

Deposit Plan Proposals Report

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1 Introduction

1.0.1 From 24th September – 12th October 2012 a series of stakeholder events will be held throughout the County Borough. The purpose of these meetings will be to discuss the emerging Deposit Plan with stakeholders before the Authority formally places the plan on Deposit in February / March 2013.

1.0.2 This report sets out what is being presented to stakeholders. It sets out the emerging picture both in terms of the overall strategy for the LDP and the various topic based policies that will be included. The report principally outlines the emerging proposals for:

- The level of growth – i.e. how many houses will need to be developed over the Plan period (2011 – 2026);
- Where this growth will be located – i.e. through the identification of settlement limits and major allocations of land;
- Promoting economic activity and employment opportunities;
- Dealing with mineral, waste and renewable energy related development; and
- Protecting the more sensitive areas of the natural and built environment.

1.0.3 The report is also accompanied by the following , all of which are available on the main LDP website: www.npt.gov.uk/ldp

- Stakeholder Presentations – copies of the slides presented at each of the stakeholder meetings which summarise the main points from this Deposit Plan Proposals Report; and
- The emerging LDP Proposals Map – showing the geographical location of the emerging policies and proposals.

1 . Introduction

2 Pre-Deposit Plan

2.0.1 On 5th September 2011 the Pre-Deposit Plan went out for consultation for a 6 week period (Appendix A outlines the key stages of Plan Preparation). During this time the Council received 569 representations (367 objections & 202 support).

2.0.2 In addition to assessing these responses, new and emerging planning policy guidance is being assessed and the evidence base updated. The following key studies and assessments have either been completed or are ongoing:

Completed:

- Affordable Housing Viability Study;
- Economic Growth Assessment & Employment Land Provision Study (prepared jointly for NPT and City & County of Swansea);
- Landscape Assessment.

Ongoing:

- Strategic Housing Market Assessment (prepared jointly for NPT and City & County of Swansea);
- Gypsy & Traveller Study;
- Strategic Flood Consequences Assessment;
- Infrastructure Delivery Plan;
- Settlement Boundary Review;
- Renewable Energy Toolkit;
- Open Space & Greenspace Assessment;
- Welsh Language Impact Study;
- Retail Capacity Study.

2 . Pre-Deposit Plan

Deposit Plan Proposals Report

3 Growth Strategy

3.0.1 A number of stakeholders including the Welsh Government (WG) commented on the level of growth proposed at the Pre-Deposit stage and highlighted that growth should not solely be based on past migration trends. In March of this year the Authority commissioned Peter Brett Associates (PBA) to undertake an assessment of potential levels of economic growth and employment land and link this to the number of houses that would be needed to accommodate the required labour supply. This was a joint study for both NPT and the City & County of Swansea.

3.0.2 As a result of this study, the level of growth (Moderate) proposed within the Pre-Deposit Plan (6280 units, 420 units per year) has now increased to 8227 units, 548 units per year (which closely fits with the Pre-Deposit's High growth option (8554)). NPT's growth strategy is now underpinned by projected levels of economic growth (nationally driven but also influenced and adjusted to take into account the local economy including proposed regeneration strategies). This economic led scenario reflects the demographic changes set out in the 2008 WG projections because it factors in the projected decline in residents of working age population and the reduction in average household size.

3.0.3 The Economic study was commissioned to ensure that the housing and employment strategies in the LDP are aligned. As stated in the report by Peter Brett *'to under provide or over provide [for housing] is likely to result in unsustainable travel flow because economically active residents have to travel further to find work, or working age residents from outside the county borough have to commute in.'* (PBA (2012:101).

3.0.4 The LDP Growth strategy is now based on an economic led scenario which uses job growth and projected economic activity rates to identify the required working age population to support the projected number of jobs. The basis of the calculation is the acknowledgement that only a percentage of the population is likely to be economically active and subsequently the total population including residents that are economically inactive must grow proportionally to support economic growth (e.g. facilitate growth in economically active residents). This different approach enables the Council to identify the level of housing required to meet its economic objectives within the population projection framework established in the WG 2008 population projections. The study has included economic assumptions based on the Council's planned interventions to reduce unemployment and increase the economic activity rate. This combined with the overall level of economic growth potential identified in the study leads to a deviation in the population projections and subsequent housing demand set out in the WG 2008 projections.

3.0.5 The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time.

3 . Growth Strategy

3.0.6 The Authority is therefore increasing its annual housing build rates to 548 units which is much higher than what has been achieved in the past. However, in order for a site to be allocated for housing it has to be rigorously assessed and evidenced that it will be delivered within the plan period. This information will be contained within the Infrastructure Delivery Plan (IDP). There is a mixture of brownfield and greenfield sites included within the housing land supply. This will ensure a fairly even delivery of sites throughout the life of the plan period resulting in a sound Plan.

	Neath Port Talbot to 2026	
	EE Adj Scenario:	EE Adj+ Scenario:
	(1,789 jobs)	(3,850 jobs)
a1. Economically active 2011	59,775	59,775
a2. Working Age Population 2011	87,519	87,519
b. Population 2011	139,266	139,266
c. Households 2011	64,041	64,041
d. Net gain of jobs (minus 5% for double jobbing allowance)	1,700	3,658
e. Net Change in unemployment 2010 – 2025/6	-1,913	-1,913
e2. Requirement for Commuters/Economic migrants	-213	1,745
f. Economically active 2025/2026	59,562	61,520
(f = a + d + e)		
g. Working age population	81,592	84,274
(g = f x 1.37)		
h. Total population 2025/2026	141,653	146,309
(h = g x 1.75)		
i. Private households population 2025/2026	138,537	143,091
(i = h - 2.2%)		
j. Total number of households 2025/2026	69,968	72,268
(J = i ÷ 1.98 persons per household)		
k. Number of additional homes 2025/26	5,927	8,227
(k = j – c)		
l. Population change 2010 - 2025/26	2,387	7,043
(l = h - b)		

4 Housing Sites & Deliverability

4.0.1 In order for the LDP to deliver 8227 residential units, 8844 units will need to be provided to ensure that there is a degree of flexibility (Appendix B: Test of Soundness CE4 - It is reasonably flexible to enable it to deal with changing circumstances). The housing land supply will be made up of a number of different components: new housing allocations (sites of 10+ houses); landbank (sites with planning permission); small sites (sites within settlement limits that will provide between 1 and 9 units); and windfall sites (sites within settlements that are unforeseen). These components are listed in more detail within the Housing section 7.1.

4.0.2 Appendix D highlights the housing trajectory which has taken into account all of the new housing allocations and commitments (landbank – sites with planning permission) and assesses when they are likely to be developed. The red line shows the 548 unit target (8227/15 years). This graph, together with the infrastructure delivery plan (which will provide more detail on each site) projects that there should be a gradual build up to 548 units by 2014/15 (when the LDP is adopted and supersedes the current UDP). From this point onwards, the new LDP allocations will be released which will ensure a fairly even distribution of sites coming through in the short, medium and long terms (up to 2026) (with a potential accelerated rate between 2018-2023 to address the reduced rate experienced in the early part of the plan when the UDP strategy constitutes as the adopted plan).

4 . Housing Sites & Deliverability

5 Spatial Strategy

5.0.1 The LDP spatial strategy seeks to focus development along the M4 corridor whilst reinvigorating the Valley communities:

This will:

- Focus the majority of development along the M4 corridor and in the urban areas of Neath, Port Talbot & to a lesser extent Pontardawe.
- Support small businesses and tourism.
- Prioritise Pontardawe & Glynneath as growth points in the valleys.
- Support for more limited growth (housing and employment) within the remaining valley communities.

5 . Spatial Strategy

6 Key Issues

6.0.1 In order for the LDP to establish a vision and strategies for the future it has to understand the characteristics of the area and any problems or issues experienced within the County Borough (in addition to NPT's Corporate Strategies). A number of topic papers will be produced to support the LDP; which will assess all of the available evidence, together with adhering to guidance from the WG and stakeholder feedback.

6.0.2 The Pre-Deposit Plan identified 29 key issues. As a result of new and emerging guidance, up-to-date evidence/data and feed back from the Pre-Deposit consultation (WG suggested that the LDP would be better informed by a strengthened identification of key issues), the key issues contained within the Pre-Deposit Plan have been reviewed. There are now 18 key issues.

- KI1 (Population) – The proportion of the population who are of working age is projected to decline over the LDP period.
- KI2 (Housing) – There is a need for additional affordable housing units throughout the County Borough.
- KI3 (Housing) – Average household size is projected to decline over the LDP period which is one of the factors which is driving the need for new homes.
- KI4 (Health) – Residents in Neath Port Talbot experience some of the worst health in Wales.
- KI5 (Climate Change) – The need to minimise the causes and consequences of climate change.
- KI6 (Flooding) – Due to the topography of Neath Port Talbot, tidal and river flooding pose particular threats.
- KI7 (Economy) – Sufficient land and premises needs to be provided over the LDP period to meet the requirements of businesses.
- KI8 (Economy) – Only 69% of the working age population are economically active compared to the Welsh average of 73%.
- KI9 (Economy) – Economic growth in Neath Port Talbot has stagnated over the last 10 years, with in particular low levels of market demand in the Valley areas.
- KI10 (Retail) – There are concerns over the vitality / viability of our town, district and local centres.
- KI11 (Natural Heritage) – Continuing loss of habitats and species.
- KI12 (Natural Heritage) – The impact of mineral and energy resource development on our landscape.

6 . Key Issues

- KI13 (Natural Heritage) – Brownfield (previously developed) land requiring remediation.
- KI14 (Natural Heritage) – Air Quality.
- KI15 (Built Environment) – Dereliction and loss of character in our settlements and urban centres.
- KI16 (Open Space & Indoor Leisure) – There is a shortfall in provision of open space in some communities.
- KI17 (Welsh Language) – The erosion of the Welsh language is a concern in many of the valley communities.
- KI18 (Transport) – The accessibility of Neath Town Centre to ensure the delivery of the proposed regeneration scheme; the interchange in Port Talbot; critical bridge links and park & share schemes.

7 Emerging Strategies & Proposals

7.1 Housing

7.1.1 Employment-led projections - As discussed in section 3, the level of housing and population which is to be delivered over the LDP period is based on the number of people required to fill the number of jobs likely to be created over the LDP period (Experian Economics). The Deposit Plan Strategy will therefore seek to deliver population growth to meet the projected level of economic growth over the LDP period having also taken into consideration the objective to improve the economic vibrancy of the County Borough by increasing the economic activity and reducing unemployment levels. In addition to this, the growth strategy reflects the demographic changes set out in WG's 2008 household projections because it factors in the projected decline in residents of working age population and the reduction in average household size to ensure that the housing needs of both existing and new residents can be met over the LDP period.

7.1.2 The level of growth has been discussed within sections 3 and 4 of this report. The different components (New allocations; Commitments, Small Sites & Windfalls) which make up the housing land supply are shown below.

Table 7.1.1 Housing Land Supply & Distribution

Spatial Area	Landbank	New Allocations	Small Sites	Windfalls Large Sites	Windfalls Small Sites	Total (20/08/12)	Share-Out
Afan Valley			40	32	10	82	0.93%
Amman Valley	10		36	72	12	130	1.47%
Dulais Valley	84		34	100	12	230	2.60%
Neath	2230	1046	162	369	45	3852	43.59%
Neath Valley	114	180	110	32	6	442	5.00%
Pontardawe	200	347	92	204	21	864	9.77%
Port Talbot	861	1542	135	342	38	2918	32.96%
Swansea Valley	172		59	89	6	326	3.69%
Total	3671	3115	668	1240	150	8844	100.00%

7 . Emerging Strategies & Proposals

Table 7.1.2 Housing Calculation Summary

Housing Need			8227
Housing Requirement (Basic)	Allowances	Windfall Sites	2058
		Small Sites	
	Site-Specific	Landbank Sites	6169
		New Allocations	
	Sub-Total		8227
Housing Requirement (Plus Contingency)	Allowances		2058
	Site-Specific		6169
	Contingency (10%)		617
	Sub-Total		8844
Housing Supply 23/08/12	Allowances		2058
	Site-Specific		6786
	Sub-Total		8844
Housing Requirement			8844
Housing Supply			8844

7.1.3 The spatial distribution of the growth is discussed at a strategic level within section 5 whereby housing development will be distributed throughout the County Borough in order to deliver the LDP spatial strategy which seeks to focus development along the M4 corridor whilst reinvigorating the Valley communities. In addition to this, the housing allocations have also been distributed in accordance with the Settlement Hierarchy (Appendix C).

7.1.4 One of the key mechanisms to deliver the Spatial Strategy is the identification of settlement boundaries. **Settlement boundaries** help to steer development towards the most appropriate and sustainable locations and at the same time reconcile development with the need to protect the countryside.

7.1.5 Clear, defensible boundaries around settlements have therefore been defined (in accordance with the settlement hierarchy) in the form of 'settlement limits' beyond which there will be specific policies to protect the countryside from development. Windfall and small sites will also be included within the settlement limits.

7 . Emerging Strategies & Proposals

7.1.6 Within the identified settlements limits the following housing allocations are proposed. For ease of reference they have been split between new allocations and commitments.

Table 7.1.3 New Allocations

Spatial Area	Site Name	No. of Units	Site Reference
NEATH	Caewern	42	H1/1
	Crymlyn Grove Phase 2 &3	76	H1/2
	Crymlyn Parc Skewen	150	H1/3
	Dwr y Felin Lower School	70	H1/4
	Gorffwysfa, Bryncoch	15	H1/5
	Hafod House, Neath	12	H1/6
	Land off Fairyland Road, Tonna	300	H1/7
	Leiros Park	200	H1/8
	Neath Town Centre Redevelopment	50	H1/9
	Ocean View Jersey Marine	81	H1/10
	Wern Goch Skewen	50	H1/11
PORT TALBOT	Baglan Bay	250	H1/12
	Former Arts Centre Taibach	15	H1/13
	Gas works site, Aberavon	70	H1/14
	⁽¹⁾ Glanafan Comprehensive School	50	H1/15
	Green Park Aberavon	50	H1/16
	Harbour Way (Port Talbot Docks)	370	H1/17
	Land at A4107 & Hawthorn Close, Cwmafan	100	H1/18
	Land north east of Blaenbaglan	31	H1/19
	Land rear of Baglan School	110	H1/20
	Min yr Afon, Cwmafan	12	H1/21
	Moor Road, Baglan Moors	35	H1/22
	Morfa Afan, Dalton Road	10	H1/23
	NPT College Campus Margam	70	H1/24
	Tirmorfa Road Aberafan Seafront	75	H1/25
	Tywyn School Aberafan Seafront	110	H1/26
	Velindre School	15	H1/27
	Western Logs Cwmafan	130	H1/28
⁽²⁾ Afan Lido	40	H1/29	
PONTARDAWE	Former Cwmtawe School, Phase 2	32	H1/30
	Land off A 464 (incl P9)	150	H1/31
	Land off Waun Penlan Rhydyfro	70	H1/32
	Land off Waun Sterw	45	H1/33
	Ynysymond Road	50	H1/34
NEATH VALLEY	Parc Avenue, Glynneath	150	H1/35
	Trem y Glyn, Glynneath	30	H1/36

1. Site is subject to Cabinet decision in association with the Strategic School Improvement Plan (SSIP)
2. Site is subject to Cabinet decision on the future location of the Afan Lido replacement

7 . Emerging Strategies & Proposals

Table 7.1.4 Landbank (Commitments)

Spatial Area	Site Name	No. of Units	Site Reference
NEATH	86-100, Briton Ferry Road	28	HLB/1
	Area 1, Coed Darcy Urban Village	147	HLB/2
	Barrons Court, Neath Abbey	15	HLB/3
	Coed Darcy Urban Village	1828	HLB/4
	Crymlyn Grove	81	HLB/5
	Eaglesbush, Neath	50	HLB/6
	Garthmor Phase 2	34	HLB/7
	Hillside, Groves Road, Neath	34	HLB/8
	Wauinceirch Remainder	13	HLB/9
PORT TALBOT	Afan Way, Baglan Moors	42	HLB/10
	Coed Darcy Urban Village	322	HLB/4
	Copperminers, Cwmafan	90	HLB/11
	Dyffryn Road, Taibach	14	HLB/12
	Groeswen, Margam	39	HLB/13
	Land at Blaenbaglan Farm	260	HLB/14
	Station Road	14	HLB/15
	Stycyllwen, Baglan	24	HLB/16
	Talbot Road	46	HLB/17
PONTARDAWE	Thorney Road, Baglan	10	HLB/18
	Bryn Morgrug, Alltwen	56	HLB/19
	Former Cwmtawe School	80	HLB/20
	Waun Penlan, Rhydyfro	19	HLB/21
AMMAN VALLEY	Holly Street	45	HLB/22
	125/133, Heol Y Gors, GCG	10	HLB/23
DULAIS VALLEY	Heol Y Waun	68	HLB/24
	Maes Marchog, Banwen	16	HLB/25
NEATH VALLEY	Heol y Glyn, Glynneath	81	HLB/26
	Welfare Hall, Glynneath	17	HLB/27
	Ynys Y Nos Avenue, Pontwalby	16	HLB/28
SWANSEA VALLEY	Golwg Y Mynydd, Godrergrraig	64	HLB/29
	Graignewydd Barratts	38	HLB/30
	Graignewydd McLeans	70	HLB/31

7.1.7 Density levels have been reviewed since the Pre-Deposit plan taking into consideration results from the Local Housing Market Assessment, the Affordable Housing Viability Assessment and the Economic Growth Study. In order to achieve the objectives of the plan, proposals will be expected to achieve a minimum density of 35 dwellings per hectare in urban areas and 30 per hectare within the valley areas. Higher density development will be encouraged within town centres, at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good.

7.1.8 A large proportion of the new housing needed within Neath Port Talbot has been created by the reduction in household size. As households are becoming smaller on average, the housing market has responded by focusing more on 1 and 2 bedroom houses

and flats in some communities, whereas in other areas, the emphasis has been on larger houses. The LDP will guide the mix of house types on sites in relation to the needs of the area (as identified within the Local Housing Market Assessment) so that in each community, there is a balance of housing types and sizes, including dwellings that are suitable for the elderly and the disabled.

AFFORDABLE HOUSING

7.1.9 Opinion Research Services (ORS) have undertaken a Joint Strategic Housing Market Assessment (SHMA) for Neath Port Talbot (NPT) and the City & County of Swansea. The results show that based on the revised level of growth (8227) NPT has a need of 3200 affordable units (39% of overall build, 213 units per annum).

7.1.10 To determine the level of affordable housing that could be achieved through the planning system by private developers an Affordable Housing Viability Study (AHVS) was undertaken, which is compliant with the requirements of the Welsh Government's Technical Advice Note (TAN) 2 "Planning and Affordable Housing" which emphasises the importance of gathering evidence about development economics and viability to test policy targets. The overall aim and purpose of the study was to:

- Advise on ambitious yet achievable and viable target(s) and threshold(s) for affordable housing;
- Advise on a robust policy position with respect to the setting of thresholds which do not impact on the delivery of housing in the County Borough.

7.1.11 The following affordable housing percentage targets have been identified for each submarket area. The targets apply to developments of 3 dwellings or more:

Table 7.1.5 Affordable Housing Percentage Targets

Spatial Area	Percentage Target
Neath	20%
Port Talbot	20%
Pontardawe	5%
Neath & Dulais Valley	0%
Swansea & Amman Valley	0%
Afan Valley	0%

7.1.12 The identified targets are based on the short to medium term of 5-8 years. However, scenario testing within the AHVS suggests that higher percentages are obtainable in the long-term. The identified targets will be monitored annually and if necessary subject to a full review on a five-year basis.

7 . Emerging Strategies & Proposals

7.1.13 The number of private sector affordable units that could be delivered over the plan period will be calculated based on Gross Development Value not number of units.

7.1.14 The public sector will also contribute to reducing the affordable housing need. Based on past trends, Registered Social Landlords (RSL's) could potentially deliver between 50-60 affordable units per year over the plan period, although currently the level of Social Housing Grant is projected to reduce in the short/medium term.

7.1.15 Supplementary Planning Guidance (SPG) will be prepared to assist the Deposit Plan. This document will provide more detail and explain how the affordable housing policy will be implemented by the Development Control Team when a planning application is submitted.

7.1.16 Sites for 100% affordable housing together with a rural exceptions criteria based policy will be considered.

7.2 Gypsies

7.2.1 In April of this year (2012), the Authority commissioned Opinion Research Services (ORS) to undertake a Gypsy Survey. The survey found that the estimated extra provision that is required for Gypsies and Travellers in Neath Port Talbot is 20 pitches. This requirement is driven by growth amongst the existing population of the County Borough.

7.2.2 However, a considerable proportion of this requirement has been created to meet the needs of migrants into the area (from neighbouring authorities). The study identified that the needs of these households could be met elsewhere in the area such as along the M4 corridor in Swansea and Bridgend. Therefore, while this study identifies a need for 20 pitches it notes that this need could be met in neighbouring local authorities who currently have much lower levels of Gypsy and Traveller site provision than Neath Port Talbot.

7.2.3 The Council needs to consider introducing a local needs priority policy. This will ensure that vacant pitches will be prioritised to satisfy the needs of the existing population. Whereby, if a pitch should become vacant, this pitch should be retained to meet the needs of the existing population.

7.2.4 If the management solution were to be adopted, the need over the LDP period would drop to 5 pitches. Work will need to be undertaken to alleviate the existing flooding issues in Caegarw. Once this has been undertaken, 2 previously decommissioned pitches will become available, which will result in a need of 3 pitches over the plan period.

7.2.5 This need will be met by expanding the existing site at Caegarw, Margam.

7.2.6 In terms of meeting the needs of migrants into the Authority, a fair, reasonable and robust criteria based policy will allow any future applications to be judged on their own merits.

7.3 Employment

7.3.1 Sufficient land and premises need to be provided over the LDP period to meet the requirements of businesses both in terms of the size and type of unit and the location. The Peter Brett Economic Study calculated that over the plan period (up to 2026) NPT would require approximately 20 hectares of employment land, this can be accommodated within the Authority's strategic sites: Baglan Bay, Coed Darcy Urban Village & Harbourside, PT Docks and within existing safeguarded employment sites.

7.3.2 The following employment allocations/designations are proposed:

Strategic Regeneration Areas (Mixed-use):

Coed Darcy Urban Village - SRA/1

Harbourside, Port Talbot Docks – SRA/2

Strategic Employment Sites:

Baglan Bay – EM1/1

Safeguarded Employment Sites:

Table 7.3.1 Safeguarded Employment Sites

Map Ref:	Site Location	Spatial Area
EM2/1	Fabian Way	Neath
EM2/2	Lonlas Village Workshops	Neath
EM2/3	Neath Abbey Business Park	Neath
EM2/4	Neath Abbey Wharf	Neath
EM2/5	Melincryddan CMB Site	Neath
EM2/6	Baglan Energy Park	Port Talbot
EM2/7	Baglan Industrial Estate	Port Talbot
EM2/8	Endeavour Close, Baglan	Port Talbot
EM2/9	Kenfig Industrial Estate	Port Talbot
EM2/10	Llewellyn's Quay	Port Talbot
EM2/11	Alloy Industrial Estate	Pontardawe
EM2/12	Vale of Neath Supplier Park	Neath Valley
EM2/13	Glynneath Village Workshops	Neath Valley
EM2/14	Crynant Business Park	Dulais Valley
EM2/15	Land at Nant Y Cafn	Dulais Valley
EM2/16	Cwmgors Workshops	Amman Valley
EM2/17	Former Dewhirst Site, Ystalyfera	Swansea Valley
EM2/18	Croeserw Industrial Estate	Afan Valley
EM2/19	Glyncorwg Workshops	Afan Valley

7.3.3 The LDP will promote economic activity and employment opportunities through:

- i. focusing development on strategic sites;

7 . Emerging Strategies & Proposals

- ii. retaining and safeguarding a variety of existing employment sites;
- iii. the expansion of settlement limits to allow land to be released for the development of small businesses and live-work units allowing working from home; and
- iv. applying a flexible approach in the valley area for the development of employment uses where they meet the strategic objectives of the Plan.

7.3.4 Evidence suggests that there is highest demand for smaller units (typically 200sqm to 500sqm) and a need to invest and improve the existing industrial space. This is unlikely to be achieved without public or third party support as there remains a viability gap as the cost of speculative development is greater than the current rental levels.

7.3.5 In order for the projected number of jobs (3850) to be achieved and secured within NPT, funding will have to be secured from s106 agreements, community trusts (e.g. from windfarms), serviced land provided by the Authority and Community Infrastructure Levy (CIL) monies. This money is needed to fund the provision of smaller units and help fund the viability gap between rental levels. Grant aid is available from a number of EU funding programmes (Appendix G).

7.3.6 Working in partnership with our internal and external stakeholders the LDP strategy aims to reduce unemployment, increase economic activity and the working age population and reduce net out-commuting. Assumptions on the projected levels of each of these variables have been fed into the housing calculation to ensure that there is an adequate supply of housing to meet the needs of NPT's projected population.

7.3.7 Furthermore, there are a number of development projects in the pipeline which could fuel the local economy and boost economic activity such as housing in Coed Darcy, completion of the Peripheral Distributor Road (PDR) and various regeneration schemes. These projects will be of a particular benefit to the manufacturing and construction industry, which are particularly prominent within Neath Port Talbot. This will enhance employment levels in the medium term while the strengthening of the long term economy will result in continued progress post 2016. However, wider national trends and programmes will also affect employment and economic activity within the County Borough including changes to the benefit system.

7.4 Community Infrastructure Levy (CIL)

7.4.1 From 6th April 2014 no more than 5 separate planning obligations can be used to provide an infrastructure project – this will have significant implications for strategic infrastructure which require pooled obligations.

7.4.2 S106 Agreements will remain in force and will deliver site specific and local matters that cannot otherwise be realised through CIL. The principal uses for S106 would be the delivery of affordable housing (expressly omitted from the definition of infrastructure in the CIL Regulations), although the Government are currently considering a possible change to this).

7.4.3 It has been agreed regionally that a viability study will be undertaken to inform the potential for having a CIL.

7.5 Climate Change

7.5.1 The various elements of the climate change strategy will be implemented through a range of LDP topics and strategies and inform the overall approach of the LDP throughout, including the following:

- i. The Settlement Strategy – by locating development in the most sustainable locations which offer more efficient use of existing facilities, co-location of uses and joint use of facilities together with sustainable modes of travel.
- ii. The Transport Strategy – through encouraging modal shift (from the car to more sustainable forms of transport e.g. rail or bike) and encouraging freight/commercial transport by alternatives to road (e.g. rail or sea) by ensuring that connections are made available where possible.
- iii. Renewable and Low Carbon Energy Strategies – by ensuring that there is an appropriate contribution to renewable and low carbon energy generation (e.g. through encouraging and where possible identifying opportunities for District Heating schemes, and development sites that could potentially achieve higher sustainable building standards).
- iv. The Strategic Flood Consequences Assessment and Flood Risk Strategy - through ensuring that developments are not located in areas likely to be at risk of flooding.
- v. The Environment Strategies - through ensuring that effects on public health and the natural environment are minimised and can be addressed.

7.6 Health

7.6.1 The LDP will address the issue of poor health through a number of ways.

- a. Settlement Hierarchy - locating development in the most sustainable locations which offer more efficient use of existing facilities, encouraging co-location and joint use of facilities with sustainable modes of travel.
- b. Improving the housing stock - using Housing policies such as affordable housing contributions and the Code for Sustainable homes.
- c. Open Space - policies to require new and safeguarding of existing provision (e.g. pitches and allotments).
- d. Environmental considerations- policies relating to pollution, air quality and quiet areas can help address health issues.

7 . Emerging Strategies & Proposals

7.7 Retail

7.7.1 The UDP retail hierarchy has been reviewed to ensure that it reflects the current role and function of the retail centres. Some of the centres' boundaries have been constricted in order to direct retail to the core of the centre, to improve the vitality and vibrancy and reduce the number of vacant premises.

7.7.2 The LDP Retail Hierarchy will seek to "...enhance the current retail offer, support the existing centres and improve the vitality, viability and attractiveness of the retail offer and centres in the County Borough".

7.7.3 The Retail strategy and policies will:

- Identify primary shopping streets in Neath and Port Talbot – supported by policies to restrict the number of non A1 retail units;
- Restrict the number of non A1 units in the district centres in order to protect their retail function;
- Support the regeneration strategies and proposals: Neath Town Centre Scheme; Neath train station improvement plans; Port Talbot Parkway; Pontardawe Regeneration Scheme; Glynneath Town Centre improvement scheme;
- Support residential uses above shops in line with TAN 4;
- Identify out-of centre retail parks in order to promote their development in advance of other sites in less appropriate out of centre locations; and
- Apply a flexible approach to retail applications in the Valley areas – support retail uses, where appropriate, outside of the identified retail centres.

7.7.4 The following designations are proposed:

Town Centres:

Neath: TC/1

Port Talbot: TC/2

Pontardawe: TC/3

District Centres:

Briton Ferry: DC/1

Skewen: DC/2

Taibach: DC/3

Glynneath: DC/4

Local Centres:

Margam: LC/1

Fairway, Sandfields: LC/2

Heol Jiwbill, Cwmafan: LC/3

Pentwyn, Baglan: LC/4

Lodge Drive, Baglan: LC/5

Resolven: LC/6

Gwaun Cae Gurwen: LC/7

Crynant: LC/8

Commercial Street / Arnold Close, Ystalyfera: LC/9

Croeserw: LC/10

Out of Centre Retail Parks:

Castle Park, Melincryddan: RP/1

Vale of Neath, Cadoxton: RP/2

Burrows Yard: RP/3

Baglan Moors: RP/4

Parc Ynysderw, Pontardawe: RP/5

7.7.5 GVA Grimley was commissioned to undertake a Retail Capacity Study of the County Borough. Surplus expenditure was identified and as a result the following sites have been allocated for retail/mixed use:

Retail Allocations (Mixed-Use):

Neath Town Centre Regeneration Area – R/1

Glanafan, Port Talbot – R/2

Park Avenue, Glynneath – R/3

7.8 Waste

7.8.1 The Materials Recovery & Energy Centre (MREC) at Crymlyn Burrows and the Pwllfawatkin Landfill Site at Abernant will continue to treat and manage the waste arisings within the County Borough.

MREC: W/1

Pwllfawatkin: W/2

7 . Emerging Strategies & Proposals

7.8.2 All employment land (either allocated or safeguarded) is considered suitable in principle to accommodate new 'in-building' waste treatment facilities – proposals will be judged against a criteria based policy.

7.8.3 Baglan Bay Energy Park EM1/1 will however be favoured to meet the regionally identified need for additional in-building treatment capacity.

7.9 Minerals

7.9.1 NPT has a wealth of mineral resources (Appendix E) that are significant on a National scale and in line with National Policy the following resources will be safeguarded:

- Primary & Secondary Coal Resources; and
- Aggregate Resources (hard rock / sand & gravel).

7.9.2 Buffer Zones are identified around permitted or proposed mineral workings where new development which would be sensitive to the adverse impacts of mineral development will be resisted (Coal – 500m; Hard Rock Quarries – 200m).

7.9.3 500m Settlement Protection Zones are identified to protect communities from the adverse impact of mineral development where new mineral development will be resisted. Any groups of houses or individual properties not defined within settlement limits will be protected by a criteria based policy.

7.10 Natural Environment

7.10.1 Policies are being developed which seek to "...protect and wherever possible enhance the natural environment".

7.10.2 The following network of designated sites of international, national and local importance is identified and will be protected:

- Natura 2000 Sites (e.g. Special Areas of Conservation);
- Sites of Special Scientific Interest (SSSIs);
- National Nature Reserves (NNRs);
- Local Nature Reserves (LNRs);
- Sites of Interest for Nature Conservation (SINCs).

7.10.3 New developments will be required to take full account of the implications of the development on wildlife and habitats and where negative effects cannot be avoided, mitigation and/or compensation will be required.

7.10.4 NPT has high value landscapes in terms of the underlying geology, cultural & historical heritage; ecology, visual amenity, tranquillity & sense of place.

7.10.5 The landscape has been assessed and the following landscape designations are proposed where the exploitation of resources (mineral & wind) will be balanced against the wider landscape interests:

Special Landscape Areas:

Mynydd Y Garth: SLA/1

Dulais Valley: SLA/2

Vale of Neath: SLA/3

Margam: SLA/4

Mynydd Y Gelli: SLA/5

Foel Trawsant: SLA/6

And;

7.10.6 Green Wedges (Which aim to protect the setting of the urban environment and prevent the coalescence of settlements):

Margam: GW/1

Alltwen / Rhos / Bryncoch / Neath Abbey / Leiros Park: GW/2

Crymlyn Bog / Crymlyn Burrows / Llandarcy: GW/3

Neath / Tonna / Cimla / Efail Fach: GW/4

Skewen / Birchgrove: GW/5

7.11 Built Environment

7.11.1 The built environment, including the County Borough's main arterial 'gateways' will be conserved and enhanced through the application of targeted design policies, the retention of important features and buildings in key centres and locations and the safeguarding of features of historic and cultural importance.

Conservation Areas:

Neath Town Centre: CA/1

Tonna Canal Depot: CA/2

Llandarcy: CA/3

Margam Park: CA/4

Cilybebyll: CA/5

Glynneath Woollen Mill: CA/6

Historic Parks & Gardens:

Jersey Park, Briton Ferry: HP/1

7 . Emerging Strategies & Proposals

The Gnoll, Neath: HP/2

Victoria Gardens, Neath: HP/3

Margam Park: HP/4

Talbot Memorial Park: HP/5

Rheola, Neath Valley: HP/6

7.12 Urban Environment

7.12.1 Policies are being developed to “...protect and enhance existing community facilities and promote the provision of such facilities wherever suitable opportunities arise” – including outdoor sports facilities, children’s playing space, allotments and informal open space.

7.12.2 This will be achieved through:

- Safeguarding existing open space;
- All new development will be required to make a contribution to open space in accordance with the appropriate standard and based on identified need; and
- The promotion of multiple use, co-location and joint use of facilities.

7.12.3 The following **Urban Quiet Areas** are identified and will be protected from noise-generating development nearby:

Urban Quiet Areas:

Neath Abbey Ruins: UQA/1

Mount Pleasant Park: UQA/2

Skewen Park: UQA/3

Shelone Woods: UQA/4

Victoria Gardens: UQA/5

Church Place: UQA/6

Talbot Memorial Park: UQA/7

Vivian Park: UQA/8

Baglan Park: UQA/9

King George V Park, Pontardawe: UQA/10

7.13 Renewable Energy

7.13.1 The TAN8 ‘Strategic Search Areas’ (SSAs) form part of national policy and will continue to be considered as the starting point for assessing large scale windfarm proposals (refer to SSA Map in Appendix F).

7.13.2 Criteria-based policies are being developed to assess large, medium and small scale wind farm proposals. In regard to large scale proposals any application received will be expected to be accompanied by assessments which examine locations in a sequential order – i.e. firstly within the SSAs and then areas outside of the SSAs.

7.14 Transport

7.14.1 Policies are being developed which seek to “...reduce congestion and provide enhanced facilities for walking, cycling and public transport”.

7.14.2 This will be achieved through:

- Construction of new roads (e.g. PDR / Coed Darcy Southern Link);
- Directing new development to the most sustainable locations;
- Regulate the access, design and layout of new development to guide traffic flow safely and efficiently;
- Allocating 2 Park & Share sites in Glynneath and Margam;
- Encourage travel by more sustainable methods; and
- Improve public transport and interchange facilities.

7.14.3 Park and Share can provide an opportunity for car users, whether for commuting or leisure purposes to meet, park and continue their journey in one car. Such provision can reduce pollution and congestion and provide benefits such as reduced fuel costs to users, and therefore provide more choice and accessibility to residents.

7.14.4 Swansea operates a park and share site off J47 of the M4 at Felindre. The original application for this site was in 2007, with a site of 0.9173ha, which accommodated 364 cars. Two locations are proposed at Glynneath Business Park and J38 Margam. Glynneath has a convenient location situated adjacent to the A465, link the Heads of Valleys Road and the Midlands to Neath, Swansea, Cardiff and West Wales. A site to accommodate around 100 cars should be considered. Margam has a convenient location, adjacent to M4 and in close proximity to the PDR, this facility could be used for commuters travelling to Cardiff and the East or towards Swansea and West Wales. A site to accommodate around 200 cars should be considered.

7 . Emerging Strategies & Proposals

A Key Stages of Plan Preparation

1. Pre-Deposit Plan (or 'Preferred Strategy'):

- Stakeholder Engagement – completed May 2011.
- 6 week formal consultation – completed Sept / Oct 2011.

2. Full Deposit Plan:

- Stakeholder Engagement – Sept / Oct 2012.
- 6 week formal consultation – Feb / March 2013.

3. Examination in Public (EIP):

- March 2014.

4. LDP Adoption:

- November 2014.

A . Key Stages of Plan Preparation

B 10 Tests of Soundness

What are the Tests of Soundness?

B.0.1 The tests have been developed by the Planning Inspectorate to check that LDPs throughout the country are suitable and fit for purpose. The tests are split up into 3 groups:

- Procedural
- Consistency
- Coherence and Effectiveness

When are the Tests of Soundness used?

B.0.2 During the Examination of the LDP an Independent Inspector will assess whether the Plan is sound and is consistent with the 10 Tests of Soundness set out below. It is the role of the Inspector to ensure that the evidence and assumptions on which the Council has based its policies and proposals are properly tested. Therefore, the Planning Policy Team must ensure throughout the process that these criteria are met and that the Plan has been produced in a fair, informed and coherent manner.

	Procedural Tests
P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
C3	It has regard to the Wales Spatial Plan.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
	Coherence and Effectiveness Tests
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

B . 10 Tests of Soundness

C Settlement Hierarchy

Table C.0.1 Settlement Hierarchy

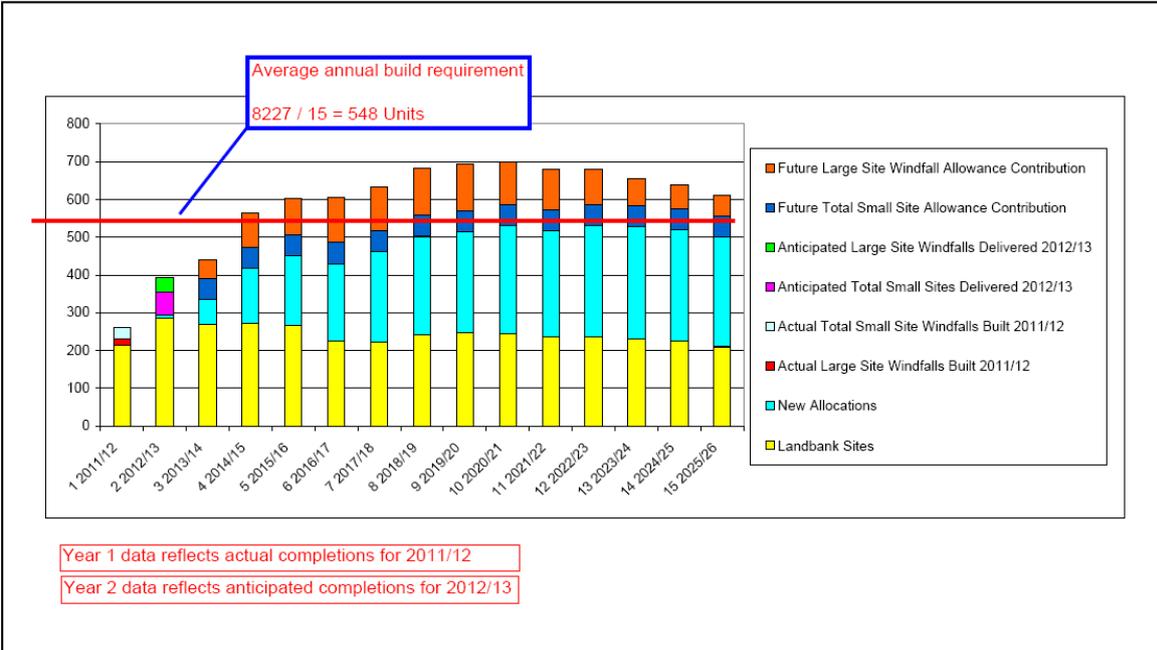
Level of Hierarchy	Expected Facilities & Services	Settlement Limit?
Town	<p>Town Centres are of regional importance and are hubs of activity, providing a diverse range of functions. Towns provide: Yes – provides the most sustainable and favourable locations for new development.</p> <ul style="list-style-type: none"> • A wide and varied range of retail services and facilities, including a mix of different use-classes providing a retail hub to serve a range of needs which could include commercial, health, banking and professional; • Several types and variations of employment uses, which may include industrial, professional and public administration; • A range of community facilities that could serve the needs of the wider community, such as library, health care, cultural uses, leisure centres; • Several types of education and training opportunities, such as primary schools, comprehensive schools and further education colleges / training centres. <p>Towns are accessible through a range of transport modes, are located on a strategic road network and act as a transport hub. Towns are a gateway for new investment and sustainable development.</p>	<p>Yes – provides the most sustainable and favourable locations for new development.</p>
District Centre	<p>District Centres provide:</p> <ul style="list-style-type: none"> • A wide range of retail, services, facilities and functions to serve the need of that and surrounding communities; • A range of different community facilities, such as a library, public park, health centre / facilities, schools, community halls and places of worship; • Several types of employment: Industrial units / workshops; <p>District Centres have good transport links to and from surrounding communities and are located on a strategic road network, vital for regional connectivity.</p>	<p>Yes – provides significant potential for development.</p>
Large Local Centre	<p>Large Local Centres provide:</p> <ul style="list-style-type: none"> • One or more retail units clustered together / concentrated in an area and support a small range of services; • One or more community facilities (such as a community hall, church, park / public open space, school); • Adequate public transport links to the nearest district / town centre. <p>And either:</p> <ul style="list-style-type: none"> • Employment land (i.e. small workshops); <p>Or:</p>	<p>Yes – provides some development potential.</p>

C . Settlement Hierarchy

Level of Hierarchy	Expected Facilities & Services	Settlement Limit?
	<ul style="list-style-type: none"> • Larger community facilities that would serve the need of that and surrounding communities, such as comprehensive school, leisure centre etc. 	
Small Local Centre	<p>Small Local Centres provide:</p> <ul style="list-style-type: none"> • At least one shop or several shops which are dispersed through the settlement. <p>And / Or:</p> <ul style="list-style-type: none"> • Several community facilities such as a community hall, church, park / public open space, school; • Transport links to the nearest large local centre. 	Yes – provides some development potential.
Village	<p>Villages provide:</p> <ul style="list-style-type: none"> • At least one community facility; • Have adequate public transport links to the nearest local centre. 	Yes – but limited infill opportunities only.
Dormitory Settlements	Dormitory Settlements contain minimal or no services / facilities and have minimal or no public transport links.	No – no development potential.

D Deposit Housing Trajectory

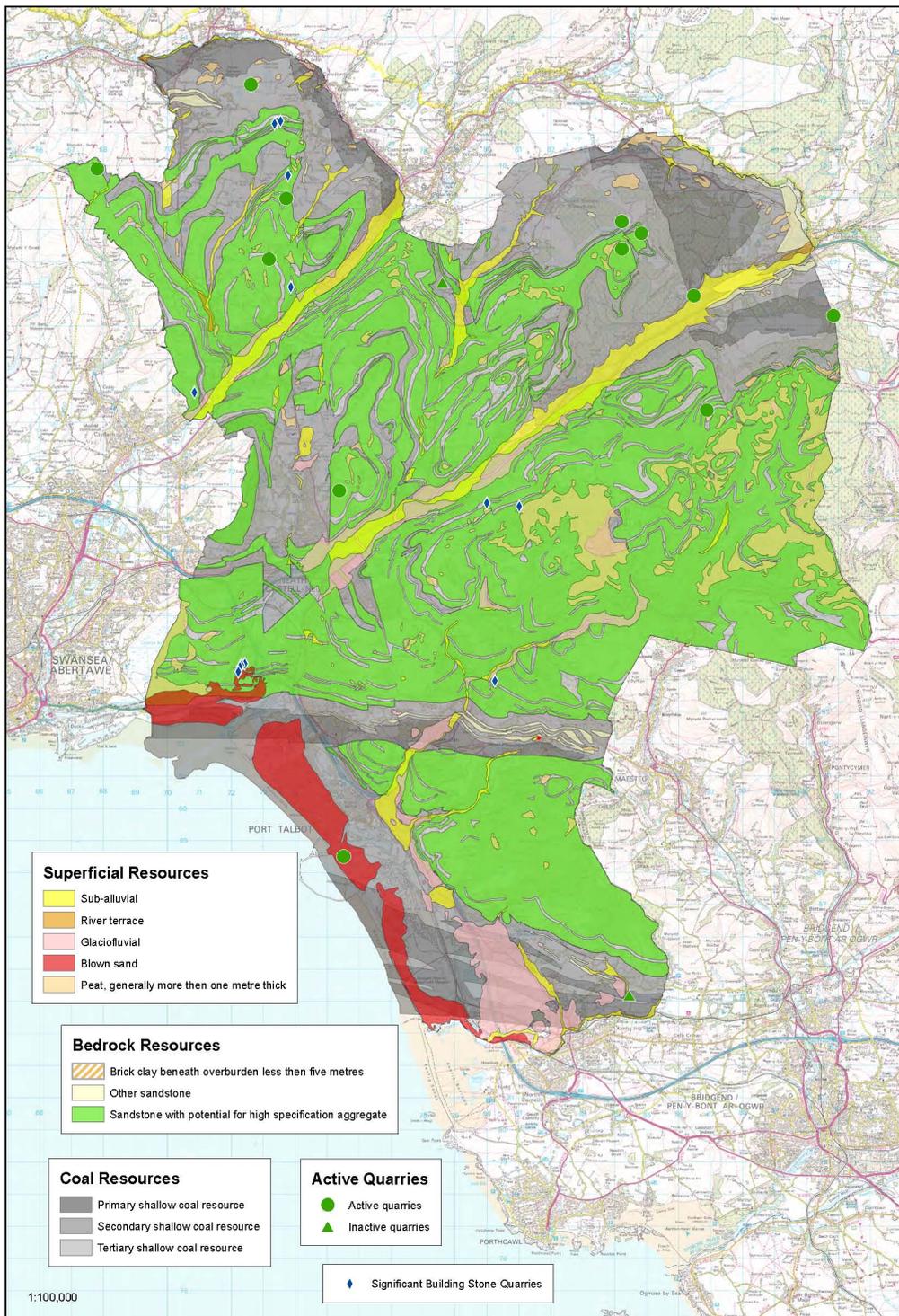
Figure D.1 Deposit Housing Trajectory



D . Deposit Housing Trajectory

E Mineral Resource Map of Wales

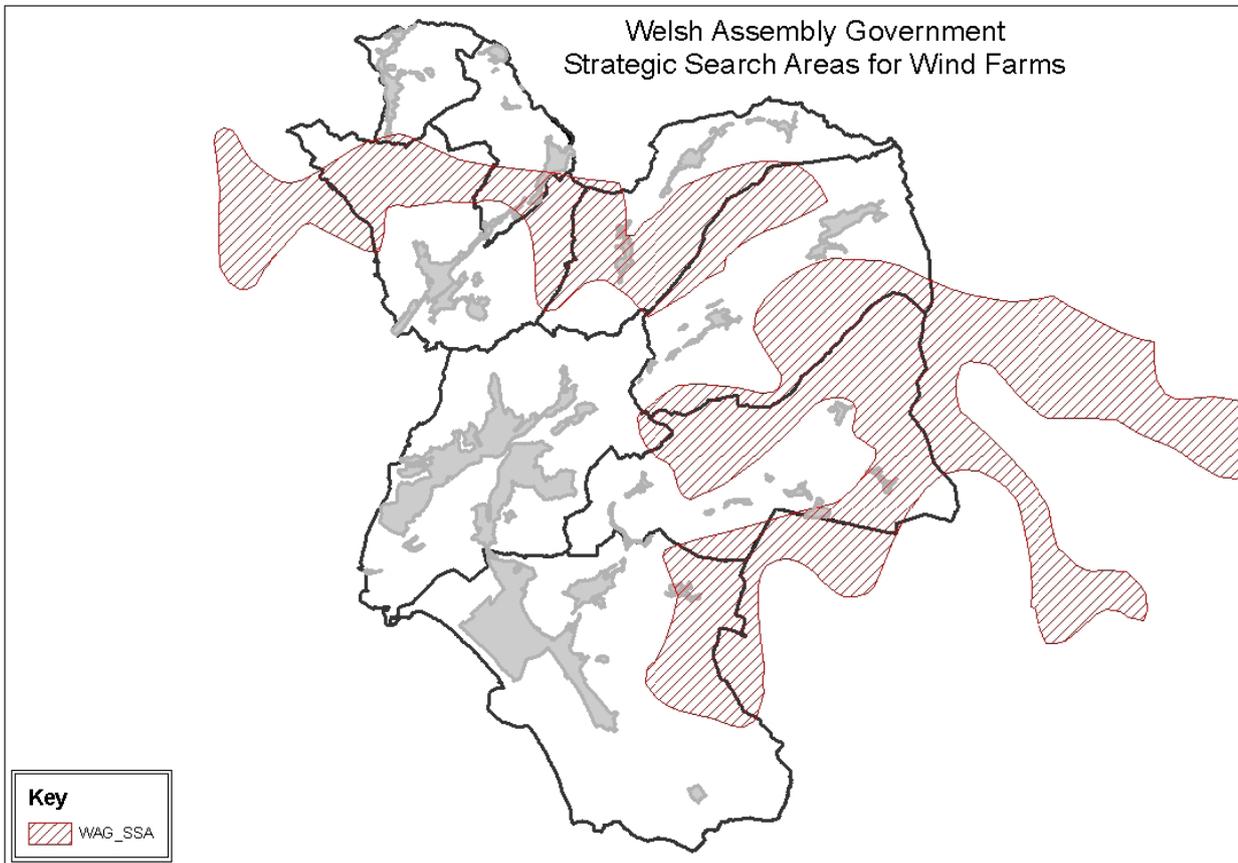
Map E.1 Mineral Resource Map for Neath Port Talbot



E . Mineral Resource Map of Wales

F Strategic Search Areas for Wind Farms

Picture F.1 Strategic Search Area for Wind Farms



F . Strategic Search Areas for Wind Farms

G List of EU funding opportunities

European funding opportunities:

Regeneration Investment Fund for Wales (RIFW)

G.0.1 This is loan fund supported by EU Convergence ERDF funding. This programme is intended to accelerate and facilitate investment in a wide range of large-scale regeneration projects across urban areas of Wales (towns and cities). Scheme ends July 2015.

South West Wales Property Development Fund (PDF)

G.0.2 To provide grant aid to developers to bridge the gap between the cost of providing or refurbishing commercial property and its subsequent market value, within the region's identified strategic employment locations. Scheme ends July 2015.

G.0.3 Under the current EU Convergence programme (2007 – 2013) ERDF Priority 5 Theme 1 – Physical Regeneration and ERDF Priority 3 Theme 2 – Strategic Infrastructure – all funding is committed and WEFO are not currently accepting new applications.

Future EU funding opportunities

G.0.4 The new EU funding programmes (2014 – 2020) will be based around 11 European Commission priorities to deliver the Europe 2020 strategy.

The new Convergence programme prioritises:

G.0.5 Priority 8 - 'promoting employment and supporting labour mobility' through the development of business incubators and investment support for self-employment and business creation

G.0.6 Priority 9 – 'promoting social inclusion and combating poverty' through physical and economic regeneration of deprived urban and rural communities.

The new Rural Development Plan programme prioritises:

G.0.7 Priority 6 – 'Realising the jobs potential and the development of rural areas, including fostering local development in rural areas' through diversification, creation of new small enterprises and job creation, fostering local development in rural areas, enhancing accessibility to information and communication technologies.

Domestic funding opportunities:

WG Regeneration Investment Grant (RIG)

G.0.8 A grant scheme available to property developers and investors in Wales for the provision of new or refurbished premises on previously developed sites.

G . List of EU funding opportunities