and accessible locations. The RLDP should also include a regeneration strategy and associated policies and proposals to catalyse a range of physical, environmental, health and socio-economic improvements within identified deprived communities.  | The ISA Framework should include appropriate objectives relating to equality, social inclusion, access to public services, employment opportunities, access to healthcare, access to open spaces and exposure to pollution (air, water, soil, etc).. |
| Human Health | **Life expectancy[[15]](#footnote-16):** Based on the latest figures for the NPTC area, life expectancy for males at birth is 76.4 and for females, 80.4. With regard to healthy life expectancy, males at birth can expect a healthy life expectancy of 58.9 years, while females from birth can expect a healthy life expectancy of 57 years. Across Wales, life expectancy for males at birth is 78.2, while for females it is 82.13. Healthy life expectancy from birth ranges from 60.9 for males to 61.5 for females.  | It is clear to see that there are large gaps in life expectancy and healthy life expectancy between males and females in the NPTC area compared to the Welsh average. Measures need to be put in place to firstly tackle deprivation which should then have a positive impact on life expectancy of both males and females.   | Any RLDP resulting from this LDP Review should take into consideration the lower life expectancy and notable health inequalities of the NPTC area resident population compared with regional and national averages. It should set out proposals, policies and guidance to safeguard and improve amenity. quality of life and health outcomes (physical and mental) for all within the NPTC area, i.e. for both the workforce and residents. | The ISA Framework should include objectives relating to amenity, quality of life, health outcomes, physical health, mental health, wellbeing, safety and security. These issues should be considered holistically when assessing the proposed components of the emerging RLDP. |
| **Physical Health/Lifestyle Choices:** According to the ‘Our Healthy Future Interactive Tool 2015’ adults living within Neath Port Talbot undertook moderate to vigorous physical activity for 30 minutes or more on 2.1 times a week on average, this is slightly below the Wales average (2.4)[[16]](#footnote-17). The percentage of adults who reported to have eaten five or more portions of fruit and vegetables the previous day in NPTC was 27% which is slightly below the average for Wales at 33% (2013-2014). This has declined by 5% since 2009-2010[[17]](#footnote-18). Between 2010 and 2015 the proportion of those who had eaten five or more portions of fruit and vegetables the previous day for Neath Port Talbot has steadily decreased but is consistently still been below the average for Wales. Childhood obesity is a significant issue in NPTC with 12.4% of children aged 4-5 years being classed as obese in 2019 in comparison to all-Wales average of 12%[[18]](#footnote-19). In Neath Port Talbot, 62% of adults are reported as being obese or overweight, in comparison to the Welsh average (58%). In 2015, 23% of adults in Neath Port Talbot identified as currently being a smoker compared to the 21% average across Wales.  | Physical health and lifestyle choices within NPTC are under performing when compared to that for Wales. Increased education and awareness would be beneficial to the population of the County Borough.  |
| **Mental Health and Wellbeing:** Neath Port Talbots’s health board (Abertawe Bro Morgannwg University Health Board) recorded 136.1 deaths per 100,000 residents in 2016 which were due to mental health and behavioural issues. Projected numbers of residents in Neath Port Talbot who have at least one mental disorder is expected to decrease from 26,864 (2015) to 25,758 (2035).[[19]](#footnote-20) | In line with the Neath Port Talbot Public Services Board The Neath Port Talbot We Want (Wellbeing Plan 2018 – 2023) there is a need to improve all aspects of the health and wellbeing of the resident population of the NPTC area, including physical heath, mental health and social wellbeing. |
| **Health Infrastructure:** Healthcare facilities in the NPTC area are managed by the Abertawe Bro Morgannwg University Health Board. The Health Board has four acute hospitals: Singleton and Morriston Hospitals in Swansea, Neath Port Talbot Hospital in Port Talbot and the Princess of Wales Hospital in Bridgend.The Health Board manages two practices in the Neath Port Talbot area: in the Afan Valley and Neath town centre and one in Bridgend: Nantyffyllon with several other practises operating as independent organisations. The ABM Community Health Board has 70 GP centres, over 300 General Practitioners, around 275 dentists, 125 Community Pharmacies and 60 Optometry premises as of 2019.  | Adequate health infrastructure needs to be located in accessible locations to meet the needs of existing and future populations. A range of high quality physical and mental health facilities are required to address the changing health needs of the population, in particular given projected population ageing.  | The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to healthcare facilities and services. | The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the adequacy, quality and spatial distribution of healthcare facilities and services. |
| Soil | **Geological and Ground Conditions:** The NPTC area has varied geological and soil characteristics. Historically, NPTC has been an area of heavy industry, particularly metal, chemical and oil-based industries. Neath Port Talbot Council last published their Contaminated Land Strategy in 2015, setting out how they will remediate contaminated land across the County Borough[[20]](#footnote-21). A total of 34 sites have been investigated, with two of these confirmed as being contaminated: Pinetree Car Sales and the Former Briton Ferry Gas Works.  | New development must be appropriately sited and designed to reflect the geological and soil characteristics of the NPTC area.  | Any RLDP resulting from this LDP should set out appropriate proposals and policies to safeguard important geological characteristics and soil resources within the NPTC area, as well as a framework for remediating contaminated land. | The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.  |
| Water | **Waterbodies**: The NPTC area has one groundwater body classified poor under the Water Framework Directive (WFD); Pelenna.A number of waterbodies within the NPTC area are at risk of having poor water quality owing to ‘point source pollution’. Water quality issues within the County Borough have been attributed to abandoned mine workings and the associated discharges of acidified iron rich water. This is identified as an issue across Wales and in parts of Neath Port Talbot[[21]](#footnote-22). | Waterbodies across the NPTC area vary in quality, ecological value and present condition. Management of water quality is essential for improving the long-term health of populations and the environment.  | Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to protect and enhance the water environment and water resources, including surface and groundwater quantity and quality. This should include measures to eliminate contamination sources which harm the water environment and to regulate pollution discharges from new developments into receiving watercourses.  | The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.  |
| **Flood risks**: The four main watercourses in Neath Port Talbot are the Afan, Dulais, Neath and Tawe which all flow NE-SW towards Swansea Bay. There are three canals running through the County Borough: Neath Canal, Swansea Canal and Tennant Canal. Significant areas along all the main rivers, watercourses and coast of the County Borough are identified as being at risk of flooding. There is some risk of coastal and reservoir flooding in Baglan. Areas at risk of river flooding include Port Talbot and Briton Ferry.It is estimated that 10-20% of properties throughout the NPTC area are located in Flood Zones. This equates to around 13,353 properties in areas at risk of flooding[[22]](#footnote-23).  | Flood risk is an ongoing issue within NPTC due to the setting of the local authority. Housing developments should be restricted where possible from development on flood plains. | Any RLDP resulting from this LDP Review should seek to manage flood risks in a sustainable manner, including by directing development away from known flood risk areas. |
| Air | **Air Quality Management Areas (AQMAs) and Poor Air Quality:** There is one identified AQMA (Taibach/Margam) within NPTC, covering the majority of land and properties between Tata Steel Works and the M4 Motorway. | Continued monitoring of air quality within NPTC is required with particular attention along the M4 corridor as development and industry grows within the County Borough.  | Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to tackle known areas of poor air quality and the likely impacts of new development on air quality, including from traffic.Any RLDP should seek to reduce local air pollution through setting out policies and proposals to promote sustainable and active travel modes. | The ISA Framework should include objectives relating to local air quality and associated health impacts. The ISA should also recognise that changes to air quality can have an impact on ecosystem services which affect biodiversity and other environmental assets. |
| Climatic Factors | **Greenhouse Gas Emissions**: 2017 statistics from InfoBase Cymru[[23]](#footnote-24) show that total greenhouse gas (GHG) emissions from within NPTC (53.2) show CO2 levels per resident (tonnes) significantly above the Welsh average (7.9). When measuring kilotonnes of industry and commercial CO2, Neath Port Talbot is significantly higher than all other authorities in Wales, emitting 7018.6 kilotonnes. This accounts for 51% of the total industry and commercial Co2 emissions for Wales. In 2019, the Welsh Government published the Energy Generation in Wales (2018) Report[[24]](#footnote-25), identifying NPTC as one of the top five local authority areas where electricity consumption is met by renewables (74%). Neath Port Talbot is identified as having the highest renewable energy generation at an estimated 1,092 Gwh. Across Wales, NPTC is also the local authority which has the highest biomass electrical capacity, due to the 41.8 MWe Margam Green Energy Plant installed in 2017. Neath Port Talbot also has the highest onshore wind capacity of all local authorities in Wales, generating 236MW from 11 projects.  | Continued monitoring of GHG emissions within NPTC is required to meet climate change targets, while also avoiding or mitigating GHG emissions as a result of development in the County Borough where possible.  | Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to support the transition to a low carbon economy. This should include the provision of a supportive policy framework for renewable and low carbon energy generation in appropriate locations. The RLDP should also include policies to encourage low carbon design and should set out a sustainable transport strategy which capitalises onexisting rail and port infrastructure within the NPTC area to contribute to the decarbonisation of the transport sector. | The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation.  |
| **Climate Change Impacts:** Climate change research predicts an increase in the severity and frequency of rainfall events. Flooding from rivers, sewers and surface water is therefore likely to increase throughout NPTC in the future. NPTC is also expected to become increasingly vulnerable to tidal flooding as sea levels rise. Coastal erosion will increase and affect coastal infrastructure. Extreme weather events will occur more frequently with greater intensity. This will impact on human health directly and upon biodiversity and food production systems. | Predicted impacts from climate change up to 2050 will place significant strain on infrastructure and available resources across the UK, including within the NPTC area. In particular, the effects associated with flood risk. | Any RLDP resulting from this LDP Review should set out policies, proposals and guidance which responds to predicted climate change impacts and allows communities and businesses in the NPTC area to adapt to the changing climate. | The ISA Framework should include objectives relating to climate change adaptation and the resilience of environmental assets within the NPTC area. |
| Material Assets | **Land Use: Neath, Port Talbot and Pontardawe** act as key hubs for services, employment, housing and retail developments for the surrounding communities. These towns are positioned at the top of the retail and commercial hierarchy of the County Borough. Briton Ferry, Skewen, Taibach and Glynneath play a strategic role within the County Borough as focus points for services, transport and community activity. NPTC has a number of historical, archaeological and architectural assets particularly Margam Country Park, playing an important role as a leisure and tourism destination. The existing LDP spatial strategy has sought to preserve material assets associated with land use broadly by focusing development along the coastal corridor and in the urban areas of Neath Port Talbot while providing a flexible approach to development in the Valleys.  | There is an ongoing need to regenerate communities within the NPTC area which have experienced post-industrial decline and have high levels of multiple deprivation. There is also a need to provide suitable land uses to meet identified needs, including increased housing and employment provision, whilst protecting sensitive land uses such as agriculture. | Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within the NPTC area. Any requirements for upgraded or new infrastructure to address existing capacity constraints, decarbonise key economic sectors or to support population, employment and economic growth should be planned for through the LDP Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations. | The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, natural resources, climate change mitigation, connectivity and accessibility.  |
| **Transport infrastructure:** Road NetworkThe Core Roads Network connects the NPTC area to adjacent regions. The following roads constitute the Core Roads Network in the NPTC area: M4, and A465.The Strategic Roads Network in NPTC connects the major settlements and population centres in the County Borough and comprises mainly the A-roads (including the Core Roads Network). The local highway network connects local areas of population to the major settlements and comprises mainly the B road networks and all classified unnumbered routes within the NPTC area. Public TransportNeath Station and Port Talbot Parkway are mainline stations served by both the Great Western rail services from London (Paddington) to Swansea (with connections to West Wales) and Transport for Wales regional services. Both Neath and Port Talbot bus stations provide comprehensive local, short and medium distance bus services, including direct services to Cardiff and Swansea.Aviation and MaritimeCardiff International Airport is located within a 40-minute journey of Port Talbot and allows access to both National and International destinations for passengers and freight.The four major deep-water docks in Wales (Swansea, Port Talbot, Barry and Newport) provide freight access worldwide. Port Talbot is a nationally strategic port asset one of the only harbours in the UK capable of handling cape-size vessels. Active TravelThere are various active travel routes within the NPTC area[[25]](#footnote-26) of which there are approximately 55 pedestrian routes totalling 47.143km in length and 24 existing cycling routes totalling 36.403km in length. Part of NPTC’s active travel routes include the All Wales Coastal Path that provides a continuous walking route around the whole of Wales, totalling 870 miles. | At present, parts of the highway network experience congestion especially at peak times.The Swansea Bay Metro is at the early stages of development, it is aimed at better connecting communities across the Swansea Bay City Region by public transport, while also developing improved rail and bus links with other parts of the UK |
| **Utilities infrastructure**: BiomassThe Margam Green Energy Plant installed in Neath Port Talbot entered commercial operation in 2019, generating renewable electricity via the grid for homes and businesses. At a cost of £160m it converts energy generated from burning waste wood before converting and exporting to the grid. Solar EnergyThe NPTC Planning Register[[26]](#footnote-27)indicates that in 2019 there was 1 application for a solar energy proposal to generate up to 9.99MW of electricity. Wind FarmsNeath Port Talbot has the highest onshore wind capacity of all local authorities in Wales, generating 236MW from 11 projects. Several windfarms are operational in the NPTC area, including the Pen y Cymoedd windfarm which opened in 2017 and comprises of 76 turbines with a capacity of 228 MW.  | There is a need for continued decarbonisation of the energy generation sector across Wales to support the transition to a low carbon economy and to help mitigate climate change. At the same time, a mix of energy generation sources is required to ensure continued security of supply and to overcome intermittency issues associated with wind and solar technologies.  |
| **Waste management**: In NPTC from 2018-2019, of the total 69,990 tonnes of municipal waste generated, 42,560 tonnes were re-used, recycled or composted,17,881 tonnes were incinerated, and 3,312 tonnes sent for other recovery. This left only 5,883 tonnes sent to landfill. Overall, 60.8% of waste was reused/recycled or composted. NPTC has a partnership agreement with nearby local authorities to process waste at the Materials Recovery and Energy Centre (MREC) located at Crymlyn Burrows within Neath Port Talbot. | There is a need to continue to meet statutory targets for sustainable waste disposal in the NPTC area.  |
| **Natural resources:** The NPTC area contains significant amounts of mineral resources; both coal and aggregate. The existing LDP described the *‘whole’* of the County Borough as underlain by coal resources. The coal is at its highest quality with anthracite in the north, with pockets of steam coals in the south east. Coal has been mined extensively in the NPTC area area for hundreds of years and is recognised for its positive economic contribution to the creation and sustenance of several valley communities. PPW 11th Edition states that proposals for new coal extraction will not be supported. Any such proposals must clearly demonstrate why they are needed in the context of climate change emissions reductions targets and for reasons of national energy security. There are two major hard rock quarries in the NPTC area at Gilfach (Neath) and Cwm Nant Lleici (Pontardawe) which supply aggregates to both the regional and UK markets.  | There is a need to protect and restore landscapes with the potential to be affected by minerals extraction. |
| Cultural Heritage | **Historic assets**: As detailed in **Table A.1** above, there are 97 identified Scheduled Monuments within the NPTC area. Of these, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman. The majority are sited within Margam (15). There are also 395 listed buildings across the NPTC area, ranging from bridges to castles (e.g. Neath Castle). There are currently 260 Buildings of Local Importance' (BLIs) andDesignated Canal Structures in the NPTC area. | The NPTC area hosts a range of designated historic assets, each of which need to be appropriately protected from effects on their integrity and setting. | Any RLDP resulting from this LDP Review should set out policies and proposals to protect, conserve and enhance historic assets across the NPTC area, including in terms of impacts on the setting of such assets and upon unknown archaeological resources. | The ISA Framework should include objectives relating to the preservation, conservation, protection and enhancement of the historic environment.  |
| **Welsh language:** NPTC’s Welsh Language Strategy commits the Council to treating Welsh and English on an equal basis when carrying out public business. NPTC are additionally dedicated to helping to raise the profile of the Welsh language and culture to residents and employees. The annual population survey conducted by Office for National Statistics[[27]](#footnote-28) identified that 22.6% of the resident NPTC population stated that they spoke Welsh.  | There is a need to safeguard and support the increased use of the Welsh language amongst the resident population of the NPTC area.  | Any RLDP resulting from this LDP Review should include policy provisions to support growth in the use of the Welsh language. | The ISA Framework should include objectives relating to the protection of the Welsh language. |
| Landscape | **Designated areas:** As detailed within **Table A.1** above there no AONBs within the NPTC area, but 2 NNRs and 6 SLAs have also been designated at a local level.  | There is a need to provide appropriate protection for designated landscapes, important landscape features and sensitive landscape character areas. There is also a need to protect key views and safeguard visual amenity. | Any RLDP resulting from this LDP Review should set out a spatial strategy, policies and proposals which protect and enhance key landscape features, improve the quality of the local landscape character, are sensitive to relevant visual receptors and encourage local distinctiveness. The RLDP should also ensure that new developments are well integrated with existing communities to create a strong sense of place. | The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts. The SEA should assess the impacts of emerging spatial strategies, proposals, policies and guidance on these aspects to ensure that the LDP Review safeguards and where appropriate enhances the level of protection afforded to the landscape. |
| **Landscape fabric, character and capacity:** NPTC covers an area of some 442 square kilometres. Neath Port Talbot has a varying landscape, ranging from sand dunes and coastal salt marsh through to upland areas of purple moor grass and ancient woodlands. There are several conifer plantations and important geological features including glaciated valleys and rock formations. The Valleys are comprised of river valleys separated by upland plateaus and mountains. The settlement pattern and land use reflect the typical ribbon type associated with this area. NPTC is seen to be traversed by the M4 motorway, A465 trunk road and the Swansea-Paddington railway line, which all influence the surrounding landscape. |
| **Visual amenity:** Visual amenity is adversely impacted in places by high levels of deprivation, resulting in buildings and infrastructure not being well maintained. Several windfarms are operational in the NPTC area, with the potential to result in visual effects.  |

* 1. Evolution of Baseline Conditions in the Absence of the LDP Review
		1. This section responds to the requirement within the SEA Regulations to consider the likely evolution of the current state of the environment in the absence of the plan or programme under consideration, namely LDP Review.

The Need for the LDP Review

* + 1. NPTC has determined that a review of the existing LDP (adopted January 2016) is needed to allow NPTC to prepare and adopt a RLDP prior to the end of the current LDP period in 2026. The Neath Port Talbot LDP Review Report (NPTC, 2020) concludes that the ‘Full Review’ procedure is needed to undertake a comprehensive review of the existing LDP and prepare a RLDP, as opposed to the ‘Short Form’ procedure which would only result in minor revisions (e.g. changes to the wording of individual policies or the addition of individual allocated sites) to the existing LDP. It is considered that a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adopted of the current LDP.
		2. In the absence of any LDP Review taking place, NPTC would be unable to either prepare a RLDP (as proposed) or propose minor revisions to the existing LDP before the end of the current LDP period in January 2026. The Neath Port Talbot LDP Review Report (NPTC, 2020) makes clear that the absence of an up to date Development Plan for the NPTC area would be likely to be exploited by the development industry, not least due to the identified housing land supply shortfall. In these circumstances’ development is likely to come forward that is not in accordance with the existing LDP’s economic regeneration-led strategy and there would be significant pressure to release greenfield sites in unsustainable locations. Both outcomes would be likely to result in a range of unacceptable significant adverse effects on the environmental topics prescribed within Schedule 2 of the SEA Regulations, including:
* Biodiversity, Flora & Fauna: Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on biodiversity, including the loss and fragmentation of habitats, whilst increases in traffic and noise could disturb sensitive species;
* Population: Increased development pressure in unsustainable locations or contrary to the LDP strategy could result in a spatial mismatch between housing supply and demand for public service provision, economic opportunities and transport infrastructure. It could also result in the inability of public services and community infrastructure to meet identified population needs, including in relation to the demands of an ageing population;
* Health: The absence of a competent and up to date LDP would restrict NPTC’s ability to improve the physical and mental health of the population through spatial planning policies and interventions. If significant increases in physical activity and active travel are not achieved, health issues including obesity, inactivity and poor air quality will continue to affect the population of the NPTC area, causing increases in ill-health, exacerbating health inequalities and restricting life expectancy. The absence of the LDP Review would also prevent NPTC from fully implementing the Well-being of Future Generations (Wales) Act 2015 and in particular from discharging the public sector duty under Section 3 of the Act, as there would be no mechanism available to align NPTC’s planning policy framework with the objectives specified within the Neath Port Talbot We Want (Well-being Plan 2018-2023). Additionally, increased development pressure in unsustainable locations or contrary to the LDP strategy could lead to the loss of areas of open space, reducing opportunities for physical activity, with associated adverse health outcomes;
* Soil: Increased development pressure in unsustainable locations or contrary to the LDP strategy could prevent contaminated land from being remediated and result in the irreversible loss of important soil resources (e.g. high quality peatland). In the absence of an up to date LDP spatial strategy, increased pressure for the development of new facilities, housing and employment generating uses could also lead to the loss of the best quality and locally important agricultural land;
* Water: Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on water resources and adversely affect the quality of the water environment;
* Air Quality & Climatic Factors: Dependency on private cars to access employment and services could increase if development takes places in unsustainable locations or contrary to the LDP strategy. Additionally, opportunities to pro-actively encourage transport modal shift to walking, cycling and public transport would be lost. In the absence of a major short-term shift towards the use of electric vehicles, the resulting increase in traffic would increase fossil fuel combustion, carbon emissions and local atmospheric pollution, in particular greater release of particulate matter. This would act against wider policy efforts to decarbonise key economic sectors including transport mitigate climate change. It could also lead to worsening air quality and result in NPTC requiring to designate additional Air Quality Management Areas (AQMAs) to address areas of poor air quality;
* Material Assets: Increased development pressure in unsustainable locations or contrary to the LDP strategy would be likely to increase pressure and capacity constraints on a range of essential infrastructure. This could itself result in a range of environmental effects as well as restricting long term housing, economic and employment growth across the NPTC area. In short, without the LDP Review it is likely that a range of infrastructure required to meet identified needs across the NPTC area would not be delivered;
* Cultural Heritage: Increased development pressure in unsustainable locations or contrary to the LDP strategy could add pressure to sensitive areas of historic and/or archaeological interest, as well as undermining the character of conservation areas; and,
* Landscape: Increased development pressure in unsustainable locations or contrary to the LDP strategy could have a significant negative impact on the landscape character of the NPTC area, especially if additional new development were to be concentrated within areas of high landscape value (e.g. within the existing 6 SLAs across the NPTC area).
	+ 1. In addition, in the absence of having a competent and up to date statutory Development Plan, NPTC’s planning resources may need to be diverted away from development planning activities in pursuit of preparing a new LDP towards resisting undesirable ‘planning by appeal’ cases. It is therefore expedient for NPTC to undertake the LDP Review before the end of the current LDP period in 2026.

Use of the Full or Short Form LDP Review Procedure

* + 1. In the event that the Short Form procedure was used instead of the Full Review procedure for this LDP Review, any resulting changes to the existing LDP would be limited in scope. This would prevent the LDP from fully taking account of the range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels which have emerged since January 2016. The resulting adverse environmental effects are likely to be similar to, albeit not as severe as, those listed above in relation to the potential absence of a competent statutory Development Plan for the NPTC area.
		2. The LDP Review is therefore being undertaking in accordance with the ‘Full Review’ procedure to allow NPTC to prepare a comprehensive and up to date replacement LDP.
1. Review of Plans and Programmes
	1. Introduction
		1. This Appendix supports Section 3 of the Neath Port Talbot LDP Review ISA Scoping Report by providing a review of relevant qualifying plans, programmes and strategies of relevance to the LDP Review. The main purpose of this review is to identify relevant environmental protection objectives and wider policy requirements within relevant policy documents which should be taken account of within (or otherwise inform) the LDP Review and this associated ISA process.
	2. Review of Relevant Plans and Programmes
		1. **Table B.1** below sets out a review of other plans and programmes of relevance to the LDP Review and the associated ISA process. This review will be updated as required throughout the LDP Review process to take account of emerging policy developments and it will be appended to each iteration of the Neath Port Talbot LDP Review ISA Report. Of note, **Table B.1** does not consider the implications of Welsh national planning policy documents for the LDP Review; rather, these are addressed separately within **Table B.2** given their central importance in determining the soundness of the replacement LDP which will result from the LDP Review.
		2. In terms of the **possible impacts of the UK’s withdrawal from the European Union as of 31st December 2020**, **Table B.1** includes all relevant international plans and programmes of relevance to the LDP Review. At this time all European legislation of indirect relevance to the NPT LDP Review has been retained within **Table B.1**. While this is subject to change over the course of the preparation of the RLDP, some idea of the direction of future change can be gathered from the National Assembly for Wales Climate Change, Environment and Rural Affairs Committee has set out Environmental principles and governance post-Brexit (October 2019). This, the Committee’s second report to consider the effect of the UK’s departure from the European Union on environmental principles and governance structures in Wales, set out a series of recommendations for the Welsh Government’s future Bill to address environmental principles and governance gaps. In summary the Committee has recommended ‘non-regression’ or ‘progression’ as a principle of a future Bill and for the inclusion of the EU’s four core environmental principles: Precautionary; Preventative; Rectification at source; and Polluter-pays principle while assessing the benefits of including other EU and international principles.
		3. As of 1st January 2021, the UK Government committed to the maintaining of environmental standards and international obligations, stating that the following will remain in place:
* The UK's legal framework for enforcing domestic environmental legislation by UK regulatory bodies or court systems; and
* environmental targets currently covered by EU legislation - they are already covered in UK legislation.
	+ 1. In addition, Wales Special Protection Areas and Special Areas of Conservation (Natura 2000 sites) have been confirmed to have the same protections they had when the UK was part of the European Union.

Table B.1: Review of Other Relevant Plans, Programmes and Strategies

| **SEA Topic** | **Relevant Plans, Programmes and Strategies** | **Overview of Purpose and Key Requirements** | **Implications for Neath Port Talbot LDP Review** | **Implications for ISA** |
| --- | --- | --- | --- | --- |
| **International** |
| Population (including relevant socio-economic issues) | United Nations (2016) Habitat III (Quinto), United Nations Economic Commission for Europe (1998) The Aarhus Convention. | These documents provide an international framework for promoting sustainable development within all decision making. National and local developments should take sustainability into account and openly share relevant information to the public.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance which furthers the delivery of sustainable development and safeguards transparency in decision making. The LDP Review process itself must also be objective, transparent, evidence based and conducted fairly. | Applied as a whole, the ISA Framework should provide a holistic suite of assessment criteria to determine the contribution of any RLDP to the delivery of sustainable development.  |
| Human Health | United Nations (1989) UN convention on the Rights of the Child 1989, United Nations (2016) Committee on the Rights of the Child Recommendations Report, World Health Organization (1999) Guidelines for Community Noise 1999, World Health Organisation (2004) Children’s Environment and Health Action Plan for Europe. | These documents provide an international framework which recognises the importance of the preservation and protection of human health when undertaking development activities.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the prevention of negative effects to human health from local developments in line with international legislations.  | The ISA Framework should include objectives relating to the protection of human health.  |
| Biodiversity, Flora & Fauna | The Ramsar Convention on Wetlands (1971), EU Biodiversity Strategy - Our Life Insurance, Our Nature Capital: An EU Biodiversity Strategy (2011), AEWA (1995) Convention on the Agreement on the Conservation of African – Eurasian Migratory Water birds (The Bonn Convention), UNESCO (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora, United Nations (1992) The Rio Convention on Biodiversity. | These documents provide an international framework to protect sites designated at the international level for reasons of biodiversity conservation and important species from harm.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the avoidance of effects on biodiversity when allocating sites for redevelopment activities.   | The ISA Framework must include objectives relating to the appropriate conservation, protection and enhancement of designated sites. |
| Soil & Land | United Nations (2001) Stockholm Convention on Persistent Organic Pollutants. | This convention aims to reduce the production and use of persistent organic pollutants. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring that all development activities restrict the use of these pollutants. | The ISA Framework should include objectives relating to the restriction of Persistent Organic Pollutants.  |
| Water | United Nations (1982) Convention on Law of the Sea. | This convention demonstrates the rights and responsibilities of nations for fair use of the world’s oceans. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring that all development activities adhere with the conventions guidelines.  | The ISA Framework should include objectives pertaining to the protection of coastal areas and the avoidance of negative effects on the sea caused by development.  |
| Air | WHO Air Quality Guide­lines, United Nations (1979) Geneva Convention on Long Range Transboundary Air Pollution. | These guidelines provide a scientific assessment of the health impacts of Air Pollution and provides guidelines applicable worldwide for various pollutants.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for acceptable levels of Air Quality and proximity of communities to developments which may cause unacceptable levels of air quality.  | The ISA Framework should include objectives relating to local air quality and associated health impacts. |
| Climatic Factors |  Kyoto Protocol to the UN Convention on Climate Change, The United Nations Framework Convention on Climate Change, United Nations (2009) The Copenhagen Accord, United Nations (2010) Cancun Adaptation Framework, United Nations (2016) Paris Agreement. | These documents provide an international framework which identifies the need for climate change mitigation and adaptation action. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the mitigation of climate change effects caused by development and meet the key requirements as outlined by the policies.  | The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation within the NPTC area.  |
| Material Assets | United Nations (1989) Basel Convention. | This convention seeks to reduce the movements of hazardous waste between nations and the amounts/toxicity of waste generated. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the reduction in toxic waste generated. | The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility. |
| Cultural Heritage | World Cities Culture Report 2015 – measures and cultural assets, UNESCO (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage, UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage.  | These documents provide an international framework to identify and protect historic assets. They aim to ensure the historic assets have a function in the community and are integrated into various planning programmes.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection, preservation and presentation of historic assets as set out in international policy.  | The ISA Framework should include objectives relating to the preservation, conservation, protection and enhancement of the historic environment. |
| Landscape | N/A |  |  |  |
| Interrelated Effects  | Johannesburg Declaration on Sustainable Development, Communication COM (2005) 666: Taking Sustainable use of resources forward, United Nations (1992) The Rio Declaration on Environment and Development, United Nations (2002) The World Summit on Sustainable Development. | Commits the sustainable use of resources and promotes sustainable development.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable development.  | The ISA Framework should include guidance for achieving sustainable development goals.  |
| **European: As a result of Brexit on 31/12/20 all relevant European law has now been incorporated into domestic UK law. Limited European legislation which remains of indirect relevance is outlined below.** |
| Biodiversity, Flora & Fauna | Council of Europe (1981) Convention on the Conservation of European Wildlife and Natural Habitats - The Bern Convention, EU Birds Directive (Directive 2009/147/EC/ on the conservation of wild birds), EU Habitats Directive (EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (As amended by 97/62/EC)). | These documents provide a European framework to protect sites designated at the European level for reasons of biodiversity conservation and important species from harm.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity in accordance with European legislation & policy.  | The ISA Framework should include appropriate objectives to assess potential habitat loss, recreational impacts, water abstraction, pollution and disturbance effects from policies, proposals, advice and guidance contained within any replacement LDP resulting from the LDP Review. |
| Water | EU Water Framework Directive (Directive 2000/60/EC), EU Floods Directive (Directive 2007/60/EC), European Commission (2006) Groundwater Directive 2006/118/EC, European Commission (1991) The Urban Waste Water Directive 91/271/EEC, European Commission (1998) The Drinking Water Directive 98/83/EC, European Commission (2006) The Bathing Waters Directive 2006/7/EC, European Commission (2008) Marine Strategy Framework Directive 2008/56/EC.  | These documents provide a European framework which seek to protect the quality of the water environment, including through ensuring safe levels for bathing and drinking water and by promoting sustainable urban drainage.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for mitigating flood risk, protecting the drinking water supply and the protection of the community from unsafe water levels.  | The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks. |
| Climatic Factors | EU (2009) Renewable Energy Directive (2009/28/EC), A Resource Efficient Europe, United Nations (1994), European Commission (2001) National Emissions Ceiling Directive 2001/81/EC, European Commission (2007) The Integrated Climate and Energy Package, European Commission (2012) Energy Efficiency Directive (2012/27/EU), European Commission (2014) 2030 Policy Framework for Climate and Energy. | These documents provide a European framework to respond to the global challenge of climate change. Primarily, the minimisation of future climate change through mitigation and the implementation of adaptation measures are key themes. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the avoidance of contributing factors of climate change.  | The ISA Framework should include objectives for tIhe reduction of negative environmental effects from local development.  |
| **National (UK) - all legislative and policy frameworks are informed by relevant higher level European and international frameworks** |
| Population (including relevant socio-economic issues) | The Enterprise and Regulatory Reform Act 2013, The Plan for Growth (BIS, 2011), Equality Act 2010, Local Growth: Realising every Place’s potential (BIS, 2010), HM Government (2013) Aviation Policy Framework. | These documents provide a framework at the UK level to promote strong, sustainable and balanced growth across all economies. They aim to encourage investment and create an equal opportunity environment.  | Any replacement RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable growth within the NPTC area for the benefit of its resident population. | The ISA Framework should include guidelines pertaining to achieving economic growth as designated by national policy.  |
| Human Health | The Marmot Review, The Health and Social Care Act (2012), Child Obesity Plan (2016), Health Protection Agency (2007) Children’s Environment and Health Action Plan, Health Protection Agency (2008) Health Effects of Climate Change in the UK 2008 - An update of the department of Health report 2001/2002, Health Protection Agency (2009) Health Strategy for the United Kingdom 2, Health and Safety Executive (2009) The Health and Safety of Great Britain: Be Part of the Solution, Sustainable Development Commission (2010) Sustainable Development: The Key to Tackling Health Inequalities. | These documents provide a framework at the UK level to reduce health inequalities and make improvements to public health while promoting active lifestyles.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for access to good quality health services as set out in International and European legislation.  | The ISA Framework should include objectives relating to tackling health issues and creating adequate health and safety guidelines.  |
| Biodiversity, Flora & Fauna | The UK Post 2010 Biodiversity Framework (JNCC, 2012), The Protection of Badgers Act 1992, The Natural Environment White Paper (DEFRA, 2012), Natural Environment and Rural Communities Act (2006), The Conservation of Habitats and Species Regulations (The Conservation of Habitats and Species Regulations (2010) and amendments (2012)), 25 Year Environment Plan (UK Government, 2018), Defra (2007) Conserving Biodiversity the UK Approach 2007, Defra, Scottish Government, Welsh Assembly Government (2008) The Invasive and Non-Native Species Framework Strategy for Great Britain, HM Government (1981) Wildlife and Countryside Act, HM Government (1990) Environmental Protection Act, HM Government (2010) Conservation of Habitats & Species Regulations 2010 (as amended 2011), HM Government (2010) Environmental Permitting (England and Wales) Regulations, Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework, Strategic Plan for Biodiversity 2011-2020 (2010), UK National Ecosystem Assessment (2011) UK National Ecosystem Assessment: Understanding Nature’s Value to Society. | These documents provide a framework at the UK level to provide protection for protected species and habitats.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for protection of protected habitats and species, including any special protection areas.  | The ISA Framework should include objectives relating to national policy on the protection of Biodiversity, flora and fauna.  |
| Soil & Land | Guiding Principles for Land Contamination, HM Government (1986) Agriculture Act (with numerous revisions) 1986. | These documents provide a framework at the UK level to identify and remediate contaminated land, as well as regarding the management of agricultural land.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of agricultural assets and land contamination policies.  | The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner. |
| Water | The Pitt Review: Learning Lessons from the 2007 Floods (2008), Flood and Water Management Act (2010), Defra (2005) Safeguarding Sea Life, Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries, Defra (2009) Our Seas – a Shared Resource: High Level Marine Objectives, Defra (2010) Adapting to Coastal Change: Developing a Policy Framework, Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status, DECC (2010) Marine Energy Action Plan, Department for Transport (2007) Ports Policy Review Interim Report, Department for Transport (2011) National Policy Statement for Ports, Environment Agency (2005) Cleaner Coasts, Healthier Seas: EA Marine Strategy, Environment Agency (2013) Groundwater Protection Policy and Practice (GP3), HM Government (1973) The Protection of Wrecks Act 1973, HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010), HM Government (2009) Flood Risk Regulations, HM Government (2009) The Marine and Coastal Access Act, HM Government (2010) Marine Strategy Framework Directive - putting in place the legal framework for implementation, HMG, NI Executive, Scottish Government, Welsh Assembly Government (2011) UK Marine Policy Statement, Inshore Fisheries and Conservation Authorities Bylaws (various), Natural England and JNCC (2011) Marine Conservation Zone (MCZ) Project, NERC (2010) Marine Environmental Mapping Programme (MAREMAP), UK Marine Monitoring and Assessment Strategy (2010) Charting Progress 2: The State of UK Seas. | These documents provide a framework at the UK level regarding flood risk management and the protection of water and coastal environments.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to coastal preservation and management and flood risk within the NPTC area.  | The ISA Framework should include objectives relating to marine guidelines for cleaner oceans and provide flood risk mitigation.  |
| Air | The Air Quality Standards Regulations (2010) as amended, Air Quality Strategy for England, Scotland, Wales and Northern Ireland, UK’s Air Quality Action Plan (Defra, revised January 2016), The Environment Act (1995), Defra (2010) Air Pollution: Action in a Changing Climate, Defra (2011) Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO2) in the UK: List of UK and National Measures. | These documents provide a framework at the UK level to implement objectives for the reduction of air pollution.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to the preservation of acceptable levels of air quality during local development in the NPTC area.  | The ISA Framework should include objectives pertaining to the protection and enhancement of local air quality and the minimisation of air pollution. |
| Climatic Factors | The Carbon Plan (DECC, 2011), Committee on Climate Change (2008) Building a Low-Carbon Economy - the UK's Contribution to Tackling Climate, DECC (2009) UK Ports for the Offshore Wind Industry: Time to Act, DECC (2011) Carbon Plan: Delivering our Low Carbon Future,, DECC (2009) Framework for the Development of Clean Coal, DECC (2011) National Policy Statements for Energy Infrastructure, DECC (2011) UK Renewable Energy Roadmap, DECC (2014) UK National Energy Efficiency Action Plan, Environment Agency (2010) Managing the Environment in a Changing Climate, HM Government (1998) Petroleum Act, HM Government (2006) The Stern Review: The Economics of Climate Change, HM Government (2008) Climate Change Act 2008, HM Government (2008) The Energy Act, HM Government (2015) Ozone-Depleting Substances Regulations 2015, HM Government (2017) UK Climate Change Risk Assessment. | These documents provide a framework at the UK level regarding the need to mitigate and adapt to climate change. In particular, the Climate Change Act 2008 sets a legally binding target of reducing the UK’s GHG emissions by 80% by 2050 compared with 1990 and requires a programme of rolling carbon budgets to be set to achieve this.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible.  | The ISA Framework should include objectives relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation. |
| Material Assets | The National Infrastructure Plan (2011), HM Treasury (2014) National Infrastructure Plan, Reducing and Managing Waste Policy (DEFRA, 2013, Waste Incineration (England and Wales) Regulations 2002, The Environmental Permitting (England and Wales) (Amendment) Regulations 2016, The Waste Electronic Equipment (Amendment) Regulations SI 2010/1155 amending The Waste Electrical and Electronic Equipment (WEEE) (Waste Management Licensing) (England and Wales) Regulations 2006, The Hazardous Waste Regulations 2005 (England and Wales), The Waste Regulations 2011 (England and Wales), Landfill Regulations 2002 (England and Wales, amended 2005), Waste and Emissions Trading Act 2003 (Amended), National Planning Policy for Waste (DCLG, 2014), Meeting the Energy Challenge: A White Paper on Energy (DECC, 2007), The UK Renewable Energy Strategy (HM Government, 2009), Defra (2012) National Policy Statement for Waste Water, HM Government (1995) Environment Act 1995. | These documents provide a framework at the UK level regarding infrastructure development, environmental permitting, waste management and energy generation. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the efficient use of material assets, the deployment of renewable and low carbon energy generation sources and sustainable waste management within the NPTC area.  | The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility. |
| Cultural Heritage | Heritage Protection for the 21st Century: White Paper (DCMS, 2007), The Ancient Monuments and Archaeological Areas Act 1979, The Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979, HM Government (1996) The Treasure Act 1996. | These documents provide a framework at the UK level regarding the protection and conservation of cultural and historic assets, including listed buildings, ancient monuments and archaeological resources.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection and promotion of cultural and historic assets in the NPTC area.  | The ISA Framework should include objectives relating to the protection, enhancement, conservation and preservation of assets.  |
| Landscape | Hedgerow Regulations 1997, Natural Environment and Rural Communities Act (2006), HM Government (1949) National Parks and Access to the Countryside Act 1949, HM Government (1967) Forestry Act 1967, HM Government (2000) Countryside and Rights of Way Act 2000, HM Government (2006) Commons Act 2006.  | These documents provide a framework at the UK level regarding the protection of national parks, countryside and rural communities including rights of way and protection of forests.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of landscapes and hedgerows, including protected areas within the NPTC area.  | The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts.  |
| Interrelated Effects | The UK Sustainable Development Strategy (HM Government, 2005), National Planning Policy Framework (DCLG, 2012), Planning Practice Guidance, Defra (2011) Mainstreaming Sustainable Development, Department for Transport (2008) Delivering a Sustainable Transport System, HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (2000) Transport Act 2000, HM Government (2006) Government of Wales Act 2006, HM Government (2017) The Wales Act, Royal Town Planning Institute (2017) Digital Economy and Town Planning, Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development. | These documents provide a framework at the UK level to promote sustainable development and sustainable transport initiatives. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable development in the NPTC area.  | The ISA Framework should include objectives relating to sustainable development targets.  |
| **National (Wales) - all legislative and policy frameworks are informed by relevant higher-level UK, European and international frameworks** |
| Population (including relevant socio-economic issues) | Well Being of Future Generations (Wales) Act 2015, Housing (Wales) Act, 2014 Growth and Competitiveness Commission (2016) Our Valleys, Our Future (July 2017), Welsh Government Future Trends Report (2017), The Strategy for Older People in Wales: Living Longer, Ageing Well (2013-2023 (Welsh Assembly Government), Social Services and Well-being (Wales) Act 2014, Welsh Assembly Government (2007) One Wales – A Progressive Agenda for the Government of Wales, Welsh Assembly Government (2009) Getting On Together - a Community Cohesion Strategy for Wales, Welsh Assembly Government (2009) Improving Lives and Communities – Homes in Wales, Welsh Assembly Government (2006) Play Policy Implementation Plan, Welsh Assembly Government (2009) Farming, Food and Countryside: Building a Secure future – A New Strategy for Farming, Welsh Assembly Government (2009) Living Well Living Independent Lives, Welsh Assembly Government (2010) Economic Renewal: A New Direction, Welsh Assembly Government (2010) Food for Wales, Food from Wales 2010:2020, Welsh Assembly Government (2010) Fulfilled Lives, Supportive Communities, Welsh Assembly Government (2010) Welsh Medium Education Strategy 2010, Welsh Assembly Government (2011) Sustainable Social Services for Wales: A Framework for Action, Welsh Assembly Government (2011) Rights of Children and Young Persons (Wales) Measure 2011, Welsh Assembly Government (2013) Partnership for Growth: The Welsh Assembly Government Strategy for Tourism 2013 – 2020, Welsh Assembly Government (2013) Vibrant and Viable Places New Regeneration Framework, Welsh Assembly Government (2013) The Strategy for Older People in Wales 2013-2023, Welsh Assembly Government (2013) Framework for Action on Independent Living, Welsh Assembly Government (2014) Declaration of Rights for Older People, Welsh Assembly Government (2014) Housing (Wales) Act 2014, Welsh Assembly Government (2015) Green Growth Wales: Investing in the Future, Welsh Assembly Government (2015) Child Poverty Strategy for Wales, Welsh Assembly Government (2015) Volunteering Policy, Supporting Communities, Changing Lives, Welsh Assembly Government (2016) Strategic Equalities Plan, Welsh Assembly Government (2016) Social Services: The national outcomes framework for people who need care and support and carers who need support, Welsh Assembly Government (2016) Early Years Outcomes Framework, Welsh Assembly Government (2017) Prosperity for All :The National Strategy, Welsh Assembly Government 2015/16 Review of evidence of inequalities in Wales, Welsh Assembly Government Future Trends Report (2017), Welsh Assembly Government Population and Household Projections (2017). | These policies are informed by International, European and UK policies and broadly focus on progressive agendas for increasing economic growth and enhancing social wellbeing in Wales. | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area.  | The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner.  |
| Human Health | The Active Travel (Wales) Act (2015), Children’s Commissioners for Wales (2016) Annual Report 15-16, (2017) Public Health (Wales) Act 2017, NHS Wales (2011) Together for Health, Public Health Wales (2015) A Healthier, Happier and Fairer Wales, Welsh Assembly Government (2008) Designed to Add Value - a third dimension for One Wales, Welsh Assembly Government (2009) Rural Health Plan, Welsh Assembly Government (2010) Setting the Direction: Primary & Community Services Strategic Delivery Programme, Welsh Assembly Government (2006) Climbing Higher – A Strategy for Sport and Physical Activity, Welsh Assembly Government (2012) Working Differently – Working Together, Welsh Assembly Government (2012) Together for Mental Health: A Strategy for Mental Health and Wellbeing in Wales, Welsh Assembly Government (2013) A Noise Action Plan for Wales 2013-2018, Welsh Assembly Government/ NHS (2016) Measuring the health and well-being of a nation: Public Health Outcomes Framework for Wales. | These documents provide a framework at the Welsh level to improve the physical and mental health of the population.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for key health provisions and targets within the NPTC area.  | The ISA Framework should include objectives relating to adequate health provisions for all communities regardless of location.  |
| Biodiversity, Flora & Fauna | Environment (Wales) Act, 2016, (2009) Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009, Wales Biodiversity Partnership (2010) Wales Biodiversity Framework, Welsh Assembly Government (2009) Woodlands for Wales Strategy, Welsh Assembly Government (2015) The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond. | These documents provide a framework at the Welsh level to protect biodiversity interests, including designated sites and important species.  | Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity, flora and fauna within the NPTC area.  | The ISA Framework should include objectives relating to the preservation, protection and conservation efforts of biodiversity levels.  |
| Soil & Land | Environment (Wales) Act, 2016, Joint Nature Conservation Committee (ongoing) Geological Conservation Review, Welsh Assembly (2012) Contaminated Land (Wales) (Amendment) Regulations 2012, The Nitrate Pollution Prevention (Wales) Regulations. | These documents provide a framework at the Welsh level regarding the avoidance and remediation of contaminated land and the creation of a geological profile of Wales.  | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for local developments which may be taking place on protected areas or contaminated land.  | The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner. |
| Water | Environment (Wales) Act, 2016, Countryside Council for Wales (now Natural Resources Wales) (2015) National Seascape Assessment for Wales, LUC, NRW, Environment Agency (2015) The Severn River Basin Management Plan, Natural Resources Wales (2015) Dee River Basin Management Plan, Natural Resources Wales (2015) Welsh Coastal Tourism Strategy (Welsh Assembly Government, 2008), Interim Marine Aggregates Dredging Policy (Welsh Assembly Government, 2007), Coastal Access Improvement Programme (Welsh Assembly Government, 2007) Making the Most of Wales’ Coast: The Integrated Coastal Zone Management Strategy for Wales (Welsh Assembly Government, 2008), Wales Fisheries Strategy (Welsh Assembly Government, 2011) Strategic Policy Position on Water (Welsh Assembly Government, 2011) Marine Renewable Energy Strategic Framework, Welsh Assembly Government (2013) National Flood and Coastal Erosion Strategy for Wales, Welsh Assembly Government (2013) Wales Marine and Fisheries Strategic Action Plan Welsh Assembly Government (2015) The Welsh National Marine Plan, Welsh Assembly Government (2019) Water Strategy for Wales, Welsh Assembly Government (2015) Wales Marine Evidence Report, Welsh Water (2008) Surface Water Management Strategy, Welsh Water (2014) Final Water Resources Management Plan, Welsh Regional Coastal Groups, SMP 20 Lavernock Point to St Ann’s Head (South Wales), The Nitrate Pollution Prevention (Wales) Regulations. | These documents provide a framework at the Welsh level regarding the management of coastal and river areas, marine renewable energies, surface water management and coastal tourism.  | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for local developments which may be affected by rising water levels, poor flood risk management or may be assisted by coastal and tourism strategies in the NPTC area. | The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks. |
| Air | Air Quality Standards (Wales) Regulations (2010). | This document provides a framework at the Welsh level regarding the protection and improvement of air quality in accordance with limits set within European legislative. | Any RLDPresulting from this LDP Review should provide policies, proposals, advice and guidance for appropriate levels of local air quality management within the NPTC area.  | The ISA Framework should include objectives relating to air quality and air pollution controls, as well as provide acceptable air quality levels for health purposes.  |
| Climatic Factors | Environment (Wales) Act, 2016, Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales, Re-Energising Wales Project, Welsh Assembly Government (2006) Environment Strategy for Wales, Welsh Assembly Government (2010) Climate Change Strategy for Wales, Welsh Assembly Government (2010), Capturing the Potential: A Green Jobs Strategy for Wales, Welsh Assembly Government (2010), Low Carbon Revolution – the Welsh Assembly Government Energy Policy Statement, Welsh Assembly Government (2011) Policy Statement: Preparing for a Changing Climate, Welsh Assembly Government (2011) Preparing Wales for Climate Change: Adaptation Delivery Plan, Welsh Assembly Government (2012) Energy Wales: A Low Carbon Transition, Welsh Assembly Government (2014) Energy Wales: A Low Carbon Transition Delivery Plan, Welsh Assembly Government (2016) Environment (Wales) Act 2016.  | These documents provide a framework at the Welsh level to respond to the need to mitigation and adapt to climate change. The framework focuses on seeking to decarbonise key economic sectors, encouraging low carbon energy generation and enhancing the reliance of the natural environment.  | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible. | The ISA Framework should include objectives relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation within the NPTC area. |
| Material Assets | HM Government (2010) Waste (Wales) Measure 2010, Natural Resources Wales (2015) LIFE Natura 2000 Programme for Wales Natural Resources Wales (2016) State of Natural Resources Report (SoNaRR), Sustainable Development Commission (2009) Low Carbon Wales, Welsh Assembly Government (2008) One Wales: Connecting the Nation, Welsh Assembly Government (2008) Wales Transport Strategy, Welsh Assembly Government (2010) Towards Zero Waste One Wales: One Planet. The Overarching Waste Strategy Document for Wales, Welsh Assembly Government (2012) Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales, Welsh Assembly Government (2012) Wales Infrastructure Investment Plan, Welsh Assembly Government (2013) Active Travel (Wales) Act, Welsh Assembly Government (2015) Green Growth Wales: Local Energy, Welsh Assembly Government (2016) Active Travel Action Plan for Wales, Welsh Assembly Government (2016) Energy Efficiency in Wales: A Strategy for the Next 10 years 2016-2026, Welsh Assembly Government (2017) Natural Resources Policy, Active Travel Act (Wales) 2013. | These documents provide a framework at the Welsh level regarding the protection of natural resources, infrastructure development strategies and investment plans, and transport strategies and policies.  | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the enhancement and protection of material assets within the NPTC area.  | The ISA Framework should include objectives relating to waste regulations, protection of natural resources, resource management and green growth.  |
| Cultural Heritage | Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Valuing the Welsh Historic Environment Welsh Assembly Government (2010), Welsh Language (Wales) Measure 2011, Cymraeg 2050 A million Welsh speakers, Welsh Assembly Government, Welsh Assembly Government (2017), Light Springs through the Dark: A vision for culture in Wales (2016). | These documents provide a framework at the Welsh level regarding the protection of cultural heritage; including historic assets and the use of the Welsh language. | Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection, preservation and presentation of cultural heritage and where possible, the inclusion of the Welsh language wherever relevant in the NPTC area.  | The ISA Framework should include objections relating to the protection of historic assets. |
| Landscape | Environment (Wales) Act 2016, Countryside Council for Wales (now Natural Resources Wales) (2001) Register of Landscapes of Historic Interest, Natural Resources Wales (ongoing) LANDMAP Programme. | These documents provide a framework at the Welsh level regarding the protection and mapping of natural resources, protected and important landscapes of historic interest.  | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the preservation of protected landscapes and natural resources within the NPTC area.  | The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts. |
| Interrelated Effects | Environment (Wales) Act, 2016, Historic Environment (Wales) Act 2016, (2015) Planning (Wales) Act 2015, Welsh Assembly Government (2008) People, Places, Future Wales 2040: The National Plan NDF (2021), Welsh Assembly Government (2009) One Wales: One Planet, A New Sustainable Development Scheme for Wales (2018), Welsh Government Future Trends Report (2017), Welsh Assembly Government (2011) Rural Development Plan for Wales (2014-2020), Welsh Assembly Government (2012) City Regions Final Report, Welsh Assembly Government (2016) Planning Policy Wales – Edition 11, Welsh Assembly Government (2016) Welsh Assembly Government Programme for government, Taking Wales Forward 2016-2021, Welsh Assembly Government: Wales We Want National Conversation, Reforming Local Government: Resilient and Renewed – Welsh Assembly Government Whitepaper (Jan 2017).  | These documents provide a framework at the Welsh level regarding sustainable urban and rural development, city regional development and spatial planning. | Any RLDPresulting from this LDP Review should provide policies, proposals, advice and guidance for adhering to sustainable development guidelines where possible within the NPTC area.  | The ISA Framework should include objectives relating to sustainable development targets.  |
| **Regional (Proposed SDP Level)** |
| Interrelated effects | Swansea Bay City Deal (2017), Emerging Strategic South West Wales Strategic Development Plan, Regional Technical Statement (RTS) 2nd Review (2020) Natural Resources Wales - South West Wales Area Statement 2020. | The Swansea Bay City Deal is a £1.3bn investment in 11 major projects across the Swansea Bay City Region across Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea. The City Deal is being funded, subject to the approval of project business cases, by the UK Government, the Welsh Government, the public sector and the private sector.The Swansea Bay City Deal is a £1.3 billion investment programme which aims to boost the regional economy by £1.8bn and generate up to 10,000 jobs. It is being led by the four regional local authorities: Carmarthenshire Council, Swansea Council, Neath Port Talbot Council and Pembrokeshire Council - together with the Abertawe Bro Morgannwg and Hywel DDA University Health Boards, Swansea University, the University of Wales Trinity Saint David, and private sector partners. It has focuses on four themes:1. Internet of Economic Acceleration;2. Internet of Life Science & Wellbeing;3. Internet of Energy; and,4. Smart Manufacturing;At the time of writing, local planning authorities have been invited to consider the development of Strategic Development Plans in addition to their own LDP reviews currently being undertaken. 4 SPDs are proposed to cover North Wales, Mid Wales, South East Wales and South West Wales.Under the provisions set out in Mineral Technical Advice Note 1 (MTAN1): Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) must prepare an RTS setting out how demand for aggregates will be met in the region across a 15-year period. The RTS assesses the supply and demand of aggregates in each Mineral Planning Authority (MPA) area, setting out each MPA’s contribution to meeting regional demand. The SWRAWP 2nd Review was published for consultation in August 2019, setting out the demand for primary land-won aggregates in the South Wales sub regions at 12.486 mtpa. Neath Port Talbot is part of the Swansea City- Sub-Region on which calculations are based on two ‘theoretical’ options (i.e. only one of two options/datasets would be used to calculate demand) These are split into Option A (historical sales) and Option B (housing requirements from each LPA).Based on historical sales across the South Wales region (option A), 0.611 mtpa of aggregate will be required from Neath Port Talbot to meet ongoing demand.Based on housing requirements outlined in the existing LDP and calculated against the demand across the South Wales region, 0.347 mtpa would be required from Neath Port Talbot would be required to meet demand across the region. Taking into account the differences in provision of types of aggregate across all local authorities in the South Wales region, Preferred Annualised Apportionment for Neath Port Talbot has been calculated at 0.305 mtpa. Natural Resources Wales has produced its first Area Statements (2020). Each Area Statement outlines the key challenges facing that particular locality, what we can all do to meet those challenges, and how we can better manage our natural resources for the benefit of future generations. They will be updated regularly and improved year-on-year. Viewed together, the seven Area Statements can be seen as a collaborative response to what is known as the Natural Resources Policy, published by the Welsh Government in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales’ natural resources into the future.NPT is located within the South West Wales Area Statement. This Area Statement identifies the key risks, opportunities and priorities that we all need to address to build the resilience of our ecosystems and support sustainable management of the natural resources. It sets out actions that NRW and its partners, will take forward to address the issues they have identified.The themes for South West Wales are: * Reducing health inequalities - This theme aims to examine the opportunities to address health inequalities in South West Wales by using natural resources and habitats;
* Ensuring sustainable land management - Ensuring our land is sustainably managed for future generations;
* Reversing the decline of, and enhancing, biodiversity - This theme aims to explore how we can reverse the decline of biodiversity by building resilient ecological networks; and,
* Cross-cutting theme: Mitigating and adapting to a changing climate – This cross-cutting theme looks at how we can adapt and respond to a changing climate.
 | The preparation of any RLDPwill need to be closely aligned with the preparation of the South West Wales SDP and the South Wales Regional Aggregate Working Parties RTS to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues. The preparation of any RLDP will therefore need to align with the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under-provision of aggregates.The South West Wales Area Statement provides a collaboratively developed identification of the key environmental challenges faced in the South West Wales Area. It identifies key thematic issues which the NPT RLDP needs to consider and build into the Review. It usefully provides a clear regional understanding of the key issues faced by NPT and its neighbours in the region and provides data sources which will be updated as the RLDP process progresses. | A separate SA/SEA process will need to be undertaken for the emerging South West Wales SDP once the lead Responsible Authority for the preparation of this plan has been determined. As with this LDP Review, SA/SEA Scoping will be needed to set an assessment framework prior to the development of substantive SPD components. The ISA Framework proposed for use in the ISA of the LDP Review (Section 5) should be kept under review and tested for compatibility against the SA Framework for the South West SPD once this has been produced. The South West Wales Area Statement should inform the ISA framework and be kept under review as the ISA is developed through the RLDP process. |
| **Local (NPTC & Neighbouring Local Authorities) - all legislative and policy frameworks are informed by relevant higher-level Welsh, UK, European and international frameworks.** |
| Population (including relevant socio-economic issues) | Neath Port Talbot Strategic School Improvement Programme (NPTC, 2018). The Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Aging Well in Neath Port Talbot Plan, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, Neath Port Talbot Single Integrated Plan 2013-2023, Neath Port Talbot CBC Corporate Plan 2019-2022, Neath Port Talbot Welsh in Education Strategic Plan [WESP] 2017 – 2020, NPTC Local Housing Strategy 2015-20, NPTC Homelessness Strategy 2018-22, Swansea Bay City Region Economic Regeneration Strategy 2013-2030, Neath Port Talbot Strategic Equality Plan 2015-2019, NPTC Local Development Strategy, Port Talbot Waterfront Enterprise Zone, Neath Port Talbot Digital Strategy (2018-2022) 'Smart & Connected’, Neath Port Talbot Tourism Development Action Plan, Neath Port Talbot Destination Management Plan.  | Local policies regarding socio-economic issues broadly address the following themes: * Improving quality of life for all;
* Protecting and enhancing the environment;
* Increasing prosperity;
* Delivering safer and more inclusive communities;
* Achieving a healthier County Borough; and,
* Ensure good quality housing.

The Neath Port Talbot Public Services Board Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing affecting residents of the NPTC area, as required under the Wellbeing of Future Generations (Wales) Act 2015.Informed by the Wellbeing Assessment, the Neath Port Talbot We Want (Wellbeing Plan 2018-2023) identifies policy changes and actions to improve the health and wellbeing of the population within the NPTC area:* To support children in their early years, especially children at risk of adverse childhood experiences;
* Create safe, confident and resilient communities, focussing on vulnerable people;
* Put more life into our later years - Ageing Well;
* Promote well-being through work and in the workplace;
* Valuing green infrastructure and the contribution it makes to Well-being; and,
* Tackling digital exclusion.

The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,* Develop the local economy and environment.
 | Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance relating to the wellbeing and the prosperity for the community in the NPTC area.  | The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner. |
| Human Health | Neath Port Talbot Council’s Plan for Adult Social Care 2019-2022, Neath Port Talbot Active Travel ‘Existing Route Map’ (ERM) and Integrated Route Map (IRM), Neath Port Talbot Health, Social Care & Wellbeing Strategy, NPTC Strategic Delivery Plan for Mental Health Services (2018), The Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Aging Well in Neath Port Talbot Plan, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017. | The health policies relevant to NPTC address issues encompassing social inclusion, lifestyle and health and social care.The Neath Port Talbot Wellbeing Assessment summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the NPTC area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board ‘The Neath Port Talbot We Want’ (Well-Being Plan 2018-2023) provides key statistics to inform future local development plans, including:* The promotion of health lifestyles including regular exercise;
* Addressing poor lifestyle choices and childhood poverty;
* Addressing health inequalities within the NPTC area, including differences in life and health life expectancy; and,
* Improve access to healthcare facilities.

The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,* Improve the well-being of children and young people; and,
* Improve the well-being of all adults.
 | Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance relating to healthcare targets set by NPTC in their LDP area.  | The ISA Framework should include objectives relating to tackling health issues and creating adequate health and safety guidelines. |
| Biodiversity, Flora & Fauna | Neath Port Talbot Biodiversity Duty Plan (2017), Neath Port Talbot Local Biodiversity Action Plan (LBAP). | The local biodiversity action plan and duty plans aim to map/quantify biodiversity and identify its importance for the NPTC area.  | Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect biodiversity, flora and fauna and its habitats from being destroyed by local development.  | The ISA Framework should include objectives relating to conservation, protection and enhancement of biodiversity interests. |
| Soil & Land | N/A |  |  |  |
| Water | NPTC Flood Risk Management Strategy.  | The NPTC Flood Risk Management Strategy sets out locally significant flood risk in the NPTC area. The main aim of the strategy is to reduce the social and economic impacts on the local community as a result of flooding while also reducing the overall risk of flooding.  | Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect, prevent and mitigate adverse impacts on flood risk levels as a result of local development.  | The ISA Framework should include objectives relating to the reduction of flood risk while guiding local development decisions.  |
| Air | NPTC Air Quality Strategy ‘Airwise: Clean Air for Everyone’ (2017). | This Air Quality Strategy sets out NPTC’s approach to tackle air quality issues in the area now and in the future.  | Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection of air quality and the prevention of adverse impact on local, regional and national air quality standards as a result of development, including industry.  | The ISA Framework should include objectives relating to tackling air quality issues. |
| Climatic Factors | Neath Port Talbot Decarbonisation and Renewable Energy Strategy (2020). | The Neath Port Talbot Decarbonisation and Renewable Energy Strategy sets out the framework to achieve the Council's carbon footprint reduction aspirations. It is based around three key themes: transportation, buildings and spaces; and, influencing behaviour. | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to climate change mitigation and adaptation. In particular, the LDP Review should plan for upgraded and new infrastructure to support the decarbonisation of key economic sectors within the NPTC area. The RLDP should therefore include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations The RLDP will therefore have a key role in facilitating the implementation ofthis overarching corporate strategy. | The ISA Framework should include objectives relating to climate change mitigation and adaptation.  |
| Material Assets | Joint Local Transport Plan 2015-2020, Regional Waste Plan for the South West Wales Region, Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want (Well-being Plan 2018 – 2023). | The Joint Local Transport Plan sets out the transport strategy adopted by four local authorities (Carmarthenshire, Neath Port Talbot, Swansea and Pembrokeshire), replacing original individual plans. It provides a strategic outlook on road traffic reduction, road safety, public transport, parking, managing the transportation network, and cycling and walking. The regional waste plan policy aims to provide a land use planning framework at the regional level. Each Local Planning Authority (LPA) shall develop which service best suits their needs and manage their own waste. The Neath Port Talbot Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the Neath Port Talbot area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board ‘The Neath Port Talbot We Want’ (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:* Promotion of a wider mix of uses on sites in existing employment areas to stimulate growth;
* Provision of business and management skills training in NPTC; and,
* Address inequalities faced by people living in the Valleys.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the reasoned provision of transport.  | The ISA Framework should include objectives relating to the growth of material assets.  |
| Cultural Heritage | Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want (Well-being Plan 2018 – 2023), Neath Port Talbot Council Welsh Language Promotion Strategy.  | The Neath Port Talbot Council Welsh Language Promotion Strategy describes how NPTC will aim to raise the profile of the Welsh language and culture with its residents and employees. The Neath Port Talbot Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and Social Wellbeing for residents in the Neath Port Talbot area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Neath Port Talbot Public Services Board ‘The Neath Port Talbot We Want’ (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:* Work to maximise the benefit of residents of NPTC from cultural, built and natural assets understanding Welsh heritage by mapping sites and buildings, promoting the use of the Welsh language; and, promote awareness of the benefits of these assets.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the preservation and promotion of the Welsh language and promote the economic, environmental and social wellbeing of the NPTC area.  | The ISA Framework should include objectives relating to the preservation of historic assets. |
| Landscape | N/A |  |  |  |
| Interrelated Effects | Neath Port Talbot Public Services Board Assessment of Local Well-being May 2017, the Neath Port Talbot We Want Well-being Plan (2018 – 2023). Neath Port Talbot Single Integrated Plan 2013-2023. | As noted above, these documents identify a wide-ranging set of socio-economic and wellbeing challenges affecting residents within the NPTC area and identify wellbeing objectives and associated measures to address these. | Any RLDP resulting from this LDP must respond to the locally identified wellbeing objectives and demonstrate compliance with the Wellbeing of Future Generations (Wales) Act 2015.  | The ISA Framework should include objectives relating to all aspects of health and wellbeing, including each of the wellbeing objectives defined within the Neath Port Talbot We Want (Well-being Plan 2018 – 2023). |

* 1. Review of National Planning Policy Requirements
		1. **Table B.2** below presents a review of Welsh national planning policies and guidance in order to identify key policy requirements which will need to be taken account of within the LDP Review. National planning policy is presently contained within Planning Policy Wales (PPW) -11th Edition (2021), comprising of policy themes concerning well-being goals in line with the Wellbeing of Future Generations (Wales) Act 2015 and reflecting the Welsh Assembly Government strategies and policies. Future Wales 2040was published by the Welsh Government on 24th February, setting out the 20-year plan for Wales up to 2040, identifying nationally significant developments. Key policy requirements arising from the NDF of relevance to the LDP Review are also identified in **Table B.2**.

Future Wales 2040: The National Plan National Development Framework (February 2021)

* + 1. In September 2020, the Minister for Housing and Local Government provided a working draft Future Wales National Development Framework (NDF), including a Schedule of Changes report, setting out the changes made since consultation was undertaken on the previous draft published in 2019. The NDF was then published by the Welsh Government on 24th February 2021 alongside Planning Policy Wales 11th Edition.
		2. The NDF will be reviewed and updated every five years but provides a twenty-year spatial vision for development in Wales. The NDF provides a framework to be built upon by Strategic Development Plans (SDPs) and Local Development Plans which themselves will identify the location of infrastructure and development across the country. The Future Wales 2040 NDF (February 2021) has been reviewed, with the implications described under each SEA Objective in **Table B2**.

Implications of the Covid-19 Pandemic

* + 1. Following the onset of the Covid-19 pandemic in early 2020, the preparation of RLDPs was impacted by changes to local authority capacity and resources, the ability to host the traditional LDP consultation events and the ability to adhere to the agreed Delivery Agreement (DA). In response, the Welsh Government released a letter on 18th March 2020 requesting all Local Planning Authorities (LPAs) to reflect on their individual circumstances ,providing guidance for LPAs at different stages of RLDP preparation.

NPTC commenced work on the preparation of the LDP Review Report at the beginning of 2020, completing the 6-week public consultation period on 16th March 2020. Following formal approval from NPTC, the LDP Review Report was submitted to the Welsh Government in July 2020. The Draft DA has now been prepared and will be consulted on in tandem with this ISA Scoping Report. The Draft DA will set out the review timetable (as required to be approved by Welsh Government), the Community Involvement Scheme (CIS) and the NPTC resources which will be committed to developing the RLDP. The finalised timescales for completion of these elements will be confirmed in the final version of the DA, expected in December 2021. month.

Implications of Brexit

* + 1. On 31st December 2020, the United Kingdom left the European Union, with implications for legislative geographies taken under review as part of the SA of the emerging Neath Port Talbot LDP. The European Union (Withdrawl) Act 2018 which provides legal continuity, enabling the transposition of directly applicable existing EU law and converting it into UK law, creating a new category of domestic law for the United Kingdom named ‘Retained EU Law’. Brexit therefore has implications of the review of European legislative undertaken for this SA which has been addressed in the main policy tables.

Table B.2: Implications of Welsh National Planning Policies for NPT LDP Review

| **SEA Topic** | **Relevant Plans, Programmes and Strategies** | **Overview of Purpose and Key Requirements** | **Implications for Neath Port Talbot LDP Review** | **Implications for ISA** |
| --- | --- | --- | --- | --- |
| **Approved Policy Documents** |
| Population (including relevant socio-economic issues) | Planning Policy Wales Edition 11 (2021), Future Wales 2040: The National Plan National Development Framework (2021), Technical Advice Note (TAN) 2: Planning and Affordable Housing (2006),Technical Advice Note (TAN) 4: Retail and Commercial Development, Welsh Assembly Government (2010) Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities, Welsh Assembly Government (2009) Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, Welsh Assembly Government (2014) Technical Advice Note (TAN) 23: Economic Development, Technical Advice Note (TAN) 13: Tourism, Welsh Assembly Government (2013), Welsh Government Circular (005/2018): Planning for Gypsy, Traveller andShowpeople Sites (2018), Welsh Government 'Prosperity for All': the National Strategy' (2017), Welsh Government Valleys Task Force: Our Valleys, Our Future (July2017). | These documents require the preparation of LDPs to:* Co-ordinate development with infrastructure provision;
* Follow the principles of sustainable development including demonstrating an appropriate consideration to the ‘five ways of working’ and an improvement in the delivery of all four aspects of wellbeing: social, economic, environmental and cultural;
* Support national, regional, and local economic policies and strategies;
* Align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car;
* Promote the re-use of previously developed, vacant and underused land;
* Deliver physical regeneration and employment opportunities to disadvantaged communities;
* Guide and control economic development to facilitate regeneration initiatives and promote environmental and social sustainability;
* Reflect work with neighbouring authorities and other relevant stakeholders to plan strategically for employment land provision;
* Be underpinned by an up to date and appropriate evidence base to support policy choices and land allocations for economic development;
* Set out an evidence based economic vision for the area, including a broad assessment of anticipated employment change by broad sector and land use;
* Provide targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development;
* Identify strategic employment sites at regional scale by agreement amongst local authorities, giving careful consideration to the attributes of strategic employment sites to ensure they provide a differentiated offer across the region;
* Include policies relating to future development on existing employment sites to protect them from inappropriate development: – to encourage the regeneration and re-use of sites which are still suitable and needed for employment; – to control and manage the release of unwanted employment sites to other uses;
* Seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses;
* Propose specific locations for those necessary industries which are detrimental to amenity and may be a source of pollution;
* Seek to promote and facilitate development that will deliver physical regeneration;
* Prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities;
* Concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres;
* Include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change;
* Include policies on the scope for new economic development in and adjoining rural settlements and identify suitable sites. In remote rural areas and smaller settlements, a criteria-based approach should be considered;
* Include policies encouraging farm diversification and new rural development opportunities;
* Identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites;
* Adopt the ‘town centres first’ principle with consideration always given to an existing centre;
* Establish a local retail hierarchy which identifies the nature, type and strategic role to be performed by retail and commercial centres;
* Set out measures to reinvigorate particular centres, as appropriate, including linking to centre-wide strategies, masterplans and place plans;
* Promote vibrant, attractive and viable retail and commercial centres;
* Identify the boundaries of retail and commercial centres contained within the hierarchy on the proposals map;
* Allocate sites for retail and commercial centre uses where there is assessed to be a quantitative or qualitative need and where size and scale are in accord with the retail strategy. Sites should be identified using the sequential approach and, where appropriate, assessed for their impact on other centres;
* Include a criteria-based policy against which proposals coming forward on unallocated sites can be judged;
* Set out policies for primary and secondary areas, where appropriate;
* Develop policies which deal flexibly with changes to existing buildings;
* Include policies relating to future development on existing retail sites to protect them from inappropriate development and to control and manage the release of unwanted retail sites to other uses;
* Monitor the health of retail centres to assess the effectiveness of policies;
* Locate new commercial, retail, education, health, leisure and public service facilities within town and city centres with good access by public transport to and from the town/city and where appropriate the wider region. . LPAs should work in partnership with the private sector to identify sites which accord with the sequential approach and are in line with the LDPs retail strategy;
* Incorporate the new sequential search methodology for identifying housing sites (PPW (2021) paras 3.41 – 3.43);
* Planning Authorities must use their housing trajectory as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing requirements as part of LDP AMRs and for subsequent plan review. The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan;
* Establish a strategic framework for the protection, provision and enhancement of well-designed tourism, sport, recreation and leisure facilities in the NPTC area;
* Protect from development playing fields and open space that has significant amenity or recreational value to local communities;
* Locate facilities which may generate high levels of travel demand in or close to town centres where possible;
* Consider the scope to use disused land and routes as parks, linear parks or greenways in urban areas; and,
* Encourage the multiple use of open space and facilities, where appropriate, to increase their effective use and reduce the need to provide additional facilities.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area. | The ISA Framework should include objectives relating to socio-economic issues including economic competitiveness and economic growth, employment provision, social wellbeing, housing and open space.  |
| Human Health | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (1997) Technical Advice Note (TAN) 11: Noise, Noise and Soundscape Action Plan (2018-2023). | These documents require the preparation of LDPs to take into account EU limits and target values and WHO guidelines on the detrimental effects of noise on health, including:* Taking account of the ‘Agent of Change’ principle in the consideration of adverse impacts upon human health caused by air and soundscape quality affected by proposed developments;
* The prioritisation of active travel modes to assist in achieving the Well-being Goals; and,
* Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and promotion of human health within the NPTC area.  | The ISA Framework should include objectives relating to all aspects of human health and wellbeing.  |
| Biodiversity, Flora & Fauna | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (2009) Technical Advice Note (TAN) 5: Nature Conservation and Planning, Welsh Assembly Government (1997) Technical Advice Note (TAN) 10: Tree Preservation Orders, National Natural Resources Policy (NNRP) (2017). | These documents require the preparation of LDPs to:* Identify all international, national and local designated sites (including potential SPAs, candidate SACs and listed Ramsar sites);
* Provide criteria against which a development affecting the different types of designated site will be assessed, reflecting their relative significance;
* Include locally-specific policies for the conservation and, where appropriate, enhancement of landscape and amenity;
* Provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity;
* Make appropriate provision for Local Nature Reserves;
* Include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees;
* Clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate;
* Provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses;
* Recognise the potential of and encourage land uses and land management practices that help to secure carbon sinks;
* Consider the location of fragile habitats and species; and,
* Encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses, subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and preservation of biodiversity, flora and fauna in accordance with national planning policy.  | The ISA Framework should include objectives relating to biodiversity conservation.  |
| Soil & Land | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021). | These documents require the preparation of LDPs to:* Take account of the physical and environmental constraints on development of land, including, for example, the level of contamination and stability;
* Ensure new development is not undertaken without an understanding of the risks, including those associated with the previous land use, mine and landfill gas emissions, and rising groundwater from abandoned mines;
* Ensure new development does not take place without appropriate remediation;
* Ensure consideration is given to the potential impacts which remediation of land contamination might have upon the natural and historic environments;
* Ensure new development is not undertaken without an understanding of the risks, including those associated with subsidence, landslips or rock falls;
* Ensure development does not take place without appropriate precautions;
* Take account of coastal / land erosion risks;
* Seek to restore unstable and contaminated land;
* Ensure that any proposals for opencast, deep mine development (in wholly exceptional circumstances only) clearly demonstrate why they are needed in the context of climate change emissions reductions targets and for reasons of national energy security; and,
* Take account of the requirement to provide a Health Impact Assessment to accompany any applications for opencast coal working.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the safeguarding and efficient use of land and soil resources. | The ISA Framework should include objectives relating to the safeguarding and efficient use of land and soil resources.  |
| Water | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021)Welsh Assembly Government (1998) Technical Advice Note (TAN) 14: Coastal Planning, Welsh Assembly Government (2004) Technical Advice Note (TAN) 15: Development and Flood Risk, Implementation of Schedule 3 to the Flood and Water Management Act 2010: the Mandatory Use of Sustainable Drainage Systems (SuDS) (2019).Welsh National Marine Plan (2019). | These documents require the preparation of LDPs to:* Take account of the key role of flooding in strategic decision making on locations for growth and new infrastructure;
* Take account of the physical and environmental constraints on development of land, including flood risk;
* Include policies relating to PPW11 (2021) ‘Water and Flood Risk objectives regarding the effects of development on water supply and wastewater management;
* Consider the effects of development on water supply and wastewater management, development plans and water and development management and water; and,
* When preparing LDPs, LPAs should consult with adjacent authorities and Natural Resources Wales and ensure that, as well as not being at risk itself, development does not increase the risk of flooding elsewhere;
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of water quality, water resources and the water environment.  | The ISA Framework should include objectives relating to the protection and enhancement of water quality, water resources and the water environment. |
| Air | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021). | These documents require the preparation of LDPs to consider the effects of development on air quality and recognise that air quality impacts from development proposals must be assessed, including by:* Taking account of the ‘Agent of Change’ principle in the consideration of adverse impacts upon human health caused by air and soundscape quality affected by proposed developments.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to air quality.  | The ISA Framework should include objectives relating to air quality. |
| Climatic Factors | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), , Welsh Government 'Prosperity for All: A Low Carbon Wales' (2019). | These documents require the preparation of LDPs to:* Align with the need to meet Wales’ international commitments to address climate change targets.
* Align with Wales’ targets for the generation of renewable energy, namely:
* For 70% of consumed electricity to be generated from renewable energy by 2030;
* For one gigawatt of renewable energy capacity to be locally owned by 2030; and,
* For new renewable energy projects to have at least an element of local ownership from 2020.
* Identify opportunities and plan positively for the implementation of District Heat Networks within Priority Areas for District Heat Networks as identified in the NDF;
* Align with the Welsh Governments presumption in favour of large-scale wind-energy development (including repowering) within the Pre-Assessed Areas for Wind Energy as identified in the NDF;
* Ensure that renewable and low carbon energy proposals are in alignment with the criteria set out in Policy 17 and 18 of the NDF;
* Ensure that tackling the causes and consequences of climate change is taken into account in locating new development;
* Consider the increased risk of physical and environmental constraints as a result of climate change;
* Policies 16-18 of the NDF note the priority areas for the development of new renewable energy (wind and solar farms and district heating networks) sites;
* Commit to contributing towards a reduction in carbon emitting transport modes and mitigating poor air quality;
* Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure;
* Direct development to settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, LDP policies must ensure that the development is designed for resilience over its whole lifetime; and,
* Consider the effects of development on the adoption of renewable and low carbon energy.
 | Any RLDP resulting from this LDP needs to respond to the climate emergency and should provide policies, proposals, advice and guidance relating to climate change mitigation and adaptation, including the need to support developments which will contribute towards meeting international and national climate change targets such as the renewable energy targets set out in the NDF. | The ISA Framework should include objectives relating to climate change mitigation and adaptation.  |
| Material Assets | Planning Policy Wales 11th Edition (2021) Future Wales 2040: The National Plan National Development Framework (2021), Welsh Assembly Government (2007) Technical Advice Note (TAN) 18: Transport, Welsh Assembly Government (2002) Technical Advice Note (TAN) 19: Telecommunications, Welsh Assembly Government (2014) Technical Advice Note (TAN) 21: Waste, Welsh Assembly Government (2009) Minerals Technical Advice Note (MTAN) Wales 2: Coal, Welsh Assembly Government (2004) Minerals Technical Advice Note (MTAN) Wales 1: Aggregates Welsh Assembly Government (2004). | These documents require the preparation of LDPs to:* Be consistent and integrated with the strategies and policies contained in Local Transport Plans and other relevant strategies. Any LTP proposal that directly involves the development or use of land, or has land use implications, should appear as a policy or proposal in the development plan;
* Ensure that transport centred projects undergo an assessment in accordance with the Welsh Transport Appraisal Guidance (WelTAG);
* LDPs must support PPW (2021) objectives (promoting active travel, supporting public transport, managing traffic and parking and planning for roads, railways, airports, ports and inland waterways);
* Take into account the land use implications of the Welsh National Marine Plan (WNMP) (2019);
* Set out the land use/transportation strategy, addressing accessibility and the provision of strategic and integrated transport facilities, including roads, railways and interchanges;
* Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport;
* Ensure that development sites which are highly accessible to non-car modes are used for travel intensive uses, reallocating their use if necessary;
* Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport;
* In rural areas, designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development;
* Include specific measures to promote active travel in accordance with the Active Travel (Wales) Act 2013;
* Set out policies to promote the use of public transport including new and improved interchange facilities and, where appropriate, park and ride schemes;
* Include appropriate traffic management policies; • identify the primary road network, including trunk roads, and separately identify the core network;
* Identify proposals for new roads and major improvements to the primary route network and the broad policy on priorities for minor improvements;
* Include policies and proposals relating to the development of transport infrastructure other than roads;
* Identify, and where appropriate protect, routes required for the sustainable movement of freight;
* Protect disused transport infrastructure, including railways, rail sidings, ports, harbours and inland waterways from development that would compromise their future transport use, where re-use is a possibility;
* Minimise the adverse impacts of transport infrastructure projects on the natural, historic and built environment and on local communities;
* LDPs should maximise the use of existing infrastructure and should consider how the provision of different types of infrastructure can be co-ordinated; and,
* LDPs should identify suitable locations for sustainable waste management as well as criteria for how applications for waste management development will be determined, recognising that the most appropriate locations will be those with the best potential to contribute to a broad infrastructure framework and those with the least adverse impact on the local population. LDPs should set out policies and proposals for the location of telecommunications equipment, allocating sites for major developments and including criteria-based policies to guide telecommunications developments where sites other than those identified in the plan may be proposed.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to infrastructure development, waste management and the sustainable use of natural resources.  | The ISA Framework should include objectives relating to infrastructure development, waste management and the sustainable use of natural resources. |
| Cultural Heritage | Planning Policy Wales 11th Edition (20218), Future Wales 2040: The National Plan National Development Framework (2021),Welsh Assembly Government (2016) Technical Advice Note (TAN) 12: Design, Welsh Assembly Government (1997) Technical Advice Note (TAN) 20: Planning and the Welsh Language, Welsh Assembly Government (2017) Technical Advice Note (TAN) 24: The Historic Environment.  | These documents require the preparation of LDPs to:* Adhere to the Welsh Language (Wales) Measure (2011) to support the preservation of the Welsh language;
* Provide a statement about how the needs and interests of the Welsh language have been taken into account;
* If necessary, language impact assessments may be carried out in respect of large developments not allocated in the LDP which are proposed in areas of particular sensitivity or importance for the language. Any such areas should be clearly defined in the development plan;
* Emphasis on protecting and supporting the Welsh language in policy making and in its contribution towards achieving the Thriving Welsh language well-being goal and the wider Welsh Government target of a million welsh language speakers by 2050;
* Provide policies relating to the protection and preservation of world heritage sites, archaeological remains, listed buildings and conservation areas, local historic assets and historic parks and gardens;
* Identify locally specific policies in relation to the historic environment and cover those historic assets deemed to be important considerations from a local planning perspective;
* Consider the risk archaeological and historic sites by housing developments; and,
* Policies must also not be introduced which encourages discrimination between individuals based on their linguistic ability or seek to control housing occupancy on linguistic grounds.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of the historic environment and the promotion of the Welsh language.  | The ISA Framework should include objectives relating to the protection and enhancement of the historic environment and the promotion of the Welsh language.  |
| Landscape | Planning Policy Wales 11th Edition (2021), Technical Advice Note (TAN) 7 Outdoor Advertisement Control, Future Wales 2040: The National Plan National Development Framework (2021) | These documents require the preparation of LDPs to:* Take into account designated historic landscapes in Wales and where it is appropriate, develop locally specific policies which will contribute to their conservation;
* Consider the physical risks to landscape as a result of housing developments;
* Support the Welsh Governments strategic framework for the enhancement of biodiversity and the resilience of ecosystems;
* Include areas which could be protected as ecological networks for their potential importance for adaptation to climate change, habitat restoration or creation, or which provide key ecosystems services in development planning policy;
* Support opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being; and,
* Cumulative action towards the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of designated landscapes, landscape character, landscape features and visual amenity.  | The ISA Framework should include objectives relating to the protection and enhancement of designated landscapes, landscape character, landscape features and visual amenity.  |
| Interrelated Effects | Planning Policy Wales 11th Edition (2021), Future Wales 2040: The National Plan National Development Framework (2021), Technical Advice Note (TAN) 3: Simplified Planning Zones (Welsh Assembly Government, 1996). | These documents require the preparation of LDPs to:* Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good;
* Maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;
* Development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land;
* Encourage higher density and mixed-use development near public transport nodes, or near corridors well served by public transport;
* Foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;
* Locate development so that it can be well serviced by existing infrastructure (including for energy supply, waste management and water;
* Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;
* Locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime;
* Contribute to the wider efforts by the planning system to respond to the behavioural chances as a result of the Covid-19 pandemic and contribute to a sustainable recovery shaping places around a vision for healthy and resilient places; and,
* Include strategic policies on the location of potentially polluting developments and should set out criteria by which applications for such developments will be determined, but they should not exclude provision for such projects or prohibit all applications to set them up.

With reference to the protection of Green Belts and Green Wedges; LDPs should:* Provide opportunities for access to the open countryside;
* Provide opportunities for outdoor sport and outdoor recreation;
* Maintain landscape/wildlife interest;
* Retain land for agriculture, forestry, and related purposes;
* Improve derelict land; and,
* Provide carbon sinks and help to mitigate the effects of urban heat islands.

PPW (2021) also promotes the protection of agricultural land and the re-use of brownfield land alongside further sustainability guidelines. LDPs should identify opportunities to ensure higher sustainable building standards are adopted, ensure that proposed developments are evidence based and viable and encourage applications which reflect key principles of climate responsive developments. The preparation of LDPs must ensure that:* Their housing trajectory is used as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing requirements as part of LDP AMRs and for subsequent plan review. The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan;
* The availability of previously developed sites and empty or underused buildings and their suitability for housing use;
* The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;
* The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure;
* The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities;
* The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development;
* Proposals for new settlements should be promoted through and fully justified in the LDP;
* LDPs must include an authority wide target for affordable housing based in the LHMA and identify the expected contributions that policy approaches identified in the LDP will make to meeting this target;
* LDPs should also include site thresholds or a combination of thresholds and site-specific targets including the correct proportion of affordable housing;
* LDPs must be supported by an assessment of the accommodation needs at Gypsy/traveller sites;
* Quantify the housing requirement (both market and affordable housing);
* Set an affordable housing target;
* Set out a settlement strategy;
* Adopt the new sequential search methodology for identifying housing sites;
* Include clear policy criteria against which applications for development of unallocated sites will be considered;
* Specify the circumstances in which previously developed sites would be deemed to perform so poorly that their use would not be favoured before that of a (particular) greenfield site;
* Set targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development;
* Include clear development management policies to guide the determination of applications, including guidance on design, access, density, off-street parking and open space provision for particular areas as appropriate;
* Specify mechanisms to be used to monitor the take up of housing land;
* Include policies for affordable housing in areas where need has been identified, including any areas where exception sites will be considered; and,
* Include policies to indicate where developer contributions will be expected toward infrastructure, community facilities and affordable housing.
 | Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance to support the delivery of sustainable development.  | The ISA Framework should provide a suite of linked objectives to support the delivery of sustainable development.  |

1. The SEA Consultation Bodies are defined by the SEA Regulations as Cadw and Natural Resources Wales. The Welsh Assembly Government will also be treated as a SEA Consultation Body for the purposes of this ISA. [↑](#footnote-ref-2)
2. The Planning (Wales) Act 2015 Section 2 sets out the definition of sustainable development for the planning system and directly refers to the definition in the WBFG Act [↑](#footnote-ref-3)
3. EU Directives 2000/78/EC, 2000/43/EC, 2006/54/EC (all enacted) and proposed Directive COM/2008/0426 final - CNS 2008/0140 [↑](#footnote-ref-4)
4. Excluding those discounted from further consideration owing to being below minimum site sizes, which will be confirmed within the LDP Review Candidate Sites Assessment Methodology. [↑](#footnote-ref-5)
5. NOMIS: <https://www.nomisweb.co.uk/reports/lmp/la/1946157394/report.aspx> [↑](#footnote-ref-6)
6. StatsWales: <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2018-based/populationprojections-by-localauthority-year> [↑](#footnote-ref-7)
7. NPTCBCCBC Local Housing Strategy (2015): [https://www.NPTCBC.gov.uk/media/3980/NPTCBCcbc\_local\_housing\_strategy\_2015.pdf](https://www.npt.gov.uk/media/3980/nptcbc_local_housing_strategy_2015.pdf) [↑](#footnote-ref-8)
8. UK House Price Index - Wales (March 2020) [↑](#footnote-ref-9)
9. LDP Review Report, Neath Port Talbot Council (January 2020) [↑](#footnote-ref-10)
10. Educational attainment statistics sourced from NOMIS: Labour Market Profile – Neath Port Talbot [↑](#footnote-ref-11)
11. All data sourced from NOMIS: Labour Market Profile – Neath Port Talbot [↑](#footnote-ref-12)
12. Business Register and Employment Survey- Neath Port Talbot (2019) [↑](#footnote-ref-13)
13. StatWales Neath Port Talbot Local Authority Analysis (2019) [↑](#footnote-ref-14)
14. Neath Port Talbot Public Services Board Well-being [↑](#footnote-ref-15)
15. ONS, Life expectancy of females/males 2015-17 figures [↑](#footnote-ref-16)
16. NHS Wales Informatics Service, Our Healthy Future Interactive tool 2015, Average number of days of 30

mins or more moderate to vigorous physical activity (capped) reported by adults, age standardised. [↑](#footnote-ref-17)
17. Welsh Health Survey (WG) (2013-2014 data) Our healthy future indicators [↑](#footnote-ref-18)
18. Promoting healthy living among pupils in Neath Port Talbot. Available at: [https://democracy.NPTCBC.gov.uk/documents/s52366/App%201%20-%20Promoting%20Healthy%20Living%20Among%20Pupils%20in%20Neath%20Port%20Talbot%20Schools%20Task%20and%20Finish%20Gr..\_.pdf](https://democracy.npt.gov.uk/documents/s52366/App%201%20-%20Promoting%20Healthy%20Living%20Among%20Pupils%20in%20Neath%20Port%20Talbot%20Schools%20Task%20and%20Finish%20Gr.._.pdf) [↑](#footnote-ref-19)
19. Western Bay Population Assessment <http://www.westernbaypopulationassessment.org/en/mental-health/> [↑](#footnote-ref-20)
20. Neath Port Talbot Council Contaminated Land Strategy (2015): [https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf](https://democracy.npt.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf) [↑](#footnote-ref-21)
21. Neath Port Talbot Council Contaminated Land Strategy (2015): [https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf](https://democracy.npt.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf) [↑](#footnote-ref-22)
22. Infobase Cymru <http://www.infobasecymru.net/IAS/resources/Neath_Port_Talbot.pdf> [↑](#footnote-ref-23)
23. InfoBase Cyrmu <http://www.infobasecymru.net/IAS/themes/environmentandsustainability/environment/tabular?viewId=518&geoId=1&subsetId=> [↑](#footnote-ref-24)
24. Energy Generation in Wales in 2018 (2019) <https://gov.wales/sites/default/files/publications/2019-10/energy-generation-in-wales-2018.pdf> [↑](#footnote-ref-25)
25. Neath Port Talbot Council: Active Travel Existing Routes Map [https://www.NPTCBC.gov.uk/6489](https://www.npt.gov.uk/6489) [↑](#footnote-ref-26)
26. Neath Port Talbot Council: Planning Register [https://planningonline.NPTCBC.gov.uk/online-applications/simpleSearchResults.do?action=firstPage](https://planningonline.npt.gov.uk/online-applications/simpleSearchResults.do?action=firstPage) [↑](#footnote-ref-27)
27. StatsWales: Neath Port Talbot Council: Welsh Language speakers [↑](#footnote-ref-28)