



Neath Port Talbot County Borough Council

Local Development Plan 2011 – 2026

Sustainability Appraisal August 2013



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1 Non Technical Summary

1.1 Introduction

1.1.1 This report is the non-technical summary of the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), of the Deposit Local Development Plan (LDP). This non-technical summary is intended to provide a broad overview of the findings of the SA, with the main SA report presenting the appraisal findings in full.

1.1.2 SA is the process by which the influence that a land use plan would have over development and change is assessed according to the Plan's likely contribution to environmental, economic and social objectives. SA is defined as *'a systematic and iterative process undertaken during the preparation (and review) of a plan which identifies and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these'*⁽¹⁾.

1.1.3 The need for SEA arises from the European Union Directive⁽²⁾ on the assessment of the effects of certain plans and programmes on the environment. The SEA Directive requires environmental assessment during production of certain plans and programmes which are likely to have significant effects on the environment.

1.1.4 With the SA focusing on social and economic issues and the SEA focusing on the environment, the appraisal has been completed as a single process. Therefore, the term SA is used jointly for all references in this report and should be taken to include the requirements of the SEA Regulations.

1.2 Sustainability Appraisal Stages

1.2.1 The SA has been integrated into the Plan preparation process. As a result, sustainability principles have been applied from the outset and rather than producing 'end of plan' changes, the SA has influenced the decisions taken as the strategy and policies have developed. The table below sets out the main stages of the SA in relation to the Plan preparation process.

1 LDP Wales - Welsh Government.

2 European Union Directive 2001/42/EC.

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Table 1.2.1 SA and LDP Main Stages

LDP Stages	Sustainability Appraisal Stages and Tasks
1. Evidence Gathering	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
	<p>A1: Review other relevant policies, plans and programmes and sustainability objectives</p> <p>A2: Collecting baseline information</p> <p>A3: Identify sustainability issues and problems</p> <p>A4: Developing the SA Framework</p> <p>A5: Prepare and Consult on the SA scoping report</p>
2. Strategic Options and Preferred Strategy	Stage B: Developing and refining options and assessing effects
Preparation of LDP Pre-Deposit Plan (Preferred Strategy)	<p>B1: Testing the objectives against the SA Framework</p> <p>B2: Developing the options</p> <p>B3: Predicting the effects</p> <p>B4: Evaluating the effects</p> <p>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the LDP</p>
	Stage C: Preparing the Sustainability Report
	C1: Preparing the Sustainability Appraisal Interim Report
3. Public Consultation on LDP Preferred Strategy	<p>Stage D:</p> <p>D1(i): Public Consultation on SA Interim Report</p>
4. LDP Deposit Plan preparation	<p>D2(i): Appraising significant changes from consultation</p> <p>D3(i): Making decisions and providing information</p>
5. Public consultation on Deposit LDP	D1(ii): Public Consultation on SA Report
6. Submission, examination and adoption	D2(ii): Appraising significant changes resulting from representations

LDP Stages	Sustainability Appraisal Stages and Tasks
	D3(ii): Adoption statement and finalised SA Report
7: Monitoring and Review	Stage E Monitoring the significant effects of implementing the LDP
	E1: Developing aims and methods for monitoring E2: Responding to adverse effects

1.2.2 To date, the Council has published the following SA reports, both of which are available on the Council's website:

- **SA Scoping Report (February 2011)** - which established the sustainability baseline of the County Borough, contained a review of other relevant plans and programmes that may influence the SA and LDP, presented the SA Objectives and outlined the proposed methodology for the SA.
- **SA of the Pre-Deposit LDP Interim Report (September 2011)** - which accompanied the publication of the Pre-Deposit Plan and contained detailed assessments of the LDP Preferred Strategy, including the options for the level of growth, the Plan's vision, objectives, preferred strategies and strategic policies.

1.2.3 In parallel with the LDP, both reports were the subject of consultation and the responses from the consultees were taken into account in moving forward with the SA.

1.2.4 The current document⁽³⁾ is being issued as part of the Deposit Plan public consultation [Stage 5 / SA Stage D1/(ii)].

1.3 Sustainability Appraisal Objectives

1.3.1 A set of sustainability objectives has been developed for the SA. They cover a range of sustainability issues related to environmental, economic and social factors. The purpose of the objectives is to provide a consistent definition of sustainable development for the SA process and the emerging vision, objectives, strategy and policies / proposals of the LDP can then be assessed as part of the process of systematic appraisal.

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1.3.2 The SA objectives are categorised under eight topic areas and are set out in the table below.

Table 1.3.1 The SA Objectives

Topic		Objectives
1	Climate Change	<p>1A: Ensure that all development takes into account likely future changes resulting from climate change (Adaptation).</p> <p>1B: Achieve government targets for reducing greenhouse gas emissions (Mitigation).</p> <p>1C: Make the area's appropriate contribution to national energy production (Mitigation).</p>
2	Natural Resources and Waste	<p>2A: Minimise loss or degradation of natural resources while ensuring that they are used only in a sustainable way.</p> <p>2B: Maintain and improve the chemical and biological/ecological quality of natural resources.</p> <p>2C: Minimise waste and reduce amounts of waste disposed of to landfill.</p>
3	Biodiversity and Geodiversity	<p>3A: Prevent any further net loss of biodiversity.</p> <p>3B: Exploit all reasonable opportunities to secure biodiversity enhancements.</p> <p>3C: Minimise adverse effects on designated geodiversity sites.</p>
4.	Landscape, Townscape and Historic Character	<p>4A: Protect and/or enhance the area's landscape and townscape.</p> <p>4B: Protect and/or enhance the area's historic environment including architectural and archaeological resources.</p>
5	Pollution (Air Quality, Noise and Light)	<p>5A: Achieve acceptable levels (meet national/European standards) of air quality throughout the County Borough.</p> <p>5B: Achieve acceptable noise levels and protect quiet areas throughout the County Borough.</p> <p>5C: Reduce light pollution.</p>
6	Community Cohesion	<p>6A: Improve social cohesion and minimise the incidence of social exclusion by addressing the causes of social exclusion.</p> <p>6B: Protect and enhance the culture and character of communities including cultural resources and Welsh language.</p>

Topic		Objectives
7	Health and Wellbeing (including poverty/deprivation)	<p>7A: Improve physical and mental health outcomes for all.</p> <p>7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.</p> <p>7C: Reduce/minimise the incidence and impacts of poverty by addressing the causes and consequences of poverty.</p>
8	Economy	<p>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.</p> <p>8B: Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and the use of, local resources and environmental assets.</p> <p>8C: Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community.</p>

1.4 The SA Findings & Influence on the Pre-Deposit Plan

1.4.1 At the Pre-Deposit stage, specific issues identified by the SA related to the following areas:

Strategic Alternatives

1.4.2 The Pre-Deposit Plan identified '*moderate growth*' as the preferred growth option. The SA broadly supported this option while raising some points in relation to:

- Additional housing development bringing the risk of increased greenhouse gas emissions;
- The development of greenfield sites resulting in the loss of potentially productive soil resources; and
- The dangers of increasing traffic levels in areas where there are existing concerns with regard to air quality.

Preferred Strategies

1.4.3 Issues identified in relation to the Pre-Deposit preferred strategies related to effects on biodiversity, landscape/townscape, community character and culture, climate change and pollution. Particular points highlighted included:

- The need for careful attention to both development location and mitigation/compensation requirements if the SA objective to avoid further net loss of biodiversity is to be met;
- Further consideration needed about the role and development of freight and passenger rail transport with particular reference to the potential impacts and benefits; and
- The need to consider the imposition of higher building standards through the LDP.

Area-based Strategies

1.4.4 Strategies for the Neath, Port Talbot and the valley areas were assessed and issues in relation to potential habitat loss, additional pollution, landscape impacts, adverse impacts on local communities and accessibility were noted.

Strategic Policies

1.4.5 Detailed appraisals were undertaken of the strategic policies in the Pre-Deposit Plan which led to some amendments being made and the following cross-cutting issues being identified:

- The potential for increased congestion, traffic and noise;
- Increased commuting to work;
- The gradual loss of wildlife and their habitats; and
- Localised, sometimes significant impacts, resulting from mineral and wind turbine development.

1.5 The SA Findings & Influence on the Deposit Plan

Vision

1.5.1 The vision has guided the development of the strategy and the integrated set of policies contained within the Plan. It also complements the Council's overall vision as set out in the Community Plan.

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

1.5.3 The vision brings positive benefits in relation to a number of SA objectives, including positive social and economic benefits through working with market forces, reducing impact on resources and landscapes, and addressing economic and social issues in the Valley communities. A potential conflict was however identified in regard to focusing a significant amount of employment and housing land together along the coastal corridor.

1.5.4 Adverse impacts such as an increase in pollution, traffic congestion and impacts on the natural environment were identified. This concern has been taken into account during Plan preparation and the approach included within the relevant topic based strategies and policies seek to ensure that adverse impacts are minimised.

Objectives

1.5.5 The LDP Vision will be delivered through a number of objectives and these objectives are fundamental to the LDP and form the basis for policy development. The first four objectives are considered to be overarching in that they are wide ranging and will inform all areas of the Plan. The area based objectives concern the two identified strategy areas, while the remaining objectives are grouped under the themes identified in the Wales Spatial Plan.

1.5.6 Each objective was assessed against the SA objectives to determine their compatibility. This process highlighted a number of issues which resulted in the amendment of some of the objectives.

1.5.7 Overall, the LDP objectives were assessed as being broadly compatible with the SA objectives, subject to some uncertainties. As such the LDP objectives are generally considered to be effective and appropriate. Some conflict between objectives

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is however inevitable, since those promoting development (required to address social and economic objectives) are in conflict with those addressing environmental issues. This concern has been taken into account during Plan preparation and the approach included within the relevant topic based strategies and policies seek to ensure that conflict and adverse impacts are minimised.

Development Strategy

1.5.8 The Development Strategy (comprising both growth and spatial strategies) is a fundamental element of the LDP strategy. With the aim of creating sustainable communities, a 'Settlement Hierarchy' defined those areas which were identified as the most sustainable locations to accommodate future growth.

1.5.9 The Development Strategy seeks to '*facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities*'. This means:

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

1.5.10 The level of growth set out in the Deposit Plan has greatly increased from the '*moderate*' preferred growth option identified in the Pre-Deposit Plan. In comparison, the revised Deposit Plan level of growth falls between the '*medium*' and '*high*' growth options that were presented in the Pre-Deposit Plan.

1.5.11 The strategy for growth is now based on an economic-led strategy which complements the approach taken in neighbouring authorities. The chosen growth scenario is aspirational in its approach and aims to maximise job growth within the

local economy. The level of growth aims to ensure the County Borough becomes more independent and less reliant on outside sources of labour by improving the economic activity rates of its residents.

1.5.12 In order to complement the projected growth in economic activity, the Plan makes provision for an additional 8,000 new residential units. In addition, to meet this level of growth an element of flexibility has been incorporated and the total housing requirement for the Plan equates to 9,150 residential units.

1.5.13 In regard to the findings of the SA, it is highlighted that the implementation of the strategy will need to be controlled and monitored to determine that development is being delivered and whether it is helping to achieve the overall strategy. It is also acknowledged that LDP implementation will need to ensure that achieving sustainable development is not compromised by the current economic climate.

1.5.14 Whilst there will be positive impacts for communities and the economy, inevitably, there will be some sustainability impacts of delivering the growth levels promoted through the LDP. The impacts will be predominantly related to environmental issues including land-take, natural resource use and environmental protection:

- *Climate Change* - there will be a greater likelihood of locating development in vulnerable areas and a risk of increasing greenhouse gas emissions compared with lower levels of growth.
- *Land-take / Quality of Natural resources*: there will be a greater need to develop greenfield sites leading to a loss of productive soil resources. Policies will therefore need to be in place to guide development in such areas.
- *Loss of biodiversity*: there is a potential increase in the loss of biodiversity that cannot be easily mitigated or compensated for.
- *Protection / Enhancement of Landscape / Townscape*: there may be more significant landscape impacts although there could be beneficial effects on local townscapes where higher economic growth brings more prosperity.
- *Pollution*: the peripheral location of some of the allocated housing sites and the fact that there being more households and therefore more cars could lead to increased levels of pollution. Increased car travel can have negative impacts including increased congestion that can subsequently have negative knock on

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effects on health and climate change issues. Focusing development along the coastal corridor also has the potential to lead to compounding existing air quality issues within the Port Talbot area.

1.5.15 Directing development to the most sustainable locations, as the Deposit Plan sets out to achieve, is only part of the solution. The LDP will need to be influential in aiming to encourage a modal shift away from the private car. Furthermore, the LDP will need to play a role in achieving and enhancing an integrated transport network which promotes the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community.

1.5.16 These concerns has been taken into account during Plan preparation and the approach included within the relevant topic based strategies and policies seek to ensure that adverse impacts are minimised.

Policies

1.5.17 The SA reviewed all of the Policies of the LDP, assessing their potential contribution to sustainable development. Overall, the assessment indicated a comprehensive coverage of sustainable development issues and should help avoid many adverse impacts of implementing the quantity of development promoted through the LDP.

Allocations

1.5.18 The SA reviewed all of the site-specific allocations of the LDP, including those allocated for housing, employment, retail and tourism.

1.5.19 In accordance with the Development Strategy, the majority of allocations are focused within the key settlements of Neath and Port Talbot along the Coastal Corridor in recognition of the important role these settlements play within the area and the regional context. There are a number of major developments planned that are of paramount importance in building sustainable, prosperous communities and delivering the LDP vision.

1.5.20 Strategic Regeneration Areas at Coed Darcy (Neath) and Harbourside (Port Talbot) and the construction of the Swansea University Science and Innovation Campus at Fabian Way are key developments for Neath Port Talbot and will have a wider role in enhancing economic prosperity to the region acting as a catalyst for future growth.

1.5.21 In reinvigorating the Valleys, two growth areas are identified in Pontardawe and the Upper Neath Valley. Pontardawe and Glynneath act as hubs within the Swansea and Neath Valley respectively and provide a range of retail services, leisure facilities, education establishments and employment opportunities. When combined, the LDP allocates a large amount of housing in Pontardawe and the Upper Neath Valley allowing the population to expand and support growth in the employment, retail and tourism sectors.

1.5.22 It is acknowledged in the SA that a significant proportion of the total amount of land allocated for new housing and employment is already committed for development and that those commitments are compatible with the Development Strategy of the Plan. In regard to 'new' allocations, the inevitable sustainability impacts of delivering the growth levels promoted through the LDP have been highlighted earlier.

1.5.23 In broad terms, the housing supply will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the the release of greenfield areas. In preparing the LDP, the Council has taken a significant number of sites into consideration. The detailed assessment included a range of questions under the categories of strategy, landscape, environmental impacts, highways, infrastructure and deliverability / viability.

1.5.24 The SA identified that whilst the peripheral location of some of the housing allocations may lead to some negative impacts, the allocations have been selected as far as practicable in accordance with sustainable development principles to be in locations that minimise as far as possible impacts on the environment and those that reduce dependency on the private car. At the same time, the effects of a changing climate (for example flood risk) have been taken into account as far as possible in all the Plan allocations and policies.

1.5.25 Overall, the assessment indicated that as a result of the comprehensive coverage of sustainable development issues within the topic based strategies and policies this should help avoid many adverse impacts of implementing the quantity of development promoted through the LDP.

1.6 Health, Equalities & Welsh Language Impact Assessment

1.6.1 As part of the SA process, assessments are made of the impacts of the Plan's policies and proposals on human health, equalities (including sex, age, race and disability issues) and on the Welsh language. Each of these aspects has been assessed alongside all the other sustainability and environmental issues, enabling the effects

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of the Plan to be fully assessed in detail. The findings have also been taken into account in the development of the Plan. Through this process, the SA has considered health, equalities and Welsh language matters in detail and the SA Report incorporates the Health Impact Assessment, Equalities Impact Assessment and Welsh Language Impact Assessment.

Health Impact Assessment (HIA)

1.6.2 As part of the SA process, the LDP policies and proposals were assessed in terms of the following objectives and questions relevant to health impacts:

1.6.3 Topic 7: Health and Wellbeing:

- SA Objective 7A: Improve physical and mental health outcomes for all.
 - Will the proposed strategy/policy/proposal enhance and maintain optimum levels of appropriate public health and care services accessible to all?
- SA Objective 7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.
 - Will the proposed strategy/policy/proposal create a clean, safe, high quality physical environment that promotes physical and mental wellbeing for all?
 - Will the proposed strategy/policy/proposal improve accessibility of and to key services such as shops and medical services as well as employment and education and reduce inequalities in access?

1.6.4 This analysis has resulted in the identification of the following main points relating to the potential impacts of the Plan on people's health:

- Poor air quality is a particular issue in some parts of the County Borough which may be exacerbated by additional development and associated traffic.
- High unemployment levels and low levels of economic activity in some areas have a detrimental effect on health.
- Good access to local recreational facilities, open space and health services is important for health.

- Community cohesion and provision of community facilities.
- Adequate housing provision for all is needed, including affordable housing provision.

1.6.5 In relation to these points, the SA has drawn attention to aspects of the Plan that could influence the situation, and measures that can be incorporated into the Plan to minimise any adverse affects and address existing problems. These include:

- The need to plan sustainable and self sufficient communities with good access to services and internal and external links through 'active' modes of travel such as walking and cycling. The Plan's settlement strategy and policies concerning the provision and safeguarding of open space, recreational and community facilities and walking and cycling routes address some of these issues.
- The Plan aims to provide for and encourage a fairly high level of economic growth including the creation of jobs to help reduce unemployment and economic inactivity levels.
- Associated with the projected level of economic growth, the Plan provides for an ambitious level of house building, enabling the maximisation of affordable housing provision.
- The impacts of these high levels of growth and development have the potential to have adverse environmental and social effects. These are addressed where possible by policies to minimise pollution and traffic increases, safeguard and provide open space, recreational and community facilities and conserve biodiversity and the countryside.

Equalities Impact Assessment

1.6.6 The SA has addressed equalities issues through the Community Cohesion and Health and Wellbeing topics including the need to ensure that all sections of society should benefit from improved health and wellbeing and that inequalities should be reduced through addressing poverty issues. The LDP policies and proposals were assessed in terms of the following objectives and questions relevant to equalities issues:

- SA Objective 6A: Improve social inclusion and minimise the incidence of social exclusion by addressing the causes of social exclusion.

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- Will the proposed strategy/policy/proposal ensure provision of and access for all to a wide variety of experiences and social and cultural resources?
- Will the proposed strategy/policy/proposal encourage and support intra and intergenerational community participation?
- SA Objective 7A: Improve physical and mental health outcomes for all.
 - Will the proposed strategy/policy/proposal enhance and maintain optimum levels of appropriate public health and care services accessible to all?
- SA Objective 7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.
 - Will the proposed strategy/policy/proposal create a clean, safe, high quality physical environment that promotes physical and mental wellbeing for all?
 - Will the proposed strategy/policy/proposal improve accessibility of and to key services such as shops and medical services as well as employment and education and reduce inequalities in access?
- SA Objective 7C: Reduce/minimise incidence and impacts of poverty by addressing the causes and consequences of poverty.
 - Will the proposed strategy/policy/proposal ensure that basic needs such as food, safety and shelter are met, are appropriate to the needs of individuals and support a sustainable way of living and working?
 - Will the proposed strategy/policy/proposal break the cycle of deprivation?

1.6.7 This analysis has resulted in the identification of the following main points relating to the potential impacts of the Plan which have been addressed where possible in the Plan's policies:

- The Plan relates to the use and development of land and for the most part the proposals do not draw any distinctions between different groups in society but relate to spatial distributions, actively seeking where possible to ensure that

disadvantaged areas are improved and spatial differences addressed rather than considering specific groups in society. Within Neath Port Talbot, there are no identified spatial concentrations of any particular societal groups that would be disadvantaged through this approach.

- An exception to this general approach is made in relation to Gypsies and Travellers, where specific provision is made for additional new pitches to meet the identified need, and allowance is made for specific lifestyle requirements in policy relating to dealing with associated applications. These provision are in accordance with national policy and guidance and are considered to deal appropriately with the requirements of Gypsy and Traveller groups without causing significant harm to other groups.
- There are concerns that significant development within areas where the Welsh language is an important part of everyday life may have a detrimental effect on its use and importance by encouraging an influx of non-Welsh speakers. This is addressed in more detail by the Welsh Language Impact Assessment. However, in drawing up policies to address concerns about the Welsh Language it has been important to ensure that non Welsh speaking people and groups do not suffer discrimination, for example by being prevented from moving to a particular area. This is considered in more detail as part of the Welsh Language Impact Assessment (see below).
- Policies and proposals relating to economic development are considered to be appropriate in terms of seeking to maximise job creation and to enhance the economy of the area, helping to provide additional jobs and to address poverty and inequality.
- In terms of detailed design, the SA has highlighted concerns about ensuring accessibility for all groups both to facilities amenities and services in particular areas and to individual sites and buildings. Plan policies relating to the development of a sustainable settlement hierarchy, with improved linkages by a range of modes, and improved distribution of services, facilities and amenities help to address the wider issue, although some aspects (such as the strategy for the provision of health care) cannot be addressed directly. The issue of access to specific sites and buildings and the achievement of 'inclusive' design is addressed by the design policy, although internal detailed design issues are covered by other regulations.

Welsh Language Impact Assessment

1.6.8 The extent to which the Welsh language is an important part of everyday life and the social fabric of communities differs across the County Borough, but in some areas it plays a central role. The SA has assessed the impact of the Plan's policies and proposals as part of the Community Cohesion topic, through the following objective and question:

- SA Objective 6B: Protect and enhance the culture and character of local communities.
 - Will the proposed strategy/policy/proposal protect, enhance and support the use and development of the Welsh language?

1.6.9 Although this question has been applied to all the policies and proposals in the Plan, the extent to which new developments and Plan policies can influence the use of Welsh in areas where there is little use of the language is very limited. However, in the identified Welsh speaking areas, new developments and Plan policies can have a significant effect on use of the language, in particular when people are encouraged to move to new housing developments from elsewhere, bringing the potential for an influx of non Welsh speakers. In such areas, the SA has raised concerns about possible impacts in relation to some proposals. The following measures have been incorporated into the Plan to address these concerns where possible:

- The County Borough's main language sensitive areas have been identified, where 25% or more of the population speak the language.
- Limited new residential accommodation is proposed for many of these areas.
- A policy has been incorporated into the Plan requiring developers to submit a Language Action Plan where the proposal is for more than 10 dwellings; retail development of 1000 sqm or more; or commercial or industrial development.
- Measures suggested to address concerns about impacts on the language include providing funding for Welsh medium schools, facilities for Welsh speakers and learners and the requirement for a Welsh language service within any commercial development.

1.6.10 It is considered that these measures will effectively address concerns about impacts on the language in language sensitive areas, while ensuring that no one is unfairly discriminated against.

1.7 Monitoring

1.7.1 The Planning and Compulsory Purchase Act requires authorities to keep under review those matters that may affect the planning and development of their areas. Monitoring is an increasingly important aspect of evidence based policy making and monitoring systems are key mechanisms in developing a fuller understanding of the issues that impact upon communities and the environment and the extent to which existing policies are meeting their stated objectives leading to more effective future policy formulation.

1.7.2 Furthermore, there is also a requirement for monitoring of the SA providing a check of LDP implementation on sustainability development. The specific requirements of the SEA Regulations on monitoring are to *'monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage'*.

1.7.3 Whilst the sustainability framework is a good starting point for developing targets and indicators for monitoring, it must be acknowledged that monitoring for the SA can be part of the wider monitoring process for the LDP. The SEA Regulations identify that *'...monitoring for SEA can be incorporated into other monitoring arrangements and therefore it may be possible to combine with the annual monitoring proposals for the LDP'*.

1.7.4 In light of this, the Monitoring Framework developed for the LDP incorporates the SA objectives and therefore combines the monitoring requirements of both the SA and LDP. Monitoring will commence once the LDP has been adopted.

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2 Introduction

2.0.1 This report is the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), of the Deposit Local Development Plan (LDP).

2.0.2 SA is the process by which the influence that a land use plan would have over development and change is assessed according to the Plan's likely contribution to environmental, economic and social objectives. SA is defined as *'a systematic and iterative process undertaken during the preparation (and review) of a plan which identifies and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these'*⁽⁴⁾.

2.0.3 The need for SEA arises from the European Union Directive⁽⁵⁾ on the assessment of the effects of certain plans and programmes on the environment. The SEA Directive requires environmental assessment during production of certain plans and programmes which are likely to have significant effects on the environment.

2.0.4 With the SA focusing on social and economic issues and the SEA focusing on the environment, the appraisal has been completed as a single process. Therefore, the term SA is used jointly for all references in this report and should be taken to include the requirements of the SEA Regulations.

2.1 Purpose of the Sustainability Appraisal

2.1.1 Neath Port Talbot County Borough Council, as Local Planning Authority (LPA), has published its Deposit Local Development Plan (LDP), in accordance with the Planning and Compulsory Purchase Act 2004. The Welsh Government (WG) in its guidance on the preparation of LDPs highlights that a key task is contributing to Sustainable Development. LPAs preparing LDPs are required to undertake a Sustainability Appraisal of the LDP to assess whether sustainability issues have been adequately addressed – i.e. to ensure that decisions are made in line with the principles of sustainable development.

4 LDP Wales - Welsh Government.

5 European Union Directive 2001/42/EC.

2 . Introduction

2.1.2 The SA incorporates a Strategic Environmental Assessment (to comply with the European Strategic Environmental Assessment Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004). It also considers impacts on health, equalities and the Welsh Language as part of a coordinated appraisal.

2.1.3 Sustainability Appraisal is an ongoing 'iterative' process that has assessed the Plan as it emerged and informed its preparation. The SA Scoping Document (giving the background to the SA process, baseline information and framework for the appraisal) was prepared in 2010 and made available for public consultation. Following this consultation, amendments were made and incorporated into the SA and revised Scoping Report and all aspects of the emerging 'Pre-Deposit' LDP were appraised following the published methodology. The Pre-Deposit LDP (setting out the Council's Preferred Strategy including growth and spatial strategies) was published for consultation in September 2011 together with the SA Interim Report which detailed the assessments undertaken and made recommendations. Comments received in regard to the SA Interim Report have been taken into account in the ongoing appraisal of the Deposit Plan and are incorporated into this document which details all the appraisals undertaken, the conclusions reached and the recommendations in relation to the Deposit Plan.

2.1.4 The purpose of the SA is to:

- Assess how effectively each strategy, policy or proposal within the LDP and the Plan as a whole has addressed sustainability and environmental issues;
- Highlight any issues and concerns and make recommendations about how these can be addressed; and
- Assess the effectiveness of the LDP in addressing health, equality and Welsh language issues within the County Borough.

2.1.5 All elements of the Deposit LDP have therefore been assessed to analyse:

- The impacts of each strategy, policy or proposal - short, medium or long term, positive or negative;

- The cumulative effects of each strategy, policy and proposal; and
- The cumulative effects of the LDP as a whole in relation to the key sustainability and environmental issues identified in the Sustainability Appraisal Scoping Document.

2.2 SA Stages & Compliance with the Regulations / Guidance

2.2.1 The requirements and guidance concerning the preparation of the SA are set out in the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (LDP) (Wales) Regulations 2005 and associated guidance. The requirements concerning the preparation of the SEA are set out in the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

2.2.2 The SA has been integrated into the Plan preparation process. As a result, sustainability principles have been applied from the outset and rather than producing 'end of plan' changes, the SA has influenced the decisions taken as the strategy and policies have developed. The table below sets out the main stages of the SA in relation to the Plan preparation process.

Table 2.2.1 SA and LDP Main Stages

LDP Stages	Sustainability Appraisal Stages and Tasks
1. Evidence Gathering	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
	A1: Review other relevant policies, plans and programmes and sustainability objectives A2: Collecting baseline information A3: Identify sustainability issues and problems A4: Developing the SA Framework A5: Prepare and Consult on the SA scoping report
2. Strategic Options and Preferred Strategy	Stage B: Developing and refining options and assessing effects
Preparation of LDP Pre-Deposit Plan (Preferred Strategy)	B1: Testing the objectives against the SA Framework B2: Developing the options B3: Predicting the effects

2 . Introduction

LDP Stages	Sustainability Appraisal Stages and Tasks
	<p>B4: Evaluating the effects</p> <p>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the LDP</p>
	Stage C: Preparing the Sustainability Report
	C1: Preparing the Sustainability Appraisal Interim Report
3. Public Consultation on LDP Preferred Strategy	<p>Stage D:</p> <p>D1(i): Public Consultation on SA Interim Report</p>
4. LDP Deposit Plan preparation	<p>D2(i): Appraising significant changes from consultation</p> <p>D3(i): Making decisions and providing information</p>
5. Public consultation on Deposit LDP	D1(ii): Public Consultation on SA Report
6. Submission, examination and adoption	<p>D2(ii): Appraising significant changes resulting from representations</p> <p>D3(ii): Adoption statement and finalised SA Report</p>
7: Monitoring and Review	Stage E Monitoring the significant effects of implementing the LDP
	<p>E1: Developing aims and methods for monitoring</p> <p>E2: Responding to adverse effects</p>

2.2.3 To date, the Council has published the following SA reports, both of which are available on the Council's website:

- **SA Scoping Report (February 2011)** - which established the sustainability baseline of the County Borough, contained a review of other relevant plans and programmes that may influence the SA and LDP, presented the SA Objectives and outlined the proposed methodology for the SA.
- **SA of the Pre-Deposit LDP Interim Report (September 2011)** - which accompanied the publication of the Pre-Deposit Plan and contained detailed assessments of the LDP Preferred Strategy, including the options for the level of growth, the Plan's vision, objectives, preferred strategies and strategic policies.

2.2.4 In parallel with the LDP, both reports were the subject of consultation and the responses from the consultees were taken into account in moving forward with the SA.

2.2.5 The current document⁽⁶⁾ is being issued as part of the Deposit Plan public consultation [Stage 5 / SA Stage D1/(ii)].

2.2.6 The structure of the document incorporates the SEA regulations requirements, but the matters considered have been expanded to address social and economic matters including health, equalities and Welsh Language issues.

2.3 The Appraisal Methodology

2.3.1 A set of sustainability objectives has been developed for the SA. They cover a range of sustainability issues related to environmental, economic and social factors. The purpose of the objectives is to provide a consistent definition of sustainable development for the SA process and the emerging vision, objectives, strategy and policies / proposals of the LDP can then be assessed as part of the process of systematic appraisal.

2.3.2 The SA objectives (as amended following consultation) are set out in the table below.

Table 2.3.1 The SA Objectives

Topic		Objectives
1	Climate Change	1A: Ensure that all development takes into account likely future changes resulting from climate change (Adaptation). 1B: Achieve government targets for reducing greenhouse gas emissions (Mitigation). 1C: Make the area's appropriate contribution to national energy production (Mitigation).
2	Natural Resources and Waste	2A: Minimise loss or degradation of natural resources while ensuring that they are used only in a sustainable way. 2B: Maintain and improve the chemical and biological/ecological quality of natural resources. 2C: Minimise waste and reduce amounts of waste disposed of to landfill.

2 . Introduction

Topic		Objectives
3	Biodiversity and Geodiversity	<p>3A: Prevent any further net loss of biodiversity.</p> <p>3B: Exploit all reasonable opportunities to secure biodiversity enhancements.</p> <p>3C: Minimise adverse effects on designated geodiversity sites.</p>
4.	Landscape, Townscape and Historic Character	<p>4A: Protect and/or enhance the area's landscape and townscape.</p> <p>4B: Protect and/or enhance the area's historic environment including architectural and archaeological resources.</p>
5	Pollution (Air Quality, Noise and Light)	<p>5A: Achieve acceptable levels (meet national/European standards) of air quality throughout the County Borough.</p> <p>5B: Achieve acceptable noise levels and protect quiet areas throughout the County Borough.</p> <p>5C: Reduce light pollution.</p>
6	Community Cohesion	<p>6A: Improve social cohesion and minimise the incidence of social exclusion by addressing the causes of social exclusion.</p> <p>6B: Protect and enhance the culture and character of communities including cultural resources and Welsh language.</p>
7	Health and Wellbeing (including poverty/deprivation)	<p>7A: Improve physical and mental health outcomes for all.</p> <p>7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.</p> <p>7C: Reduce/minimise the incidence and impacts of poverty by addressing the causes and consequences of poverty.</p>
8	Economy	<p>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.</p> <p>8B: Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and the use of, local resources and environmental assets.</p> <p>8C: Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community.</p>

2.3.3 Sustainability principles generally and the SA objectives in particular have influenced the development of the LDP throughout the preparation process. The main elements of the Plan have also been assessed against the SA objectives and changes and amendments made as part of an iterative process. More details are given of the appraisal methodology in chapter 6.

2.3.4 This document is supported by a background paper, which is available on the LDP website: <http://www.npt.gov.uk/ldp>

2.4 Other Appraisals Incorporated in the SA

2.4.1 In addition to Sustainability Appraisal, the LDP has to be the subject of a Strategic Environmental Assessment (SEA) and also needs to be assessed in relation to equalities, health and the Welsh Language. Rather than treat these as separate, stand-alone exercises, the SA process has been extended to include them, reflecting the way the LDP has to integrate them into its decision-making.

Strategic Environmental Assessment

2.4.2 Strategic Environmental Assessment (SEA) focuses primarily on environmental issues. Under Schedule 2 of the SEA Regulations the Council is required to assess the likely significant effects of the LDP on: 'the environment, including such issues as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors including secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary positive and negative effects'.

2.4.3 The SEA is incorporated into the overall SA as an integral part of the appraisal. The issues listed in the SEA Directive are built into the SA by incorporating them within the SA topics, objectives and questions as outlined in the table below.

Table 2.4.1

SEA Directive Issues	SA Topic
Biodiversity	Topic 3: Biodiversity and Geodiversity
Population	Topic 6: Community Cohesion
Human Health	Topic 7: Health and Wellbeing
Fauna	Topic 3: Biodiversity and Geodiversity
Flora	Topic 3: Biodiversity and Geodiversity
Soil	Topic 2: Natural Resources and Waste

2 . Introduction

SEA Directive Issues	SA Topic
Water	Topic 2: Natural Resources and Waste
Air	Topic 5: Pollution (Air Quality, Noise and Light)
Climatic Factors	Topic 1: Climate Change
Material Assets	Topic 2: Natural Resources and Waste
Cultural Heritage (inc. Architectural and archaeological)	Topic 4: Landscape, Townscape and Historic Character and Topic 6: Community Cohesion
Landscape	Topic 4: Landscape, Townscape and Historic Character

Health Impact Assessment

2.4.4 The Health Impact Assessment (HIA), although not yet a legislative requirement, forms part of the SA. In Neath Port Talbot the HIA is of particular relevance as health and wellbeing issues are still a major concern. The purpose is therefore to assess whether the LDP has done enough to address health and wellbeing and in particular the health inequalities prevalent between different population groups and geographical areas.

Equalities Impact Assessment

2.4.5 By law (Equalities Act 2008) all activities of the Local Authority are subject to equality impact assessments. The purpose of this assessment is therefore to:

- Meet this legislative requirement;
- Identify whether any particular groups within the County Borough are adversely impacted upon by proposals within the LDP;
- Assess whether any negative or disproportionate impacts are acceptable; and
- Make recommendations of how these impacts can be mitigated or reversed.

Welsh Language Impact Assessment

2.4.6 Neath Port Talbot contains communities where the Welsh Language is a significant feature of community life. They principally include the Amman and Swansea valleys while lower percentages of Welsh speakers live in the Dulais, Neath

and AfanValleys. The emerging LDP strategies and proposals have been assessed in relation to their effects on the use of the Welsh language within communities and whether more can be done to address these issues.

2.4.7 Further details about these issues and the findings of the appraisal are given in Chapter 8.

2.5 The Habitats Regulations Appraisal

2.5.1 It is also necessary to undertake a separate appraisal of the LDP under the Habitats Regulations (Habitats Regulations Appraisal or HRA). The purpose of the HRA is similar to the SA in some ways (for example considering the likely impacts on biodiversity, flora and fauna), but specifically focusing on whether the LDP would be likely to create any significant effects on any biodiversity site that is of European importance (i.e. a Special Area of Conservation or Special Protection Area, including Ramsar sites). The Preparation of the HRA is a separate matter from the SA and is the subject of a separate document⁽⁷⁾.

2 . Introduction

3 Summary of LDP Strategy

LDP Structure

3.0.1 The LDP sets out the vision for the County Borough and how it will develop over the Plan period (2011 - 2026). The vision has guided the development of the strategy and the integrated set of policies contained within the Plan. It sets out how existing assets located along the urbanised coastal belt will be enhanced and utilised to improve the economic and social outlook for the whole area, while improving the general environment. The future role for the more rural parts of the County Borough is outlined together with the way that the economy and communities of the valleys will be supported and enhanced.

3.0.2 The LDP vision is delivered through a number of objectives which address the key issues facing the County Borough. The objectives are fundamental to the LDP and form the basis for policy development.

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

The Development Strategy

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

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

3 . Summary of LDP Strategy

3.0.6 In the 'Valleys' strategy area the scope for development is further reduced due to topography and access to the main arterial transport routes (rail and M4). The Valleys area is made up of five main valleys; the Afan, Amman, Dulais, Neath and Swansea (which includes the town of Pontardawe).

3.0.7 The LDP strategy takes a different approach for development within each of these two strategy areas of the County Borough.

3.0.8 The Development Strategy aims to:

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

3.0.9 This means:

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

3.0.10 The level of growth is based on an economic-led strategy which complements the approach being taken in the City and County of Swansea and addresses the key issues of Neath Port Talbot in order to achieve the LDP's vision and objectives. The chosen economic-led scenario is aspirational in its approach and aims to maximise job growth within the local economy. This method has enabled the Authority to forecast how economic changes over the Plan period equate to the requirements for employment land and the number of new homes needed to accommodate the projected

population and required labour supply. This is intended to ensure alignment between the employment and housing strategies and to result in a more sustainable pattern of development.

Population, Housing & Economic Growth

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

3.0.12 At the local level, economic growth has stagnated over the last 10 years. This has not been helped by the global recession. In order to meet the aspirations of the 15 year vision, key regeneration schemes and projects such as Harbourside, Coed Darcy Urban Village, Baglan Bay and land at Junction 38 (M4), Margam are intended to transform the area by redeveloping previously used, unsightly former industrial land.

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

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

3.0.15 Housing and employment allocations are supported by the identification of a retail hierarchy which reflects the function of centres in terms of their existing commercial role and retail offer.

Spatial Strategy

3.0.16 The towns of Neath and Port Talbot are identified as the settlements where there is the greatest potential for reducing the need to travel due to co-location of houses, jobs, shops, community facilities and public transport.

3 . Summary of LDP Strategy

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

3.0.18 The settlement strategy identifies communities that have sufficient capacity and resources to accommodate new development within designated boundaries. The identification of a settlement hierarchy seeks to provide a balanced approach to managing growth. Settlement limits are used to provide clarity of where development may be directed.

3.0.19 Based on recent trends and market focus, it is envisaged that the majority of investment will continue to be along the M4 Corridor, with demand in the Valley communities more limited. The strategy therefore focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development.

3.0.20 The legacy of past activities in the County Borough, mainly relating to heavy industry along the coastal corridor, has resulted in large areas of brownfield land (some of which is contaminated). In line with national policy, the Authority seeks to redevelop this land where possible first before encroaching into the open countryside.

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

3.0.22 The strategy provides a different approach in the Valleys where the identification of growth areas in recognition of their role as service hubs within the valley communities is intended to promote wider benefits that can filter through to other surrounding areas.

Social and Environmental Considerations

3.0.23 The LDP seeks to balance the need for development whilst minimising the potential for harm upon the environment. Protection measures include restricting development within the open countryside and within areas that pose a flood risk that cannot be mitigated against and protecting and enhancing the natural, historic and built environment and high value landscapes.

3.0.24 The main impacts on the landscape are likely to come from the exploitation of the County Borough's mineral and wind resource. These are all of national significance and the Welsh Government's policies require that they be safeguarded and exploited wherever appropriate. As they include large scale extraction and the development of large structures in the countryside, they will have major impacts on the landscape. The LDP identifies Special Landscape Areas aimed at protecting the County Borough's highest quality landscapes from harmful development.

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

3.0.26 In terms of the Welsh language, communities with a high proportion of Welsh speakers and where the language forms part of the cultural heritage have been identified as Language Sensitive Areas. In these areas the Plan seeks to take into account the implications of new development on the Welsh language.

3 . Summary of LDP Strategy

4 Policy Framework

4.0.1 Development of the LDP takes place within a framework of legislation and guidance and is informed by the objectives and aspirations of other plans, policies and programmes from international to local level. Although the Plan's direct influence will be restricted to the use and development of land and buildings, it has the potential to be an important tool for the implementation of a wide range of objectives contained in other plans and strategies. It is therefore important that the LDP reflects and implements these aspirations where appropriate.

4.0.2 Once adopted, the LDP will set the framework for the future development of the County Borough, setting out where and how new development will take place, how important areas and features will be conserved and enhanced and influencing how the society, economy and environment of the area changes in the future. The provisions of the Plan will be delivered through the planning applications system, with applications being determined in accordance with the provisions of the Plan unless material considerations indicate otherwise.

4.0.3 This chapter sets out the relationship between the LDP and other plans, policies and programmes at all levels, and indicates how the requirements of other plans, policies and programmes have been taken into account in the development of the Plan to date through the SA process.

4.1 Relationship with Other Plans, Policies & Programmes

4.1.1 One of the main objectives for the LDP system is to ensure policy integration: LDPs need to be internally consistent and to be integrated with other main policies and strategies at national, regional and local levels.

4.1.2 The Planning and Compulsory Purchase Act 2004 ⁽⁸⁾ requires local authorities to have regard to all national policies. Planning Policy Wales (PPW), Minerals Planning Policy Wales (MPPW) and a range of Technical Advice Notes (TANs) ⁽⁹⁾ set out the Welsh Government's planning policy, including principles and guidance concerning the production of development plans. The overarching policy framework is provided by the Wales Spatial Plan ⁽¹⁰⁾, and the LDP is required to have regard to both the Spatial Plan's vision and its propositions. The content of the guidance and policy is summarised in the Deposit Plan and its supporting topic and background papers.

8 Planning and Compulsory Purchase Act 2004 www.legislation.gov.uk

9 PPW, MPPW and TANs <http://wales.gov.uk/topics/planning/policy/?lang=en>

10 Wales Spatial Plan <http://wales.gov.uk/about/programmeforgovernment/strategy/spatial/?lang=en>

4 . Policy Framework

4.1.3 In addition, the LDP Regulations ⁽¹¹⁾ require that the Regional Transport Plan, the Regional Waste Plan and the Local Housing Strategy must be taken into account.

4.1.4 At the local level, the Council's Community Plan ⁽¹²⁾ provides the strategic policy framework for the local authority area, and the Community Plan vision and objectives have to be taken into account by the LDP and must inform development of the LDP's strategies and proposals. Incorporating the vision and guiding principles of the Community Plan, the Single Integrated Plan (SIP) (2013 - 2023) sets out the Council's vision for Neath Port Talbot. The Plan's vision is to *'Create a Neath Port Talbot where everyone has an equal opportunity to be healthier, happier, safer and prosperous'*.

4.1.5 In addition to these requirements there is a range of other plans and strategies at national, regional and local level that should be taken into account in the development of the LDP. Further details are given in the Deposit Plan document.

4.1.6 In relation to sustainability issues, the SA process is intended to ensure that the effects of the Plan on sustainability and environmental issues and objectives are fully taken into account, together with health, equalities and Welsh language impacts. In order to ensure that all relevant policy and guidance is considered, the SA framework has been developed following consideration of a wide range of international, European, National and Local legislation and policy.

4.2 International, European and UK / Welsh Government Requirements

4.2.1 A large number of international and European level conventions and directives set environmental and other objectives that national and local governments and planning regimes need to take account of. In turn, national UK and Welsh Governments produce a range of policy and objectives in addition to planning legislation and guidance that need to be taken account of and incorporated. The most relevant of these are identified and summarised in the SA Scoping Document under the various SA topic chapters.

4.2.2 Where appropriate, these aims and objectives have been taken into account in the process of development of the LDP, and this is explained and recorded in the Deposit Plan and supporting material. They have also been taken into account in the development of the SA Framework, as recorded in the SA Scoping Document and

11 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005
<http://www.legislation.gov.uk/wsi/2005/2839/contents/made>

12 Neath Port Talbot Community Plan <http://www.npt.gov.uk/default.aspx?page=632>

consequently in the appraisal of the Plan as it emerges. This should ensure that the Plan complies with and takes into account all relevant requirements and objectives as far as possible.

4 . Policy Framework

5 Neath Port Talbot Today & Future Trends

5.1 Current State of the Area

Climate Change

5.1.1 Addressing climate change is fundamental to sustainability. Two issues need to be addressed:

- The causes of climate change (the need to cut emissions of greenhouse gases that cause climate change);
- The consequences of climate change (the need to address the impact of the changes that will occur as a result of past emissions and other reasons).

5.1.2 NPT is important as an employment base nationally and within Swansea Bay, with some long established heavy industries (e.g. the steel industry). As a result, levels of emissions within NPT are high, but while new industrial processes may increase emissions, they may be beneficial in delivering wider sustainability improvements (e.g. reducing imports or displacing more damaging processes elsewhere).

5.1.3 Transport is a major contributor to greenhouse gas emissions, and the M4, A465 and local traffic all contribute. The County Borough contains some 62,000 dwellings and a whole variety of industrial, business and extractive activities. Both new development and the performance of existing buildings and activities are increasingly under scrutiny in respect of climate change impacts.

Causes of Climate Change

CO₂ Emissions⁽¹³⁾

5.1.4 Neath Port Talbot has the highest per capita emissions of CO₂ in Wales. Between 2005 and 2007, per capita CO₂ emissions increased from 55.4 tonnes to 60.8 tonnes, but then decreased to 44.4 tonnes by 2009. This high level of emissions appears to be mainly due to heavy industry, in particular steel production. Investment by Tata Steel in BOS gas recovery technology has resulted in a reduction in CO₂ emissions of 250,000 tonnes per annum, and this is partly reflected in the above figures.

13 [Local Authority Carbon Dioxide figures - Department of Energy and Climate Change](#)

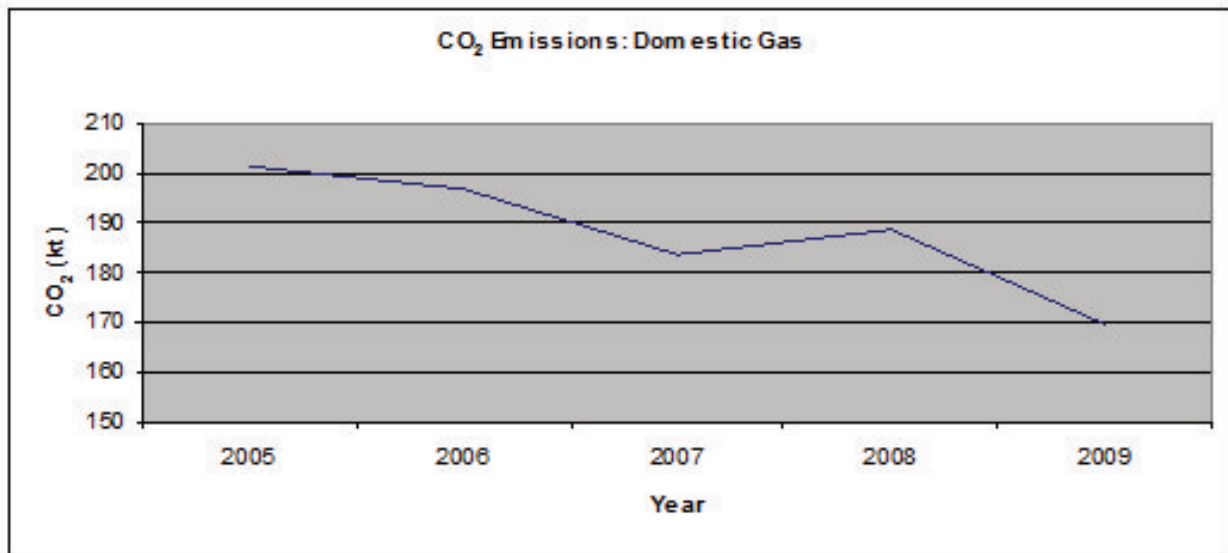
5 . Neath Port Talbot Today & Future Trends

5.1.5 There are significant amounts of carbon stored/locked up within the County Borough area, for example in soils (especially peat), trees, woodlands and forests, which may be released as a result of land use changes or development. This needs to be taken into account and protected where possible.

Gas Use⁽¹⁴⁾

5.1.6 There appears to have been a fall in domestic gas use in recent years, which may be due to improved domestic insulation and boiler efficiency.

Figure 5.1



5.1.7 There has also been a general reduction in CO₂ emissions from the use of commercial gas since 2000, although there was an upward trend in 2005/2006.

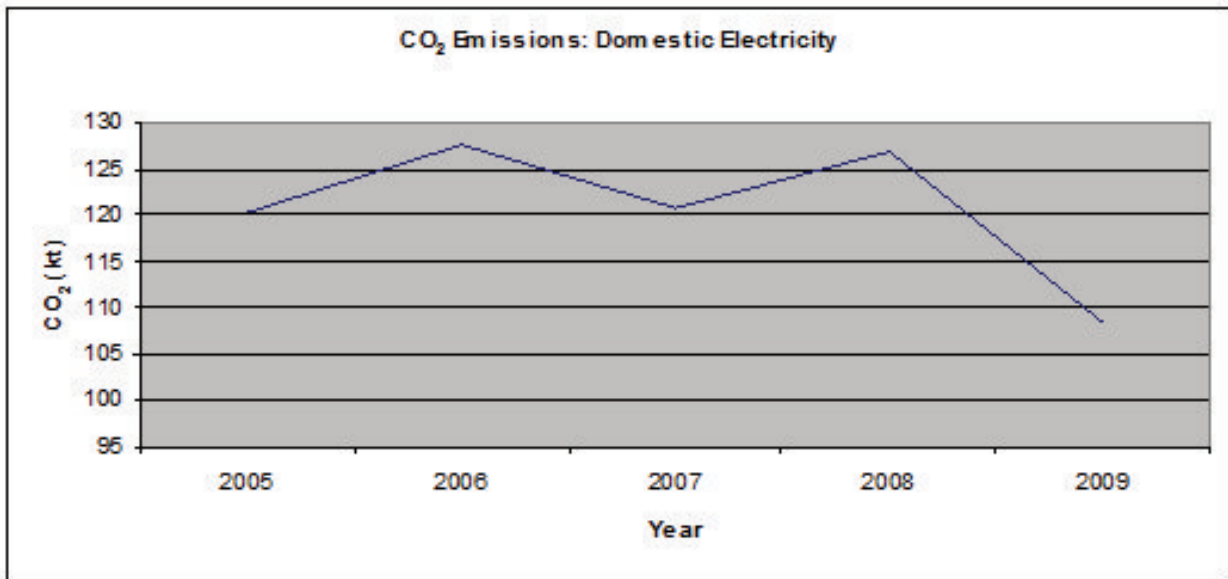
Electricity Use⁽¹⁵⁾

5.1.8 Emissions from domestic electricity use have fluctuated over recent years, but there was a notable reduction in 2009.

14 [Local Authority Carbon Dioxide figures - Department of Energy and Climate Change](#)

15 [Local Authority Carbon Dioxide figures - Department of Energy and Climate Change](#)

Figure 5.2

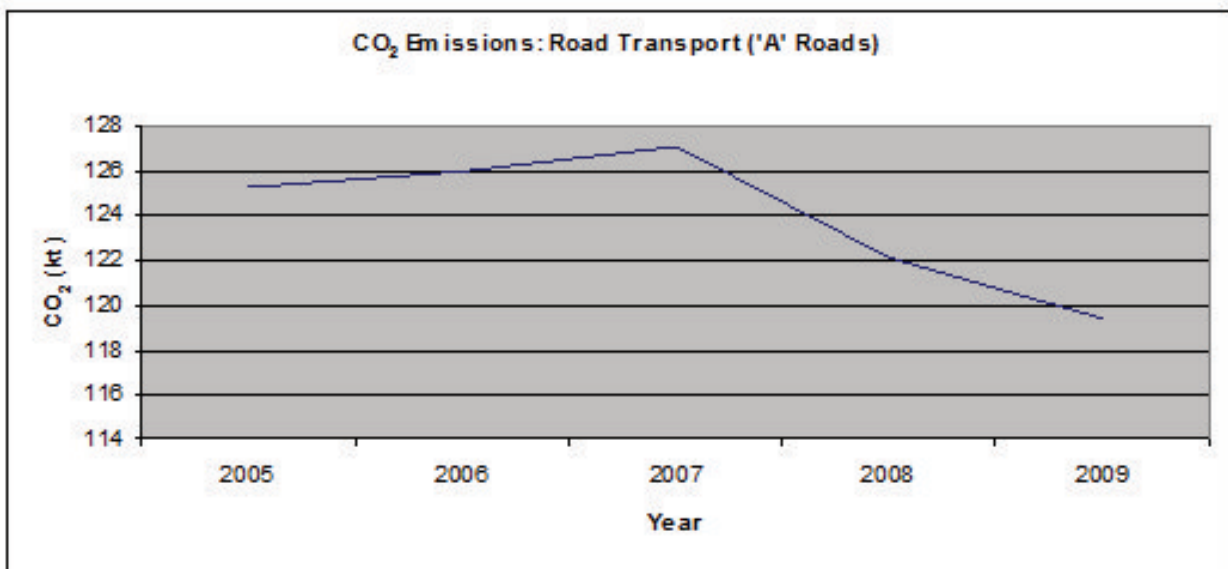


5.1.9 Industrial and commercial figures indicate a similar pattern, with a gradual decline in emissions becoming more pronounced in 2009.

Transport

5.1.10 Improvements are continually being made to vehicle design, improving efficiency and developing the potential of alternative fuels. However, growth in traffic and vehicle use may still result in a greater impact overall.

Figure 5.3



5 . Neath Port Talbot Today & Future Trends

5.1.11 Figures for road transport indicate a general decline in emissions in 2008 and 2009 which may be partly as a result of the above improvements, but are likely to be affected also by the economic slowdown.

5.1.12 The LDP will play a particular role in reducing transport emissions, in relation to the location of new development, its accessibility by a range of transport options and reducing the need to travel. There is potential for the electrification of the main line railway to London, which could result in a significant improvement in emissions, depending on the means used for electricity generation.

Buildings

5.1.13 New development (housing and other buildings) will be increasingly required to improve their environmental performance through planning and building regulations.

Consequences of Climate Change

Flood Risk

5.1.14 Most of Neath Port Talbot's population lives in areas along the coast or along valley floors. The Environment Agency's Flood Map shows flood zones, some flood defences, areas benefiting from flood defences and flood storage areas. Flood Zone 3 is the Agency's best estimate of the areas of land with a 1% (1 in 100), or greater, chance of flooding each year from rivers, or with a 0.5% (1 in 200) chance, or greater, of flooding each year from the sea and Flood Zone 2 is the Agency's best estimate of the areas of land between Zone 3 and the extent of the flood from rivers/from the sea/from rivers and, or the sea with a 0.1% (1 in 1000) chance of flooding in any year.

5.1.15 The Welsh Government also issues development advice maps in conjunction with the advice in TAN15 which identify areas at risk from flooding. These zones (zones C1 and C2 – see Map 5.38 in Section 5.3 below) include significant areas that are centres of population. Indications are that flooding events will become more frequent in the future as a result of climate change.

5.1.16 The Environment Agency also prepares and oversees a number of plans and strategies that address changes in the water environment (and the associated risks). These include Catchment Flood Management Plans, Shoreline Management Plans, and River Basin Management Plans, which each propose or are likely to propose measures to address risks from climate change that will have to be taken into account.

5.1.17 In relation to climate change, the Shoreline Management Plan (SMP2)⁽¹⁶⁾ identifies alternative ways of managing coastal protection, to be applied to each stretch of the shoreline for 3 future time periods (short term (up to 20 years), medium term (20 to 50 years) and long term (50 to 100 years)). The options are to hold the existing defence line; advance the existing defence line; managed realignment; and no active intervention. Most of Neath Port Talbot's coastline is to be defended as at present ('hold the existing defence line') for all three time periods, with areas of dunes at Crymlyn Burrows and Baglan Bay being identified for managed realignment over all three time periods.

5.1.18 Neath Port Talbot is covered mainly by the Ogmore to Tawe Catchment Flood Management Plan⁽¹⁷⁾, although a very small area is covered by the Loughor to Taf CFMP. The Ogmore to Tawe plan identifies main areas of flood risk in Resolven, Glynneath, Neath town centre, Aberafan, Port Talbot, Cwmafan, Taibach and Margam. The CFMP aims to identify the most sustainable way of managing flood risk and has put forward policies for different parts of the CFMP area.

5.1.19 In relation to Neath Port Talbot, the relevant Catchment Abstraction Management Strategies⁽¹⁸⁾ indicate that there is generally no water available for additional abstractions from local water courses in the relevant catchments of the County Borough (See Resources and Waste section below). It is indicated that careful management will be necessary in order to continue to meet demand taking into account the likely effects of climate change. However, the majority of the public water supply to the Neath Port Talbot area is drawn from the Afon Tywi in Carmarthenshire. Dwr Cymru/Welsh Water's draft Water Resources Management Plan ⁽¹⁹⁾ indicates that there are no anticipated problems in water supply in the Tywi Conjunctive Use System Water Resource Zone and that there is adequate 'headroom' for anticipated future demand.

Resources and Waste

Water Quality

16 [Swansea Bay and Carmarthen Bay Shoreline Management Plan](#)

17 [Catchment Flood Management Plans \(Environment Agency Wales \(EAW\)\)](#)

18 [The Tawe, Loughor and Gower Catchment Abstraction Management Strategy \(EAW 2007\); The Neath, Afan and Ogmore Catchment Abstraction Management Strategy \(EAW Consultation Document 2005\)](#)

19 [Revised draft Water Resources Management Plan \(Dwr Cymru/Welsh Water Oct 2011\)](#)

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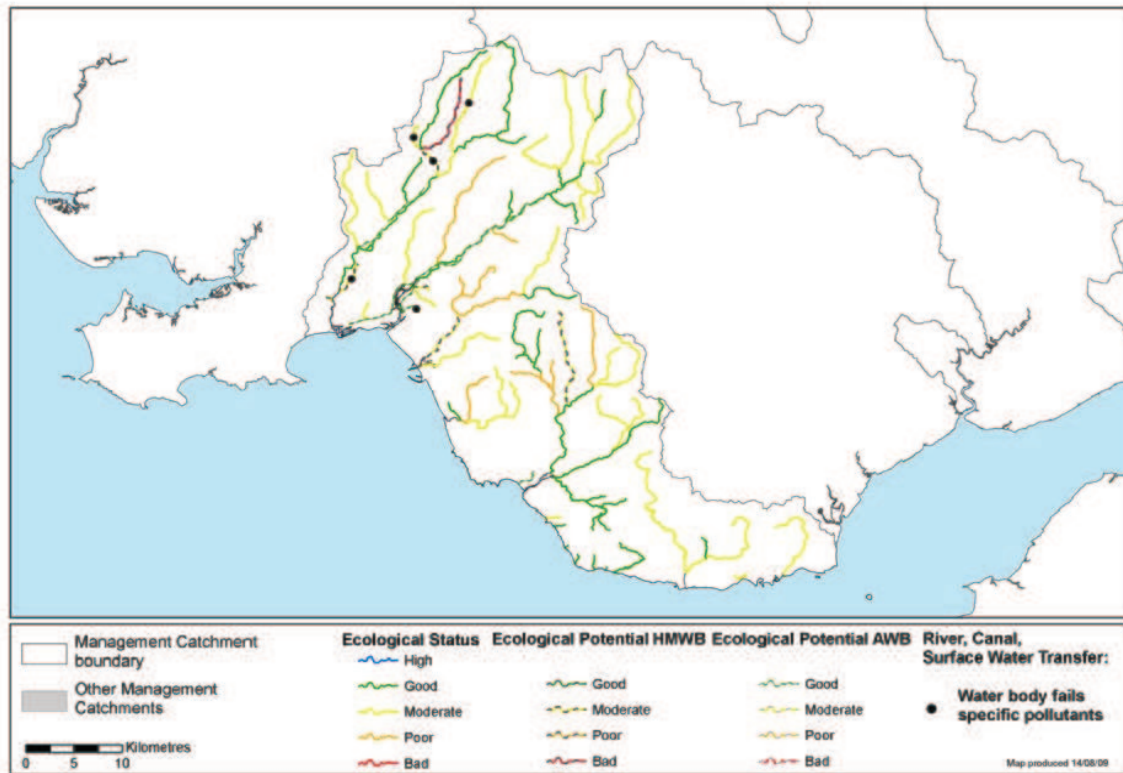
5.1.20 Chemical and biological water quality in the County Borough's rivers has fluctuated in recent years with no clear overall improvement or deterioration trends. The ecological quality of rivers in the western Wales river basin district is shown in Map 5.1 below. Current ecological status is shown, together with ecological potential for heavily modified water bodies (HMWB) and artificial water bodies (AWB).

5.1.21 Ecological classification comprises the following elements:

- The condition of biological elements, for example fish;
- Concentrations of supporting physico-chemical elements, for example the oxygen or ammonia levels;
- Concentrations of specific pollutants, for example copper;
- And for high status, largely undisturbed hydromorphology.

5.1.22 The Western Wales River Basin Management Plan⁽²⁰⁾ indicates that key pressures in the catchment will be addressed through local actions and that those waters in the worst state will be prioritised. This will require an integrated multi-organisation approach. Map 5.1 indicates current ecological status/ potential of surface waters in the Ogmore to Tawe catchment.

Map 5.1 Current Ecological Status/potential of surface waters in the Ogmore to Tawe Catchment (Western Wales RBMP 2009)



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Water Quality Objectives

5.1.23 One of the objectives of the Water Framework Directive⁽²¹⁾ is to aim to achieve good status in water bodies by 2015. However, it will not be possible to meet this objective for 64% of water bodies since greater improvement in status is limited by current understanding of causes and actions required to tackle the problems.

5.1.24 For the Ogmore to Tawe catchment, the River Basin Management Plan⁽²²⁾ identifies the following objectives:

Table 5.1.1 River Basin Management Plan Objectives

River and lake water bodies	Now	2015
-----------------------------	-----	------

21 [EU Water Framework Directive \(Directive 2000/ 60/ EC\)](#)

22 [Western Wales River Basin Management Plan \(Environment Agency Wales 2009\)](#).

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% at good ecological status or potential	37	49
% assessed at good or high biological status (52 water bodies assessed)	40	57
% assessed at good chemical status (12 water bodies assessed)	75	75
% at good status overall (chemical and ecological)	34	46
% improving for one or more element in rivers		21

5.1.25 In relation to bathing water quality, Aberafan Beach is considered likely to meet good bathing water quality standards in 8 out of 10 bathing seasons on average and achieves Blue Flag status. The EU Bathing Waters Directive sets a number of microbiological and physio-chemical standards that bathing waters must either comply with (“mandatory” standards) or endeavour to meet (“guideline” standards).

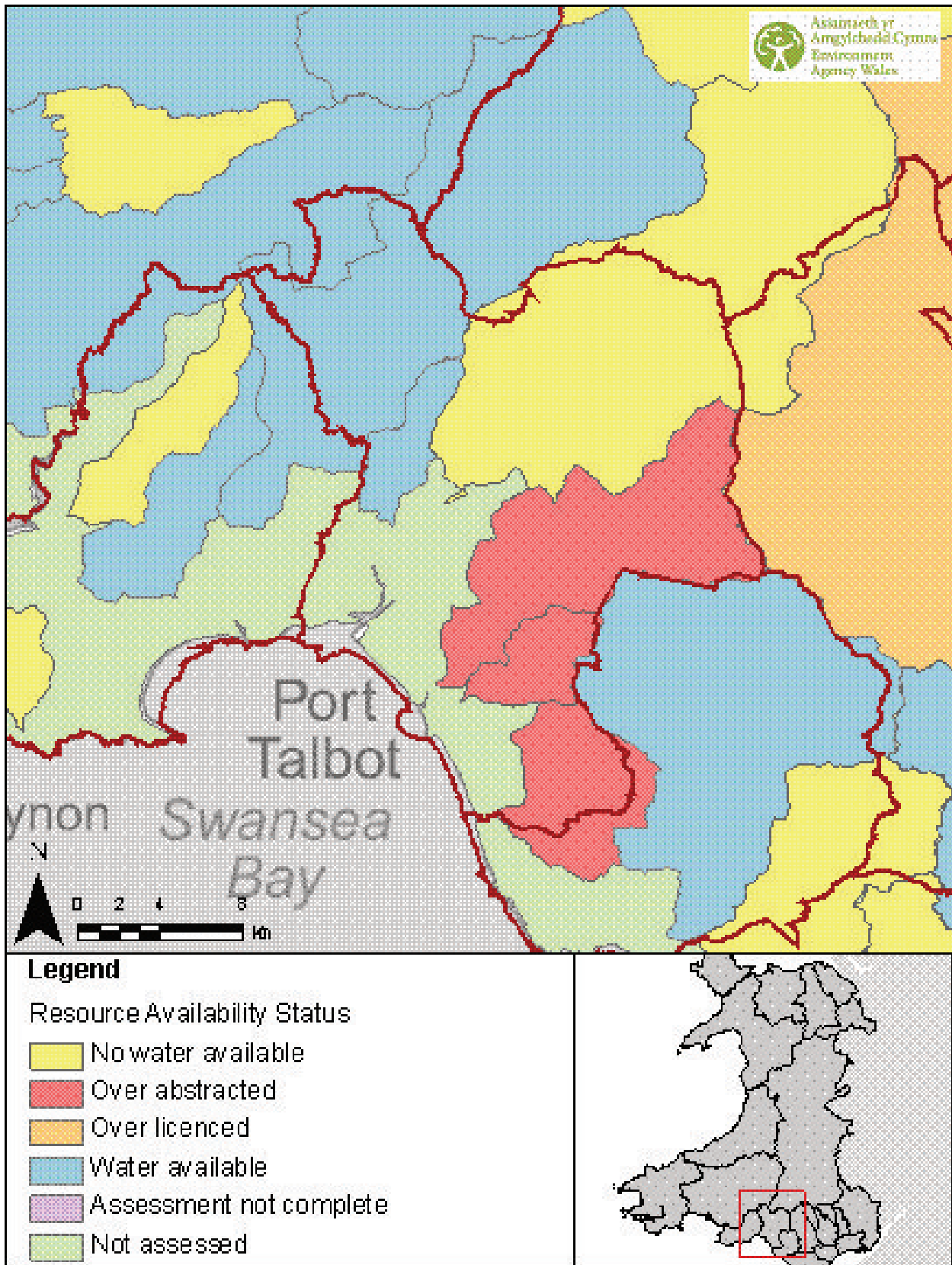
Water Availability

5.1.26 Map 5.2 below gives information from the relevant Catchment Abstraction Management Strategies⁽²³⁾ indicates that there is a general shortage of water available for abstraction in the relevant catchments of the County Borough. Both the Afan and Neath rivers are experiencing considerable pressures due to historic licences of key industries, while the Neath, Tennant and Swansea canals also provide water for industrial use. As a result of likely climate change, water availability during summer months is likely to become more problematic and potential impacts on river and watercourse hydrology and ecology need to be considered, as well as possible shortages of supply for domestic or industrial use.

23 [The Tawe, Loughor and Gower Catchment Abstraction Management Strategy \(EAW 2007\);The Neath, Afan and Ogmore Catchment Abstraction Management Strategy \(EAW Consultation Document 2005\)](#)

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Map 5.2 Water Abstraction Availability



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5.1.27 However, in relation to the public water supply the County Borough is primarily supplied from the Tywi Conjunctive Use System. The river Tywi is impounded at Llyn Brienne, north of Llandovery and water is abstracted at Nantgaredig (east of Carmarthen) from where it is pumped 17 miles to Felindre Water Treatment Works (north of Swansea). After treatment, a population of approximately 400,000 (together with industry etc) in an area extending from Carmarthen to the Vale of Glamorgan is supplied. Additional supplies to the upper parts of Neath, Afan and Tawe Valleys are provided from the Ystradfellte Impounding Reservoir and Crai Impounding Reservoir.

5.1.28 Dwr Cymru/Welsh Water's draft Water Resources Management Plan ⁽²⁴⁾ indicates that there are no anticipated problems in water supply in the Tywi Conjunctive Use System Water Resource Zone and that there is adequate 'headroom' for anticipated future demand.

Soils

5.1.29 Soils are essential for plant growth, the support of habitats and the provision of environmental services (in particular clean water and the storage of carbon), are a source of materials and minerals and are integral to the landscape.

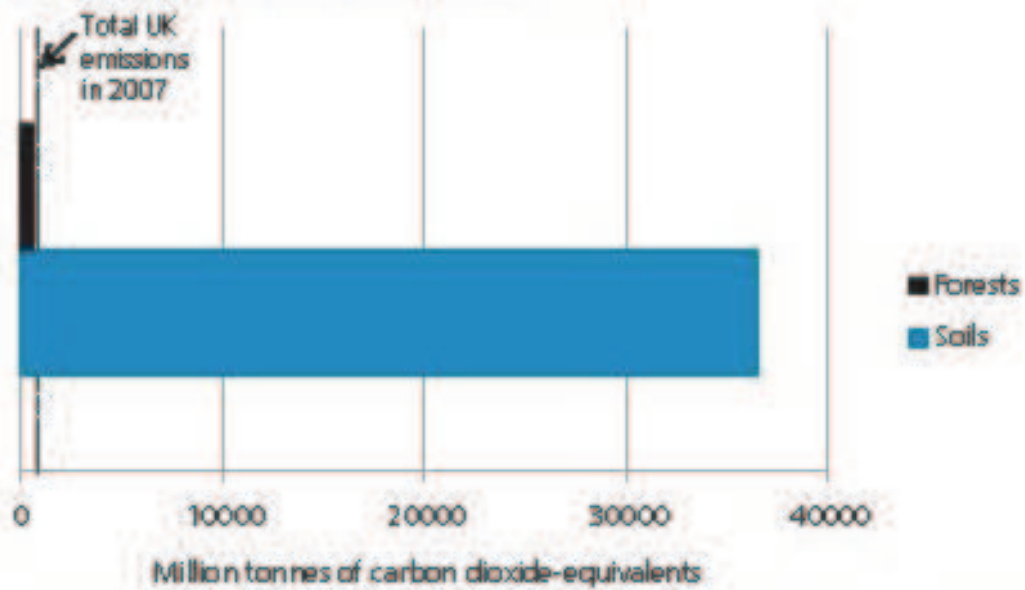
5.1.30 Within Wales, soil holds 9 times the amount of carbon that is stored in vegetation. Over 80% of this carbon is associated with our upland and grassland soils including peat soils. The total Welsh stock of carbon in soil and vegetation has been estimated to be in the order of 450-500 MtC (million tonnes of carbon).⁽²⁵⁾ It is important to minimise losses of this carbon in order to minimise the release of carbon to the atmosphere, with consequent effects on climate change. Figure 5.4 below indicates the carbon stored in UK forests and soils.⁽²⁶⁾

24 [Revised draft Water Resources Management Plan \(Dwr Cymru/Welsh Water Oct 2011\)](#)

25 [Welsh Soils Action Plan Consultation \(WAG 2008\)](#)

26 [EU Thematic Strategy for Soil Protection \(COM \(2006\) 231](#)

Figure 5.4 Carbon Stored in UK Forests and Soils

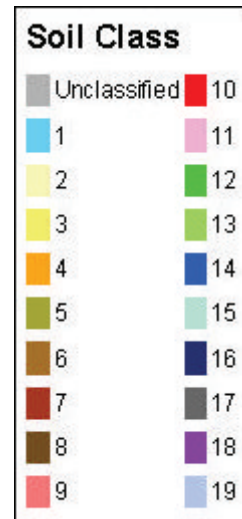
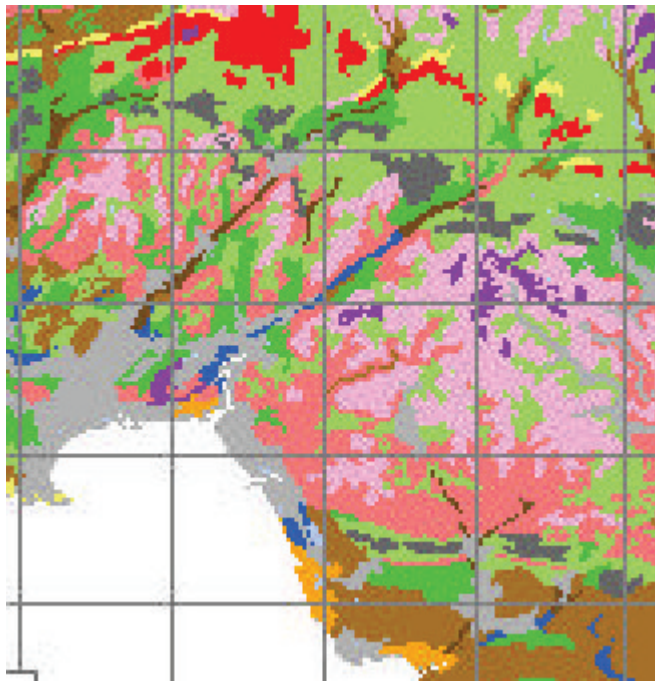


5.1.31 As can be seen from Map 5.3.⁽²⁷⁾ good quality soils for agricultural purposes are largely concentrated in south and east of the County Borough area (see (in particular in the Margam area where there are well drained loamy soils), while soils in the upland areas are agriculturally poor. However, poorer quality soils can often be important in supporting valuable habitats.

27 [Critical Appraisal of State and Pressures and Controls on the Sustainable use of Soils in Wales \(Final Report to Welsh Assembly Government 2002\)](#)

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Map 5.3 Extract from National Soil Map of Wales



Legend to the Simplified National Soil Map for Wales

1	Saltmarsh soils
2	Shallow acid peaty soils over rock
3	Shallow soils over limestone
4	Sand dune soils
5	Slowly permeable clayey soils over mudstone
6	Well drained loamy soils
7	Well drained sandy soils
8	Well drained soils in floodplains
9	Well drained acid loamy soils over rock
10	Well drained very acid loamy and sandy soils
11	Loamy acid permeable soils with a wet peaty surface
12	Slowly permeable, seasonally wet, loamy and clayey soils
13	Slowly permeable wet acid soils with a peaty surface
14	Stoneless loamy and clayey soils with high groundwater

15	Stoneless loamy and clayey coastal soils with high groundwater
16	Permeable sandy and loamy soils with naturally high groundwater
17	Restored soils
18	Deep acid peat soils
	<i>Unclassified soils: mostly built land Urban and industrial land</i>

5.1.32 The coal, oil, petrochemical and metal manufacturing industries, which have dominated the area’s economy and employment, have suffered substantial contraction or restructuring over recent decades. Significant areas of ‘brownfield’ land have therefore become available for redevelopment in recent years, including the former BP Llandarcy Refinery (i.e. The Coed Darcy Urban Village) and parts of the former BP Chemicals site which now is part of the Baglan Bay development. These sites require extensive remedial measures to allow the safe reuse of the land, which is on-going. However, on many sites remediation is often only achieved as part of the redevelopment of the site.

Waste

5.1.33 Active waste management sites are shown in Map 5.4 overleaf.⁽²⁸⁾ This includes all categories of sites, but of particular note are the licensed landfill sites (also shown on Map 5.5) at Morfa within the Corus site (map labels 20 & 21), at Giants Grave (22) (designated as a contingency site and not currently operational) and at Pwllfawatkin (9 & 24). There are civic amenity sites at Pwllfawatkin (10), Cymmer (11) and Briton Ferry (18).

5.1.34 Waste from Neath Port Talbot is processed at the Materials Recovery and Energy Centre (MREC) at Crymlyn Burrows (27), where it is sorted and if possible recycled or composted, with some incineration and energy recovery. The remaining residual waste is sent for landfill at the Pwllfawatkin site.

5.1.35 The Regional Waste Plan⁽²⁹⁾ estimates that the South West Wales region has a current need for new hazardous and inert waste landfill capacity, but will not need any new non-hazardous waste landfill capacity up to 2013.

28 Environment Agency Wales Local Evidence Package Neath Port Talbot 12/02/0000209
 29 [South West Wales Regional Waste Plan \(1st Review\)](#)

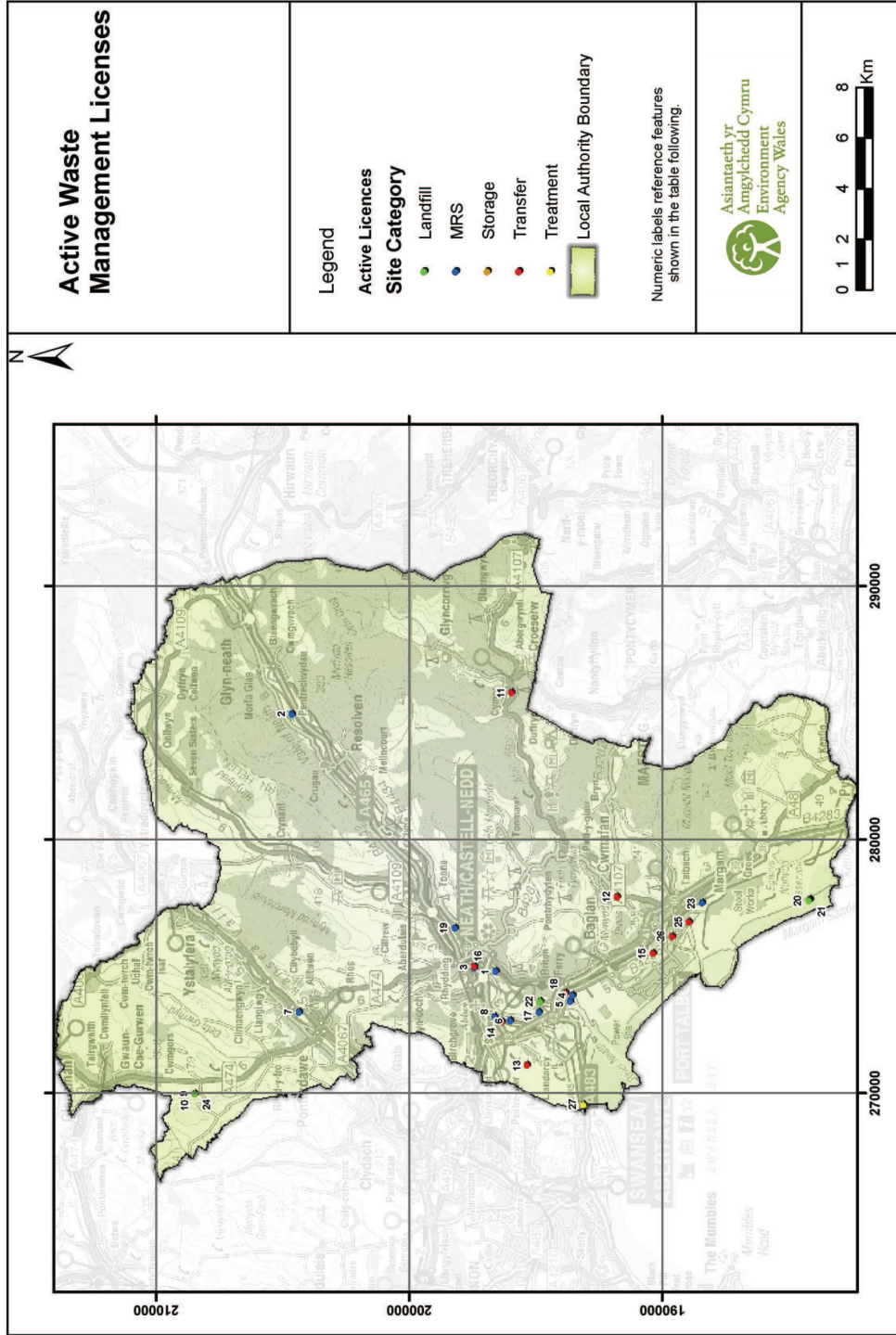
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5.1.36 The estimated total land area required in the region for new in-building facilities by 2013 ranges between 60 hectares and 85.2 hectares depending on the option chosen for dealing with the waste. The LDP will need to address whether landfill and waste treatment and collection facilities are adequate.

5.1.37 In Neath Port Talbot, the percentage of waste recycled/reused/composted increased from 23% to 47% between 2006 and 2011, while total municipal waste arisings have decreased from 24.3 thousand tonnes to 21.7 thousand tonnes in the same period. Residential household waste generated per person has consequently decreased in this period from 135 to 54 kilograms per person.⁽³⁰⁾

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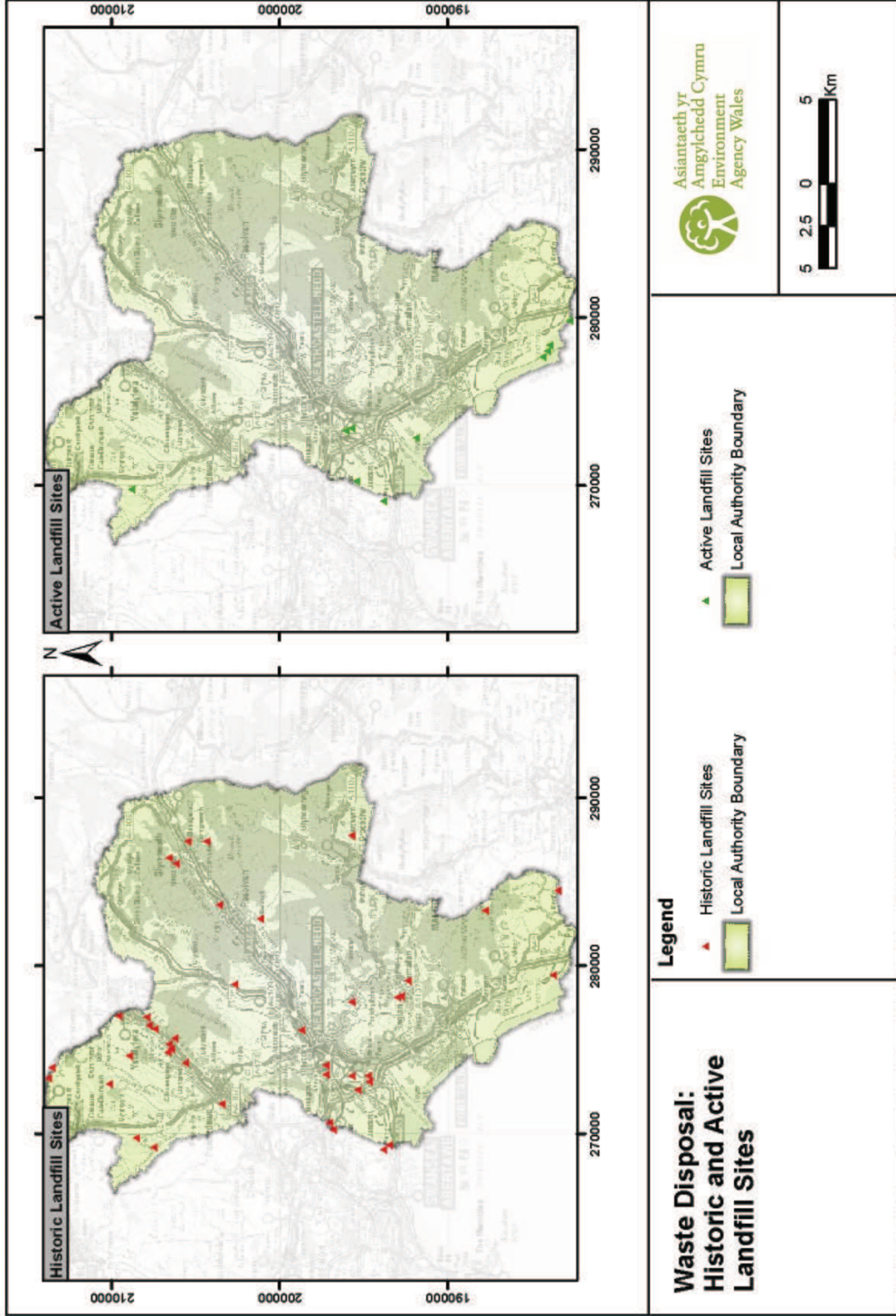
Map 5.4 Active Waste Management Licenses



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Map 5.5 Waste Disposal: Historic and Active Landfill Sites



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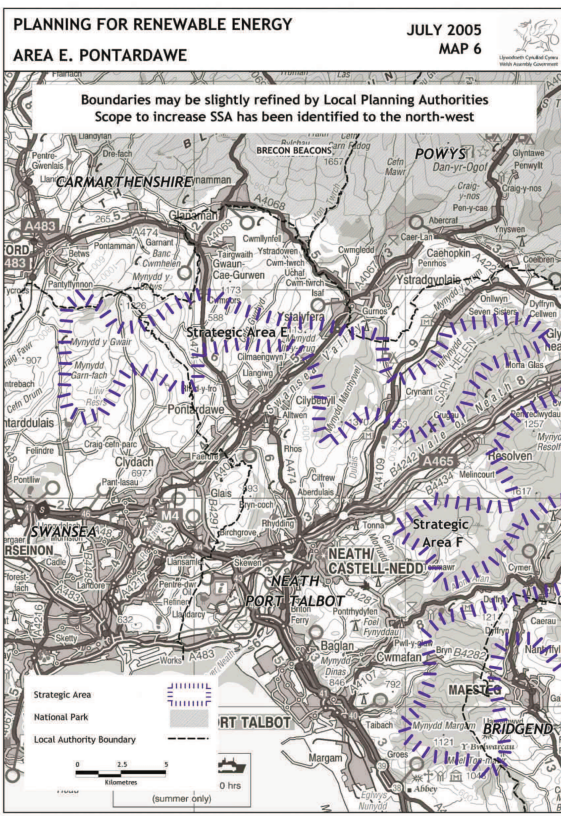
Renewable Energy

Wind

5.1.38 TAN 8⁽³¹⁾ identifies Strategic Search Areas (SSAs) for the development of wind farms, two of which are partly within Neath Port Talbot (Areas E and F). The two SSAs are identified as having an indicative capacity of some 247 MW which equates to about 23% of the total for all Wales. The County Borough's wind resource is therefore significant due its location and the extent of upland and moorland areas suitable for turbines. The SSAs are shown below (Map 5.6 Area E. Pontardawe (Map 6) & Map 5.7 Area F. Coed Morgannwg (Map 7)).

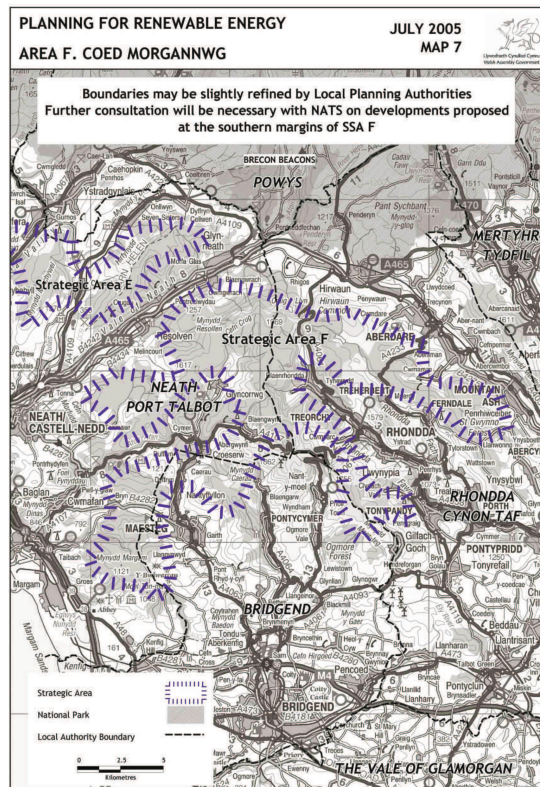
Map 5.6 Strategic Search Areas - Area E Pontardawe

Map 6



Map 5.7 Strategic Search Areas -Area F Coed Morgannwg

Map 7



Hydropower

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5.1.39 The Environment Agency has mapped and assessed opportunities for hydropower in England and Wales ⁽³²⁾ and has identified Neath Port Talbot as one of the local authorities with most opportunities nationally. However, with the exception of a small scheme at the National Trust site at Aberdulais, to date there has been little progress or development in hydropower.

Solar

5.1.40 There has been some interest in developing solar power in NPT, with proposals approved for 5MW schemes at Baglan Bay and Maesgwyn. Other areas of brownfield land in the coastal belt may be attractive for similar developments in the future.

Tidal

5.1.41 There have been several proposals for harnessing tidal power within Swansea Bay and elsewhere in the Severn Estuary. Pre-application discussions are currently underway for a Tidal Lagoon at Swansea Bay with a planning application expected to be submitted in Oct 2013. While such proposals are not within the planning jurisdiction of the local authority and are the responsibility of the Crown Estate, proposals may have planning implications related to on-shore infrastructure.

Other Renewables

5.1.42 There is an existing biomass power station at Margam, with another that has received planning permission on an adjacent site. Other possibilities for energy generation from renewable sources include Centralised Anaerobic Digestion (using food waste, agricultural wastes, sewage sludge etc.) and Building Integrated Renewables (BIR) including biomass boilers, air and ground source heat pumps, solar power (photovoltaics) and small and micro wind power.

Minerals

5.1.43 Within the County Borough, there are minerals resources which are significant on a UK scale. Nearly all the County Borough is underlain by coal resources with anthracite in the north and steam coals in the southeast and there may be viable and extractable reserves of coal bed methane and shale gas (subject to investigation/evaluation). Sandstone, sand and gravel within and above the coal measures are extracted for aggregates, construction and industrial uses.

32 [Opportunity and environmental sensitivity mapping for hydropower in England and Wales \(Environment Agency\)](#)

5.1.44 Pennant sandstone resources include rock with a high polished stone value (PSV) used for road surfacing. The two major quarries in Neath Port Talbot, Gilfach and Cwm Nant Lleici, supply these High Specification Aggregates which are seen as being of strategic importance.

5.1.45 Marine and land based sand and gravel resources are also important, and two areas (between Rheola and Glynneath and between Pyle and Margam) have been identified in MTAN1.⁽³³⁾ The TAN requires these resources to be safeguarded.

Biodiversity and Geodiversity

5.1.46 Neath Port Talbot has a varied range of landscapes and habitats, ranging from coastal saltmarsh and sand dunes through valley side meadows and ancient woodlands to upland areas of purple moor grass. Large areas of the County Borough now contain conifer plantations (which are ecologically poor and increase the acidity of water). Forestry Commission plantations cover some 35% of the County Borough, the highest proportion in England and Wales. The area contains important geological features including glaciated valleys and rock formations, reflecting the area's geological past.

5.1.47 There are 5 sites with European designations for nature conservation (Natura 2000 and Ramsar sites) within or within 5km of Neath Port Talbot with others further afield, as indicated below in Map 5.8.

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Map 5.8 SACs in and around NPTCBC



5.1.48 The LDP will be subject to Habitats Regulations Appraisal in relation to its likely effects on these sites.⁽³⁴⁾ These sites must be afforded the highest level of protection.

5.1.49 Within Neath Port Talbot there are 20 Sites of Special Scientific Interest (SSSIs) (four of which have been designated partly or wholly for geological reasons), 2 National Nature Reserves (NNRs) and 3 Local Nature Reserves (LNRs). These are shown on the plan below, together with the LNR at Kenfig (Map 5.9 below).

5.1.50 Habitat fragmentation is a key issue facing biodiversity, especially in relation to the likely effects of climate change. CCW has undertaken significant work on a national scale to identify strategic areas of habitat connectivity throughout Wales, while Neath Port Talbot Council has developed more detailed connectivity maps at a local level. An analysis has been carried out based on broad-leaved woodland, heathland and marshy grassland, using current data sets. This has identified areas that are important, or have the potential to be important, in linking significant areas of habitat.

5.1.51 In geological terms, the County Borough mostly lies on Upper Carboniferous rocks of the South Wales Coalfield, underlain by Carboniferous Limestone and Millstone Grit. The Neath and Swansea Valleys show surface expression of faulting along the Neath and Swansea Valley Disturbances. Sandstones of the Pennant Measures (Upper Coal Measures) form an extensive and deeply dissected plateau which gradually falls southwards. Pleistocene glacial deposits are extensive in valleys across the northern area, with the Neath and Swansea rivers draining along typically glacial U-shaped valleys, where hanging valleys create waterfalls.

5.1.52 RIGS are the most important places for Earth Science conservation outside statutorily protected sites such as SSSIs. They form a network of geological sites that are considered worthy of protection within the County Borough and wider region. A study was undertaken in 2000 by Cardiff University⁽³⁵⁾ which identified a number of sites of interest. Five of the more significant sites are now incorporated within geological SSSI designations, but no RIGS designations resulted from this study.

5.1.53 More recently, the South Wales RIGS Audit⁽³⁶⁾ has looked at geologically significant sites across the region. As a result of this exercise, two RIGS have been identified, at Aberdulais Falls and Melincourt Brook.

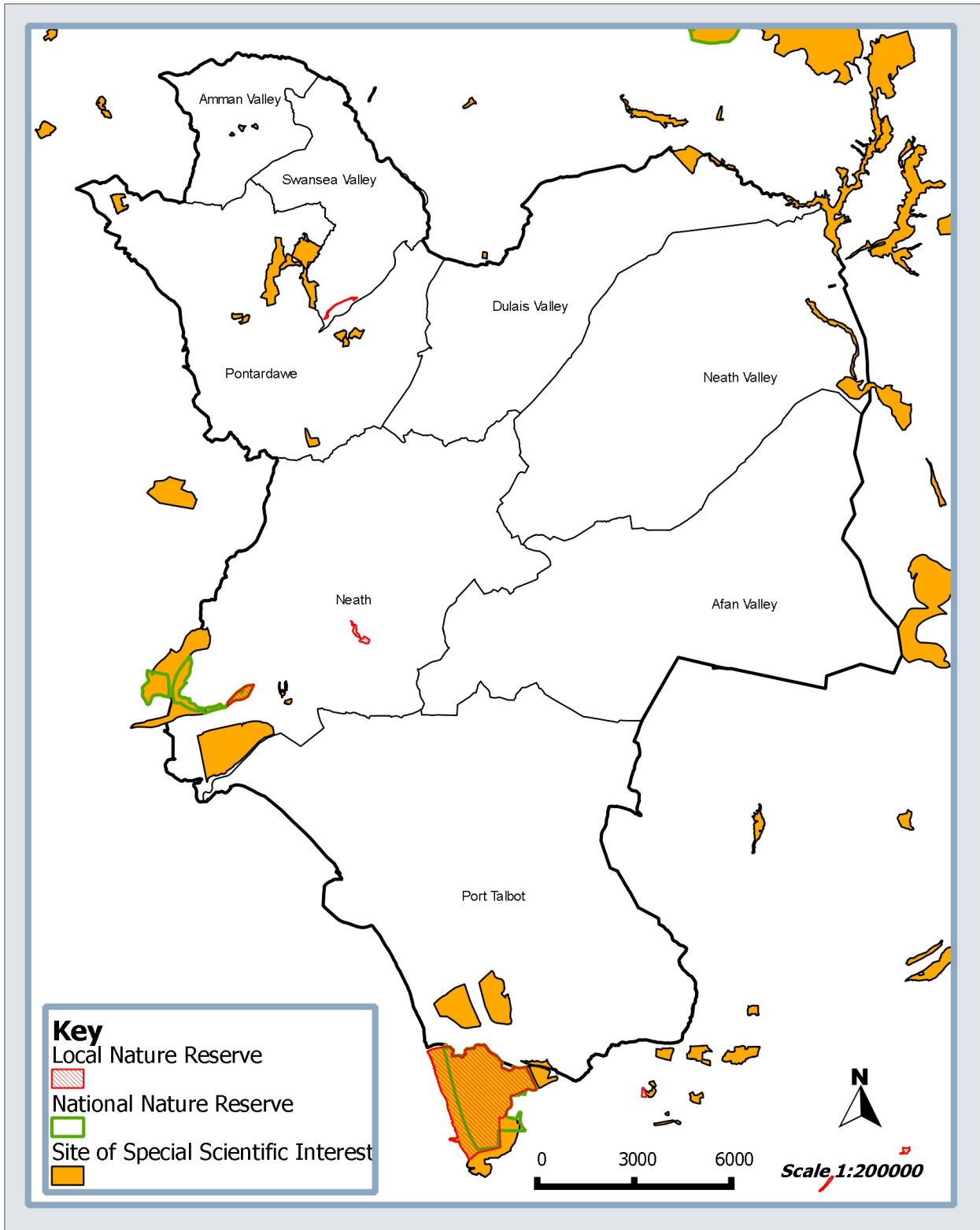
34 [HRA Note](#)

35 Geological Site Survey Database of the Neath Port Talbot County Borough Council (V A Ratter et al Cardiff University 2000).

36 South Wales RIGS Audit; R. Kendall and A. Humpage; British Geological Survey 2012.

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Picture 5.1 SSSIs, NNRs and LNRs



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5.1.54 In addition to these formal designations, the Local Biodiversity Action Plan⁽³⁷⁾ identifies the following priority habitats and habitats of local concern:

- Wetlands (ponds and lakes; canals; rivers and streams; fens and reedbeds);
- Grasslands (Lowland hay meadow and old pasture; purple moor grass and rush pasture; lowland dry acid grassland; roadside verges);
- Heathland and bog (Heathland; lowland raised bog and blanket bog);
- Woodland (Native woodlands and parkland; hedges and other boundary features);
- Coastal Habitats (Sand dunes; Coastal floodplain grazing marsh and saltmarsh; Previously developed land of biodiversity interest; coastal vegetated shingle).

5.1.55 The LBAP also identifies 62 priority species/species of local concern.

5.1.56 The loss of LBAP Habitats is monitored through assessing planning permissions granted.⁽³⁸⁾ The loss of habitat has generally been significant in recent years although it has fluctuated. The figure for 2008-2009 is relatively low, but this is likely to reflect reduced development activity.

5.1.57 Habitat Area Lost 2003-2009⁽³⁹⁾ is shown in figure 5.5.

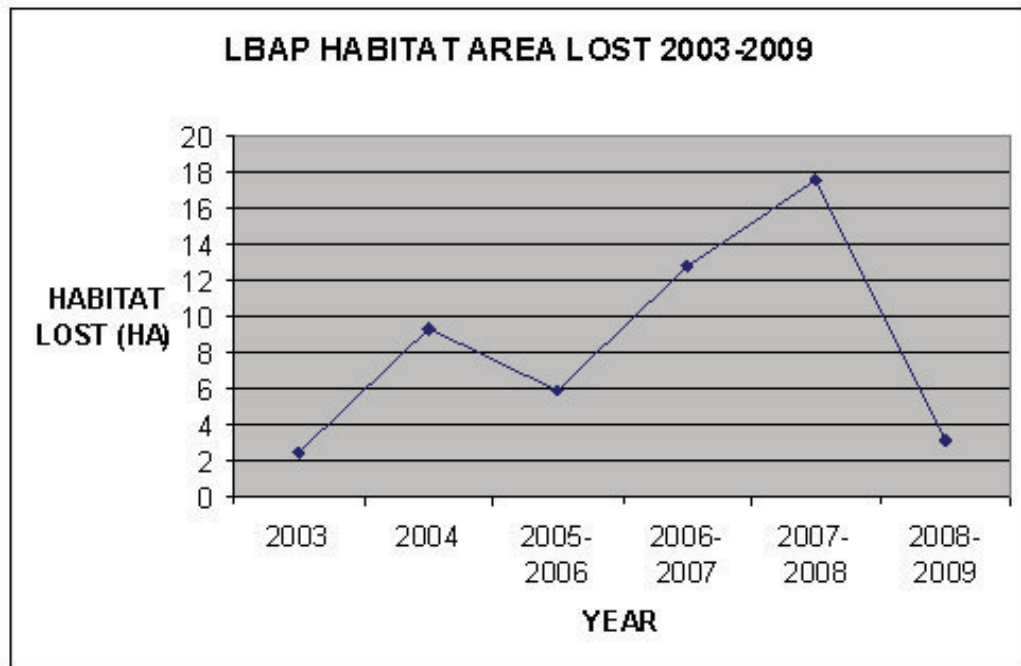
37 [NPT Local Biodiversity Action Plan 2008-2012](#)

38 NPT Biodiversity Unit.

39 NPT Biodiversity Unit

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Figure 5.5 Habitat Area Lost 2003-2009



5.1.58 Information on the current status and trends for the European sites is given in the Habitats Regulations Appraisal.

5.1.59 In relation to the SSSIs, a first ‘Rapid Review’ exercise was carried out in 2003 by CCW, and the results published in the 2004-5 SSSI Report. The Review was updated and extended during spring 2006 in response to the Wales Environment Strategy, and, in addition to habitats, included species and Earth science features for the first time.

5.1.60 The Rapid Review data is being used to make an interpretation of the condition of each SSSI. However, this information has not been published to date.

5.1.61 In relation to the NNRs, a Wales-wide assessment of the status of NNR ecological features was undertaken in June 2007. The assessment was based on:

- monitoring and surveys carried out by individual NNR staff, volunteers and contractors (where available);
- Common Standard Monitoring of SAC features where they occur on NNRs;
- the professional opinion of the Reserve Manager.

5.1.62 Once information on the condition of SSSIs and NNRs is published, this will be taken into account in the assessments of likely effects of the LDP on these features.

Landscape, Townscape and Historic Character

5.1.63 There is extensive evidence of human activity and settlement in Neath Port Talbot from early prehistoric times, through the Roman and Medieval periods to the significant part the area played in the industrial revolution and the coal, steel and petrochemical industries of the 20th century. This is reflected in the settlement pattern of the area, its landscape, monuments and buildings.

5.1.64 The Neath Port Talbot LANDMAP landscape assessment⁽⁴⁰⁾ is a detailed appraisal of the landscape of the County Borough. It is noted that the area rises from sea level at Swansea Bay to 600m AOD at Craig y Llyn, with a dramatic rise of some 200m at the scarp slope from the coastal plain. The area takes the form of a deeply incised plateau, with distinct river valleys, a narrow coastal belt and limited lowland areas, punctuated by the main Neath estuary and those of the Afan and Kenfig. There is a major coastal dune system interrupted by industry and other development and the river mouths. In relation to rural land use, 43% of the area is forested, while the main agricultural use is pasture, with little arable, and extensive upland commons. Coal mining and windfarms have a significant impact, with major industries on the coastal fringe. The area has major road, rail and water/sea transport links, mainly along the coastal belt. The settlement pattern has been dominated and defined by industry with urban development widespread mainly in the major valleys.

Designations:

5.1.65 Reflecting this diversity are a range of designations relating to the historic environment (See Map 5.9).

Register of landscapes, parks and gardens of special historic interest in Wales⁽⁴¹⁾

5.1.66 Cadw has identified landscapes, parks and gardens of historic interest and has compiled a register. This has no statutory powers but is intended to provide information to aid their protection and conservation. Historic parks and gardens are graded in a similar way to listed buildings (Grades I, II* and II), and the park boundaries and essential setting are defined.

Historic Landscapes:

40 Neath Port Talbot LANDMAP Landscape Assessment (2004) White Consultants

41 [Register of Landscapes, Parks and Gardens of Historic Interest in Wales \(Cadw\)](#)

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1. Merthyr Mawr, Kenfig and Margam: listed as a landscape of outstanding historic interest. The designation comprises two discrete areas: Merthyr Mawr; and Kenfig and Margam Burrows. Only Kenfig and Margam Burrows extends partly into Neath Port Talbot. The landscapes are listed as extensive areas of littoral, wind blown sand dunes situated on the west Glamorgan coast, containing buried remains of immense archaeological and historic potential from the prehistoric, Roman and medieval periods.
2. Margam Mountain: listed as a landscape of special historic interest, described as a discrete block of the south Wales uplands situated at the south west fringe of the historical Glamorgan Blaenau, displaying continuity, density and diversity of human occupation from the prehistoric period to the recent past. The area includes: Bronze Age ritual and funerary monuments; large Iron Age hillforts, settlements, enclosures and trackways; a Roman road; a large and important group of Early Christian inscribed stone monuments and associations; medieval defensive works; Margam Abbey, later a site for gentry residences, a landscaped park, pleasure gardens and a magnificent Georgian orangery; Second World War defensive installations.

Historic Parks & Gardens:

1. Jersey Park, Briton Ferry (Grade II): An exceptionally well preserved urban public park. Its original layout of formal and informal areas remains complete and includes sports facilities.
2. Margam Park (Grade I): A multi-layered site of outstanding historical importance. It includes prehistoric and Cistercian abbey remains, and has Tudor, eighteenth-century and nineteenth-century garden and landscaping phases.
3. The Gnoll, Neath (Grade II*): A largely eighteenth-century landscape park of very great historical interest, in its original setting above Neath. The landscape of the Gnoll is exceptional for its combination of industrial and ornamental functions and for its strong visual relationship with the surrounding countryside.
4. Victoria Gardens, Neath (Grade II): A small, well preserved and popular urban public park, with most of its original layout and features.

5. Talbot Memorial Park, Port Talbot (Grade II): A small, well preserved urban public park with a fine central bandstand and war memorial.
6. Rheola (Grade II): The survival of an early nineteenth-century villa by John Nash and its contemporary picturesque setting. Although part of the park has been developed with a wartime aluminium plant, the majority of the setting, which was kept deliberately simple, survives, as do some of Nash's picturesque estate buildings.

Conservation Areas

5.1.67 There are 6 Conservation Areas in the County Borough, designated under the Planning (Listed Buildings and Conservation Areas) Act 1990:

1. Glynneath Woollen Mill: A relatively small area comprising a group of mainly terraced houses, some of distinctive red brick and three storey design centred around three streets associated with the former woollen mill.
2. Margam Park: The conservation area comprises the central part of the park, including the main buildings (Margam Castle, the Orangery, the Abbey church and ruins) and formal gardens.
3. Neath Town Centre: Features of importance include the traditional commercial centre with some small shop units, the general market, public buildings, the castle, St. Thomas' church, Victoria Gardens and other architectural features and structures.
4. Tonna Canal Depot: A small area around the Neath Canal at Tonna, including the restored canal depot and workshops, canal structures including lock and lock gates, and the residential lock house property.
5. Llandarcy: originally designed as a garden village of some 250 houses and flats, to house the workers for the adjacent oil refinery, built between 1918 and 1922 in an 'arts and crafts' style.
6. Cilybebyll: A small self-contained rural village grouped around the parish church of St. John the Evangelist.

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5.1.68 A conservation plan and delivery strategy has been commissioned for Neath Town Centre Conservation Area, but little information is currently available about the condition of the Conservation Areas.

Listed Buildings and Ancient Monuments

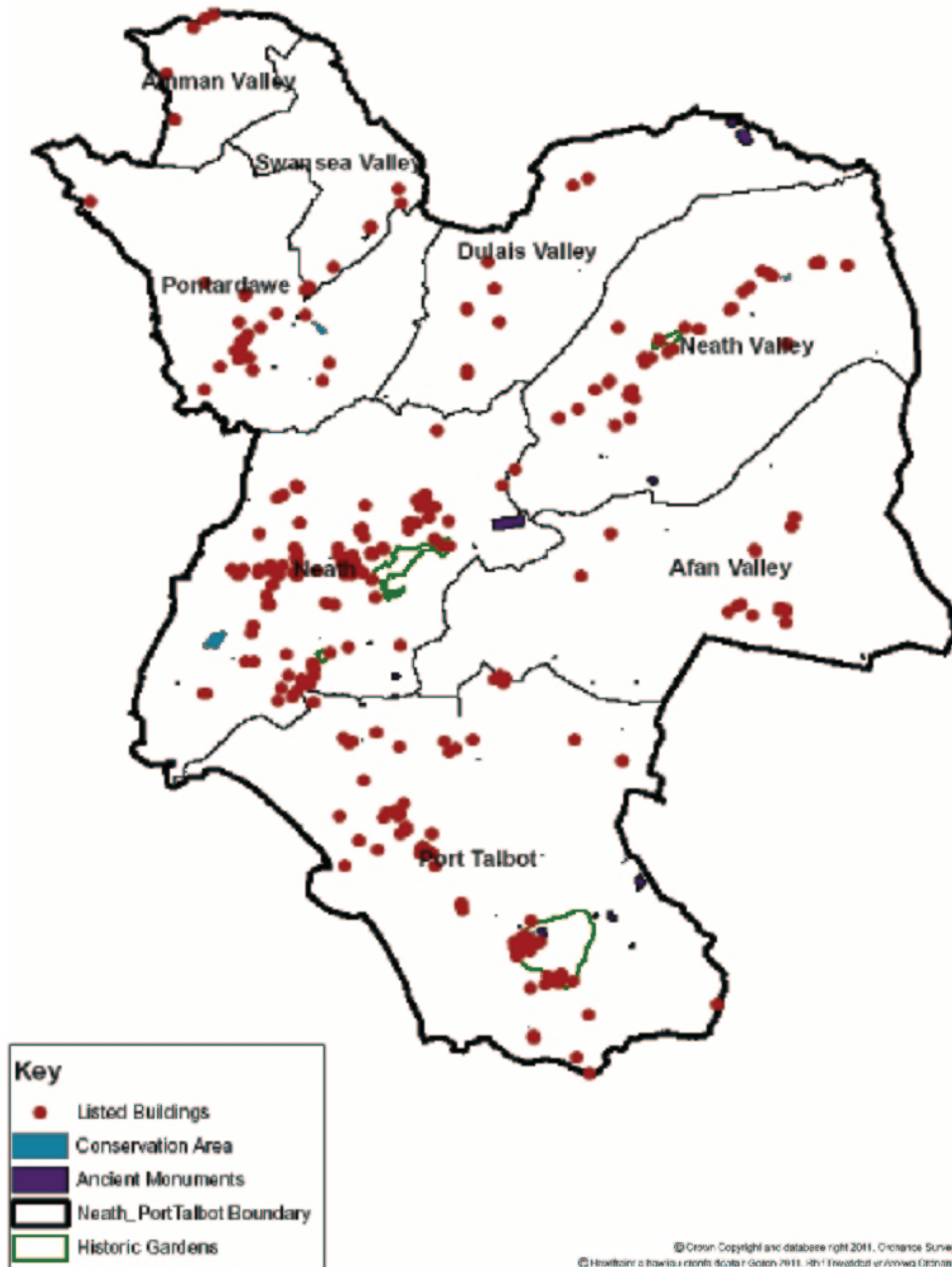
5.1.69 There are 391 *Listed Buildings* in the County Borough. Seven are grade I (All apart from St. Catherine's Church, Baglan being buildings in Margam Park), 36 are grade II* and the remainder are grade II. Industrial buildings and features comprise the largest group, including bridges, tramways, canals etc, followed by significant numbers of houses and chapels/churches. There are concentrations of listed buildings in the town centres and valley settlements, and in Margam Park. A register of listed buildings at risk is maintained, which indicates that more than 45 buildings are at serious risk, with a further 90 identified as needing close monitoring.

5.1.70 There are 92 *Ancient Monuments*, the majority of which are prehistoric features including forts, cairns and standing stones, with significant numbers of Roman features and industrial remains. Ancient Monuments are generally more widely spread across the area than listed buildings, with many prehistoric and Roman features on hilltops and ridgeway routes. There are likely to be significant sites and archaeological features that are not afforded the protection of scheduling due to a lack of current knowledge or information. There is an increasing awareness of the significance of this heritage and its potential to draw visitors to the area, but there is a lack of interpretation or facilities.

Townscape

5.1.71 Many of the area's community iconic buildings face increasing threats. Chapels, churches, public houses, schools and working men's halls are finding it increasingly difficult to survive. The loss of these social buildings can have a dramatic impact on the visual character of a community. A register of historic/listed buildings at risk is maintained which assesses the number of buildings currently considered to be at risk of being lost and the level of risk.⁽⁴²⁾ However, there are significant numbers of prominent buildings which are not afforded the protection of listing despite their importance in the local townscape.

Map 5.9 Historic Designations



National Park

5.1.72 Neath Port Talbot adjoins the Brecon Beacons National Park along the County Borough boundary between Pontneddfechan and Dyffryn Cellwen. A very small area of the National Park falls within the County Borough along the boundary

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north east of Pontneddfechan. Proposals within Neath Port Talbot that could have any impact on the national park should take into account the national park purposes to conserve and enhance natural beauty, wildlife and cultural heritage, and to promote opportunities for the understanding and enjoyment of their areas' special qualities by the public.

Pollution

Air

5.1.73 National air quality objectives are set for a range of pollutants⁽⁴³⁾ and Neath Port Talbot's air quality is measured against these objectives at a number of sites across the County Borough. The following results have been recorded for 2012:⁽⁴⁴⁾

Table 5.1.2 Air Quality Results for 2011

Pollutant	Monitoring Site
PM ₁₀	Port Talbot Fire Station (official site for assessing compliance)
The National Air Quality Objective level was exceeded on 11 days during 2012, but there has been no breach of the Air Quality Objective since 2007. The trend shows that exceedances are decreasing.	Monitoring is also conducted at : Little Warren, Port Talbot Docks, Talbot Road, Theodore Road, Twll yn y Wal Park and Dyffryn School. The Environment Agency also monitors at Prince Street.
Nitrogen Dioxide	Port Talbot Fire Station and other sites
Levels of nitrogen dioxide did not breach the Objective level at most locations, but concentrations at Victoria Gardens in Neath and near to Pontardawe Post Office were raised. Continuous analysers have been deployed at these locations and detailed assessments of air quality have been conducted.	Monitoring was conducted for a full year at 32 around the County Borough.
Sulphur Dioxide	Port Talbot Fire Station
None of the National Air Quality Objective levels were exceeded during 2012.	
Carbon Monoxide	Port Talbot Fire Station
No exceedances	

43 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA 2007)

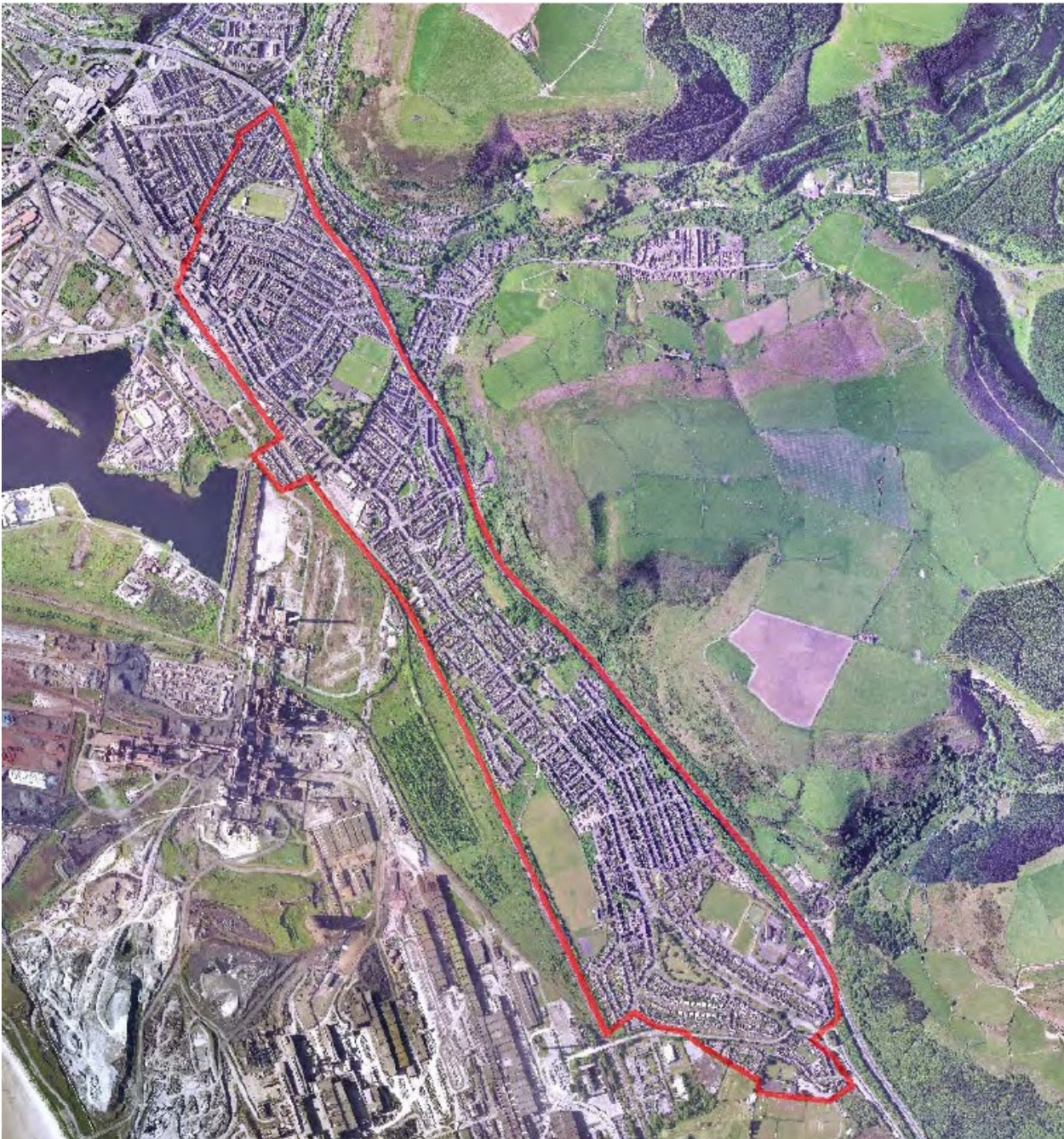
44 [NPT](#) Climate Change Section

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Ozone	Port Talbot Fire Station
There were exceedances of the air quality standard on 5 days during 2012.	

5.1.74 The exceedances in PM_{10} s in the Margam/Taibach area led to the declaration of an Air Quality Management Area (AQMA) in 2000 (Map 5.10 below).

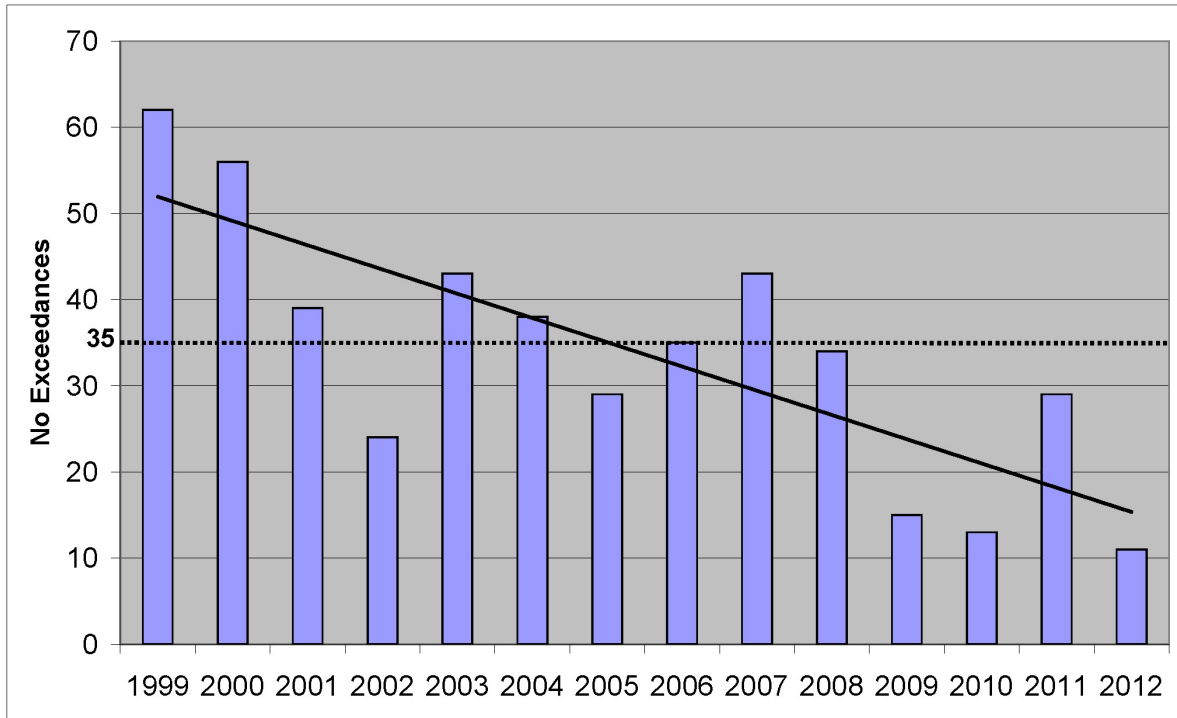
Map 5.10 Margam / Taibach Air Quality Management Area



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5.1.75 Monitored levels of PM₁₀s are shown in fig 5.2 below.⁽⁴⁵⁾

Picture 5.2 Monitored Levels of PM10s



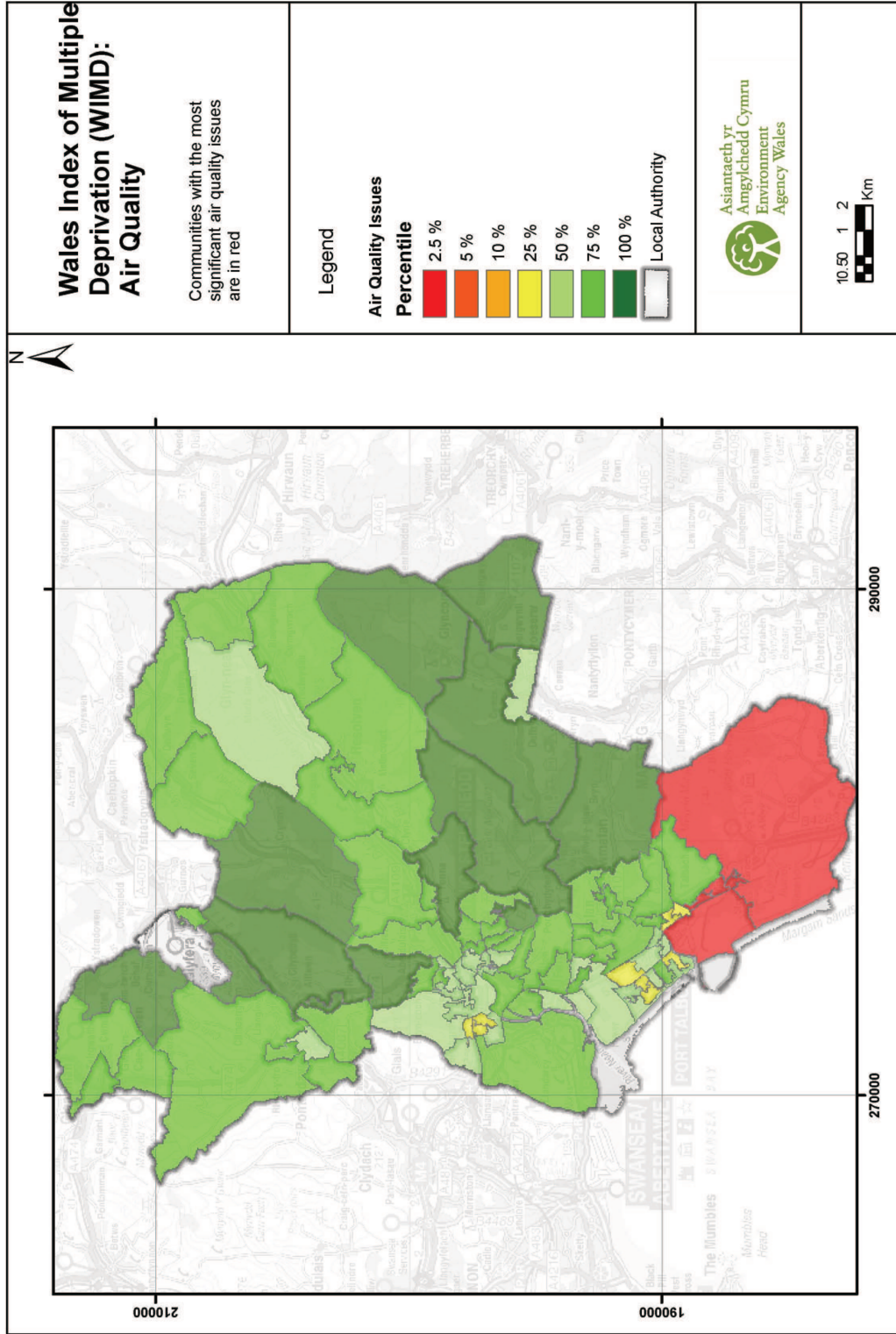
5.1.76 Communities with the most significant air quality issues are shown on Map 5.11, which again indicates that the Margam and Taibach areas have the most significant problems, together with town centre areas of Neath and Port Talbot.⁽⁴⁶⁾

45 [NPT Climate Change Section](#)

46 Environment Agency Wales: Local Evidence Package Neath Port Talbot 12/02/2009.

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Map 5.11 Wales Index of Multiple Deprivation (WIMD) Air Quality



(c) Hawffraint y Goron. Cedwir pob hawl. Asiantaeth yr Amgylchedd, 100026380, (2008). (c) Crown copyright. All rights reserved. Environment Agency, 100026380, (2008).

Nickel

5.1.77 Historically, levels of nickel in air have been high. The European Union has set a target air quality standard of 20 ng/m³ for nickel concentrations in the air which has to be met by the end of 2012. Nickel levels in parts of Pontardawe do not currently comply with this target, but work by the Environment Agency has reduced contributions from one local source to below the target limit, while additional work is required at another source to ensure improvements are made at this site also.

5.1.78 Two new nickel air monitoring sites have been proposed in Pontardawe which will form part of the UK metals monitoring sites. Initial results show that the levels of nickel are above the target value and a local company is investing in improved filtration and dust controls to reduce the releases of nickel from their site. Public Health Wales and the Health Protection Agency have advised that the nickel levels measured in the Tawe Valley are unlikely to have any long term adverse public health implications.

Habitats

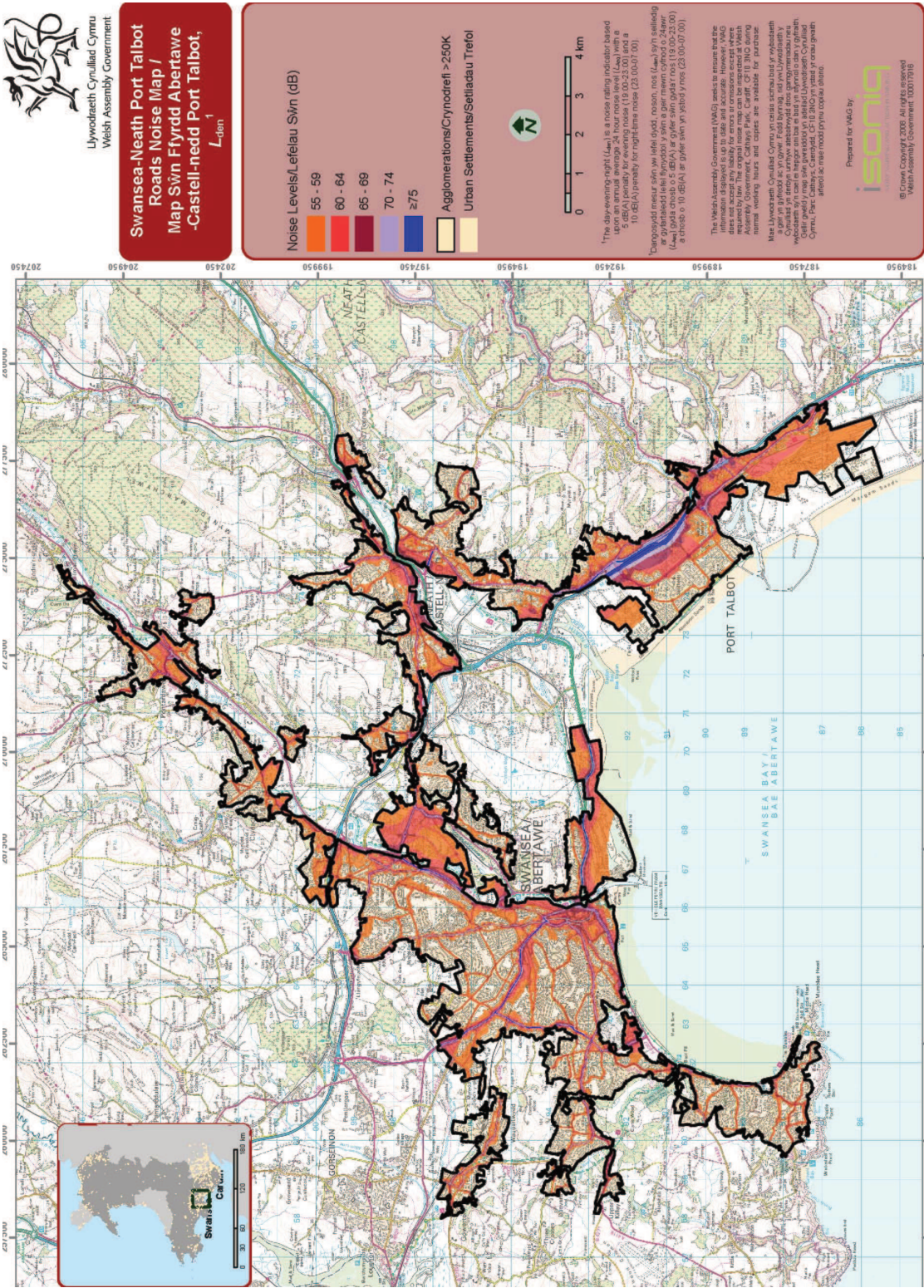
5.1.79 Air pollution can also have impacts on sensitive habitats, for example nitrogen enrichment and acid deposition is a significant issue on a number of sites within and outside NPT, including Crymlyn Bog SAC. This issue is addressed in detail in the Habitats Regulations Appraisal.

Noise:

5.1.80 WG as the competent authority implementing the European Noise Directive has identified residential properties within urban agglomerations that are affected by road and rail noise. Map 5.12 shows road noise levels for the urban areas of NPT and Swansea.⁽⁴⁷⁾

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Map 5.12 Road Noise Levels for Urban Areas of NPT and Swansea



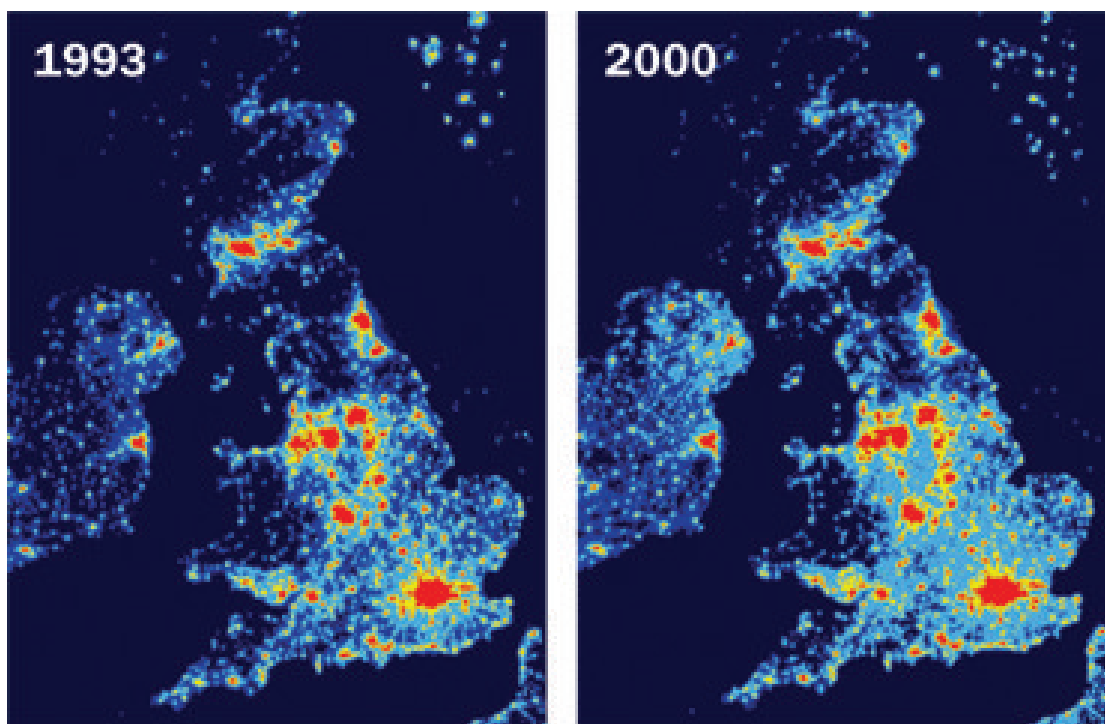
5 . Neath Port Talbot Today & Future Trends

5.1.81 In consultation with NPT CBC, the Welsh Government has designated seven publicly accessible areas within the urban agglomeration of Neath Port Talbot as 'Quiet Areas'. Once an area has been designated as a quiet area, Planning Policy Wales requires development plan policies to have regard to the need to protect it from an increase in noise, and requires special consideration where noise-generating development is proposed nearby. Further work is focusing on implementing the Noise Action Plans and identifying ways of protecting sensitive buildings (such as houses) and of mitigating other effects.

Light:

Increasing light pollution can contribute to the urbanisation and loss of tranquillity of an area, prevent viewing of the night sky, disrupt sleep patterns with detrimental effects on health, and adversely affect wildlife.

Figure 5.6 Light Pollution



5.1.82 The above images (figure 5.6) indicate the increase in light pollution in recent years across the UK.⁽⁴⁸⁾

Community Cohesion

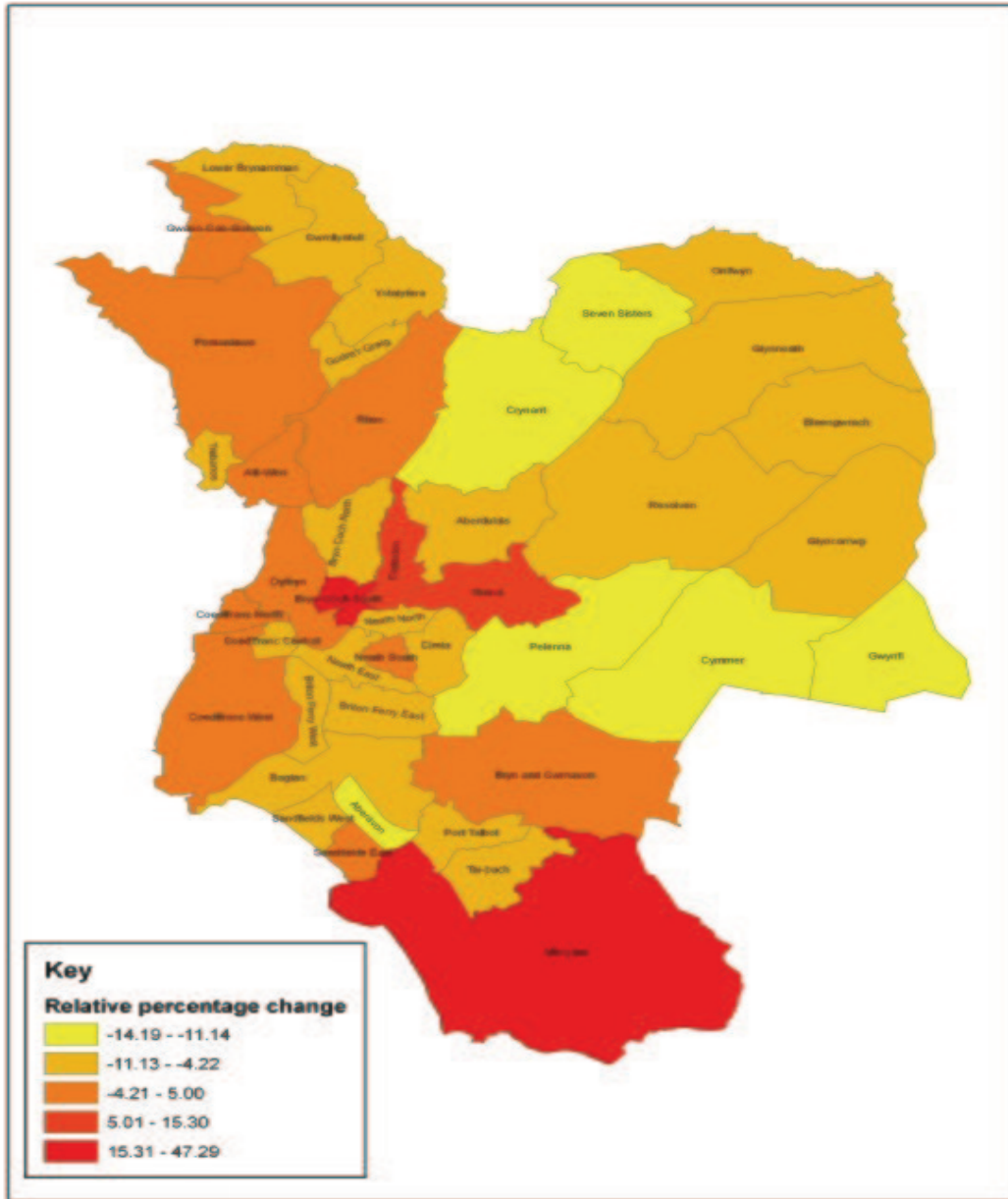
5.1.83 The area has developed around and been dominated by industry, in particular the coal, iron and metal industries, with the petro-chemical industries becoming significant later. The decline of these industries in recent years, taking away the original economic base of many communities, has had and is liable to have further and significant effects on the culture of settlements. This has been reflected in Neath Port Talbot experiencing a low level of population growth since 2001. Prior to this, there had been a lengthy period of population loss.

Population

5.1.84 Map 5.13 (below)⁽⁴⁹⁾ indicates that while some areas of the County Borough have experienced significant population increases - in particular areas in the south east of NPT and around the northern fringes of Neath - many parts have experienced significant population loss, in particular many rural areas and the valleys. There has been significant depopulation in the Afan and Dulais valleys.

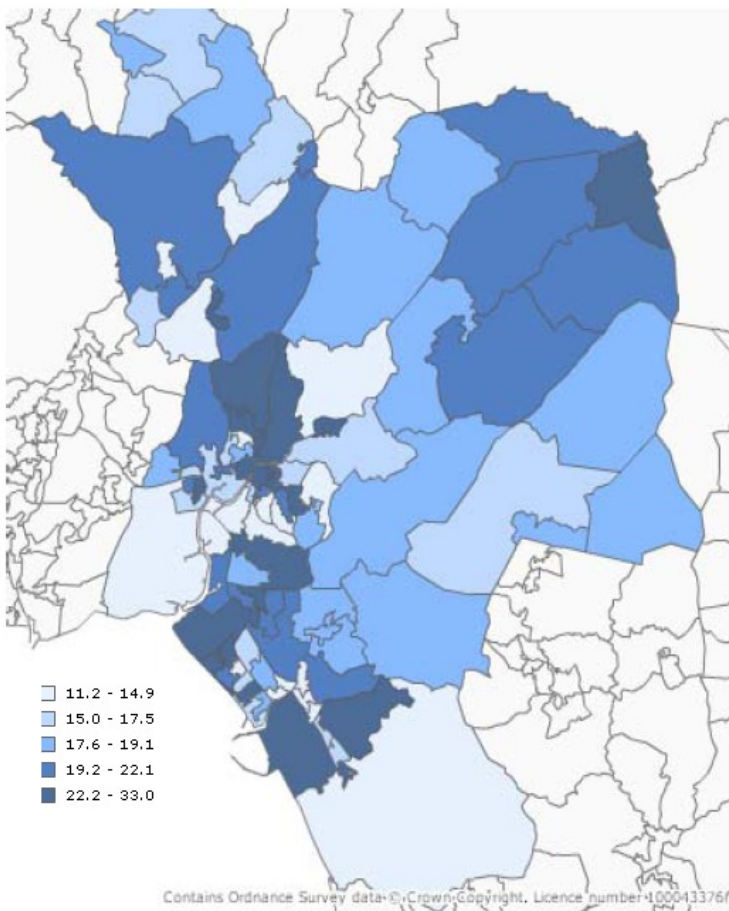
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Map 5.13 Percentage Population Change



5.1.85 Map 5.14 (below) ⁽⁵⁰⁾ indicates that a number of small areas in the County Borough have high proportions of elderly residents. Central parts of Neath and Port Talbot and some valley areas have more than 20% of residents over the age of 65 years compared to a national average of 18.4% in Wales.

Map 5.14 Age Structure, % 65 years old+, 2011 Census, ONS

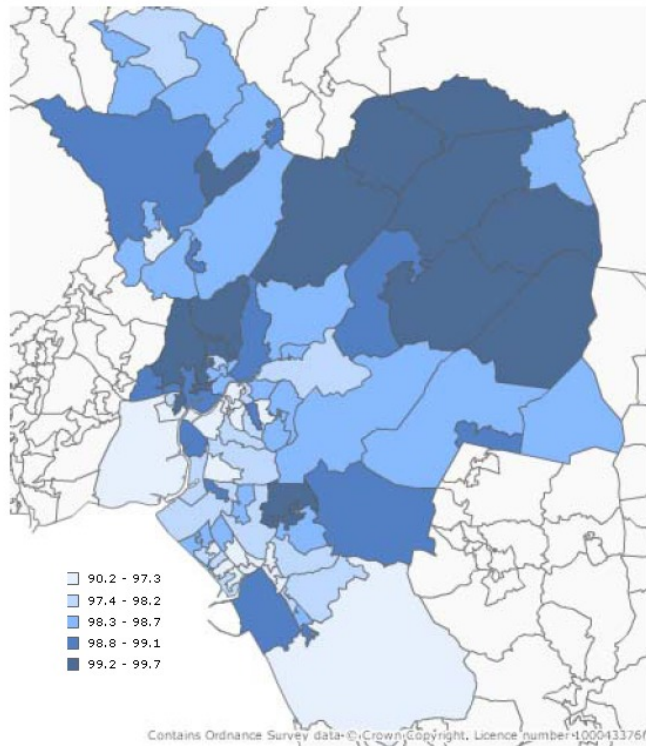


Ethnicity

5.1.86 The overwhelming majority of people resident in Wales are of a white ethnic background. At the time of the 2011 Census, the minority ethnic population of Wales numbered 135,203, the equivalent of just over 4.4 per cent of the resident population. Map 5.15⁽⁵¹⁾ indicates that there are many areas of the County Borough with fewer than 2% ethnic make up in their population.

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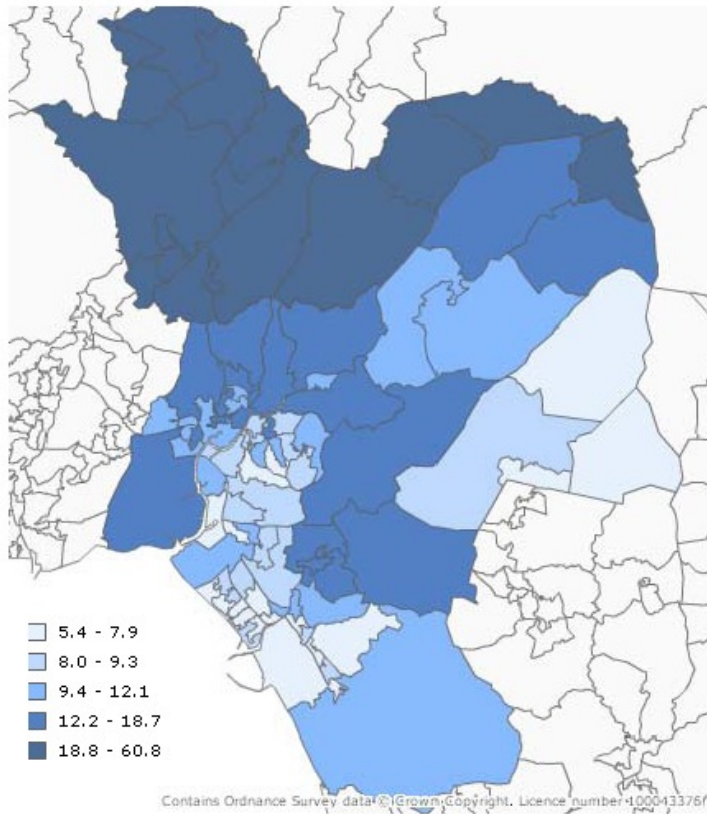
Map 5.15 Percentage of population who are white, 2011 Census, ONS



Welsh Language

5.1.87 15.3% (20,698) of the population of Neath Port Talbot (aged 3 and over) were recorded as being able to speak Welsh in 2011, in comparison with 18.0% (23,398) in 2001. (Map 5.16 below)⁽⁵²⁾

Map 5.16 Percentage of Welsh Speakers in Neath Port Talbot, 2011
Census, ONS



5.1.88 The Welsh language is a particular feature of the communities within the Upper Swansea, Amman and Twrch Valley areas. Across the area from Trebanos to Cwmllynfell and Rhos to Gwaun-Cae-Gurwen the percentage of Welsh speakers is consistently above the Welsh average (19% in 2011 Census). However, between 2001 and 2011 there was a marked reduction in the proportion of Welsh speakers within these communities. (see Table 5.1.3 below).⁽⁵³⁾

Table 5.1.3 Percentage of Welsh Speakers by Community

Community	% Welsh Speakers (2001)	% Welsh Speakers (2011)	% Change in proportion of Welsh speakers
Cwmllynfell	68.2	58.8	-9.4
Lower Brynamman	68.1	60.8	-7.3
Gwaun-Cae-Gurwen	67.9	55.8	-12.1

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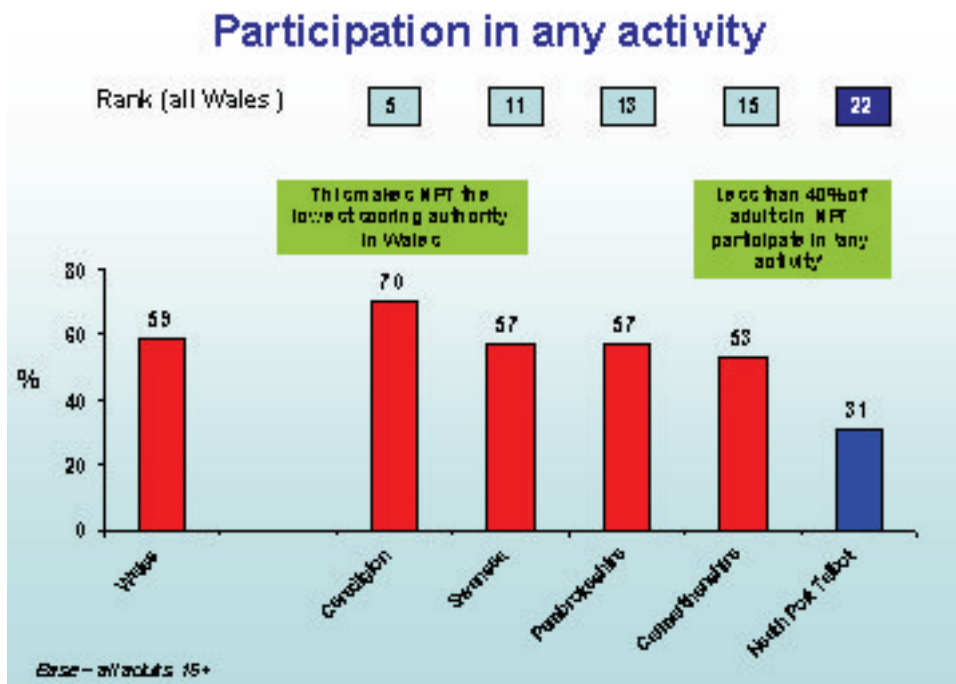
Ystalyfera	54.6	46.0	-8.6
Trebanos	42.4	33.6	-8.8
Godre'r-graig	41.5	30.1	-11.4
Pontardawe	37.4	31.0	-6.4
Alltwen	35.9	29.5	-6.4
Rhos	28.6	24.7	-3.9
Crynant	29.7	25.1	-4.6

Community Participation

5.1.89 Participation in community, cultural and sporting activity can be an indicator of wellbeing but also of cohesion.

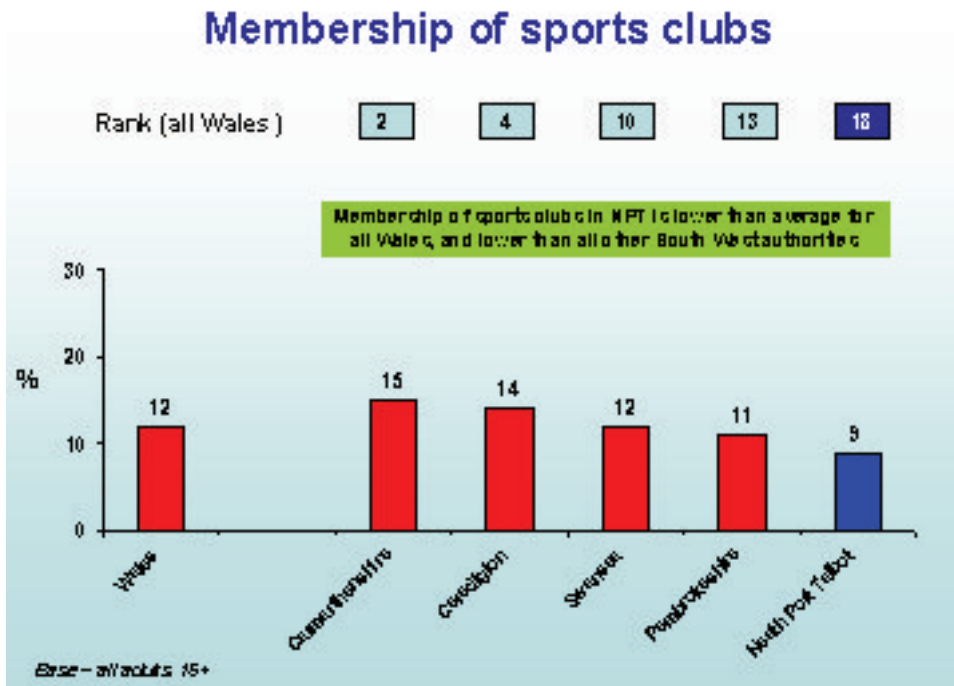
5.1.90 Less than 40% of adults in Neath Port Talbot participate in any sporting activity – the lowest level in Wales and considerably less than Swansea or Ceredigion.⁽⁵⁴⁾ Sporting activity would include both indoor and outdoor activity such as billiards and walking.

Figure 5.7 Participation in any Activity



5.1.91 Individuals who participate in any sporting activity of any kind are more likely to take part in other leisure activities than those who have not participated in any activity. In Neath Port Talbot this is true of every leisure time pursuit other than watching satellite or cable T.V. and visiting the countryside.

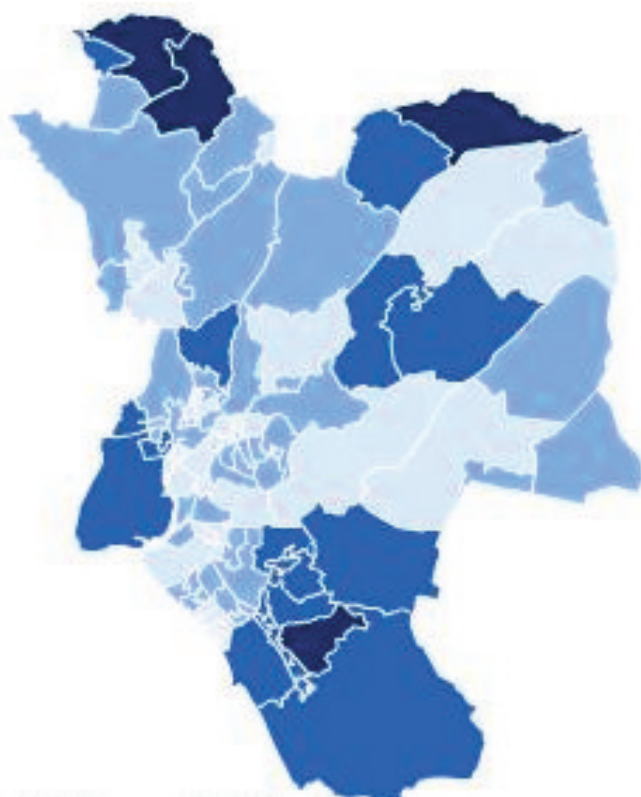
Figure 5.8 Membership of Sports Clubs



5.1.92 To facilitate participation there is a need, however, for places for people to meet as well as having the ability to access facilities. Within the County Borough provision and access is often an issue as illustrated by Map 5.17 - Access to leisure centres.⁽⁵⁵⁾

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Map 5.17 Access to Leisure Centres



Key (mins)

□	5.4 - 16.1
■	16.2 - 26.7
■	26.8 - 37.3
■	37.4 - 48.0

Average time (mins) to travel to leisure centre by bus or walking (2008)

Crown Copyright: Licence Number 100043576

5.1.93 Of the derelict and empty buildings within the Valley areas, there are five chapels and one former place of worship; two pubs and three former club buildings.⁽⁵⁶⁾

5.1.94 Provision and access are not the only factors affecting participation - people also need time to participate in social and community activities. Commuting will impact on this. In 2008 24,000 residents commute out of the County Borough for work – many to Swansea, Bridgend and Carmarthen.⁽⁵⁷⁾

5.1.95 Poor health or disabilities similarly impact on participation levels. Evidence⁽⁵⁸⁾ suggests that caring for elderly, disabled or dependents with poor health is also a major barrier to inclusion, especially where this relates to child carers. The inability of children to participate – either because of poverty and/or because of caring responsibilities - perpetuates cycles of social exclusion as a lack of participation limits children's ability to develop valuable social skills. Where there is a concentration of informal caring within a community, the ability of a community to develop social capacity is similarly limited which in turn impacts on cohesion.

The level of unpaid care provision within Neath Port Talbot as compared with Wales is illustrated in table 5.1.4 below.⁽⁵⁹⁾

56 NPT Derelict Property Register

57 [SB 78/2008 Statistics on Commuting in Wales 2008. Welsh Assembly Statistics Bulletin, 10th December 2009](#)

58 [Social Exclusion Unit Office of Deputy Prime Minister](#)

59 2011 Census

Table 5.1.4 Provision of Unpaid Care

Percentage of people who provide unpaid care (Census 2011)			
	1-19 hrs a week	20-49 hours a week	50+ hours a week
Wales	57.4%	14.6%	28.0%
Neath Port Talbot	51.0%	16.1%	33.0%

Health and Wellbeing

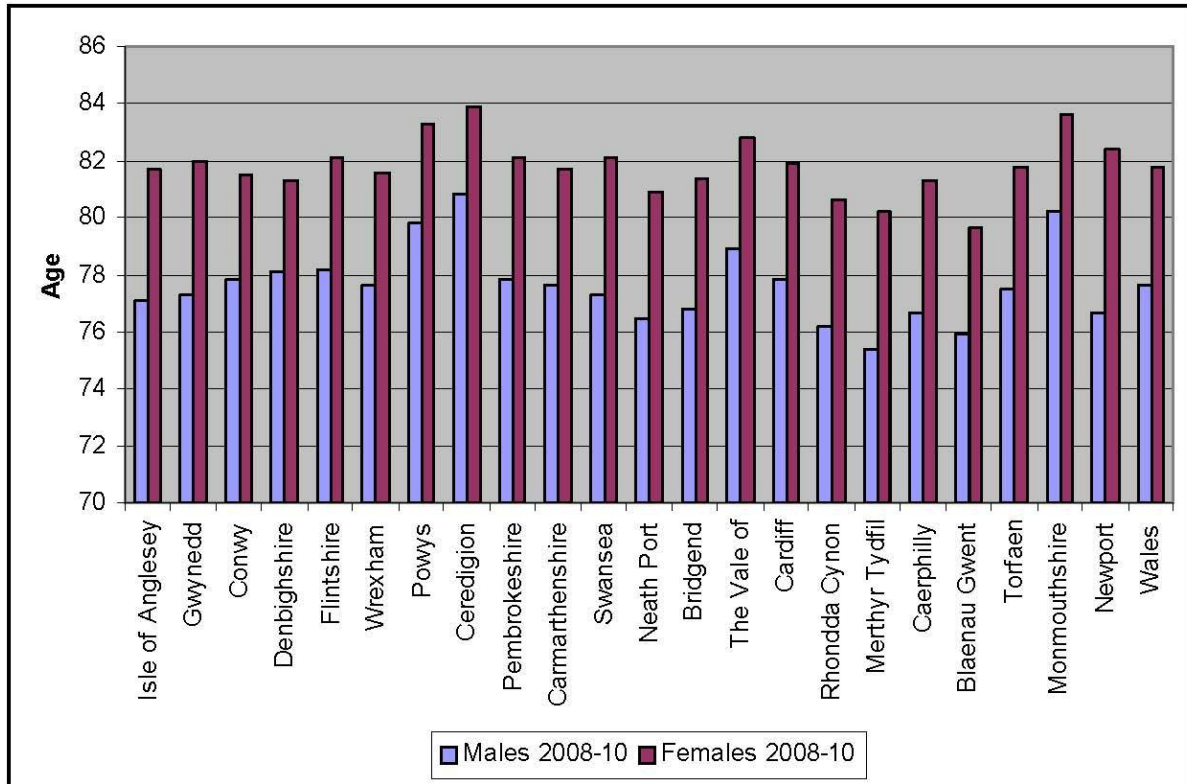
5.1.96 The County Borough suffers from the worst health within Wales. Within its boundaries are two of the worst areas of multiple deprivation in the UK and Wales. The need to address and integrate health issues into the LDP has already been recognised, but the SA will assess the scope and effectiveness of the LDP proposals.

Health Outcomes within Neath Port Talbot County Borough

5.1.97 As picture 5.3 illustrates, the County Borough has one of the lowest life expectancy rates - both male and female - within Wales.⁽⁶⁰⁾

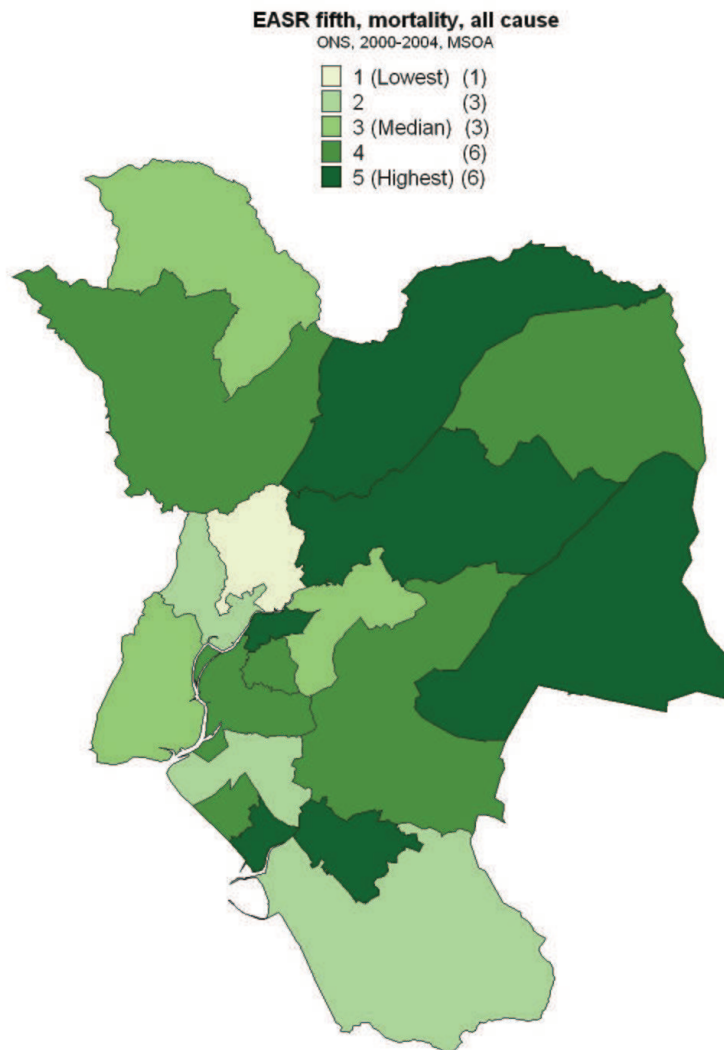
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Picture 5.3 Life Expectancy (male and female) compared with Wales and other Authorities



5.1.98 As Map 5.18 illustrates,⁽⁶¹⁾ mortality rates vary considerably within the County Borough, with the highest all cause mortality rate being within the Valley areas which are also associated with areas of multiple deprivation.

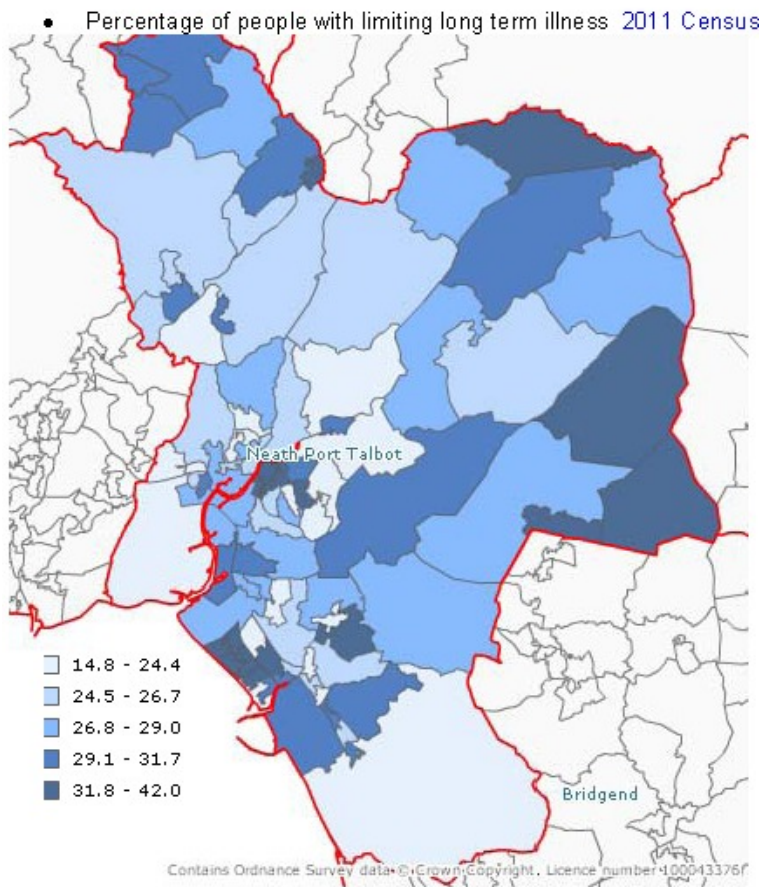
Map 5.18 All Cause Mortality. Crown Copyright.



5.1.99 Within the County Borough there are high concentrations of people suffering from long term health issues shown below in Map 5.19⁽⁶²⁾.

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Map 5.19 Percentage of People with Limited Long Term Illness 2011

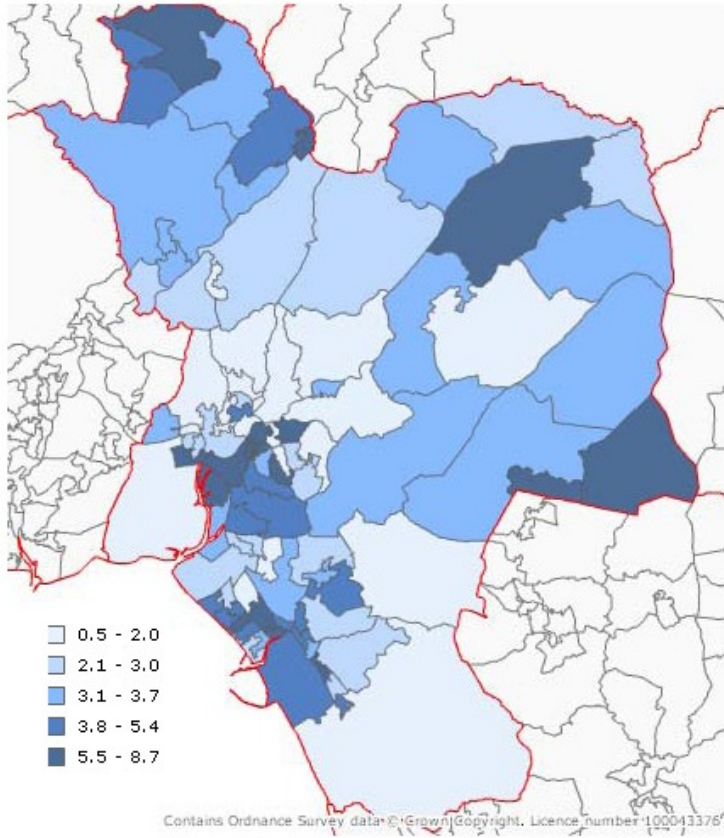


5.1.100 Neath Port Talbot as a consequence of this also has high levels of incapacity benefits claimants shown in Map 5.20 below ⁽⁶³⁾

5 . Neath Port Talbot Today & Future Trends

Map 5.20 Incapacity Benefits Claimants 2012

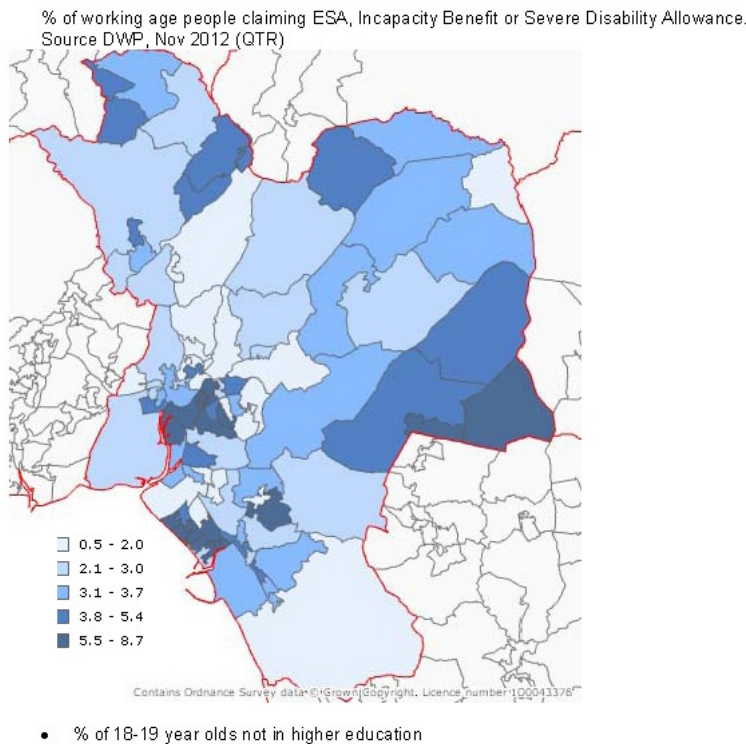
Incapacity Benefits Claimants Nov 2012 (Qtr) Source DWP



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Map 5.21 also shows a high level of the working age population claiming ESA, incapacity benefits or severe disability allowance.⁽⁶⁴⁾

Map 5.21 Percentage of working age people claiming ESA, Incapacity Benefits or Severe Disability Allowance 2011



5.1.101 With regard to mental health conditions, it is reported in the Welsh Health Survey of 2007- 2008, that 12% of the population within the County Borough were being treated for mental illnesses. This compares with 9% in Wales as a whole. Within the County Borough, the male suicide rate per 100, 000 is 29.8 compared with the lowest in Wales of 15.9 in The Vale of Glamorgan.⁽⁶⁵⁾

Access and Quality of Services

5.1.102 Access to key services and amenities, which for the purposes of the SA includes appropriateness and affordability, impacts on health. Key services and amenities include medical and other caring services as well as shops, leisure amenities, education and training. Transport, or the lack of appropriate transport, will affect levels of access as will the provision of high speed ICT which is dealt with in the economic chapter.

64 2011 Census, ONS

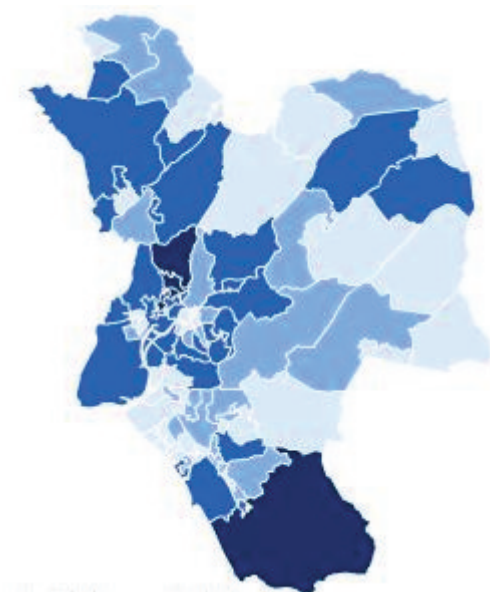
65 [Office for National Statistics - Male Suicide Rates.](#)

5.1.103 Within Neath Port Talbot services are often inaccessible within 15 minutes by bus or foot as Maps 5.22 - 5.26 illustrate. The provision of bus services is dynamic and led by market forces. As a result the level of provision a community enjoys can change radically over a short period of time.

Provision of Key Services within 15 mins (by bus or walking)

Map 5.22 Average time (mins) to GP surgery by bus or walking (2008) ⁽⁶⁶⁾

Map 5.22 Access to GP Surgeries



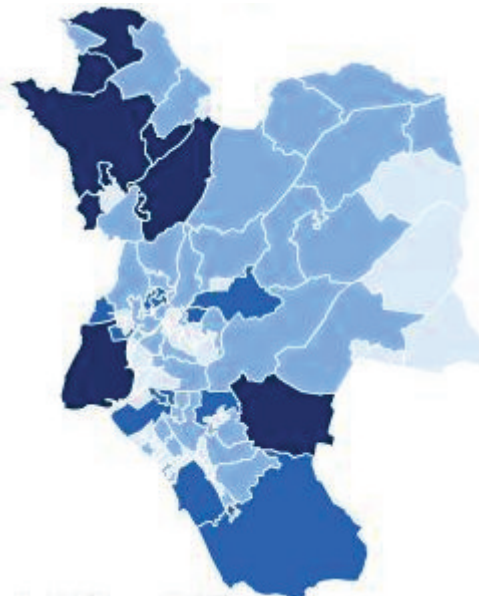
Key (mins)

- 3.2 - 10.2
- 10.3 - 17.1
- 17.2 - 24.1
- 24.2 - 31.0

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Map 5.23 Access to Food Shops

M a p



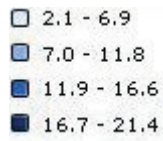
5.23 Average time (mins) to food shop by bus or walking (2008) ⁽⁶⁷⁾

Key (Mins)

66 [Wales Data Unit - Average time to access facilities - GP surgery](#)

67 [Wales Data Unit - Average time to access facilities - food shop](#)

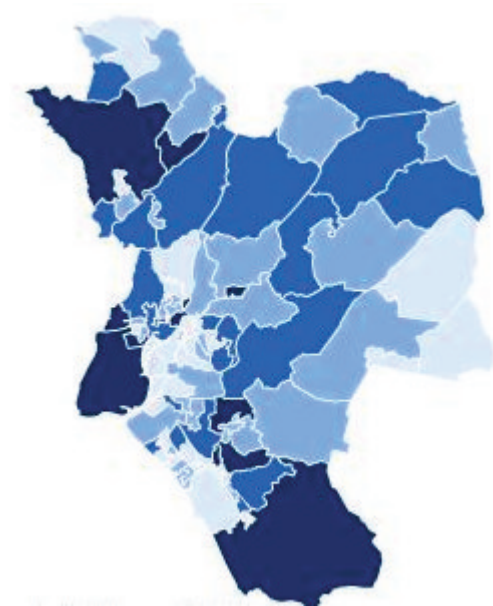
5 . Neath Port Talbot Today & Future Trends



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Map 5.24 Average time (mins) to primary school by bus or walking(2008)⁽⁶⁸⁾

Map 5.24 Access to Primary Schools



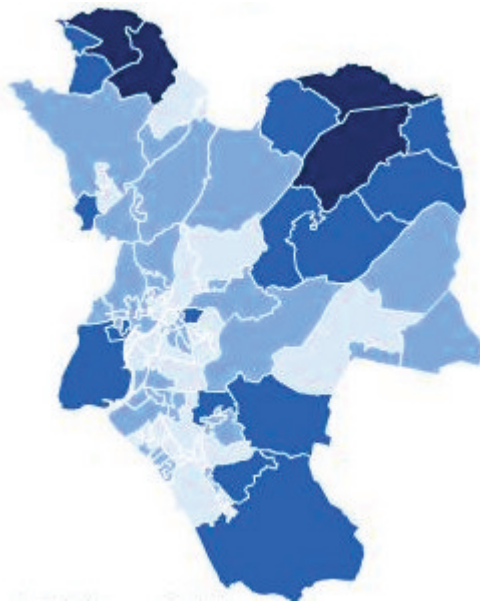
Crown Copyright: Licence Number 100043576

Map 5.25 Average time (mins) to secondary schools by bus or walking(2008)⁽⁶⁹⁾

68 [Wales Data Unit - Average time to access facilities - primary school](#)

69 [Wales Data Unit - Average time to access facilities - secondary schools](#)

Map 5.25 Access to Secondary Schools



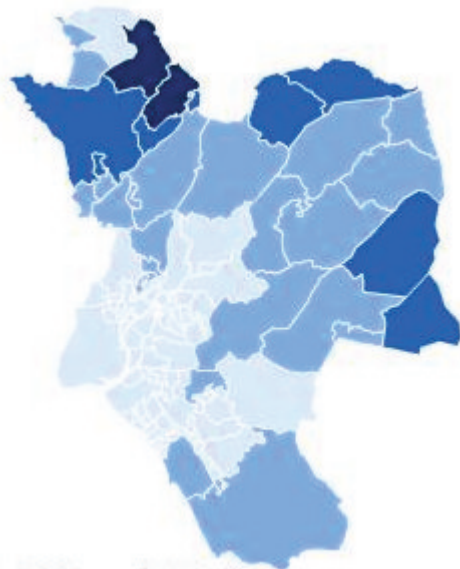
Key (mins)

- 6.4 - 16.9
- 17.0 - 27.4
- 27.5 - 37.8
- 37.9 - 48.3

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Map 5.26 Average travel time (mins) to transport node (2008)⁽⁷⁰⁾ i.e. Strategic transport services that allow residents to travel beyond their local area

Map 5.26 Access to Strategic Transport Services



Key

- 5.0 - 22.6
- 22.7 - 40.2
- 40.3 - 57.8
- 57.9 - 75.4

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Lifestyles

70 [Wales Data Unit - Average time to access facilities - strategic transport services that allow residents to travel beyond their local area](#)

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5.1.104 Lifestyles impact on both physical and mental health and evidence suggests that environments affect lifestyle choices.⁽⁷¹⁾

5.1.105 The incidence of lifestyle related illness is increasing and is associated with diet, physical exercise, and substance misuse – including alcohol. The percentage of people suffering from diabetes (although lifestyle is not always a causal factor) in Neath Port Talbot is 8% compared to 6% in Wales.⁽⁷²⁾

Alcohol

5.1.106 Within Neath Port Talbot 48 per cent of men report drinking above the recommended allowance compared to the Welsh figure of 45%. Similarly 29% of men report binge drinking.⁽⁷³⁾

5.1.107 Male mortality attributable to alcohol (2002-06) is higher than the Welsh average for males.⁽⁷⁴⁾

Nutrition

5.1.108 41% of men and 43% of women within the County Borough reported eating five fruit and vegetable portions the day previous to the survey being undertaken. This compares to Welsh figures of 42 and 46%. In both cases the position is, therefore, worse than that of Wales.⁽⁷⁵⁾

Physical Activity Rates

5.1.109 As figure 5.9 demonstrates, in Neath Port Talbot significantly more people are inactive than undertake sufficient physical activity for good health. This makes NPT the lowest scoring authority in Wales.

Fig. 5.13 Physical Activity Rates - percentage of residents⁽⁷⁶⁾

71 [Greenspace Scotland 2009: Health Impact Assessment of Greenspace: a guide](#)

72 [Welsh Health Survey 2007](#)

73 [Welsh Health Survey 2007](#)

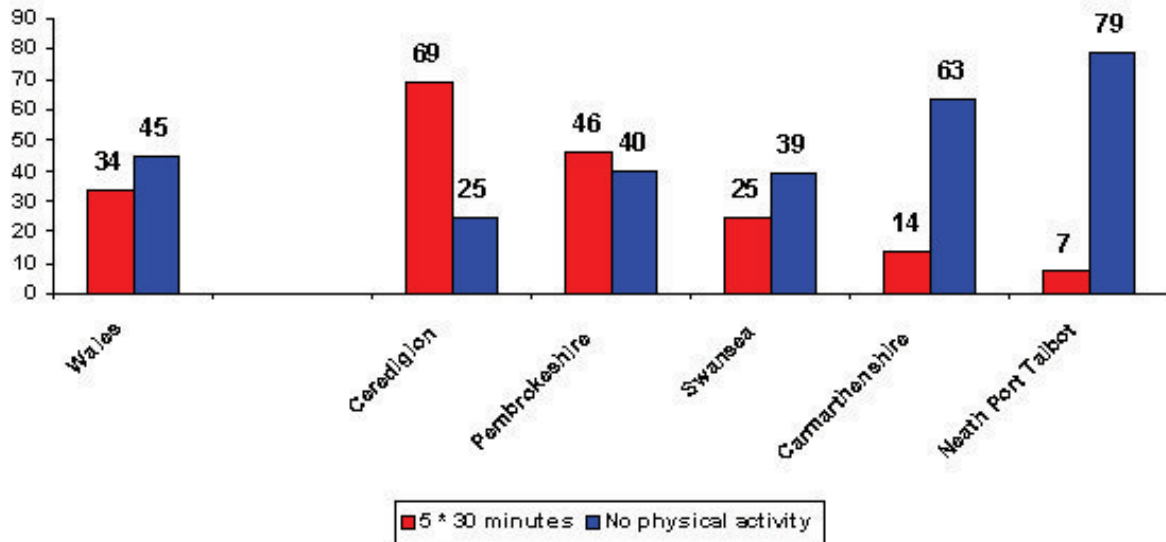
74 [Wales NHS - A Profile of Alcohol and Health in Wales](#)

75 [Welsh Health Survey 2007](#)

76 [Sports Council for Wales - Participation Survey](#)

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Figure 5.9 Physical Activity Rates - percentage of residents



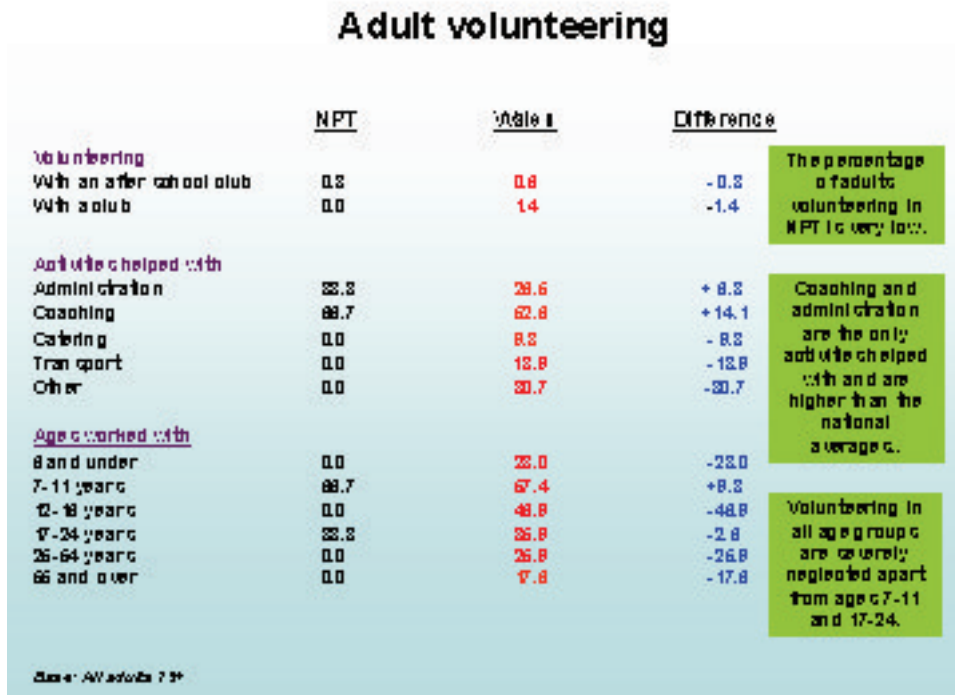
Social and Community Influences

5.1.110 These issues are addressed in the community cohesion chapter, but at an individual level it can be measured by the degree of social involvement. This is difficult to measure quantitatively, but voluntary community activity is one recognised measure. It is also seen as a means to develop social skills which are linked to successful employment.

Active Volunteering

Figure 5.10 Percentage of People Volunteering in Sport Related Activities⁽⁷⁷⁾

Figure 5.10 Volunteering linked to sporting activities



5.1.111 In 2008 the NPT Citizens’ panel⁽⁷⁸⁾ identified the different types of unpaid help that respondents gave to or received from non-relatives. With regard to “giving” the three most frequently selected options were advice (29%), transporting/escorting (25%) and shopping (21%). With regard to “receiving” the most frequently selected options were transporting / escorting, (11%), shopping (11%), cleaning (8%) and advice (7%). However levels of volunteering were not measured.

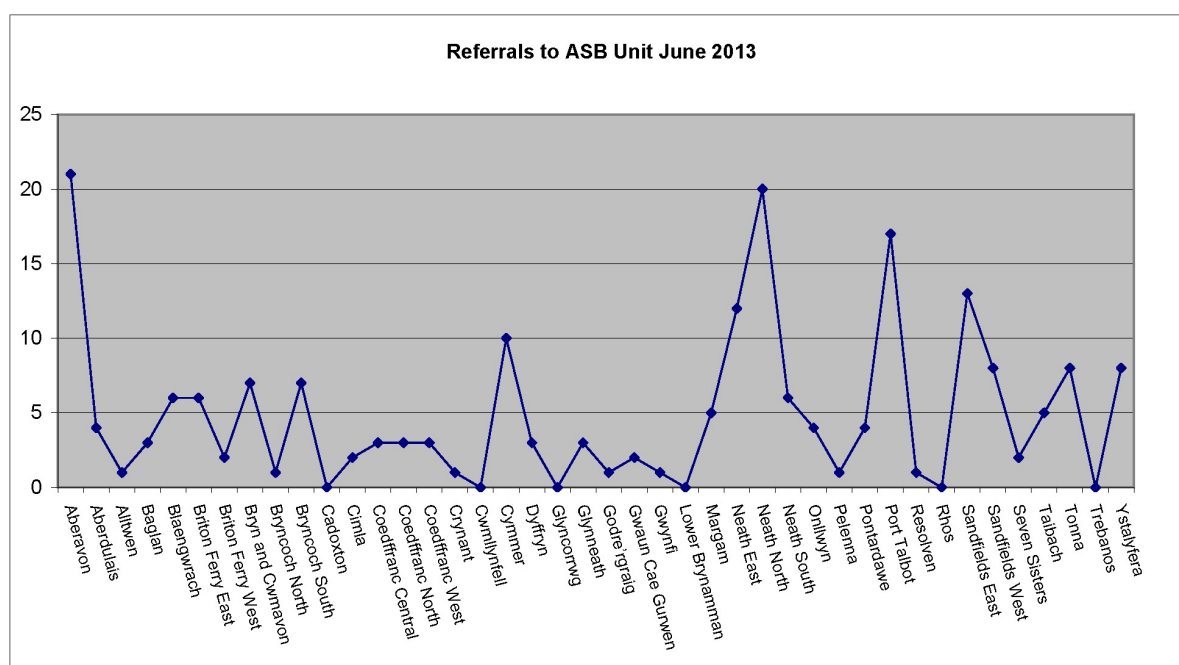
Living and Environmental Conditions

77 [Sports Council for Wales - Participation Survey](#)
 78 [Neath Port Talbot CBC Community Plan Progress Report 2008/09](#)

5.1.112 Evidence suggests that physical and mental health improves and inequalities in health are reduced through the provision of good local environments.⁽⁷⁹⁾ This includes the quality of the built environment, access to green space and open space and in particular the quality of housing. It also addresses personal safety - be it protection from flooding or pollutants see chapters 2.1 Climate Change and 2.5 Pollution of the SA, SEA, HRA and Related Appraisals Scoping Document ⁽⁸⁰⁾ or from the incidence of crime, anti – social behaviour and road accidents.

Figures 5.11 illustrate the levels of anti-social behaviour and crime.⁽⁸¹⁾

Figure 5.11 Number of anti social referrals sent to Anti-social Behaviour Unit, June 2013



Vandalism

5.1.113 Between April and October 2009, 21 incidents of vandalism relating to Authority owned property were reported. This contrasts with a total of 46 incidents in the year 2008/09, which was considerably down on 2007/08 where the total figure was 102. These figures exclude bus shelters. However repair costs to the Authority are rising, suggesting an increase in the severity of the damage.

Unfit Housing

79 [CABE](#)

80 [Scoping Document](#)

81 NPTCBC and South Wales Police 2012/13

5. Neath Port Talbot Today & Future Trends

5.1.114 The latest information that is available is to the year ending March 2006. At that time 5417 properties across the County Borough were deemed unfit – approximately one third of the Wales total.⁽⁸²⁾

Derelict Property

5.1.115 Within the Valley areas there are currently 82 derelict sites. These include houses and flats which have provided multiple accommodation as well as chapels, former workshops and chapels.⁽⁸³⁾

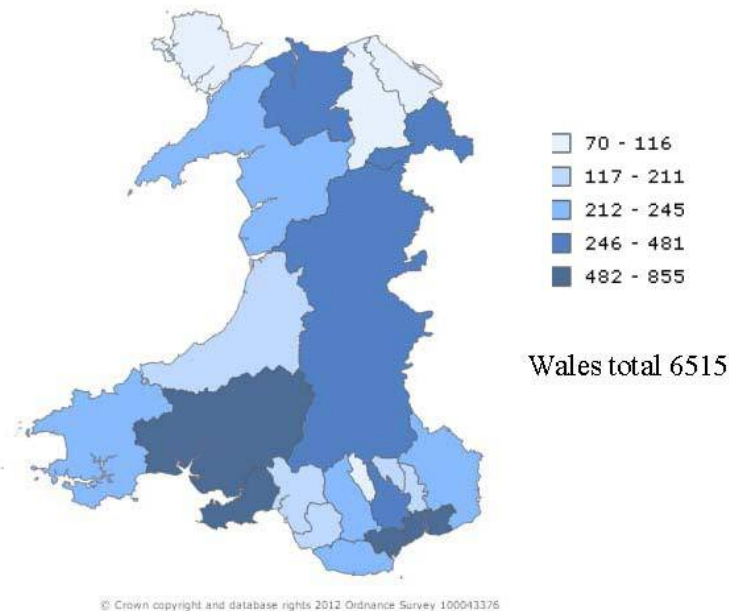
Housing Demand / Homelessness

Map 5.27 shows the number of households accepted as statutorily homeless. For Wales as a whole this amounted to 6515 households (FY 2011/12)⁽⁸⁴⁾

Map 5.27 Homelessness

Housing demand / homelessness

Total number of households decided to be eligible, unintentionally homeless and in priority need (FY 2011/12), Welsh Government



Fuel Poverty

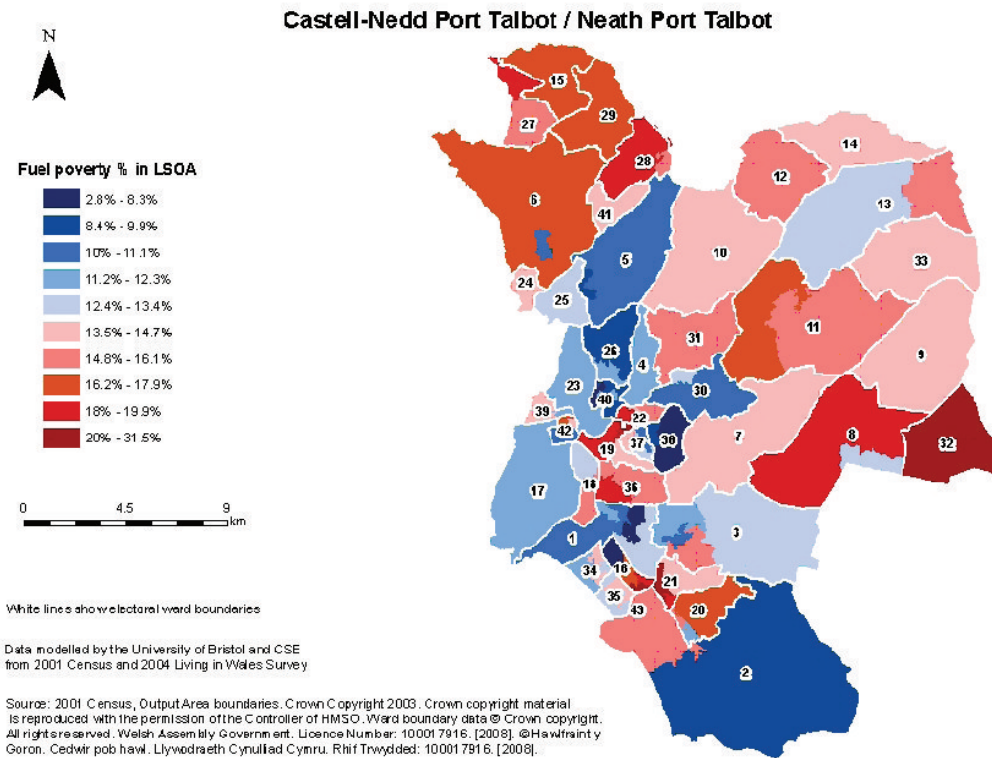
82 [Wales Data Unit](#)

83 [Derelict Property Register](#)

84 [Wales Data Unit](#)

5.1.116 Map 5.28 relates to 2001 and predates the Warm Wales initiative which will have addressed some of the issues outlined below. However WG acknowledge in their recent monitoring report that because of increasing fuel prices, the trend in reducing fuel poverty is now being reversed across Wales.⁽⁸⁵⁾

Map 5.28 Fuel Poverty



Personal Economic Circumstances

5.1.117 Employment impacts on personal development - both in terms of providing income, and where rewarding, contributing to a sense of self worth. There are areas of the County Borough which suffer high levels of deprivation – several communities being classified as being the most deprived areas in Wales see Map 5.29 below.

Earnings and Income across the County Borough

5 . Neath Port Talbot Today & Future Trends

5.1.118 As table 5.1.5 below⁽⁸⁶⁾ illustrates gross disposable household income is marginally lower within Neath Port Talbot than Wales as a whole, but the gap between NPT and the UK is far greater. Gross weekly earnings are also higher than in Wales, but as Map 5.29 Welsh Index of Multiple Deprivation⁽⁸⁷⁾ illustrates, patterns of income vary across the County Borough.

Income and Earnings

Table 5.1.5 Regional Disposable Household Income 2012 and Full time residents income

	Area	£	UK = 100	Annual Change
GDHI (Gross Disposable Household Income) per head per annum ⁽⁸⁸⁾	NPT/Bridgend	£14,007	87	+2.6%
	Wales	£14,129	88	+2.8%
	UK	£16,034	100	+2.7%
Earnings (full-time resident gross weekly 2012) ⁽⁸⁹⁾	NPT	£446.00	88	+2.6%
	Wales	£455.00	90	+0.0%
	UK	£505.90	100	+1.5%

86 [Annual Survey of Hours and Earnings \(ASHE\) 2012 ONS](#)

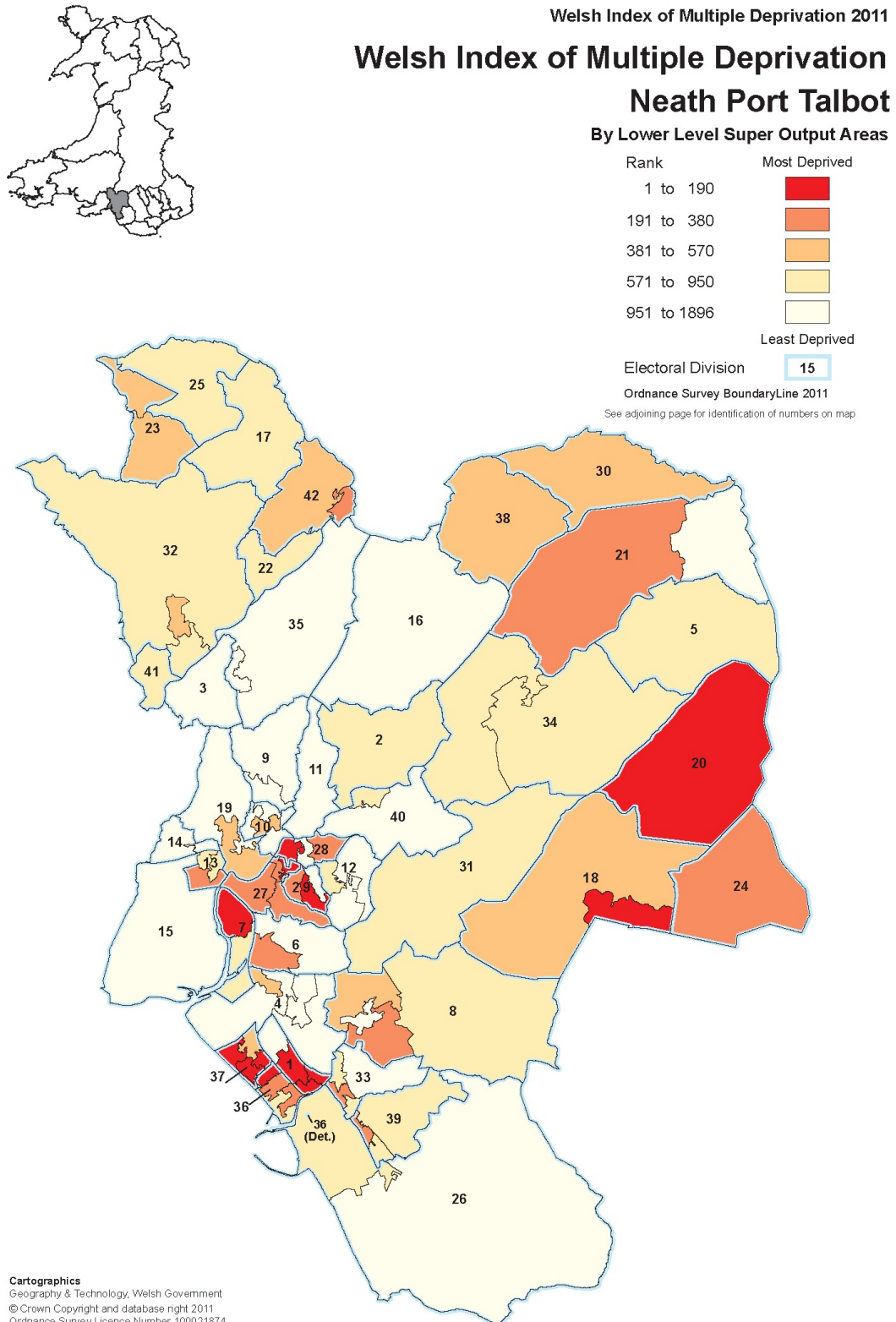
87 [Wales Data Unit](#)

88 [Office for National Statistics](#)

89 [Office for National Statistics](#)

5. Neath Port Talbot Today & Future Trends

Map 5.29 Welsh Index of Multiple Deprivation - Neath Port Talbot



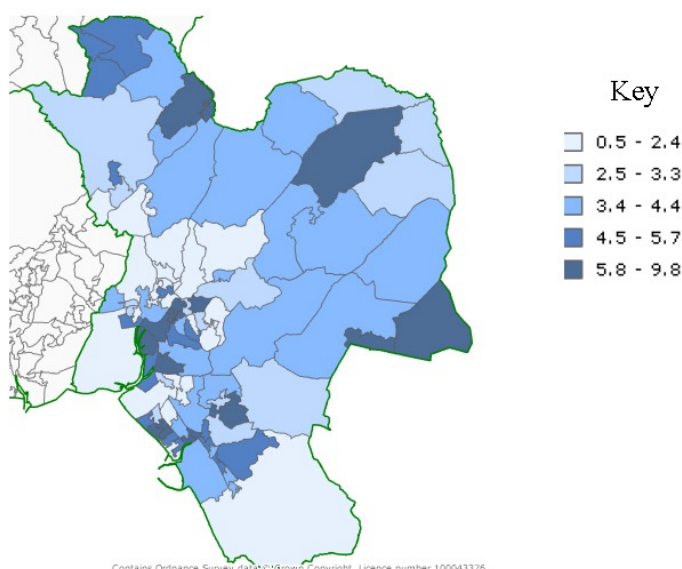
5 . Neath Port Talbot Today & Future Trends

5.1.119 As the map above illustrates areas of the County Borough suffer from the some of the highest levels of multiple deprivation within Wales. Evidence suggests that this affects suicide rates as people living within the most deprived areas are twice as likely to commit suicide than those living in the least deprived areas.⁽⁹⁰⁾

Employment / Unemployment

5.1.120 Although the latest data for Job Seekers Allowance⁽⁹¹⁾ shows that the percentage of people claiming Job Seekers Allowance is slightly higher than in Wales overall, there are clear variations across the County Borough.

Picture 5.4 Percentage of working age claimants claiming job seekers allowance (August 2012 Qtr)



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Unemployment Rates and Nature of Employment

5.1.121 Current figures suggest that the overall unemployment rate in NPT is less than that in Wales as a whole as shown in Table 5.1.6 below⁽⁹²⁾

90 [Wales NHS - National Action Plan to Reduce Suicide](#)

91 [Wales Data Unit - Working Age Claimants Claiming Job Seekers Allowance \(August 2012 Qtr\)](#)

92 [Annual Population Survey \(APS\) data for 12 month period ending December 2012 - Office for National Statistics](#)

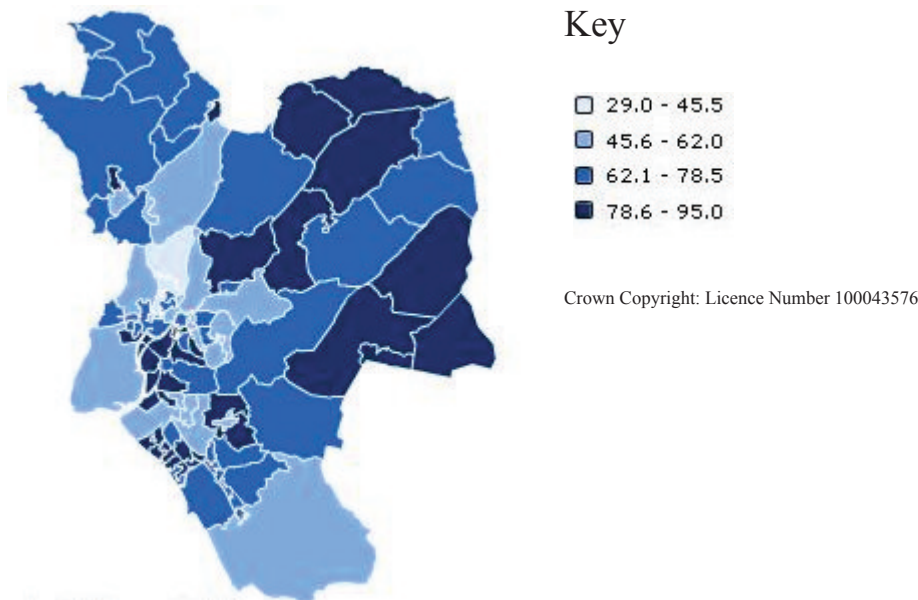
Table 5.1.6 Unemployment levels and levels of part time working within NPT, Wales and the UK 2012

Area	Unemployment (aged 16 & over)	Unemployment Rate (aged 16 & over)	Work Part-time (working age)	% working Part-time (working age)
NPT	4,500	7.2%	13,100	23.2%
Wales	119,100	8.3%	336,600	26.4%
UK	2,496,200	7.9%	7,300,600	25.7%

Education

5.1.122 Education and qualification has a major impact on current and future wellbeing. As Map 5.30 (percentage of 18-19 yr olds not in higher education 2005⁽⁹³⁾) below demonstrates, the percentage of 18-19 year olds in higher education (2005) varies across the County Borough. Table 5.1.7 illustrates the type of qualification held.⁽⁹⁴⁾

Map 5.30 Percentage of 18-19 yr olds not in higher education (2005)



93 [Wales Data Unit - 18-19 year olds not in higher education](#)

94 [Annual Population Survey Data for 12 months to Dec 2008 Office of National Statistics](#)

5 . Neath Port Talbot Today & Future Trends

Type of Qualification

Table 5.1.7 Type of Qualification

NVQ level	NPT (total)	NPT (%)	Wales (%)	UK (%)
NVQ 4 & above	20,500	23.9	30.3	34.2
NVQ 3	13,600	15.9	17.5	17.1
Trade Apprenticeships	5,000	5.8	3.8	3.7
NVQ 2	16,000	18.7	18.1	16.8
NVQ 1	12,700	14.8	12.2	12.1
Other qualifications	5,100	6.0	6.6	6.3
No qualifications	12,700	14.8	11.4	9.9
Total	85,600	100	100	100

Economy

Economic Base

5.1.123 Table 5.1.8⁽⁹⁵⁾ below demonstrates the type of employment that exist within the County Borough. 13.5% of people are employed in manufacturing compared to 13.7 % in Wales as a whole. 73.5% of people are employed in the combined service sector compared with 76.7% in Wales.

5.1.124 Employment is predominantly within public administration – often associated with low skilled, low paid employment. Manufacturing and construction provide a considerable degree of employment – manufacturing accounting for a much higher proportion of employment than in Wales, but overall, employment is focused on other sectors.

Table 5.1.8 Employment by Sector

Employee jobs by industry	NPT	NPT(%)	Wales(%)
Manufacturing	7,800	13.5	10.4
Construction	5,500	9.5	7.7
Distribution, hotels & Restaurants	9,300	16.1	18.9

5 . Neath Port Talbot Today & Future Trends

Transport & Communications	3,500	6.0	6.1
Finance, IT & other business services	7,100	12.2	11.4
Public administration	18,800	32.5	35.5
Services	3,800	6.7	5.5

5.1.125 The majority of people in the County Borough are employed in professional occupation jobs. However there is a large percentage of people employed in administrative and secretarial roles, as table 5.1.9 ⁽⁹⁶⁾illustrates, which are often low skilled and low paid.

Table 5.1.9 Occupational Groups

Major Occupation Group- Residents in employment who are:	NPT (total)	NPT (%)	Wales (%)
1. Managers and senior officials	4,100	7.1	9.1
2. Professional	8,000	13.9	17.7
3. Associate professional and technical	6,300	10.9	12.1
4. Administrative and secretarial	7,900	13.6	10.7
5. Skilled trades	7,700	13.4	12.5
6. Personal services	5,400	9.3	10.2
7. sales and customer services	5,600	9.6	8.3
8. Process plant and machine operatives	5,400	9.4	7.1
9. Elementary occupations	6,400	11.1	11.3
Total	56,800	100	100

5.1.126 Overall 11.5% of people are self employed in the County Borough compared with 13.8% in Wales as a whole.

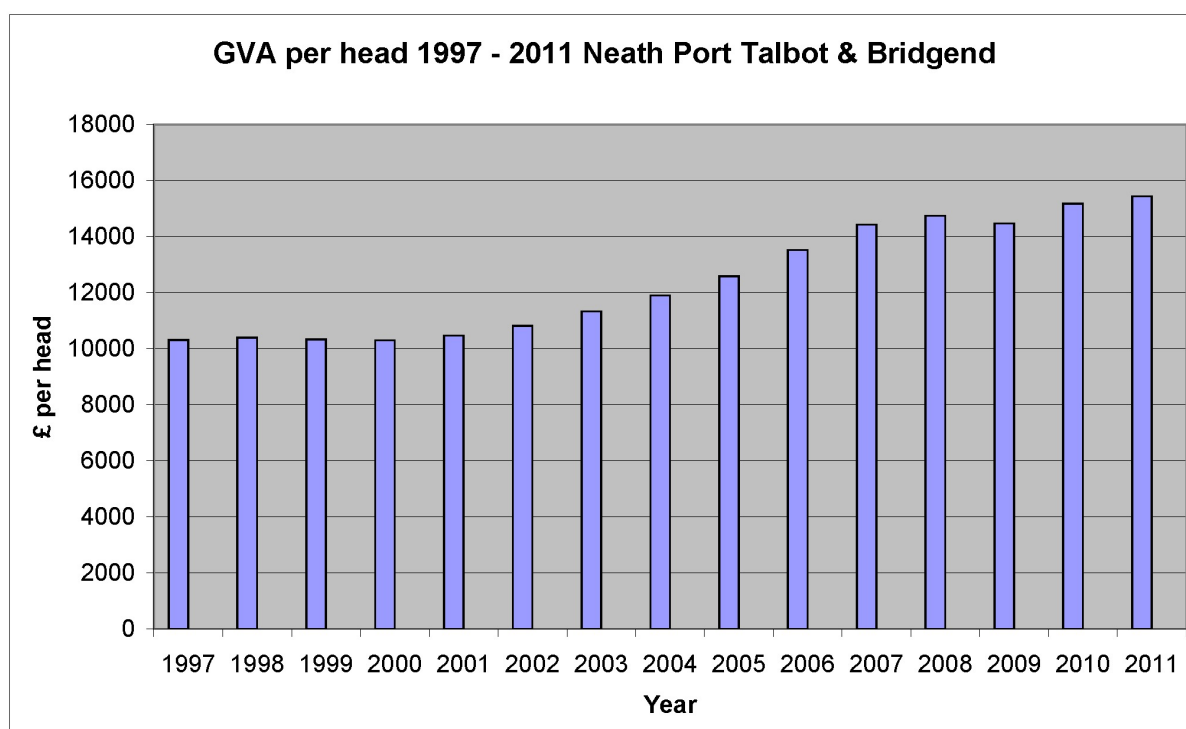
5 . Neath Port Talbot Today & Future Trends

5.1.127 Figures for Gross Value Added per capita are only available for Neath Port Talbot and Bridgend combined. Trends since 2001 suggest that GVA per capita has steadily increased. Figures to 2011 suggest that it is below the GVA per head for Wales – as is shown in Table 5.1.10 and also showed a slightly lower annual increase than in Wales as a whole.⁽⁹⁷⁾

Table 5.1.10 GVA per head

Indicator	Area	Latest Value	Index (National =100)	Annual % Change
GVA (Gross Value Added) per head 2011	NPT & Brid.	£15,440	74	+1.7%
	Wales	£15,696	75	+1.9%
	UK	£21,368	100	+1.6%

Picture 5.5 GVA per Capita for Bridgend and Neath Port Talbot



5.1.128 Given the predominance of manufacturing and construction within the economy, it is likely that this trend has been affected by the recession.

Employment Opportunities

5.1.129 Table 5.1.11⁽⁹⁸⁾ below indicates a growing number of residents working within their area of residence. However, a significant percentage still commute outside outside the County Borough for work opportunities.

Table 5.1.11 Commuting

▲	Number of working residents	Number working in the area	% of residents working in area of residence	Commuting out of the area	Commuting into the area	Net inflow ('000s)
NI	53,600	46,400	61%	20,700	13,400	-7.2

NB: 12,900 work in Swansea, 2,900 in Bridgend, 1,300 in Carmarthenshire and 2,600 work elsewhere.

5.1.130 Although it cannot be directly correlated from the figures in table 5.1.11 as the most recent figures are for 2001, most people commute or travel to work by car or van and, as Map 5.31⁽⁹⁹⁾ and Map 5.32⁽¹⁰⁰⁾ below indicate, patterns of car use vary across the County Borough, perhaps reflecting the poor access to public transport.

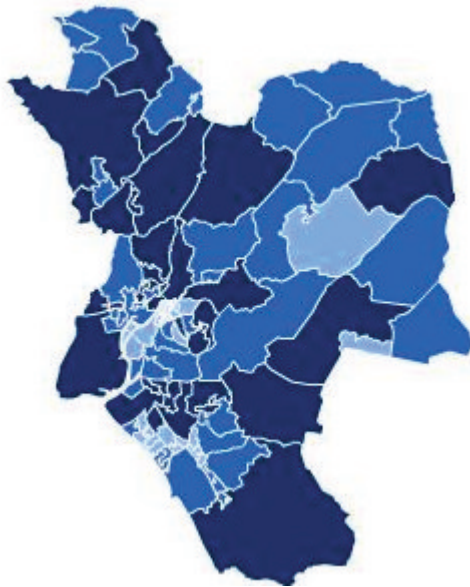
98 [SB 78/2008 Statistics on Commuting in Wales 2008. Welsh Assembly Statistics Bulletin, 10th December 2009](#)

99 [Wales Data Unit - People who travel to work by car or van](#)

100 [Wales Data Unit - People who travel to work by public transport](#)

5 . Neath Port Talbot Today & Future Trends

Map 5.31 Travel to Work by Car or Van

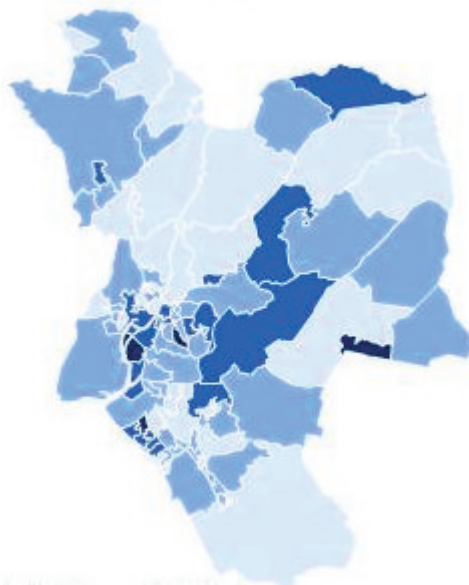


Key

- 50.0 - 59.2
- 59.3 - 68.3
- 68.4 - 77.5
- 77.6 - 86.7

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Map 5.32 Residents who travel to work by public transport



Key

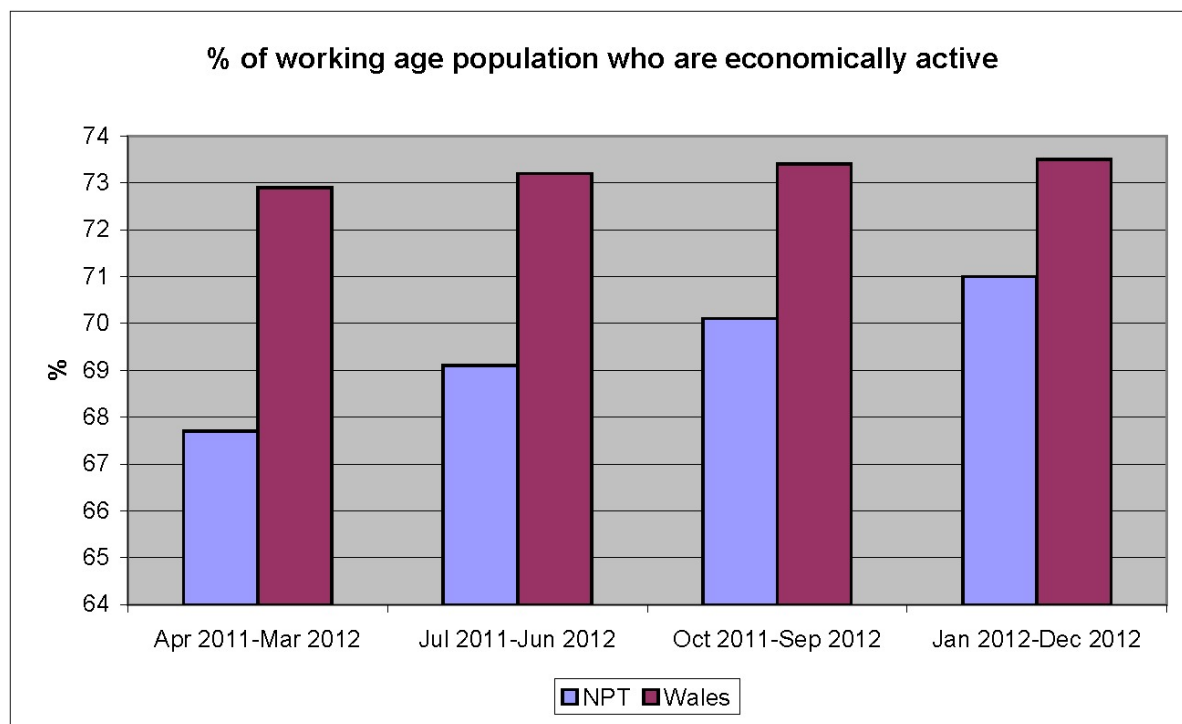
- 1.7 - 4.6
- 4.7 - 7.4
- 7.5 - 10.3
- 10.4 - 13.2

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Labour

5.1.131 Figure 5.12⁽¹⁰¹⁾ below shows that the percentage of working age people who are economically active is increasing which is similar to Wales as a whole.

Figure 5.12 Percentage of working age population who are economically active



5.1.132 Latest figures show that despite the recession the position is improving - both in actual terms and relative to the Welsh figures (see table 5.1.12).⁽¹⁰²⁾

Table 5.1.12 Economic Activity - period ending December 2012

Area	Population aged 16 and over	Working Age (men aged 16-64, women aged 16-59)	Economically Active (aged 16 & over)	Economic Activity Rate (working age)
NPT: Total	112,400	85,600	62,100	71.0%
Men	54,500	42,600	33,800	77.2%
Women	57,900	43,100	28,300	64.9%
Wales	2,456,600	1,893,300	1,438,400	73.5%
UK	50,532,600	40,187,000	31,790,900	76.8%

5.1.133 The gap between Welsh and local economic inactivity rates is closing with economic activity increasing in the County Borough.

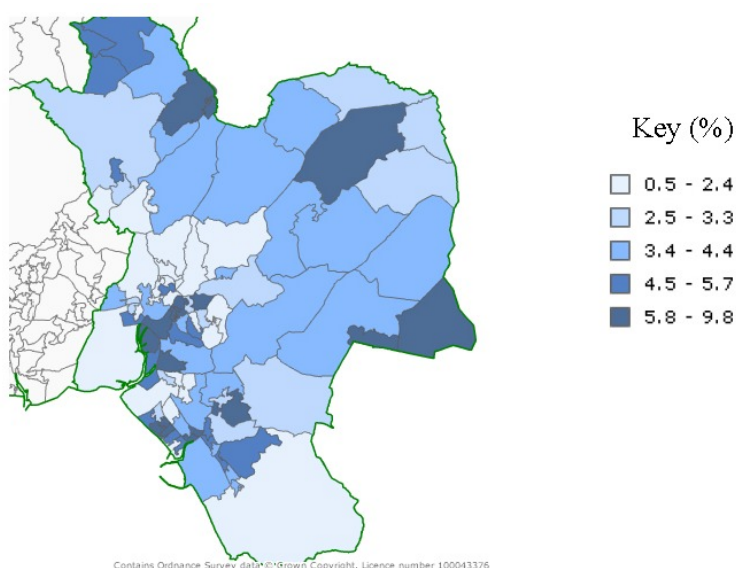
5 . Neath Port Talbot Today & Future Trends

Table 5.1.13 Economic Inactivity - period ending December 2012

Area	Employment (aged 16 & over)	Employment Rate (working age)	Economically Inactive (working age)	Economic Inactivity Rate (working age)
NPT: Total	57,600	65.8%	24,800	29.0%
Men	31,100	70.8%	9,700	22.8%
Women	26,600	60.8%	15,100	35.1%
Wales	1,319,300	67.3%	502,100	26.5%
UK	29,294,700	70.6%	9,330,200	23.2%

5.1.134 Unemployment is reflected in the percentage of working age people claiming job seekers allowance (JSA). Despite the recession, the claimant total has decreased in many areas in the County Borough. However, this is down to changes in the welfare system from the UK Government. The proportion of people claiming the allowance varies considerably across the County Borough - see Map 5.33 Percentage of working age claimants claiming Job Seekers Allowance (August 2012 Qtr).⁽¹⁰³⁾

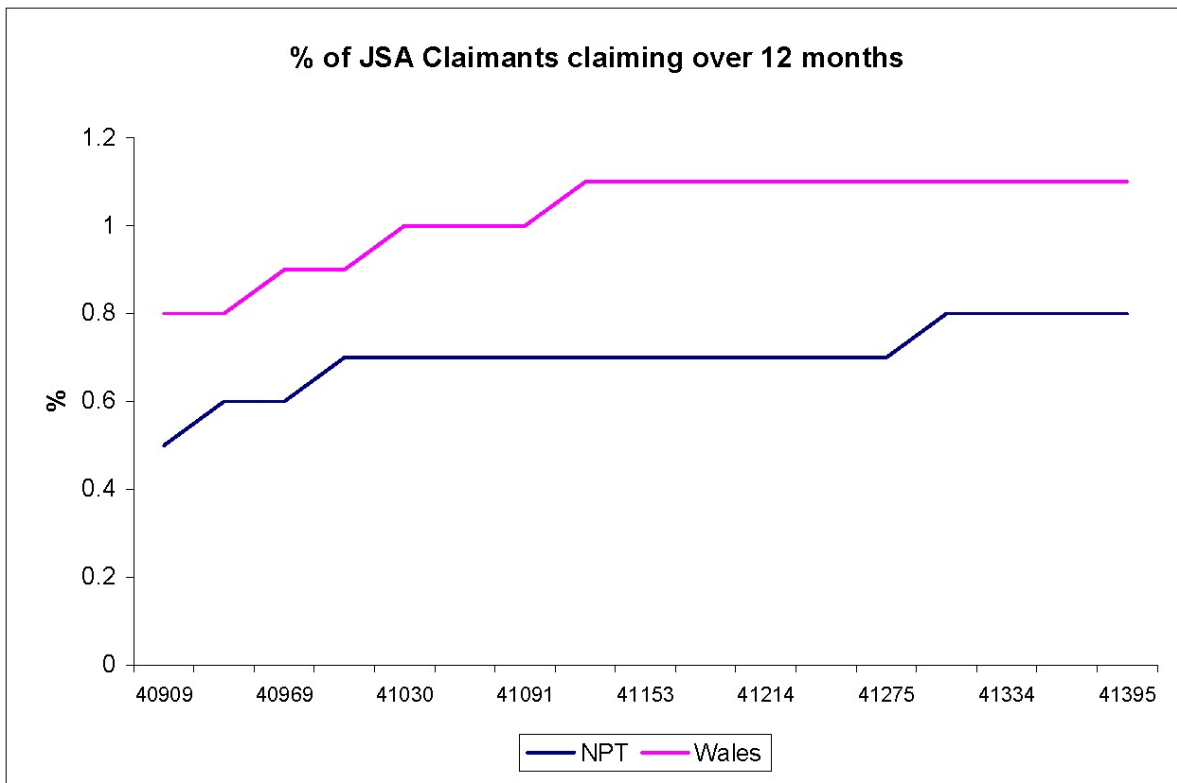
Map 5.33 Percentage of working age claimants of Job Seekers Allowance (August 2012 Qtr)



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5.1.135 Although long term unemployment is showing a slight increase, the rate of people claiming JSA for over 12 months is growing at a greater rate in Wales than in the County Borough.⁽¹⁰⁴⁾

Picture 5.6 Job Seeker Allowance Claimants - 12 months or more



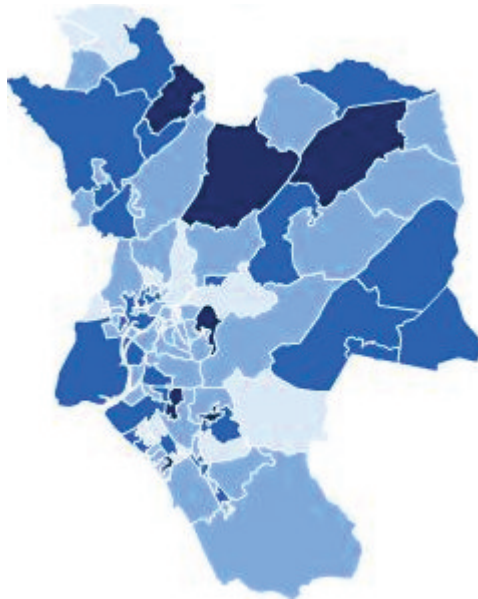
5.1.136 Patterns across the County Borough are shown below for 2011 - Map 5.34.⁽¹⁰⁵⁾

104 [Wales Data Unit - Long Term Unemployment](#)

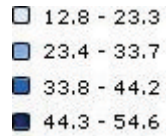
105 2011 Census, ONS

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Map 5.34 Long Term Unemployed



Key (%)

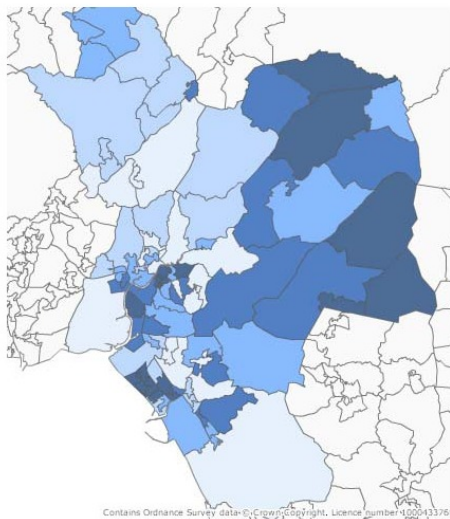


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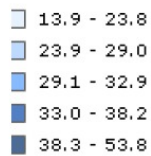
Skills

5.1.137 Skills are key to employment and economic sustainability. The County Borough suffers from a high percentage of people without qualifications and the pattern is unequal across the County Borough as Maps 5.35 and 5.36 illustrate.⁽¹⁰⁶⁾

Map 5.35 Percentage of working age population without qualifications, 2011 Census, ONS

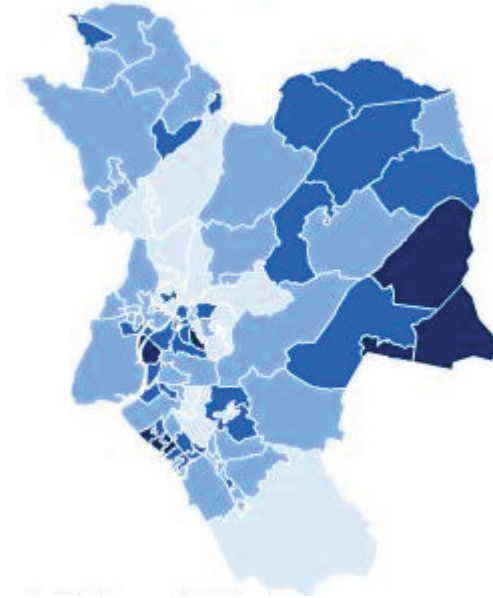


Key %

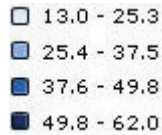


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Map 5.36 Adults aged 25-59/64 with no qualifications



Key (%)

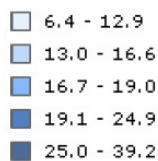
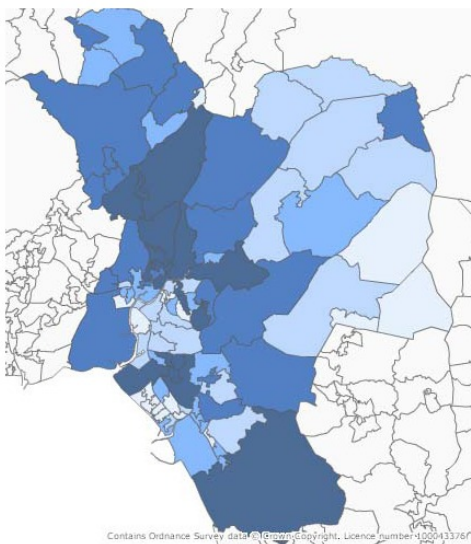


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Map 5.37⁽¹⁰⁷⁾ shows the percentage of working age population with level 4 qualifications and above which is lower than the Welsh average. Level 4+ qualifications include degrees, for example BA, BSc, Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND,

RSA Higher Diploma, BTEC Higher level, Foundation degree (NI), Professional qualifications (for example teaching, nursing, accountancy.)

Map 5.37 Working age population with level 4 qualifications and above



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Investment

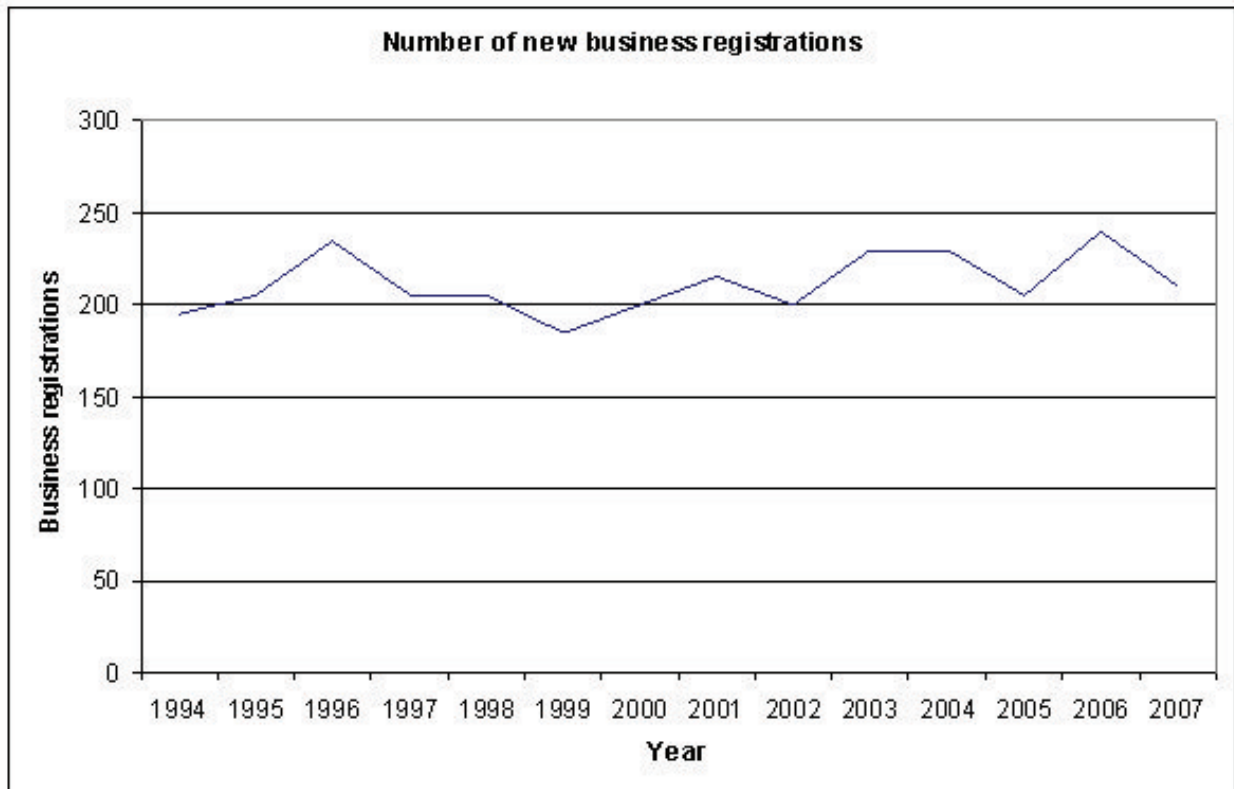
5. Neath Port Talbot Today & Future Trends

5.1.138 Figure 5.13 ⁽¹⁰⁸⁾ below demonstrates that the number of business start ups since 1994 has stayed fairly constant and shown a slight increase.

5.1.139 A survey of businesses supported by the Neath Port Talbot Business Development Fund to 2005 suggests that 79% of businesses were still trading after five years or more. This contrasts well with the UK figure of 80% of new businesses failing within the first three years.

5.1.140 Although the figures cannot be directly correlated to new businesses, it should be noted that 14,100 people commute into the County Borough for work as opposed to 24,000 residents who commute out of the County Borough.

Figure 5.13 Business Registrations



5.2 Likely Future Evolution of the Area Without the LDP

Climate Change

5.2.1 Research into the likely impacts of climate change is leading to an increasing consensus about the implications for the UK. The UK Climate Change Impacts Programme (UKCIP) has published information (UKCP09)⁽¹⁰⁹⁾ detailing a range of results taking into account variations between different global climate models and uncertainties.

5.2.2 The medium emissions scenario for 2050 indicates:

- Across Wales by 2050 average annual temperatures are projected to increase by 2.3°C;
- In summer, daily maximum temperatures are projected to increase by 3.4°C;
- In winter, daily minimum temperatures are projected to increase by 2.5°C;
- Rainfall is projected to increase in winter on average by 14% and decrease in summer by 16%. Overall the total annual average rainfall is predicted to remain the same; and
- Sea levels around Wales are predicted to rise by approximately 20cm by 2050.

5.2.3 The WG's Climate Change Strategy⁽¹¹⁰⁾ indicates that the impacts that can be expected from these changes in our climate are:

- Hotter and drier summers;
- Increase in extremely warm days;
- Milder wetter winters;
- Reduction in snowfall and frost;
- Increase in frequency of intense rainfall events;

109 [UK Climate Change Projections 2009 \(UKCP09\)](#)

110 [WAG Climate Change Strategy](#)

5 . Neath Port Talbot Today & Future Trends

- Decrease in groundwater levels; and
- Increased flooding of low-lying coastal areas.

5.2.4 Information issued in connection with the review of the Shoreline Management Plan⁽¹¹¹⁾ indicates likely significant changes to the coast such as:

- Greater frequency of storms;
- Increased wave heights;
- Increased erosion;
- Fluctuating rainfall; and
- Increasing river flows.

5.2.5 A key risk along the shore will be future changes in tidal surges, winds and storms. The combination of high tides and strong westerly and south-westerly winds, increasing wave height and tidal surges is a significant threat in terms of future coastal erosion and flooding. However, UKCP09 concludes that in most locations, the trend in storm surge levels cannot be clearly distinguished from natural variability. The Environment Agency recommends that climate change impacts on tidal inundation should be considered over a 100 year lifetime of development for residential properties and other highly vulnerable development and 75 years for other developments.

5.2.6 Changes in precipitation patterns could have implications for river flows which could affect meandering patterns, alignment of inter-tidal channels, development and breaching of sand spits, fluvial discharge and flood risks. Any effects on shoreline evolution are considered likely to be localised.

5.2.7 While the existing Unitary Development Plan (UDP) is based on a strategy of moving towards more sustainable patterns of development, the likely severity of the impacts of climate change require an increasingly proactive approach in the LDP.

Natural Resources and Waste

Water

111 [Swansea Bay and Carmarthen Bay Shoreline Management Plan Review \(Swansea and Carmarthen Bay Coastal Engineering Group\)](#)

5.2.8 The Water Framework Directive (WFD), Catchment Abstraction Management Strategies (CAMS) and River Basin Management Plan (RBMP), and existing UDP policies aim to conserve water resources and improve water quality. The WFD requires all countries within the European Union to manage the water environment to consistent standards. This is to be achieved through a formal series of 6 year cycles, starting in 2009, with the aim of achieving at least good status for all water bodies by 2015. Where this is not possible, and subject to the criteria set out in the Directive, this should be achieved in subsequent cycles. The need to conserve water will become increasingly important in light of anticipated climate change impacts, including drier summers.

Soil

5.2.9 Although the UDP directs a high proportion of new development to brownfield land, there is an additional cost in developing these sites when extensive remediation is required, which may have a significant impact on their viability for development. There is a continuing loss of agriculturally productive carbon-rich soils through development of countryside for uses ranging from housing to mining and windfarms.

5.2.10 The UDP encourages the development of higher densities of new housing, but in practice there is considerable demand for low density development. Coal mining, rock and aggregates extraction and the development of windfarms could continue to lead to the loss of soils and the habitats they sustain.

Waste

5.2.11 There have been significant increases in recent years in the percentage of waste recycled or composted in Neath Port Talbot, but there is still a significant amount of waste disposed of to landfill which may increase the need for additional waste disposal sites. Among other targets, the Welsh Government National Waste Strategy for Wales: Towards Zero Waste indicates that waste levels need to be reduced by around 1.5% per annum (2007 baseline) and that 70% of waste will need to be recycled by 2025 across all sectors.

Wind

5.2.12 As indicated above, two SSAs have been identified which are partly within Neath Port Talbot, and these areas were further refined by the Authority in SPG to identify two smaller areas within which windfarm developments are likely to be acceptable. The WG has subsequently indicated that such revision should not alter the SSA boundaries significantly and confirmed the total capacity of the SSAs which is substantially higher than those set out in TAN 8.

Minerals

5.2.13 National and UDP policies safeguard sand and gravel resources, while UDP policies identify the two main aggregate quarries and associated buffer zones. Mining and quarrying developments would be dealt with in accordance with criteria set out in the relevant policies. Areas are identified where opencast coal operations would not be acceptable, including areas within a 200m buffer from dwellings and in areas protected or designated for historic or nature conservation reasons. WG guidance (MPPW and MTAN 1) indicates that 500m should be used as a safeguarding distance, but this would only relate to settlements of over 10 dwellings.

Biodiversity and Geodiversity

5.2.14 The Water Framework Directive, CAMS and RBMP together with UDP policies aim to ensure that all water bodies maintain or achieve good ecological and chemical status, although current problems are identified in relation to quality and quantity. This should have a beneficial effect in general terms on biodiversity, especially aquatic species and wetlands.

5.2.15 Climate change is likely to have significant effects on biodiversity generally, although the detailed impacts are not readily predictable. It will be important to retain flexibility in terms of varying habitats and areas for species to migrate and adapt to climate changes, avoiding habitat isolation and fragmentation. Future development that does not take into account these considerations may be detrimental.

5.2.16 The continuing loss of biodiversity through development is a significant concern and is contrary to European and national policy. There is a risk that this will continue under existing policies. There is also erosion of habitats through activities that do not require planning permission.

Landscape, Townscape and Historic Character

5.2.17 The County Borough's countryside, apart from containing a range of priority habitats, also includes reserves of coal, rock/aggregates and wind energy that are of national significance. The UDP sets out a policy framework for considering development proposals, but there is a risk that an incremental approach could erode areas that are particularly significant to the local community.

5.2.18 Similarly, inappropriate developments in urban areas and conservation areas can adversely affect townscape and historic urban character and reduce the distinctiveness of the area's settlements.

Pollution

5.2.19 European standards for vehicle emissions and, where new industrial developments or power stations are created, the need to comply with the Large Combustion Plants Directive should have a positive impact on air quality over the next 5 - 10 years, but this may be outweighed by increasing traffic and congestion.

5.2.20 In relation to noise, increasing traffic levels are likely to increase noise levels, but measures under the Noise Directive will seek to address the areas of concern and the UDP includes policies to resist proposals that would cause unacceptable disturbance.

5.2.21 Light levels are likely to increase in the next few years, with no specific measures in place to address this issue. However, the UDP has a policy to take into account light pollution when dealing with applications for external lighting.

Community Cohesion

5.2.22 The County Borough's population will continue to age, with an increasing proportion of elderly residents for whom access to facilities will become a growing concern. Efforts to create a more active population with less ill health are likely to have some impact, but potentially, this will be offset by the effects of the ageing population and the impact of existing lifestyle diseases.

5.2.23 Without intervention some localities will continue to lose younger people and in others, the population will be increasingly elderly. This includes estates built in the 1960s, 1970s and 1980s. The lack of facilities to serve this housing is of concern. Some elderly residents will not be able to continue to live in the community in which they have lived – either because of this lack of facilities or because their housing is no longer suited to their changing needs. This will exacerbate community segregation and severance and community cohesion.

5.2.24 Further intervention will be needed to ensure that opportunities for people and communities to engage with one another are not diminished either because of a lack of facilities, access, time or disposable income. Reversing trends in participation rates will also require intervention.

5.2.25 It is likely that the rate of inward migration from other parts of Europe in search of employment will reduce, but there are likely to be localities in which new comers will be concentrated.

5.2.26 The percentage of Welsh speakers across the County Borough is likely to show an increase while remaining a relatively small proportion of the population. However Welsh speaking communities are likely to see a decline in the proportion of Welsh speakers due to the loss of younger people and an ageing population. The inward migration of non-Welsh speakers will also have an impact on the linguistic balance, although UDP policies set out a framework to assess and mitigate adverse effects. Monitoring of these policies will identify if further protection is required.

Health and Wellbeing

5.2.27 Without intervention health inequalities between geographical areas and different population groups within the County Borough will increase. Intervention will need to address socio-economic and cultural issues as well as environmental, living and working conditions.

5.2.28 Intervention will need to focus on developing a social infrastructure within all areas of the County Borough in order to break reinforcing patterns of deprivation and poor wellbeing – see also the section on community cohesion.

5.2.29 Regeneration schemes which are proposed focus attention on the M4 coastal belt and although proposed for the Valley areas, these are more limited in scope. Without intervention, evidence suggests that regeneration schemes attract and benefit new populations rather than improving wellbeing and health outcomes for the indigenous population⁽¹¹²⁾.

5.2.30 Without intervention there is a risk that adult mental health and lifestyle issues will continue to worsen. This impacts on child health and their future adult health, thus reinforcing poorer adult as well as child wellbeing outcomes.

5.2.31 Similarly without intervention certain communities will not be able to access fresh fruit and vegetables, ‘community’ facilities or employment opportunities that are created along the coastal belt.

Economy

5.2.32 The ability of the local economy to grow and/or support the needs of the local community will be increasingly constrained by environmental, supply and associated regulatory constraints.

5.2.33 These constraints include:

112 [Sustainable Development Research Network](#).

- The effects of climate change;
- The increasing costs and or security of energy supplies – the cost and scarcity of oil and oil based products;
- The scarcity of resources (including labour) and interruptions in supply; and
- Carbon reduction targets and the application of the principle that polluter pays.

5.2.34 Without intervention, these constraints could impact negatively on the competitiveness of the economy and its ability to respond to changes in the global economy and global markets.

5.2.35 Attracting investment into the area and ensuring that the local skill base meets the demands of both the local and global economy are critical to the resilience of the local economy.

5.2.36 The Wales Spatial Plan and the Unitary Development Plan focus new employment opportunities along the M4 corridor and while they set out to promote employment in the valleys and Neath, few jobs have been created. Employment sites have been proposed and made available, in some cases for decades, but new premises have not materialised, reflecting a lack of demand.

5.2.37 Without intervention and more innovative approaches this situation is likely to continue which will create an increased mismatch between communities and employment. It will also exacerbate existing disparities between Valley and Coastal regions. This will disadvantage communities and individuals living within them, impacting on their viability.

5.2.38 Location of employment along the M4 corridor will result in increased commuting. Without intervention this will generate increased traffic and pollution as well the area's carbon and ecological footprint.

5.3 Identified Problems

Climate Change

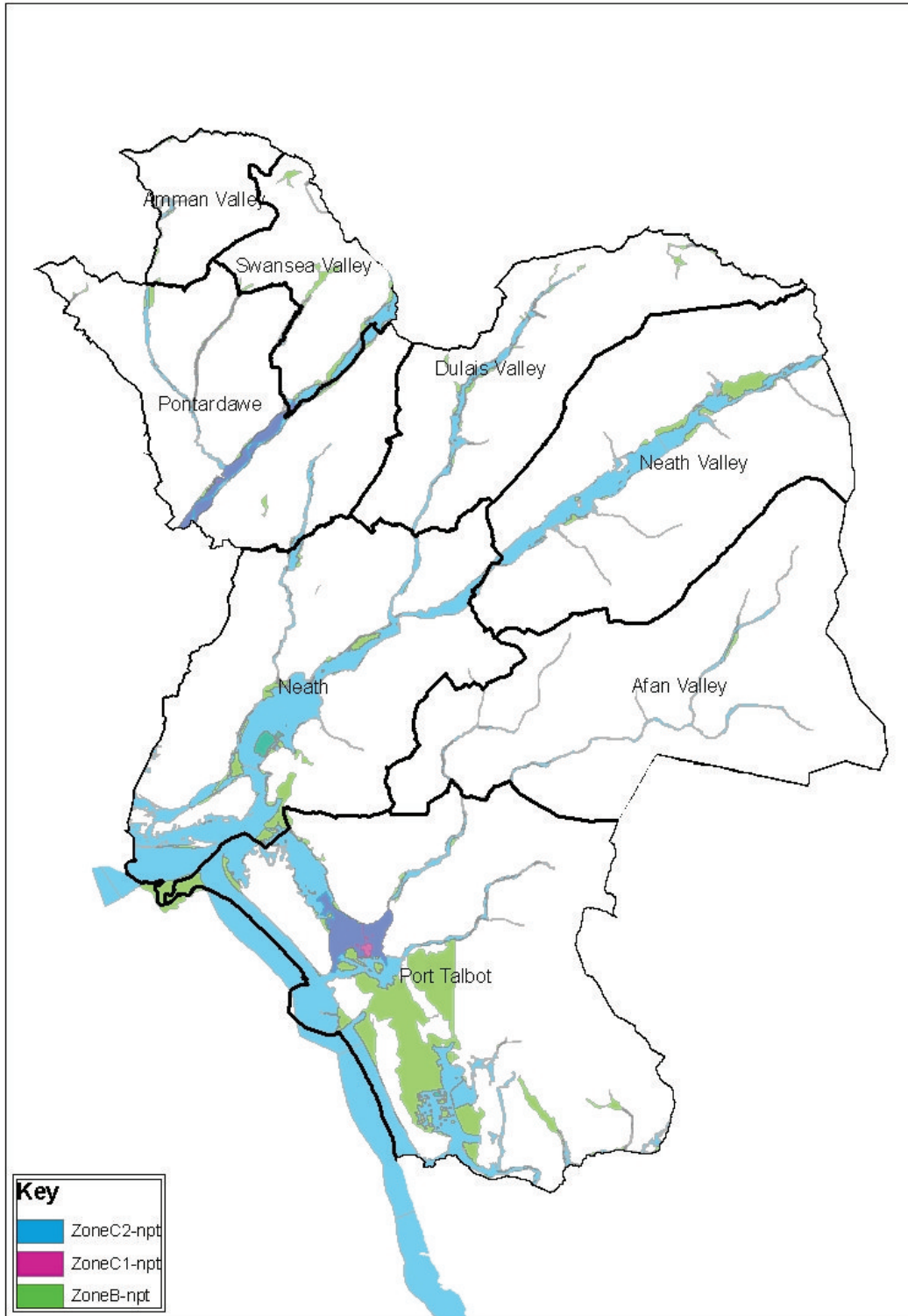
5.3.1 One of the main implications of climate change for Neath Port Talbot is likely to be the increased risk of flooding. Flood risk areas (as defined in TAN 15)⁽¹¹³⁾ are shown below. Residential areas and, in particular, transport routes are likely to be at increased risk from flooding.

113 [Technical Advice Note 15: Development and Flood Risk \(WAG 2004\)](#)

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5.3.2 Climate change could also cause problems in relation to the amount of water in watercourses in summer. Retaining sufficient water to meet the population's needs and to sustain the ecology of watercourses is likely to put pressure on reducing abstraction and use of water. This can be addressed in the location, design and specification of new development, but the implications for existing properties and their occupiers must be considered.

Map 5.38 Flood Risk Areas (TAN 15)



5.3.3 As can be seen, significant areas of the County Borough near to the coast fall within zone C2, together with large areas of the valley floors. These are areas of floodplain without significant flood defence infrastructure. TAN 15 indicates that

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only less vulnerable development should be considered in these areas. (Zone C1 is defined as areas of the floodplain which are developed and served by significant infrastructure, including flood defences, while zone B is defined as areas known to have been flooded in the past).

5.3.4 A further impact of climate change will be that hillier areas will be at risk from exposure to more frequent stormy conditions, posing risks for properties unprepared for wetter or stormier weather.

5.3.5 As well as the need to incorporate measures to promote *adaptation* to the likely results of climate change, the LDP will need to promote measures to *mitigate* the effects of its proposals. Achieving economic growth and prosperity without increasing emissions of greenhouse gases will be a significant challenge.

5.3.6 The Environment Strategy for Wales⁽¹¹⁴⁾ identifies the following likely problems:

- An increase in river and coastal flooding and erosion with increased pressure on sewer systems;
- An increase in storm damage and increased risk of subsidence in subsidence prone areas;
- Habitat and species loss and changes to the landscape;
- Summer water shortages and increased incidence of low river flows;
- Increased thermal discomfort in buildings;
- Increased health risks in summer, but reduced cold-weather illness;
- Less cold weather transport disruption, but more disruption caused by flooding; and
- Limitation of some economic opportunities (but some new economic opportunities).

Natural Resources and Waste

Water

114 [Environment Strategy for Wales \(2006\)](#).

5.3.7 In relation to both chemical and biological quality, significant lengths of river and canal in the county borough current fail to meet targets. Over abstraction is also an issue for the Afan and Neath rivers.

Soil

5.3.8 There is a need to protect the County Borough's soil resources from the impact of soil sealing due to cumulative development. Higher density development can help to address this together with avoiding development on better quality soil through achieving higher density development, and avoiding development on better quality soils where possible. There is a similar need to minimise the loss of poorer quality soils that sustain priority habitats (as identified in the NPT Local Biodiversity Action Plan) and retain peaty soils that form carbon sinks that could contribute towards climate change if damaged. There are extensive areas of brownfield land that are contaminated and require remediation, but the costs involved may be significant.

Waste

5.3.9 There is a need to assess the adequacy of existing landfill, waste collection and treatment facilities, and the ways in which the construction and operation of new development addresses waste minimisation.

Wind & Minerals

5.3.10 In relation to wind and minerals resources, the main issue relates to the potential for sterilising or otherwise preventing the use and exploitation of the resource (matters such as the effects on the landscape or habitats of an area are dealt with in other sections).

Biodiversity and Geodiversity

5.3.11 In relation to designated sites and habitats, the following general threats and causes of decline have been identified:

Table 5.3.1

Broad Habitat Type	Threat / Cause of Decline
All habitats	Climate change; inappropriate development; poor air quality
Broad leaved and mixed woodland	Inappropriate grazing; Invasive species
Dwarf shrub heath	Scrub invasion/lack of grazing; Inadequate control of grazing

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Fen, marsh and swamp	Scrub invasion/lack of grazing; Drainage problems/lack of control over drainage on surrounding land
Bogs	Scrub invasion/lack of grazing; Drainage problems/lack of control over drainage on surrounding land; Nutrient enrichment from external water sources
Standing open water and canals	Poor water quality; Siltation and consequent nutrient enrichment
Supralittoral rock (including coastal grassland, heathland & cliffs)	Lack of control over grazing; Lack of control over burning
Supralittoral sediment (sand dunes & shingle/boulders above highwater)	Over-stabilisation of sand dunes; Lack of grazing, lack of control over grazing; Lack of control over water levels; Afforestation; Lowered water levels due to proximity of plantations
Littoral sediment and littoral rock (i.e. intertidal habitats)	Coastal development and flood defence; Trampling and use of vehicles on beaches; Unsustainable fishing practice and bait collection; Poor water quality; Natural coastal processes (erosion and deposition); Litter

Other Loss of Habitat

5.3.12 Monitoring over recent years has identified a fluctuating loss of LBAP habitats in NPT as a result of planning permissions, varying between 2.5 ha per annum and nearly 18 ha per annum. This conflicts with international, national and local aspirations and commitments to halt the loss of such habitats and biodiversity.

5.3.13 Specific issues identified:

- Condition of SSSIs and other designated sites;
- Loss of habitats due to development requiring planning permission;
- Loss of habitats due to activities not requiring planning permission;
- Erosion of habitats – in countryside (disturbance, horsiculture, agriculture etc.);
- Erosion of habitats in urban areas (Higher development densities, loss of open/natural areas, loss of brownfield areas of significant biodiversity value, ‘urbanisation’ of gardens);
- A need to monitor the protection of geological features.

Landscape, Townscape and Historic Character

5.3.14 There are concerns about the loss of landscape character through development, particularly on greenfield sites and from windfarms and opencast mining.

5.3.15 The historic character of the area's towns and villages is in danger of being further eroded through the loss of 'iconic' buildings, piecemeal inappropriate developments and minor changes, in particular in conservation areas. Changes that are in themselves minor and may be 'permitted development' that does not need express planning permission can have the effect cumulatively of changing a locality's character.

5.3.16 Although a register of listed buildings at risk is maintained as a means of encouraging the reuse of the buildings, a significant increase in the need to use available sites means a continuing loss is likely.

Pollution

5.3.17 In relation to air pollution, the following areas have been identified as places where there are significant issues:

- Margam/Taibach AQMA;
- Central Port Talbot;
- Central Neath; and
- Central Pontardawe (Nickel).

Noise

5.3.18 The LDP will need to address noise issues including addressing Noise Action Planning Priority Areas and the protection and enhancement of Quiet Areas which are being identified as a result of the European Noise Directive.

Light

5.3.19 There is very little information available about light pollution, or on the effectiveness of the UDP policies, but any increase in the road network and associated lighting, or additional lighting on existing roads is likely to increase the problem.

Community Cohesion

5.3.20 The changing economic and age base of the County Borough is having social effects which may be diluting and undermining distinctive local communities and cultures, including the use of the Welsh Language. As employment centres have become more diverse and employers smaller in size, one source of common understanding and identity has been eroded – individuals may identify with a different and external community. As people travel further to their place of work and journey times have increased, so too has pressure on community cohesion – people have less time to socialise with each other locally. Modern communication methods have also created different loyalties and interests which may lie outside the local community. Levels of informal caring are significantly higher within Neath Port Talbot than other areas of Wales – with the consequent impact on cohesion and social capacity.

5.3.21 The inability of individuals to continue to live independently within their own homes as opposed to facilities or housing outside their communities has exacerbated this situation as a sense of historical connection with place and people is lost. Changing accommodation needs, especially for older residents, cannot be met within the community and residents often have the choice between moving away from the area or staying in oversize accommodation. This in turn creates issues in relation to maintenance and affordability as well as the availability of family accommodation, encouraging outward migration and a pressure on community cohesion.

5.3.22 The decline in community facilities in many settlements (for example the closure of churches, chapels, pubs and shops) underlines and reinforces these impacts. Without places to meet there is a danger that communities will lose their cohesiveness.

Health and Wellbeing

5.3.23 Poorer health outcomes are concentrated within specific areas of the County Borough – generally the Valleys and parts of Port Talbot.

5.3.24 These areas coincide with areas of higher reported crime and multiple deprivation, physical degeneration including vandalism, and poorer access to services and good quality housing.

5.3.25 Specific issues identified include the higher than average morbidity rate, the higher than average incidence of lifestyle related diseases such as diabetes, alcohol consumption and suicide rates.

5.3.26 Inward migration may offset overall trends in the age profile of the local population but age and health profiles vary considerably across the County Borough and the percentage of elderly people as a proportion of the total population has increased. The problems are likely to be focused on particular areas and neighbourhoods. This will increase pressure on age related health and social care services. The number of people claiming incapacity benefits is above the Welsh average.

5.3.27 Problems associated with social exclusion are likely to increase. Reduced accessibility would be likely to impact particularly on vulnerable groups within the community, as their members are less likely to have access to or be able to afford transport.

5.3.28 Pressure on good quality, affordable housing and that which is appropriate to individual needs and circumstances will also increase.

5.3.29 Employment opportunities within areas of the County Borough are restricted by a focus on developing the M4 coastal belt, with insufficient access to and from the Valley areas.

Economy

5.3.30 Communities face increased journey times to jobs that are migrating towards and along the M4. This will have an adverse effect on individuals' health and wellbeing and community cohesion. The commuting is heavily dependent on access to a car, reflecting increasingly diffuse commuting patterns within and out of the County Borough.

Economic Base: the following problems have been identified:

- Fewer employment opportunities in the area with the decline or loss of industries within the area, notably the coal, steel, petrochemical and oil industries;
- The prevalence of low skilled and low waged employment;
- A small manufacturing base in relation to the service sector;

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- The reliance upon construction (high carbon dependent industry) within the non service sector and, within the service sector, the prevalence of public sector service jobs which are often low paid; and
- The location of employment along the M4 corridor with the Valleys and Neath losing much of their employment base.

Labour Supply

- The area has a higher than average number of people living with a long term limiting illness and consequently a higher than average percentage of people economically inactive and living on incapacity benefits;
- Lack of skills within the economically active population and amongst those economically inactive limits the ability of the local population to take advantage of any regeneration activities. It also makes the area less attractive to potential employers especially those of ‘new’ industries;
- There is insufficient critical mass of potential employees to attract service centre operations serving regional or national customers; and
- A lack of indigenous entrepreneurial skills limits the potential for indigenous growth.

Investment

- There is a disparity of employment opportunities between the urban coastal area and rural valley areas. The desire to balance the need to regenerate these areas potentially conflicts with the desire to focus investment in areas with the greatest potential for growth – i.e. the coast;
- Access to and from employment opportunities along this belt as well as access to suppliers and markets often requires access to or ownership of private cars or road haulage. The lack of a fully integrated sustainable transport infrastructure could inhibit investment and exacerbate existing disparities;
- There is currently insufficient competitive advantage to attract significant external investment;

- Office and commercial provision exists to support small and medium enterprises, but is insufficient to effectively support greater investment;
- The lack of a high speed broadband Internet infrastructure across the whole of the County Borough could restrict investment as well as limit the possibilities of the local economy to build on the R & D foundation that exists. Geographical disparities in economic activity could also be exacerbated; and
- The physical and environmental degeneration of areas within the County Borough acts as a disincentive to investors and exacerbates the existing disparities in economic prosperity across the area.

5.3.31 The economic recession will potentially exacerbate these issues especially as public funding is likely to concentrate on existing commitments rather than new initiatives. Competition from neighbouring areas as a result of the implementation of the Wales Spatial Plan will also impact on the County Borough's ability to respond and take advantage of any global upturn.

5.4 Characteristics of the Area Likely to be Significantly Affected

5.4.1 The LDP is a land use plan that will influence the future shape and appearance of the County Borough through setting out the policies that will be applied when dealing with planning applications. Consequently, some of the identified characteristics of the County Borough are likely to be fundamentally affected by the LDP, while other aspects will not be directly influenced. In overall terms, the main underlying characteristics that have the potential to be influenced are the size of the County Borough's population, the future level of growth and the spatial distribution of development.

5.4.2 In terms of population growth, the LDP will set out the population to be accommodated over the Plan period and allocate land accordingly, which will influence the amount of accommodation provided and hence the number of people moving into and out of the area and the population profile. This will affect the overall future evolution of the area, its communities, towns, countryside and general appearance and has the potential to change the character of the County Borough.

5.4.3 The level of growth that is to be planned for is then distributed spatially by the LDP, further influencing the character and future of all the County Borough's communities, the shape and appearance of the urban and rural areas and economic development across the area.

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5.4.4 In relation to the specific topics of the SA, particular characteristics emerge from the foregoing sections of this chapter. These are considered further in turn below.

1. Climate Change

5.4.5 The proposals in the LDP are unlikely to have a significant effect on the outcomes of climate change: these are currently uncertain and are a result of global influences, although the Plan will address the causes of climate change and will need to make provision for changes that are likely to happen. In relation to the causes of climate change, changes to the County Borough's high level of CO₂ emissions will be influenced by measures in the Plan and the need to minimise any additional emissions from new planned developments need to be fully considered.

2. Resources and Waste

5.4.6 The main resources that could be affected by the LDP are likely to be minerals and soils, while waste issues will be affected by the provision made for waste treatment and disposal facilities in the Plan. The Plan will make provision for the extraction and use of mineral resources together with environmental safeguards, while soil resources will mainly be affected by the take up of greenfield sites that would result in potentially productive soils being built on.

3. Biodiversity and Geodiversity

5.4.7 The County Borough has a wide range of sites that have been formally identified as being of importance for biodiversity reasons. These include three Special Areas of Conservation (SACs) designated at European level, 20 Sites of Special Scientific Interest (SSSI) and a range of local designations (see section 5.1). The LDP has the potential to affect any of these sites, but there is also biodiversity interest on many sites that do not have any designation. This issue is a significant area where the LDP can have an impact, but there are numerous controls to protect the more important sites, and the LDP can introduce policies to give protection elsewhere.

5.4.8 Similarly, a number of sites are identified as being of Geodiversity interest. However, these areas are more limited and for the most part are not in areas where development is likely.

4. Landscape, Townscape and Historic Character

5.4.9 The County Borough has a range of important and attractive landscapes and a rich historical legacy with noteworthy buildings, historic remains and townscapes. The LDP has the potential to have major impacts on these characteristics through

proposing developments that could have a major effect on the sites in question. As with biodiversity, as well as the potential to damage the identified characteristics, the Plan is able to protect these areas from inappropriate development and will have a significant role in their future evolution.

5. Pollution

5.4.10 There are significant issues in relation to air pollution in particular in some parts of the County Borough, and significant areas of former industrial land are known to be contaminated. In relation to air pollution, this is a factor that will have to be taken into account but is largely a result of existing circumstances in the areas concerned, which will not be significantly affected by the LDP, but is addressed by other controls. Land contamination can be addressed by development, but other forms of pollution are unlikely to be greatly influenced.

6. Community Cohesion

5.4.11 Some parts of the County Borough (especially the more rural parts and the valleys areas) have experienced population losses in recent years, while areas along the coastal corridor have experienced additional population pressures. Partly as a result of this the population is ageing in some areas, and there can be poor access to facilities and services. All these factors have impacts on community cohesion and can be influenced by planning policy and the planning strategy for growth and spatial distribution.

5.4.12 At a more local level, Plan policies relating to the provision of community facilities, physical linkages and the safeguarding of the Welsh language can have a significant impact on individual communities.

7. Health and Wellbeing

5.4.13 As highlighted in previous sections, health and deprivation are significant issues in the County Borough, with particular concerns relating to low life expectancy, high mortality and incapacity rates and poor lifestyles, particularly in older urban areas and some valleys communities. The LDP will have an influence on these factors although this is likely to be through indirect effects, such as encouraging healthier lifestyles or improved employment opportunities rather than through the direct provision of health care services or facilities.

8. Economy

5.4.14 At the broad scale, by encouraging and providing for increased growth and development, the LDP can have a positive impact on the local economy, while the provision of suitable sites for employment uses can encourage businesses to become established. Some planning policies designed to protect environmental characteristics could have a restraining effect on the local economy and the LDP will need to balance these issues to achieve the optimum outcome.

6 The Alternatives & Methodology

6.1 Reasons for Selecting the Alternatives Dealt With

6.1.1 One of the key tasks in the SA process concerns the development and appraisal of the strategic alternatives, which should be realistic options for meeting the Plan's objectives. At the strategic level, the main options to be considered are the overall level of growth or change and the spatial distribution of new development. At the Pre-Deposit stage, the LDP dealt with these options in three stages:

- Options for the level of growth, based on alternative population projections, influenced by and affecting the amount of new development;
- How the preferred level of growth should be distributed spatially across the County Borough;
- The more detailed choices mainly concerning the key housing sites.

Growth Options

6.1.2 Seven growth options were considered, ranging from high decline (-200 persons per year) to very high growth (+585 persons per year). Further details of these options, together with the findings of the appraisal are given in Chapter 7.

6.1.3 The growth options were developed following detailed consideration of a range of population projections for the County Borough, based on census information and Mid Year Estimates from the Office of National Statistics. The Welsh Government (WG) issued population projections in 2008 and 2010, and the Council has produced its own projections, using the most recent available data and including policy-led influences. Full details of this process are given in the LDP Population and Housing Topic Paper.

6.1.4 The highest growth option considered is taken from the WG (2008 based) population projection. Any growth level above this was considered to be unrealistic. This view was based mainly on an analysis of internal migration rates, which declined substantially after 2003/2004. The WG projections did not take this decline into account, while the Council's projections were based on more recent figures. Full background information on this analysis is contained in the Population and Housing Topic Paper. The lowest option, representing a decline of 200 persons per year, was based on the assumption that the recently identified population loss trend would continue and increase. Any larger decrease in population was considered to be unlikely.

6 . The Alternatives & Methodology

6.1.5 Within the range considered, the growth options were divided into seven alternatives. This was considered to allow reasonable detail and contrast between options for meaningful comparisons, discussion and appraisal without the over-complication that is likely to result from considering any larger number of options within the overall range of scenarios.

6.1.6 The level of population growth leads to the identification of the amount of housing that will be needed to support and cater for the projected population. Because of a general trend towards smaller households, it is projected that even the greatest rate of population decline considered would result in the need for an additional 169 houses per annum.

6.1.7 At the Pre-Deposit stage, a moderate growth level was chosen as the preferred option. However, as a result of responses received to the Preferred Strategy consultation and following further work, research and information, this was changed to medium/high growth level. Full details are given in the Population and Housing Topic Paper and further details of the appraisals of the options are given in chapter 7.

Spatial Options

6.1.8 Due to the varied geographical nature of Neath Port Talbot (encompassing urban and industrialised areas near to the coast, areas of pastoral countryside, and more upland moors and valleys, with consequent contrasting settlement patterns), a framework for considering the LDP spatial options and alternatives was considered to be necessary. This led to the County Borough area being divided into 8 spatial areas, based on overall character.

6.1.9 For the purposes of considering the highest level spatial strategies however, a much broader characterisation was considered appropriate, essentially contrasting the coastal belt with the more upland and inland areas, and the urbanised and industrialised areas with the smaller and more remote valleys communities. The high level spatial options have therefore been characterised in terms of development along the coastal belt (or M4 corridor) as opposed to development further inland in the valleys areas.

6.1.10 Four high level spatial options were considered, covering varying mixtures of development along the coastal belt or in the valleys areas. These are set out in chapter 7. It is considered that the alternatives identified cover the main realistic and viable options, taking into account existing commitments and constraints, and that the level of detail given at this stage and scale is appropriate to allow assessment of the likely outcomes.

6.1.11 The preferred alternative is to focus on the M4 coastal area while making increased levels of intervention to rejuvenate the valleys. This balances working with market forces against increasing the resources to regenerate the valleys. It is difficult to identify the level of intervention needed to stem forces that are undermining the communities but it is apparent that existing actions are not sufficient. It is considered that the preferred option will bring benefits in terms of co-locating factors including homes and work, while reducing overall traffic growth compared with guiding more development to the valleys. The selection of the option recognises that there is already a substantial committed landbank of planning permissions and that they will deliver very significant remediation of contaminated brownfield land. On the other hand, while regenerating valley communities makes better use of existing infrastructure, it does mean some loss of countryside and habitats on the fringes of communities and an increase in traffic and commuting. However, the scale of development and adverse impacts will be relatively small and outbalanced by the positive regenerative effects. Full details of the appraisals of the options are given in chapter 7.

Local Spatial Options

6.1.12 As part of the preferred strategy, alternative spatial options were identified for housing development in the Neath spatial area, the Port Talbot spatial area and the Valleys spatial area. These options identified possible key housing development sites as alternatives within the three areas. These options were derived from consideration of the range of sites put forward for development (candidate sites), a broad assessment of their suitability and sustainability in relation to general planning criteria which had been assessed for compatibility against the SA objectives. The likely economic viability of the alternative sites and their availability for development were also assessed. From this exercise, realistic alternative proposals were put forward for the three areas.

6.2 Methodology

6.2.1 The various elements of the Deposit LDP have been assessed against the objectives and questions set out in the SA Scoping Document. These were identified following consideration of international, national and local objectives and aspirations, the local situation and problems and trends. The appraisal methodology is based on assessing the extent to which Plan strategies, policies and proposals work towards meeting the identified SA objectives.

6.2.2 Following on from the assessments of the Pre-Deposit Plan (from vision through to the LDP objectives, strategies and policies) the Deposit Plan has been assessed against the SA objectives. This process influenced the preparation of the

6 . The Alternatives & Methodology

Plan and the outcomes of the assessments have also influenced consideration of how monitoring will be undertaken and have led to the identification of matters of concern that will require attention/mitigation.

6.2.3 The SA Scoping Document sets out the SA goals, objectives and questions by topic. The various elements of the Plan were assessed by reference to the SA objectives under each topic heading, with reference to the questions and the baseline information and identified problems as set out in the scoping document. Each element of the Plan was assessed for its likely significant effects on the SA objective concerned. These effects include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects. The process has mainly been recorded in the form of matrices, incorporating short summaries of the findings and an overall scoring rating based on both symbols and colour coding. The scoring summaries differ slightly depending on the element of the Plan being assessed: more details are given in the relevant sections. However, a general outline of the system used is given in the table below.

Table 6.2.1

Symbol	Meaning
√√	Strong significant positive effect
√	Significant positive effect
0	Neutral/no significant effect
?	Uncertain effect
X	Significant negative effect
XX	Strong significant negative effect

6.3 Difficulties Encountered

Information Compilation

6.3.1 Some of the difficulties encountered in compiling the information to underpin the selection of the alternatives and preferred choices reflect a difficulty in measuring current performance and identifying trends.

6.3.2 This relates to difficulties in identifying matters that can be measured and recorded to reflect the sustainable development issues in question. This may be because the relevant information is not currently collected or because it has proved difficult to identify matters that can be measured to reflect the desired outcomes. In some cases this has, in the past, meant the use of surrogates.

6.3.3 In many cases, for example in relation to some of the Welsh Government key sustainability indicators, data is only available at national or regional level. Data may also be collated for other purposes and is not necessarily that which is best suited to determine sustainability outcomes. Collection of more relevant data is both costly and could be subject to risk of consultation overload. Some data which could be highly relevant may be commercially sensitive and therefore unavailable, for example passenger numbers on commercially run public transport services. Where local data does exist, it is often still not local enough to be relevant when assessing some local or community issues.

6.3.4 Data sets over time often use different criteria and baselines. This means that it can be difficult to accurately assess trends. Similarly it can be difficult to ensure that there are not blips in the data caused by external factors (for example weather conditions affecting air quality data). However, it should be noted that despite changes in criteria which may have affected positional data, the underlying issues in relation to health have not fundamentally changed.

6.3.5 Data can be sensitive to extreme external factors, such as the financial crisis of 2008 and its associated economic impact which also makes it difficult to assess trends accurately over the review period.

6.3.6 Some of the data is qualitative rather than purely quantitative. Qualitative data still suffers from a perception of being less significant and reliable than quantitative data, yet in relation to many sustainability issues, it is qualitative data that is more relevant. Some data may be self-reported, raising concerns about its integrity and reliability.

6.3.7 Some data is not collected as frequently as other data which could present a misleading picture of progress or otherwise in relation to certain aspects of the appraisal given the time frame of the review period. For the most part, infilling the gaps would be unmanageable and/or costly. This needs to be taken into account in evaluating the information available.

Approach to Appraisal

6.3.8 Some difficulties arise in the initial prediction of the likely effects of alternative strategies and policies. In relation to the alternative strategies, uncertainties that affect the assessment include the extent to which the strategies would be implemented through policy, the exact location of development and the final mix between greenfield and brownfield sites. Because of this only broad initial conclusions can be reached about the differing effects of alternative growth levels and spatial distributions, and there is a danger in making assumptions about the effects of alternatives that might not be borne out in reality.

6.3.9 In many instances, due to the uncertainty about the way that strategies and policies will be implemented in detail, assumptions have had to be made, or recommendations put forward about mitigation measures that should be employed. For example, the effects of new development on water quality in streams and rivers should be minimal due to controls over drainage and sewerage systems which should ensure that no adverse effects result. In other cases, a minimal or insignificant effect is predicted, subject to recommended mitigation measures being incorporated. Where such assumptions and recommendations are made, this has been noted in the detailed appraisals.

6.3.10 The topic-based approach helps to give an overview of the range of impacts that a policy or proposal is likely to have, although an overall summary of all the impacts and whether the proposal is beneficial or detrimental overall presents some difficulties, and proposals will generally have mixed effects. The iterative approach, involving appraising effects as policies and proposals are developed has been found to be effective, although there are some difficulties in recording the process when some sites and policies have been amended a number of times over the plan development period to take into account input from a wide range of sources, including consultees, stakeholders and the general public as well as from the SA process.

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7.1 Introduction

7.1.1 This chapter summarises the detailed findings of the full Sustainability Appraisal of the Deposit Plan. The chapter is arranged in sections to conform with the sections of the Deposit Plan document.

7.1.2 The appraisal should be read alongside the Deposit LDP: unless necessary to illustrate a point, the LDP text is not reproduced in this document.

7.1.3 Where elements of the Plan are unchanged from the Pre-Deposit stage, the previous appraisal remains valid and is reproduced in this document and supporting papers. Where there have been amendments and changes, these have been the subject of new assessments, alongside the full detailed policies and allocations. This is explained in the text where necessary.

7.1.4 Full details of the appraisals are contained in the SA background paper.

7.2 The LDP Vision

7.2.1 The identification of the vision was the first main stage addressed by the Pre-Deposit Plan, and it took into account existing visions for the area from the Wales Spatial Plan, the Western Valleys Strategy, the Neath Port Talbot Community Plan and the Waterfront Strategy among others. The vision was developed and refined taking into account sustainability and environmental objectives and was amended and redrafted a number of times taking account of representations received and through consideration of SA objectives.

7.2.2 The vision has been changed from that included in the Pre-Deposit Plan through the following amendments:

- More emphasis put on the protection and enhancement of the natural beauty and environmental importance of the waterfront and coastal corridor;
- Addition of redevelopment of former industrial and commercial areas;
- Addition of elements (key sites and transport/communications improvements) to develop the economy;
- More detail on the revitalisation of rural/valleys areas.

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7.2.3 The main elements of the new iteration of the vision have been tested against the SA objectives as detailed in the SA Background Paper, and while there are still inevitably some potential conflicts, it is considered that the amended vision addresses the necessary sustainability issues while setting out ambitious aspirations for developments to deliver.

7.3 The LDP Objectives

7.3.1 The Pre-Deposit Plan set out 23 objectives, grouped under the five themes of the Wales Spatial Plan, intended to translate and interpret the elements of the vision and address the issues that have been identified. The objectives are then addressed by the topic strategies and Plan policies.

7.3.2 As part of the development of the Deposit LDP, the objectives were reconsidered and amended to take into account the following considerations:

- Wording consistency;
- Need to relate more clearly to matters the LDP can directly influence;
- Need for clarification/simplification and to avoid duplications;
- Response to consultation replies, including the need to be more locally specific.

7.3.3 The amended LDP objectives were assessed against the SA objectives to check for compatibility, and this process and general consideration of sustainability and environmental considerations resulted in the following further amendments:

- Objective OB3 has been strengthened to refer to the delivery of sustainable, safe and confident communities;
- Objective OB4 now emphasises the need for facilities to be provided in line with the role and function of communities in order to enhance their sustainability;
- Objective OB19 is a new objective relating to the County Borough making a proportionate contribution towards energy needs.

7.3.4 The finalised Deposit Plan objectives are assessed as being largely compatible with the SA objectives. However, some issues are identified that have been taken into account in the development of the strategies and policies. The following main points are identified:

- Development in coastal locations will need to take into account possible future sea level rise and more frequent stormy conditions;
- The objective to preserve the landscape could potentially conflict with energy production especially in relation to windfarms;
- Extensive development and economic growth would have the potential to conflict with halting the net loss of biodiversity, unless carefully managed;
- Effects of development on landscape, townscape, pollution levels and environment etc. will depend on detailed design of schemes;
- Promoting use of renewable energy could have adverse effects on biodiversity and landscapes, depending on the detail of schemes;
- New waste developments may have adverse impacts on biodiversity, landscapes etc. depending on details of schemes;
- Objective OB18 indicates that adverse impacts should be minimised: some adverse impacts may remain on a range of matters, depending on details of schemes.

7.3.5 Full details of the amended objectives and their assessment against the SA objectives are in the SA background paper.

7.4 The Strategic Alternatives

7.4.0.1 The identification and assessment of feasible alternatives is central to the preparation of the LDP and the SA process. A range of strategic alternatives were set out in the Pre-Deposit Plan and supporting documents and were assessed by the SA. These related to growth options and spatial alternatives. The preferred spatial strategy chosen at the Pre-Deposit stage was to focus development on the M4/coastal belt while reinvigorating the valley communities, and this has not been changed for the Deposit Plan. The spatial alternatives have therefore not been reassessed, but a summary of the assessments carried out at the Pre-Deposit stage is given below in Section 7.4.2.

7.4.0.2 A number of significant comments were received however in relation to the growth option chosen ('moderate' growth), as a result of which additional work has been undertaken and a study commissioned to analyse Neath Port Talbot's level of economic growth and to link this to the number of new houses needed over the

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Plan period. As a result of this the chosen growth option has been changed. The amended chosen growth option has therefore been assessed and the SA findings and impacts on this decision are explained below in Section 7.4.1 in comparison with the previously identified range of options and SA findings.

7.4.1 The Growth Options

7.4.1.1 The Pre-Deposit LDP set out seven alternative growth options. These were based on past population trends translated into housing need, and ranged from 178 houses per annum to 705 houses per annum. Following representations received as a result of the Pre-Deposit consultation, the Deposit LDP strategy has been based on an assessment of the population growth needed to meet the projected level of economic growth over the Plan period, with the number of houses needed based on this. Taking into account the need to attract additional economically active people of working age into the County Borough, to increase the economic activity of the County Borough's population and reduce the level of unemployment, it is now projected that the Plan will need to accommodate a population growth of 7043 additional people over the Plan period. This equates to an annual housing build rate of some 548 units per annum, significantly higher than has been achieved in the past. Full details are set out in the Deposit Plan document.

7.4.1.2 The new growth option falls between the medium and high growth scenarios identified and assessed at the Pre-Deposit Plan stage. Full details and findings are contained in the SA background paper with explanations of the conclusions reached. Due to the strategic level of the options, there are significant uncertainties about the effects of the differing growth levels since the details and implications in development terms are not fully known for all the alternatives. The analysis assumes that the relevant level of growth is fully realised and that the projected housing is delivered at the rates and amounts specified.

7.4.1.3 The conclusions that apply to the chosen growth level are summarised below. The anticipated effects of the choice of a higher growth level than previously envisaged are highlighted. At this stage in the Plan preparation process, greater detail is available about the Plan policies and proposals, and measures in the Plan that potentially affect or address the issues identified. Whether the Plan addresses the issues effectively is therefore assessed in detail throughout the SA Report.

Emerging Findings from the Analysis

7.4.1.4 In general terms, the higher level of growth chosen scores relatively badly in relation to the environmental indicators, but positively for most of the social and economic indicators. The impact of the higher levels of growth on the Plan objectives are outlined below:

Positive Effects

7.4.1.5 *Improve physical and mental health outcomes for all (SA Objective 7a):* Higher population levels should help to support facilities and services within communities, encouraging more active and healthy lifestyles.

7.4.1.6 *Reduce/minimise the incidence and impacts of ill health (SA Objective 7b):* Areas and communities currently less well served by recreational facilities and with poor access to services are more likely to receive additional investment and improvements.

7.4.1.7 *Reduce/minimise the incidence and impacts of poverty (SA Objective 7c):* Higher growth levels should lead to enhanced levels of economic growth, more job opportunities and more investment, with a beneficial effect on poverty levels.

7.4.1.8 *Develop and support a local economic infrastructure that is attractive to business (SA Objective 8a):* Higher growth levels should support greater economic growth, more funding for infrastructure and environmental improvements, enhancing the attractiveness of the area to businesses.

7.4.1.9 *Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community (SA Objective 8c):* Higher growth levels should help to enhance the local skills and knowledge base of the local community and increase economic activity and opportunities.

Uncertain Effects

7.4.1.10 *Loss/degradation of natural resources (SA Objective 2a):* Higher levels of development are more likely to have a detrimental impact on natural resources: significant measures may be required to ensure that these effects are avoided.

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7.4.1.11 *Biodiversity enhancements (SA Objective 3b):* The balance between the damage caused to biodiversity by new development and the additional opportunities and funding for improvements that can come from development will depend on the amount of development taking place and the measures implemented to require enhancements.

7.4.1.12 *Protection/enhancement of historic environment (SA Objective 4b):* As above, increased development levels are more likely to adversely impact on archaeological resources in particular, but the effects will depend on protective measures taken.

7.4.1.13 *Social exclusion (SA Objective 6a):* The balance between increasing populations in communities helping to support and reinforce social inclusion and higher population numbers changing the character of communities will depend on a number of factors including the differences between individual communities.

7.4.1.14 *Culture and character of communities (SA Objective 6b):* Similar considerations apply as to objective 6a above.

7.4.1.15 *Economy based on local resources and assets (SA Objective 8b):* There are concerns that higher levels of development could have a detrimental effect on some local resources and assets to the extent of adversely affecting this objective. This will depend on measures put in place to safeguard assets.

Negative Effects

7.4.1.16 *Consequences of climate change (SA Objective 1a):* Higher levels of growth imply a greater likelihood of development sites being selected that are in more vulnerable locations, from greater flood risks or exposure to storms.

7.4.1.17 *Causes of climate change (SA Objective 1b):* Increased levels of development are likely to increase overall greenhouse gas emissions in the County Borough.

7.4.1.18 *Quality of natural resources (SA Objective 2b):* The main concern identified is the possible additional loss of soil resources through potentially increased development of greenfield sites.

7.4.1.19 *Waste (SA Objective 2c):* Increased development is likely to result in increased waste generation in relative terms.

7.4.1.20 *Net loss of biodiversity (SA Objective 3a):* Whether development results in a net loss of biodiversity is dependant on the balance between losses caused by the development and gains achieved through enhancements on the site or funds for enhancement elsewhere. With higher levels of development the concern is that the mitigation or compensation achieved will not be sufficient to outweigh the losses.

7.4.1.21 *Protection/enhancement of landscape and townscape (SA Objective 4a):* There are concerns that higher development levels are likely to have more landscape impacts. However, economic benefits of higher growth may be beneficial in townscape terms. The impacts of higher growth on this objective will depend on measures taken to reduce adverse effects and maximise benefits.

7.4.1.22 *Air quality (SA Objective 5a):* Air pollution from buildings/industry and in particular from traffic is likely to be greater with greater levels of development.

7.4.1.23 *Noise pollution(SA Objective 5b):* As above, increased traffic levels are likely to lead to increased noise levels.

7.4.1.24 *Light pollution (SA Objective 5c):* Additional development, particularly of greenfield sites, is likely to result in increased levels of light pollution.

7.4.2 The Spatial Options

7.4.2.1 The spatial options considered at the Pre-Deposit LDP stage led to the identification of the preferred spatial strategy of focusing development on the M4/coastal belt, while reinvigorating the valley communities. This overarching spatial strategy has not been changed following the Pre-Deposit stage, and the findings of the SA Interim Report are reproduced below setting out the SA findings in relation to the spatial options considered.

7.4.2.2 The LDP spatial options identified essentially distinguish between development along the coastal plain/M4 corridor as opposed to development in the valleys. The various options propose a differing mix between these spatial alternatives. A summary of the options is given in the table below:

Table 7.4.2.1

1. Continue UDP Strategy	2. Focus on M4 Corridor	3. Promote significant growth in valley communities	4. Focus on the M4/coastal belt while reinvigorating the valley communities (Preferred Strategy)
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<p>Concentrate development within existing urban form in M4 corridor/coastal belt and Neath, Port Talbot and Pontardawe; key public transport interchanges;</p> <p>Small scale development in valleys</p>	<p>In M4 corridor develop at higher densities on remaining brownfield and release greenfield sites. Employment focused on large strategic sites – predominantly brownfield plus leisure and retail in town centres.</p> <p>Valley settlement limits remain as UDP giving very limited scope for new development.</p>	<p>No additional land allocations in urban Neath and Port Talbot.</p> <p>Large housing allocations and settlement limit expansion in all valleys.</p> <p>Growth points in valleys as per Wales Spatial Plan.</p>	<p>Focus for development along M4, Neath, Port Talbot and Pontardawe;</p> <p>Priority growth points in Pontardawe and Glynneath.</p> <p>Expand valley settlement limits to encourage house building.</p>
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7.4.2.3 Two of the four alternatives promote the conflicting aims of:

1. Maximising the benefits of working with market forces by focusing development along the M4/coastal corridor or
2. Focusing new allocations in the Valleys.

7.4.2.4 The third (or no new Plan) alternative would continue the UDP's balance of guiding most development to the M4/coastal corridor while also reinvigorating the valleys. The fourth (and preferred) alternative is similar to the third, but proposes a higher level of intervention to more effectively regenerate the valleys.

7.4.2.5 The first step taken in appraising these options was to 'scope out' aspects of the appraisal that were not considered to be directly affected: the objectives identified were not considered further during the spatial options appraisal. This process is set out in detail in the SA background paper.

Appraisal of the Spatial Options

7.4.2.6 Each spatial option has been assessed against the SA objectives remaining after objectives unlikely to be affected were 'scoped out'. At the overarching strategy level, many of the effects of the alternatives are uncertain and it is important to recognise, as with the growth options, that there are ambiguities and uncertainties. A summary of the findings is contained in a matrix in the SA background paper and should be interpreted with these considerations in mind.

7.4.2.7 Findings that emerge from the analysis:

Option One: Continue UDP strategy

7.4.2.8 This option would continue to create adverse impacts in relation to traffic pollution and the loss of countryside and some valued landscapes. It would create additional traffic and commuting for Valley communities, but this would be small scale.

Option Two: focus on the M4/coastal corridor

7.4.2.9 The main positive effects relate to working with market forces and creating economic benefits. Overall traffic levels would be reduced, while the potential for energy saving would be increased. The potential contribution to providing affordable housing would be enhanced.

7.4.2.10 This would be offset by the range of negative effects including increased congestion, loss of countryside and increased pressure on in-filling within the urban areas and consequent air quality and noise concerns.

Option Three: Promote significant growth in the Valley Communities

7.4.2.11 This option recognises that the potential to shift development from the coastal/M4 corridor is limited due to low demand for housing and very low demand for employment related development and the substantial stock of planning permissions in the coastal/M4 area that would remain for development over the Plan period.

7.4.2.12 The option could, if achieved, bring big economic and social benefits to valley communities through helping sustain existing facilities and services and potentially drawing new investment. These benefits would be offset by a loss of natural resources and landscapes, and the risk of small communities losing their identity and character and potential adverse impacts on the Welsh Language. The alternative would also generate high levels of commuting and traffic, while it could cause concerns in locating new housing (and affordable housing) away from the areas of demand.

Option Four : Focus on the M4/Coastal belt while reinvigorating the valley communities

7.4.2.13 The alternative is assessed as bringing positive benefits in relation to a range of the SA objectives, including positive social and economic benefits through working with market forces, reducing impacts on resources and landscapes, and

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addressing economic and social issues in Valley communities. It would generate some increased traffic levels and associated pollution in the Valleys, but the majority of the development would be focused along the M4/coast.

7.4.2.14 Adverse impacts on the coast/M4 area would be minimised as much of the development is on existing, committed sites that were largely brownfield or contaminated although there would be some loss of landscape and habitats. This is in part driven by the need to allocate sites that would be attractive to home purchasers and developers and would generate contributions for the provision of affordable housing. Care will be needed to minimise adverse effects.

Effects of Appraisal

7.4.2.15 Option 4 emerged as the preferred option when assessed against the SA objectives and has been retained as the spatial strategy of the Plan.

7.5 The LDP Policies

7.5.0.1 The LDP vision, objectives and strategies are implemented through a range of policies that set out the approach that will be taken when planning applications are determined. At the Pre-Deposit Plan stage, a range of strategic policies were set out, all of which were assessed through the SA methodology. The findings of the SA process were taken into account in the development of the Deposit Plan policies, alongside representations received from the consultation process and other changes to the overall strategy and approach taken in the Plan. This resulted in significant amendments to the strategic policies and the introduction of a range of detailed policies in accordance with the detailed Plan requirements.

7.5.0.2 The Plan policies are organised into three groups: Overarching Policies; Area-Based Policies; and Topic Policies. The Topic Policies are grouped under topic themes, based on the Wales Spatial Plan topic areas. Each Plan policy has been assessed through the SA methodology and where appropriate the policies have been amended taking into account sustainability and environmental considerations as part of the Plan development process. The findings of the SA process are summarised below, with full details set out in the SA background paper.

7.5.1 Overarching Policies

Policy SP1: Climate Change

7.5.1.1 Policy SP1 is a strategic policy which sets out the overall approach to be taken by the LDP to dealing with both the causes and the consequences of climate change. The policy is implemented through detailed policies throughout all the topic areas of the Plan. No negative effects have been identified in relation to any SA objective and (as would be expected) it has been assessed as being positive in relation to climate change including reducing the production of greenhouse gases and addressing the effects. It also scores well for biodiversity effects, and for air quality due to aspirations to reduce private transport usage.

Policy SP2: Health

7.5.1.2 SP2 is a strategic policy setting out the overall LDP approach to health issues. Again, the policy is implemented through a range of detailed LDP policies. In addition to positive effects in relation to the SA health objectives, the policy has been assessed as having a positive impact on greenhouse gas emissions and air quality (through its aspiration to encourage active travel), social issues generally including leisure/recreation and community facilities, as the policy looks to retain a range of accessible facilities; and on local skills and knowledge and consequently poverty issues. No significant negative effects have been identified.

Policy SP3: Sustainable Communities

7.5.1.3 SP3 is a strategic policy setting out the approach to creating more sustainable communities through the definition of a settlement hierarchy and identification of settlement limits. It has been assessed as having positive effects on SA objectives relating to climate change issues, natural resources, biodiversity, landscape, community cohesion, health, and the economy, with other impacts being neutral. Guiding development to sustainable locations within defined settlement limits aims to protect the countryside from harmful development and therefore protects the landscape and biodiversity. Placing development in sustainable locations also has a positive impact on greenhouse gas emissions as it can lessen the need for the use of private cars. Sustainable locations can also ensure accessibility to key services and facilities which has a positive impact on social inclusion and access to health services. Providing attractive employment land within settlements in sustainable locations can also have a positive economic impact.

7.5.1.4 The strategic policy is implemented through two detailed policies, SC1 concerning Settlement Limits and SC2: Protection of Existing Community Facilities.

Policy SC1: Settlement Limits

7.5.1.5 Policy SC1 is a detailed policy setting out what development will be acceptable within and outside settlement limits. The settlement limits are defined on the LDP Proposals Map and the policy indicates that while most types of development will be acceptable in principle within settlement limits, outside these areas, development will only be allowed under very limited circumstances. The policy follows on from SP3 and consequently has a similar assessment, scoring positively for climate change issues, natural resources, biodiversity, landscape, community cohesion, health, and economic issues.

Policy SC2: Protection of Existing Community Facilities

7.5.1.6 SC2 is a detailed policy that only permits the loss of important existing community facilities under limited defined circumstances relating to the requirement for the facility and its viability. As well as generally positive effects on community cohesion, health and social issues, the policy has been assessed as being positive in relation to landscape/townscape issues since many community facilities have a defining role in the character and appearance of an area.

Policy SP4: Infrastructure

7.5.1.7 SP4 is the strategic policy that sets out the LDP approach to ensuring that new developments have adequate infrastructure provision. It indicates the Council's intentions with regard to planning obligations, with examples of the uses to which developer contributions may be put. It will be implemented in detail through Policy I1.

Policy I1: Infrastructure Requirements

7.5.1.8 Policy I1 is a detailed policy that sets out the uses to which developer contributions may be put (in addition to health, safety and amenity matters). Both these policies are found not to conflict with any SA objective, and serve to provide a mechanism by which some of the SA objectives may be realised which may not be possible through normal planning policy. The policies therefore have a generally positive effect.

7.5.2 Area Based Policies

Policy SP 5: Development in the Coastal Corridor Strategy Area

7.5.2.1 Policy SP5 is a strategic policy in relation to the Coastal Corridor Strategy Area. Specific strategic schemes are identified together with the general approach to residential, employment, transport and regeneration. As the policy relates to the overall strategy over a wide area, the assessment is a high level appraisal with findings in broad terms, many aspects of which are addressed in the more detailed policies throughout the Plan.

7.5.2.2 The assessment resulted in identification of the following potential issues:

1. In relation to the provision for the majority of residential development in the Coastal Corridor area, concerns are raised about the implications in relation to flooding (climate change adaptation), additional traffic and congestion and consequently air quality. Positive scores are recorded in relation to sustainable settlements; natural resources; and poverty.
2. Provisions in the policy for Strategic Regeneration Areas, employment allocations and safeguarded sites and other specific allocations are addressed in detail through the assessments of the relevant policies below.
3. The principle of managing urban form and setting through the designation of Green Wedges is assessed as being positive in relation to the relevant environmental SA objectives and health and wellbeing. Restrictions on development may have economic impacts, but these are not considered to be significant in relation to the SA economic objectives.

7.5.2.3 In relation to the concerns raised, other policies within the Plan clarify how the overall strategy will be implemented and protection policies address the issues identified. These are covered in more detail below.

Policy SRA 1: Coed Darcy Strategic Regeneration Area

7.5.2.4 The SRA policies are detailed policies relating to the two Strategic Regeneration Areas in the Coastal Corridor Strategy Area. SRA 1 concerns the Coed Darcy development and sets out the amount of residential and employment development proposed. These allocations are also listed under the housing allocations policy (H1/LB/5) and the employment allocations policy (EC1/3).

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7.5.2.5 The Coed Darcy development is an existing commitment in that it has planning permission and development on site is on-going. Extensive measures are incorporated into the development to ensure that environmental issues are dealt with and that it will encourage the development of a strong and healthy community. These measures include retaining areas of biodiversity interest, safeguarding the adjacent Crymlyn Bog National Nature Reserve/European site, provision for community facilities including extensive open space, shops and a school and provision for good transport links including public transport, walking and cycling.

Policy SRA 2: Harbourside Strategic Regeneration Area

7.5.2.6 SRA 2 concerns the Harbourside scheme in central Port Talbot and sets out the amount of residential, employment and retail development proposed. Since the site is an extensive brownfield area in a central part of the town, redevelopment is assessed positively in relation to the majority of SA objectives including climate change mitigation and most environmental objectives, health objectives and economic objectives. Concerns are raised however in relation to climate change adaptation due to the likelihood of flooding in some parts of the site, and in relation to air quality due to the proximity of the site to the Margam/Taibach Air Quality Management Area (AQMA).

7.5.2.7 In relation to these points, the LDP has been the subject of a Strategic Flood Consequences Assessment (SFCA) to investigate flooding issues in more detail. It is accepted that the site can be developed provided that areas liable to flooding are avoided as appropriate (this is addressed in the site masterplan/Supplementary Planning Guidance). In relation to air quality concerns, policies relating to pollution prevention and developments in the central Port Talbot area address air quality issues both during the construction and occupation phases.

Policy CCRS 1: Coastal Corridor Regeneration Schemes

7.5.2.8 CCRS 1 is a detailed policy covering the three regeneration schemes within the Coastal Corridor Strategy Area. These are the Neath Town Centre Redevelopment; Glanafan Comprehensive School, Port Talbot; and the Afan Lido site, including land at the rear of Tywyn School. The policy sets out the uses proposed for each site which are also listed under the housing, employment and retail allocation policies. The elements of each scheme have been assessed separately under these policies, resulting in the identification of the following issues:

Neath Town Centre Redevelopment

- Residential allocation (H1/7) and retail allocation R1/1: The site has been assessed generally positively through being in a sustainable location near to transport hubs with the potential to improve the local economy and community cohesion and with no significant detrimental impacts on the natural environment. Impacts on the local townscape will depend on detailed design considerations, although there may be some loss of existing character in the form of existing older buildings.

Glanafan Comprehensive School

- Residential Allocation (H1/16) and Retail Allocation (R1/2): The site is well located in the centre of Port Talbot with all amenities nearby. Apart from a possible risk of future flooding the site scores well with no significant negative impacts.

Afan Lido

- Residential Allocation (H1/18): The site is in a relatively sustainable location within fairly easy reach of most amenities and facilities. Overall the site scores well with no significant negative impacts.

Policy SP 6: Development in the Valleys Strategy Area

7.5.2.9 Policy SP6 is a strategic policy concerning the Valleys Strategy Area. Specific strategic schemes are identified together with the general approach to residential, employment, transport and regeneration. Again the policy relates to the overall strategy over a wide area and the assessment is a high level appraisal with findings in broad terms, many aspects of which are addressed in the more detailed policies throughout the Plan.

7.5.2.10 The assessment resulted in identification of the following potential issues:

1. The majority of residential development is concentrated within the identified Strategic Growth Areas (SGAs) of Pontardawe and the Upper Neath Valley. This is assessed as being broadly positive in terms of developing sustainable communities and therefore addressing the causes of climate change, protecting landscape and townscape and economic objectives. However, Pontardawe is identified as a language sensitive area, and significant amounts of development may have impacts in relation to the Welsh language.

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2. Mixed use regeneration scheme at Glynneath. Some concerns are raised concerning flood risk and the proximity of new retail development to the existing retail centre: further details are given in the assessments of policies H1/23 and R1/4.
3. The identification of a tourism site at Rheola is assessed positively in relation to landscape and historic environment and in economic terms, since it should result in the restoration of the historic parkland, but the assessment raises concerns about environmental impacts and the sustainability of the location. More details are given in the assessment of policy TO3/1.
4. A flexible approach to employment, including provision for Live/work units. This is assessed positively for economic and social objectives, but with environmental concerns due to the potential for development in the countryside.
5. Taking a flexible approach to small scale retail proposals. This is implemented further in policy R3, which is assessed as being generally positive in economic and social terms without any significant environmental issues since the policy refers to small scale developments within settlement limits only.
6. In relation to the protection of cultural identity and the Welsh language, this is assessed as being generally positive for social inclusion and the culture and character of communities and although it may impose additional costs on development, on balance it is considered that it will be positive for the local economy. Other objectives are unlikely to be significantly affected.

7.5.2.11 In relation to the concerns raised, other policies within the Plan clarify how the overall strategy will be implemented and protection policies address the issues identified. These are covered in more detail in Section 7.5.3.

Policy VRS1: Valleys Regeneration Scheme

7.5.2.12 VRS1 sets out in more detail the proposals for the mixed use scheme at Park Avenue, Glynneath. The policy sets out the uses proposed for the site which are also listed under the housing and retail allocation policies. The elements of the scheme have been assessed separately under these policies, resulting in the identification of the following issues:

1. Residential Allocation (H1/23). The site is well located in relation to local facilities and amenities in Glynneath and scores positively on these indicators. Main concern relates to its position within the floodplain adjacent to the river. However, the majority of the site is not in a flood risk area.
2. Retail allocation (R1/4). The site borders the edge of the existing retail centre and there are some concerns about its accessibility. However, a retail development can be located within walking distance of the existing retail centre.

7.5.3 Topic Policies

Housing

SP7 Housing Requirement

7.5.3.1 Strategic Policy SP7 indicates that the Plan will make provision for development of 9,150 dwellings within the Plan period (2011 - 2026). This includes a 13% flexibility allowance to allow for vacancies within new dwellings stock, choice and flexibility for sites not coming forward as anticipated. The housing supply is made up of a number of components:

- **Site Specific Allocations** (Sites delivering a minimum of ten units identified on the LDP Proposals Map) made up of:
 - Housing Allocations (newly identified housing sites); and
 - Housing Landbank Sites (Sites benefiting from planning consent at the LDP base-date of 1st April 2011).
- **Allowances** (An allowance is made for unforeseen sites which may come forward during the Plan period, based on past trends, settlement hierarchy considerations and the urban capacity study). These sites are not identified within the Plan.
- **Empty Homes Initiative** (An allowance is made for a number of empty properties to be brought back into use for residential purposes).

Policy H1 Housing Sites

7.5.3.2 The site specific allocations are set out in Policy H1, grouped by spatial area. A detailed assessment has been undertaken in accordance with the SA methodology of each housing allocation, with full details given in the matrices in the SA background paper. A preliminary scoping exercise was undertaken to simplify the analysis since not all SA objectives are likely to be affected by residential developments; full details of this scoping are given in the background paper. The overall detailed impact of policies SP7 and H1 is embodied in the individual site assessments, but an overview of the main issues arising is given below.

SA Objective 1A: Ensure that all development takes into account likely future changes resulting from climate change:

7.5.3.3 For new housing sites, the main issues to consider when ensuring adaptability to the effects of climate change relate to increased risks of flooding and warmer and stormier weather. A number of sites raised some concerns through being located in low lying areas near to the coast: where these were located within flood risk areas as defined by the Welsh Government's Development Advice Maps (zone C), the sites have either been removed from the site allocations or further investigation has been undertaken and has shown that the sites can be developed providing that the flood risks are taken into account in the site layout and design. The following sites lie within zone C and consequently raised concerns in relation to this objective:

- H1/16 Glanafan Comprehensive School;
- H1/17 Harbourside;
- H1/23 Park Avenue, Glynneath; and
- H1/29 Compair/GMF, Ystalyfera.

7.5.3.4 Investigations have been undertaken in relation to these sites as part of the Strategic Flood Consequences Assessment (SFCA). The Glanafan School site is within an area benefiting from flood defences and it is considered that measures can be taken in the design of the development to address flood risk. In relation to the other three sites, the SFCA has shown that only small parts of these sites are at risk from flooding and they are considered to be developable if these areas are excluded from the developed area. On this basis the sites have been allocated and are considered to take into account future changes that may result from climate change, meeting the SA objective.

7.5.3.5 Some sites in more exposed locations have raised concerns about exposure to more stormy weather in the future: This applies to the following sites:

- H1/8 Crymlyn Grove (Phase 2);
- H1/9 Crymlyn Grove (Phase 3);
- H1/12 Blaenbaglan School (land to the rear of);
- H1/18 Afan Lido and land to the rear of Tywyn School;
- H1/19 Bay View Social Club; and
- H1/22 Tir Morfa Road.

7.5.3.6 The sites listed above are either partly on relatively exposed hillsides, or near to the seafront. For these sites it is recommended that the design and layout be carefully considered to ensure that properties and amenity spaces are not unnecessarily exposed. These measures will need to be considered at the site design stage and will be highlighted in the Design Supplementary Planning Guidance (SPG).

SA Objective 1B Climate Change mitigation: Achieve relevant government targets for reducing greenhouse gas emissions:

7.5.3.7 In terms of the LDP housing sites, it is considered that no meaningful conclusions can be drawn between different sites about the comparative production of greenhouse gases of the development while under construction or when occupied, since this will depend on design and construction issues that are not known at the Plan stage. The main issue is considered to relate to the location of the site and the extent to which its residents are likely to be dependent on the private car or are able to access everyday needs through walking, cycling or public transport. Consequently, sites located in existing built-up areas near to shops and facilities where footpaths, cycle routes and public transport links are available have been assessed more favourably in relation to the climate change mitigation objective than those located in more remote areas where more journeys are likely to be by private car. 13 sites have been identified as having positive effects in relation to this objective, with two being assessed negatively. The remainder receive a neutral assessment.

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7.5.3.8 Measures recommended for less well located sites include the possibility of using developer contributions to help provide better alternative transport linkages (for example by improving footpath/cycle links or funding community transport), or funding better community facilities to improve the sustainability of the settlement.

SA Objective 2A: Minimise loss or degradation of water and soil resources while ensuring that they are used only in a sustainable way:

7.5.3.9 In relation to water resources, it is considered that differing effects on water resources between sites cannot be meaningfully assessed as this will depend on detailed design considerations which are not known at the Plan stage and controls will be applied to residential developments to ensure that no seriously detrimental effects are caused. The main issue identified relates to soil resources, when development of greenfield sites in the countryside will often result in the permanent loss of agricultural land or land and soils that could in the future be used for food production. Conversely, redevelopment of previously used sites is usually beneficial in bringing land back into use and can be a means to secure remediation.

7.5.3.10 In relation to this objective therefore, brownfield developments have generally scored better than equivalent greenfield sites. 13 sites involve bringing brownfield land back into beneficial use and therefore score positively while 8 sites are greenfield where development will mean the loss of potentially productive soil resources and consequently receive a negative assessment in relation to this objective. However, the sites in question are not on high quality agricultural land.

SA Objective 3A: Prevent any further net loss of biodiversity and SA Objective 3B: Exploit all reasonable opportunities to secure biodiversity enhancements:

7.5.3.11 The extent to which development of a site will lead to loss of biodiversity will depend on the extent of important biodiversity that exists on the site prior to the development and the extent to which the development can be amended to successfully retain areas of biodiversity interest. In order to prevent net loss, it will normally be necessary to implement mitigation or compensation measures, and objectives 3A and 3B are therefore closely linked, and are considered together.

7.5.3.12 Biodiversity assessments have been made of all the residential sites and those where development is likely to result in significant losses have been identified. In some cases it has been possible to amend the site boundaries to exclude areas of biodiversity interest, in some cases sites have not been allocated because of biodiversity considerations, while in some examples development will be possible while retaining the biodiversity interest through careful layout and design. Cases

where biodiversity loss is likely to be unavoidable have scored less well and in these cases, mitigation measures are recommended to allow development while meeting the SA objectives.

7.5.3.13 The following sites where there is little or no biodiversity interest, or where the areas of biodiversity can readily be retained have been assessed positively:

- H1/5 Dwr y Felin Lower School;
- H1/7 Neath Town Centre Redevelopment;
- H1/10 Wern Goch, Skewen;
- H1/15 Neath Port Talbot College (Margam Campus);
- H1/16 Glanafan Comprehensive School, Port Talbot;
- H1/18: Afan Lido and land to the rear of Tywyn School, Sandfields;
- H1/19 Bay View Social Club, Sandfields;
- H1/21 Morfa Afan Care Home, Sandfields; and
- H1/26 Cwmtawe School (Phase 2), Pontardawe.

7.5.3.14 Most of these sites also score positively for objective 3B since they provide good scope for securing biodiversity enhancements overall. The exceptions are the town centre redevelopment sites in Neath and Port Talbot where there is unlikely to be significant biodiversity enhancement due to the locations, and Cwmtawe School where a significant part of the site is currently of biodiversity interest leaving less scope for new provision.

7.5.3.15 The following sites have been assessed negatively since they contain areas of biodiversity interest that are likely to be adversely affected by development:

- H1/4 Ocean View, Jersey Marine;
- H1/13 Hawthorn Close, Cwmafan;
- H1/20 Purcell Avenue, Sandfields;

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- H1/25 Ynysymond Road, Alltwen; and
- H1/29 Compair/GMF, Ystalyfera.

7.5.3.16 Where biodiversity enhancements are feasible to mitigate on site for the loss of biodiversity, these sites have been assessed as having a neutral score under objective 3B. This applies to sites H1/4, H1/13, H1/25 and H1/29. The only site where this is unlikely to be feasible is H1/20, where sand dune habitat cannot readily be recreated.

SA Objective 3C: Minimise adverse effects on designated geodiversity sites:

7.5.3.17 There are four Sites of Special Scientific Interest (SSSI) within the County Borough that have been designated (partly or entirely) because of their geodiversity interest, together with two Regionally Important Geodiversity Sites (RIGS). Further information on these designations is contained in Chapter 5. None of the LDP housing allocations is near to any of these sites, and consequently Policy H1 has an overall positive effect in relation to SA objective 3C.

SA Objective 4A: Protect and/or enhance the area's landscape and townscape:

7.5.3.18 Housing developments can have a significant effect on the appearance of an area, whether on a wider scale in landscape terms or more locally in terms of townscape. The likely effects will depend on the location of the site, the topography of the surrounding area and the character and appearance of the site's setting and surroundings. At the LDP site allocation stage, details of developments are not available, but the SA assessments have been made on the basis of the information available, with recommendations where appropriate about detailed matters of design, siting, landscaping and screening etc.

7.5.3.19 Those sites which are assessed to meet the terms of the SA objective and to protect and/or enhance the landscape/townscape receive a positive score. 15 of the sites meet these criteria: generally these are brownfield sites in existing built up areas, or sites that will not be widely visible. Sites which are assessed to have an impact on landscape/townscape, but where this is not likely to be significant receive a neutral score, while sites that are likely to have a noticeable impact on important features receive a negative score. Five sites fall within this latter category, mainly through being on fairly prominent greenfield sites, where development will alter the appearance of the area noticeably. These sites are:

- H1/2 Leiros Park Extension;

- H1/11 Neath Road / Fairyland Road, Tonna;
- H1/12 Blaenbaglan School (Land to the rear of);
- H1/14 Western Logs, Cwmafan; and
- H1/20 Purcell Avenue, Sandfields.

7.5.3.20 In these cases, it is recommended that the detailed site design and layout should give careful consideration to the visual impact of the developments and that where appropriate and necessary, screening should be provided through retaining existing trees and hedgerows and/or through new landscaping and planting. These matters are addressed through other policies in the Plan including policies EN7 and BE1 and in the Design SPG.

SA Objective 4B. Protect and/or enhance the area's historic environment including architectural and archaeological resources:

7.5.3.21 New developments can have a major impact on the historic character of an area, both in visual terms where historic areas, features and buildings are present and visible but also in relation to archaeological remains. Where the existence of important features and remains is known, these may be protected by designations such as scheduling in the case of ancient monuments, conservation areas or listing of individual buildings or groups of buildings. However, not all such buildings and remains will have formal protection, and the planning system can have a significant influence on the protection of historic character generally. Some matters are covered by national policy, while LDP policy is significant particularly in relation to local designations and historic character.

7.5.3.22 The majority of proposed developments will not affect any known archaeological sites or important buildings, and have therefore received a neutral score. The exceptions receive a positive scoring: H1/7 (Neath Town Centre Redevelopment Scheme) where redevelopment would bring the opportunity to enhance the existing historic appeal of the centre of Neath, and H1/23 Park Avenue Glynneath, where a new development would bring the potential to enhance and reinstate the Neath Canal, which would also help to enhance the adjacent Conservation Area.

SA Objective 5C. Reduce light pollution:

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7.5.3.23 In relation to light pollution, all new housing developments are likely to have similar lighting levels, mainly from street lighting and individual house lighting and security lighting, but the impact that this will have will depend on the location of the site and whether it is in an existing built-up area or in a darker area within or adjacent to open countryside. The impacts of additional lighting will be further emphasised by the prominence of the site.

7.5.3.24 The assessment has found that for the majority of residential allocations, the impact in relation to this objective will be insignificant in relation to existing surrounding levels of lighting. Three of the sites, located in more prominent situations on the edge of settlements have been identified as potentially having an adverse effect. These sites are:

- H1/2 Leiros Park Extension;
- H1/12 Blaenbaglan School (land to the rear of); and
- H1/14 Western Logs, Cwmafan.

7.5.3.25 LDP Policy EN8 requires developments that are likely to cause any type of pollution to reduce any risk (including to amenity) through mitigation measures. This policy should ensure that no significant light pollution impacts result from the above developments. Measures to be considered are similar to those relating to landscape impacts. Further guidance will be given in the Design SPG.

Objective 6A. Improve social inclusion and minimise the incidence of social exclusion by addressing the causes of social exclusion:

7.5.3.26 New residential development can have a significant impact on social inclusion depending on its location, both for occupiers of the development and for the existing local community. Factors influencing this objective include access to social and cultural resources, opportunities for community socialisation and connectivity. The proximity of development to existing community hubs and community facilities, and the likelihood of development enhancing the existing community are therefore key factors.

7.5.3.27 None of the sites are assessed as having a negative effect since all are located within reasonable distance of an existing community and near to at least some facilities. Eleven of the sites receive a positive score and these are generally the sites

that are centrally located near to shops and facilities where they should help to strengthen the existing community and provide an inclusive community for new residents.

Objective 7B. Protect and enhance the culture and character of communities including cultural resources and Welsh language:

7.5.3.28 This objective is linked to objective 7A above in terms of strengthening communities, but also addresses maintaining the existing culture, including the Welsh language. The scale of the development in relation to the existing community is therefore more relevant to this objective, together with the existing use of the Welsh language in the locality. Where significant new residential development is being proposed in Welsh speaking areas, an 'uncertain' result has been recorded, and these sites are considered in more detail in Chapter 8.

7.5.3.29 The two town centre redevelopment sites (Neath Town Centre Redevelopment and Glanafan Comprehensive School) score positively since they should help to strengthen the town centres and balance their overall culture and vibrancy, by introducing more residential accommodation. Six of the sites in the Pontardawe and Swansea Valley areas are in areas where the Welsh language is significant, and further consideration is given to these sites in Chapter 8.

Objective 7B Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing:

7.5.3.30 The effects on health and wellbeing of different locations for new housing developments will mainly depend on the quality of environment that the residents will experience and the ease of access to recreational and health facilities. Some developments may be isolated from facilities and require residents to make car journeys where in other locations access could easily be achieved by more active modes.

7.5.3.31 The majority of the sites have been assessed positively for this objective, since they should provide good environments with access to open space and facilities. None receive a negative score, but ten sites, generally in smaller settlements or more isolated areas, have a neutral score due to the likely need to use the private car for some purposes.

Objective 8B Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and use of, local resources and environmental assets:

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7.5.3.32 The majority of residential allocations are assessed to have no significant impact on this objective, since although new development will bring some economic benefits, in relation to the use of local resources and assets there is not likely to be a major long term effect. However, three of the sites (Neath Town Centre Redevelopment, Glanafan School and Harbourside) are assessed as having a positive effect due to their role in helping to regenerate an area and contribution to the viability and vitality of Neath and Port Talbot town centres.

SP8 Affordable Housing

7.5.3.33 Strategic Policy SP8 states that the Plan aims to deliver 2,500 affordable housing units through requiring housing developments to contribute to affordable housing provision and through affordable housing exception sites. These two measures are implemented through detailed policies AH1 and AH2.

AH1 Affordable Housing

7.5.3.34 Policy AH1 does not propose additional development in itself, but indicates measures to be taken to secure the delivery of affordable units. This policy has therefore been assessed positively in terms of the SA social objectives, in particular ill health and the causes and consequences of poverty while not having a significantly adverse effect on the economic objectives as a consequence of the regard the policy has for economic viability of developments.

AH2 Affordable Housing Exception Sites

7.5.3.35 Policy AH2 indicates that where there is a need for affordable housing, small affordable housing developments will be allowed outside (but adjacent to) settlement limits, subject to criteria concerning environmental impacts, safeguards ensuring the units remain affordable and sustainability requirements. As with AH1 this policy is considered to have positive impacts in relation to social/poverty impacts, but some concerns were raised on environmental issues and the sustainability of likely locations outside defined settlement limits. However, the policy has been developed to ensure that criteria within the policy address these concerns.

SP9 Gypsies and Travellers

7.5.3.36 Strategic Policy SP9 indicates measures to be taken in relation to Gypsies and Travellers, comprising the allocation of a specific site and the approach to be taken in dealing with specific proposals. These measures are implemented through the detailed policies GT1 and GT2.

GT1 Gypsy and Traveller Site

7.5.3.37 A site for 11 pitches is allocated adjacent to the existing established site at Cae Garw, Margam. The provision of an additional site scores positively on some social and wellbeing indicators, although it is not located in close proximity to amenities and facilities and there are concerns in relation to some environmental issues due to its location in the countryside. These in particular relate to landscape, soil resources and biodiversity issues. These points can be addressed in dealing with the detailed proposal at the application stage through mitigation measures covered by other policies in the Plan, in particular Policy EN7 (Important Natural Features) and Policy TR2 (Design and Access of New Development).

GT2 Proposals for New Gypsy and Traveller Sites

7.5.3.38 Policy GT2 indicates that new Gypsy and Traveller sites will be permitted in sustainable locations, which may include locations outside settlement limits under certain circumstances, including where there are no other suitable sites. The SA raises concerns about the possible impacts of this on environmental objectives and in relation to access to facilities and amenities and dependence on the private car, although again the policy has positive social and health impacts. The concerns are addressed by requirements within Policy GT2 for sites to be located sustainably, to have good accessibility and not to have detrimental environmental effects.

SP10 Open Space

7.5.3.39 Strategic Policy SP10 sets out the approach that will be taken in the provision and protection of open space to ensure that local needs are met. It is implemented by two detailed policies.

OS1 Open Space Provision

7.5.3.40 Policy OS1 requires all new residential developments of more than three units to contribute towards the provision of open space wherever there is a deficiency in provision. The policy sets out the standards by which this will be judged, and includes a requirement for the provision of amenity space in association with new employment and commercial developments. The policy scores positively in relation to social indicators, in particular social inclusion and health, with further potential benefits in relation to biodiversity and landscape/townscape matters depending on the details of schemes. Provision of open space can also potentially help adaptation to climate change by retaining and providing open green spaces within urban areas. Although there will be a cost implication for developers, no significant economic detriment is identified.

OS2 Protection of Existing Open Space

7.5.3.41 This policy seeks to protect existing areas of important open space from development unless it is demonstrated that it is no longer needed or that it can be reasonably replaced. As with OS1, the policy is assessed as being positive in relation to the social indicators with additional likely benefits in terms of biodiversity, landscape/townscape issues and climate change adaptation. The policy may prevent some economic activity under some circumstances, but again this is not assessed as being significant overall.

Economy

SP11 Employment Growth

7.5.3.42 Strategic Policy SP11 seeks to encourage employment growth through a range of measures including the allocation of land for employment and business purposes, the safeguarding of existing employment areas and uses and the promotion of employment uses and 'Live-Work' units in the Valleys area. Six detailed employment policies implement this strategy.

EC1 Employment Allocations

7.5.3.43 Policy EC1 allocates four specific sites for employment uses, including two sites which are within the Strategic Regeneration Areas. Each of these sites has been assessed separately, and further details are given in the background paper. Three of the allocation sites are within brownfield areas, being areas of former industry and dockland, while Junction 38 (M4) Margam is adjacent to existing industrial and employment uses. Overall, although the appraisal has raised environmental concerns, especially in relation to Junction 38 in biodiversity, landscape and air quality terms, the allocations generally score positively in relation to the social and economic indicators, and safeguards built into the Plan (especially the environmental protection and transport and access policies) should help to ensure that the provision of new employment for the area is carried out in a sustainable way.

EC2 Existing Employment Areas, EC3 Employment Area Uses and EC4 Protection of Existing Employment Uses

7.5.3.44 Policies EC2 and EC4 restrict the uses of existing employment premises, employment areas and industrial estates, with the uses considered to be acceptable being listed in Policy EC3. Since the premises and employment areas are already being used for business purposes, the assessments of these policies have not identified any significant environmental impacts, but policies EC2 and EC4 both score positively

for most economic and social objectives since they should help to retain and promote employment generating uses in these locations, benefiting social cohesion, poverty, health and the local economy. Policy EC3 requires developments to have no adverse impacts and to be sustainably justifiable in the location, providing additional safeguards.

EC5 Employment Uses in the Valleys

7.5.3.45 Policy EC5 embodies a more flexible approach to employment development in the Valleys strategy area in order to promote 'reinvigoration'. It allows employment development outside settlement limits under certain circumstances, normally restricted to land on the edge of settlements.

7.5.3.46 The SA raises concerns about the possible impacts of this on environmental objectives including in particular effects on landscape and biodiversity and in relation to access and dependence on the private car, although the policy has positive social, health and economic impacts through its support of new and expanded businesses. The concerns are addressed by requirements within the policy for sites to be located sustainably, to have good accessibility and not to have detrimental environmental effects.

EC6 Live-work Units

7.5.3.47 Policy EC6 concerns Live-Work units (premises that are designed for dual use, combining residential and employment space). Within the Valleys Strategy Area, these are promoted and the policy indicates that they will be allowed outside (but adjacent to) settlement limits as well as within settlements. This policy receives a similar assessment to Policy EC5, being positive for economic and social objectives, but with environmental concerns due to the potential for development in the countryside. Again, the policy contains some safeguards concerning potential impacts on the environment and amenities.

SP12 Retail

7.5.3.48 Strategic Policy SP12 sets out the LDP approach to protect, support and develop retail provision and existing retail centres, including by controlling retail uses outside the identified retail hierarchy, the allocation of retail sites and a flexible approach in the Valleys strategy area for small scale retail proposals. These measures are implemented through three detailed retail policies.

R1 Retail Allocations

7.5.3.49 Policy R1 allocates four specific sites for retail developments. Each of these sites has been assessed separately, and further details are given in the background paper. Two of the sites are in town centres and will help to support the retail provision. These receive generally positive assessments since they are in sustainable locations near to transport hubs with the potential to improve the local economy and community cohesion with no significant detrimental impacts on the natural environment. Impacts on the local townscape will depend on detailed design considerations, although both developments are likely to result in the loss of some existing character in the form of existing older buildings. The Harbourside and Glynneath allocations are both located on the edge of the existing retail centres and have consequently raised some concerns through being less readily accessible and in the Glynneath case being a partly greenfield site. However, in both cases, retail developments can be located within walking distance of the existing retail centre (subject to improving linkages).

R2 Proposals Within Retail Centres and R3 Out of Centre Retail Proposals

7.5.3.50 Policies R2 and R3 set out in detail the LDP approach to retail proposals, having the aim of ensuring that retail centres are supported and enhanced through restricting the uses allowed within centres and primary shopping streets and resisting inappropriate out of centre developments. These policies have the general effect of supporting the sustainability of existing retail centres and the area's towns and villages generally and have been assessed as having a generally positive effect in respect of most SA objectives, with the only detrimental impacts identified relating to air quality issues in some central urban areas that may be exacerbated by increased traffic levels. Aspirations to encourage access to retail centres by means other than the private car (in particular through policy TR2) will help to address this issue.

SP13 Tourism

7.5.3.51 Strategic Policy SP13 sets out the ways in which the LDP will promote continued growth in the tourism sector. It is indicated that sustainable tourism development will be encouraged, a flexible approach will be taken to tourism developments, the loss of tourism facilities will be resisted and land will be allocated for tourism development. These measures are implemented through four detailed tourism policies.

TO1 Tourism Development in the Countryside

7.5.3.52 Policy TO1 sets out the circumstances when proposals for tourism developments in the countryside, outside settlement limits are likely to be acceptable. The policy has been assessed as having positive impacts in relation to economic, health and poverty objectives, but there are some concerns in relation to environmental objectives, in particular landscape, biodiversity and accessibility issues due to the possibility of large new developments in more remote areas. The policy takes into account these concerns by including criteria requiring proposals to have no detrimental impacts and to be accessible by a range of transport modes.

TO2 Protection of Existing Tourism Facilities

7.5.3.53 Policy TO2 aims to protect existing tourism facilities, preventing conversion to residential use unless employment generating uses are shown not to be viable. This is assessed to be generally positive in relation to economic objectives, while retaining existing uses should not have any new adverse impacts.

TO3 Tourism Led Regeneration

7.5.3.54 Policy TO3 allocates a site at Rheola for tourism led development. This site has been assessed separately, and further details are given in the background paper. The site comprises a mixture of historic parkland, a former industrial site and surrounding areas and is fairly near to the settlement of Resolven, although it is unlikely that many trips will be on foot. Tourism led regeneration may be a means of enhancing and restoring the historic parkland and estate and will bring positive benefits in economic terms, but the assessment raises concerns about environmental impacts and the sustainability of the location. Any development will need to comply with environmental protection policies in the Plan and meet the requirements of Policy TR2 concerning accessibility.

TO4 Walking and Cycling Routes

7.5.3.55 Policy TO4 identifies three walking and cycling routes of importance for tourism, in order to protect them from inappropriate development. For the most part the routes are not in areas where significant development would otherwise take place, and the policy has been assessed as having generally positive environmental and health benefits without raising any significant economic or social concerns.

Environment and Resources

SP14 The Countryside and Undeveloped Coast

7.5.3.56 Strategic Policy SP14 sets out the approach to the protection and enhancement of the countryside and undeveloped coast. The policy includes the following specific measures: the control of inappropriate development outside settlement limits and on the undeveloped coast; and the designation and protection of Special Landscape Areas and Green Wedges. These measures are implemented through five detailed policies.

EN1 The Undeveloped Coast

7.5.3.57 Policy EN1 states that within the area of the undeveloped coast (as defined on the Proposals Map), only very limited types of development associated with coastal defences, shipping and port requirements and limited recreational or leisure access will be permitted. The policy has been assessed positively in relation to the environmental SA objectives, with no identified negative aspects in relation to the social and economic objectives.

EN2 Special Landscape Areas

7.5.3.58 Policy EN2 designates six Special Landscape Areas (SLAs) and states that any development within an SLA will only be permitted where it is demonstrated that there will be no significant adverse impacts on the SLA features and characteristics. The policy affords additional protection to areas that have been identified as having high landscape quality and consequently is assessed as being positive in relation to most environmental objectives. On balance, it is not considered likely that it will impact adversely on the social or economic objectives.

EN3 Green Wedges

7.5.3.59 Policy EN3 designates five green wedges where there is a presumption against inappropriate development (as defined in Planning Policy Wales) which will essentially prevent developments within the designated areas that compromise the openness of the area. Any new building in a green wedge would be deemed inappropriate unless for agricultural or other limited defined purposes. The policy has therefore been assessed as having positive impacts in relation to most of the environmental SA objectives, and it is considered that it will generally help to promote the sustainability of settlements by preventing urban sprawl. There may be some minor economic effects in terms of restraining development, but these are not considered likely to be significant.

EN4 Replacement Dwellings in the Countryside

7.5.3.60 Policy EN4 sets out the circumstances under which existing dwellings in the countryside can be demolished and replaced where new dwellings would not normally be allowed. The policy restricts replacements to a suitable scale and siting and requires the removal of the original dwelling and should therefore not result in significant additional development. No significant adverse environmental impacts have been identified: possible concerns about the loss of existing important buildings and landscape impacts are addressed by criteria in the policy and the redevelopment would be restricted to the existing dwelling curtilage, minimising any adverse effects on biodiversity. No significant economic or social effects have been identified.

EN5 Conversion and Extension of Existing Buildings in the Countryside

7.5.3.61 Similarly, Policy EN5 concerns extensions to existing buildings and is assessed as having limited impacts on environmental objectives while allowing economic activity to develop where appropriate. No significant adverse impacts have been identified, taking into account the criteria in the policy.

SP15 Biodiversity and Geodiversity

7.5.3.62 Strategic Policy SP15 sets out the approach to protecting, conserving, enhancing and managing biodiversity and sites of geological interest. The policy covers internationally and nationally designated sites, sites of regional and local importance and other features of natural heritage importance. The internationally and nationally designated sites are covered by national policy, while three detailed policies set out how the other features will be dealt with when planning applications are considered.

EN6 Important Biodiversity and Geodiversity Sites

7.5.3.63 Policy EN6 covers designated sites of regional or local interest and indicates that developments will only be permitted where they conserve and enhance the site unless there are reasons why the development cannot be located elsewhere and the benefits of the development outweigh the natural heritage importance of the site. The policy also provides for mitigation/compensation measures where adverse effects are unavoidable. The policy has been assessed as being generally positive in relation to most of the SA environmental objectives, without significant negative impacts in relation to economic or social concerns since important developments are not necessarily prevented, but may be required to put in place mitigation or compensation measures.

EN7 Important Natural Features

7.5.3.64 Similarly, Policy EN7 which deals with other natural features which are not necessarily within any identified designation and receives generally positive scores for environmental objectives with no significant negative impacts on economic or social objectives.

SP16 Environmental Protection

7.5.3.65 Strategic Policy SP16 relates to the quality of environmental resources and the prevention of pollution and specifies that developments should not have adverse effects or significantly increase pollution levels, that where possible brownfield sites should be given preference for development and that developments should not increase the number of people exposed to significant pollution. These measures are implemented through three detailed policies.

EN8 Pollution and Land Stability

7.5.3.66 Policy EN8 states that proposals will not be permitted if they would have adverse effects in terms of air, noise, light, or water pollution, land contamination or land instability. Provision is made for the possibility of mitigation measures to reduce harm to acceptable levels. The policy is intended to address the possible adverse effects of development on health, biodiversity and amenity and has been assessed as having positive effects in relation to these subjects. There may be economic costs associated with the requirements of the policy, but these are not assessed to be significant.

EN9 Developments in the Central Port Talbot Area

7.5.3.67 Policy EN9 relates only to developments in central Port Talbot and is intended to ensure that developments do not cause any breaches of air quality objectives during their construction phases. The policy is assessed as having limited impacts on most of the objectives due to its limited applicability, other than its intended effects on air quality.

EN10 Quiet Areas

7.5.3.68 Policy EN10 sets out the detailed policy to be applied to the Quiet Areas that have been designated by the Welsh Government. The Quiet Areas are public open spaces located within the urban area that have local amenity value and are relatively quiet in actual and/or perceived terms. The policy is assessed as being

positive in relation to the SA noise objective, but also in terms of social inclusion and health as being a measure that should improve local environments and public spaces, with few other significant impacts.

SP17 Minerals

7.5.3.69 Strategic Policy SP17 sets out the approach in relation to minerals (including coal, sand & gravel and crushed rock), stating that a proportionate contribution will be made to meeting demand for minerals while balancing impacts on the environment and communities. Five measures are set out in the policy: the maintenance of a minimum supply of aggregates; the safeguarding of identified resources; the promotion of efficient use of aggregates; ensuring that there are no unacceptable environmental or amenity impacts; and minimising conflicts between land uses by the identification of buffer zones and settlement protection zones. These measures are implemented through four detailed policies.

M1 Development in Mineral Safeguarding Areas

7.5.3.70 Policy M1 concerns mineral safeguarding areas, which are intended to protect mineral resources from sterilisation by development which could prevent their extraction. The policy specifies that development will only be permitted within the safeguarded areas under the circumstances that it lists. It is indicated that in most instances development is likely to be able to proceed as long as developers can demonstrate one of the following: that the resource is of poor quality or quantity; that it can be extracted prior to development; that there is an overriding need for development; or that the development would not have a significant impact on the working of the resource.

7.5.3.71 The policy may therefore prevent some development that would otherwise be acceptable, but is also likely to have positive economic impacts through maximising the availability of mineral resources. In relation to environmental and social objectives, no significant impacts have been identified as the policy does not permit or prevent mineral working in itself.

M2 Surface Coal Operations

7.5.3.72 Policy M2 sets out the circumstances under which surface coal operations will not be acceptable, including on sites within 500 metres of any settlement, within or affecting any international or national areas of environmental or cultural importance. The policy will therefore have the effect of restricting surface coal operations and may consequently have an impact on the local economy and employment, but has been assessed as having positive effects on a number of environmental objectives.

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Social and health impacts are mixed, with the restriction on employment opportunities potentially affecting local communities and residents, outweighed by the protection of amenities that it provides.

M3 Development in Mineral Buffer Zones

7.5.3.73 Policy M3 relates to buffer zones identified around existing and proposed mineral sites. The zones vary depending on the type of extraction operation from 100m to 500m and the policy states that development within the zones will only be permitted if the mineral resource will not be sterilised and the proposed development will not be adversely affected by the mineral operations. The effects of the policy are therefore similar to Policy M1 in that it may prevent some development that would otherwise be acceptable, but is also likely to have positive economic impacts through protecting sites of mineral working. The SA findings therefore reflect those for Policy M1.

M4 Criteria for the Assessment of Mineral Development

7.5.3.74 Policy M4 sets out the criteria that will be applied when dealing with mineral applications (including extraction and associated development). The policy has been assessed as being positive in economic terms and in relation to some social objectives, including social inclusion and poverty due to the potential for jobs and strengthening communities, but is likely to have mixed impacts on health and wellbeing and there are concerns about a range of environmental impacts from mineral developments that may be approved. The policy seeks to address some of these concerns through criteria requiring measures to address possible damage to the environment and amenity including methods of working, management of waste, restoration and after use proposals. Other concerns are addressed by environmental protection policies.

SP18 Renewable and Low Carbon Energy

7.5.3.75 Strategic Policy SP18 indicates that a proportionate contribution will be made to meeting national renewable energy targets while balancing impacts through three specific measures: encouraging renewables and low carbon technologies; encouraging energy conservation in new developments; and ensuring there are no unacceptable impacts on the environment or amenities. The policy is therefore of key importance in addressing the SA objective relating to the causes of climate change. The measures are implemented through two detailed policies.

RE1 Criteria for the Assessment of Renewable and Low Carbon Energy Development

7.5.3.76 Policy RE1 sets out the criteria for dealing with applications for renewable/low carbon energy developments. In addition to positive impacts on climate change mitigation, the policy has been assessed as being generally positive for economic objectives, but there are concerns about the impacts of developments on the landscape and biodiversity objectives. The policy includes criteria to address these concerns as far as possible.

RE2 Renewable and Low Carbon Energy in New Development

7.5.3.77 Policy RE2 indicates that schemes for new developments to connect to sources of renewable or low carbon energy will be encouraged and that larger developments will be required to submit Energy Assessments to evaluate the possibility of implementing such a scheme. As with Policy RE1, Policy RE2 has been assessed as being positive in relation to climate change mitigation and some economic objectives, although it may entail additional costs. The policy does not provide for the implementation of new energy developments directly and hence has not raised any significant issues in relation to environmental or social objectives.

SP19 Waste Management

7.5.3.78 Strategic Policy SP19 makes provision for a network of waste management facilities and includes four measures to implement this: the treatment of waste at the Materials Recovery and Energy Centre; the identification of preferred sites to meet the need for waste treatment; the continued use of the Pwllfawatkin Landfill Site; and the requirement that provision should be made for the sustainable management of waste in all new developments. These measures are implemented through three detailed policies.

W1 In-Building Waste Treatment Facilities

7.5.3.79 Policy W1 identifies three preferred sites for new in-building waste treatment facilities: the Baglan Bay and Junction 38 (M4) Margam Strategic Employment Site allocations and at the existing Kenfig Industrial Estate. The policy sets out criteria which will be applied when dealing with applications. In-building waste treatment may be considered to be acceptable on a number of the County Borough's employment sites, but the policy indicates the sites the Council considers to be the most suitable.

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7.5.3.80 The policy has been assessed taking into account that it does not specifically allocate sites, but indicates 'preferred locations'. The locations indicated are considered to be generally appropriate, being away from significant centres of population within industrial/employment areas and the policy scores positively in relation to climate change mitigation (due to the potential for energy recovery from waste) and also resources and waste objectives and effects on landscape/townscape. Some concerns are raised in relation to potential effects on biodiversity and pollution levels due to the potential for emissions from energy from waste processes: the policy seeks to address these concerns by including a criteria requiring adverse effects to be avoided or reduced. No significant social or economic impacts are identified.

W2 Disposal of Inert Waste on Agricultural Land

7.5.3.81 Policy W2 sets out criteria for dealing with proposals to deposit waste on agricultural land. The policy indicates that permission will be restricted to cases where there is no possibility of re-using or recycling the waste, the proposal is necessary for agricultural purposes and will result in agricultural improvement. The policy has been assessed as being positive in economic terms in that it allows for agricultural improvement and in relation to the loss or degradation of natural resources. Concerns raised about biodiversity and landscape impacts are addressed by criteria in the policy, although some effects on biodiversity are likely in many cases: Policy EN6 and Policy EN7 relating to biodiversity interests will also address these concerns.

W3 Waste Management in New Development

7.5.3.82 Policy W3 requires new built developments to make provision for the waste generated both during the construction and occupation phases. Larger developments are required to submit a site waste management plan. The policy has been assessed as being generally positive in relation to the resources and waste SA objectives with no significant negative effects identified.

Transport and Access

SP20 Transport Network

7.5.3.83 Strategic Policy SP20 sets out the measures to be taken in relation to the transport system and infrastructure, including transport schemes and projects; improving connectivity and access; enhancements to the walking and cycling networks; park and share schemes; identification of the road hierarchy; highway safety, access and sustainability considerations, parking and freight transport. The measures are implemented through four detailed transport policies.

TR1 Transport Proposals

7.5.3.84 Policy TR1 identifies a range of transport schemes across the County Borough and indicates that developments that would have any adverse impact on the implementation of the schemes will be resisted. The schemes identified are existing projects and the policy has the effect of safeguarding the proposals from potential adverse effects of other developments. The policy has been assessed as being generally positive in relation to climate change mitigation, pollution and economic objectives as it will enable improvements to be undertaken that will generally have positive effects in these areas. No specific negative impacts have been identified.

TR2 Design and Access of New Development

7.5.3.85 Policy TR2 sets out the access design criteria to be applied when dealing with development proposals, requiring developments to address highway safety issues, parking and manoeuvring requirements, accessibility by a range of travel means and the requirement for Travel Assessments and Travel Plans. The policy has been assessed as being positive in relation to climate change mitigation and some pollution and health objectives in that it requires developments to be accessible by a range of transport modes, reducing dependence on the private car, while measures to address congestion issues including the requirement for Transport Assessments and Travel Plans should also have a positive impact on local economy considerations. Although requirements for additional transport provision, parking and access requirements may have implications for the local environment in specific cases, no significant detrimental impacts have been identified.

TR3 Safeguarding of Disused Railway Infrastructure

7.5.3.86 Policy TR3 states that disused or redundant railway infrastructure will be safeguarded from development which would prevent its re-use. The policy has been assessed as being generally positive in relation to climate change mitigation (since it can help to provide an alternative to road transport), but it could have the effect of preventing the re-use of land for other purposes that could have beneficial effects in economic or community terms. The policy addresses these issues through allowing re-use for non-transport purposes where re-opening is shown to be unrealistic or unnecessary.

TR4 Safeguarding Freight Facilities

7.5.3.87 Policy TR4 identifies harbours, wharfs and sidings which will be safeguarded for freight transport purposes. The policy has similar effects to Policy TR3 and consequently receives a broadly similar assessment. The policy contains similar provisions for allowing the re-use of facilities where re-opening is shown to be unrealistic or unnecessary.

Culture and Heritage

SP21 Built Environment and Historic Heritage

7.5.3.88 Strategic Policy SP21 sets out the approach to the conservation and enhancement of the built heritage of the County Borough and covers design matters, protection of arterial gateways, safeguarding of historic and cultural features and the protection of designated historic sites and areas. These measures are implemented through three detailed policies.

BE1 Design

7.5.3.89 Policy BE1 is a detailed design policy setting out criteria that developments will be expected to meet. The criteria cover character and appearance, site context (including effects on arterial gateway areas); materials and landscaping; safety and amenity impacts; retention of features; public safety; transport and communications networks; efficient use of resources; drainage; and inclusive design.

7.5.3.90 The policy has been assessed as having generally positive effects in relation to climate change adaptation and mitigation, natural resource quality and use, landscape and townscape, historic environment, community cohesion and health impacts. Although some design requirements may involve some additional costs, no significant adverse economic or other impacts have been identified.

BE2 Buildings of Local Importance

7.5.3.91 Policy BE2 relates to buildings that are of cultural, historic or architectural importance (but do not merit listing) and sets out the approach to be taken to proposals that could affect such buildings. The policy has been assessed as being positive in relation to landscape, townscape and historic character objectives and community culture and character. In terms of economic impacts, although the policy could prevent some developments that would otherwise be acceptable, it could also bring benefits from the retention of character and attractiveness. No significant negative impacts have been identified.

BE3 The Canal Network

7.5.3.92 Policy BE3 is a safeguarding policy, intended to prevent developments that would prejudice the conservation and restoration of the canals where this is feasible. The policy has been assessed as being positive in relation to the SA biodiversity objectives as the canals are generally important features for biodiversity, and in relation to the landscape/townscape and historic character objectives. Safeguarding the canals should also have health and wellbeing benefits due to general public access for recreation purposes. No significant adverse impacts have been identified.

SP22 Welsh Language

7.5.3.93 Strategic Policy SP22 identifies language sensitive areas where 25% or more of the population speak Welsh and states that the language will be safeguarded and promoted in these areas. Detailed policy WL1 sets out the measures that will be taken to implement the strategy.

WL1 Development in Language Sensitive Areas

7.5.3.94 Policy WL1 requires larger and more important developments in language sensitive areas to submit a Language Action Plan with measures to protect, promote and enhance the language. The measures to be taken will therefore depend on the individual case, but examples include funding for Welsh medium schools, support/funding for bodies that provide activities, facilities and education for Welsh speakers and learners and ensuring that a Welsh language service is provided within any commercial development.

7.5.3.95 The policy has been assessed as being positive for social inclusion and the culture and character of communities and although it may impose additional costs on development, on balance it is considered that it will be positive for the local economy. Other objectives are unlikely to be significantly affected.

7.6 Conclusion and Summary of SA Recommendations / Mitigation Measures

7.6.1 In summary, in relation to the SA objectives, the analysis has identified a range of issues and made suggestions for mitigation and avoidance measures as set out below.

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1. Climate Change

7.6.2 In relation to taking into account the likely effects of climate change, the Plan proposals have been assessed in relation to flood risk, and where appropriate flood consequence assessments have been undertaken. This has resulted in a number of sites being excluded from the final Deposit Plan. Some sites are in potentially exposed locations and this is addressed in the design policy (BE1) with further advice to be provided in the Design Supplementary Planning Guidance (SPG).

7.6.3 With regard to the causes of climate change, a number of policies allow for developments outside settlement limits and some proposals are in less well connected locations, and in these cases it is recommended that improved transport linkages or additional community facilities should be considered as part of the developments. These requirements are addressed by a number of Plan policies including those relating to community facilities, open space provision and design and access.

2. Resources and Waste

7.6.4 A number of development sites raise issues with regard to the loss of soil resources. This relates essentially to greenfield sites where development would prevent future productive use. However, the greenfield development sites in the finalised Deposit Plan are not on high quality agricultural land.

3. Biodiversity

7.6.5 In relation to biodiversity loss and enhancement, new developments whether on previously developed sites or on greenfield sites, will always have the potential to have an impact. Most of the development proposals therefore could have an effect. In order to meet the SA objective of preventing net loss of biodiversity, mitigation and compensation measures will be required for many developments, and these are covered by environmental protection policies within the Plan. A number of sites have been amended or omitted from the Plan in order to avoid having unacceptable effects on biodiversity.

4. Landscape, Townscape and Historic Character

7.6.6 Several allocated sites and some of the policies allowing development in the countryside (including renewable energy and minerals) raise concerns about possible impacts on the landscape (including from light pollution). It is recommended that such developments should be required to pay particular attention to landscape impacts and implement measures such as the retention of existing landscape features, provision

of additional planting and screening and pay careful attention to site designs. Policies in the Plan implement these measures, and further guidance will be contained in the Design SPG.

7.6.7 In relation to historic character and buildings, some concerns are raised about Policy EN4 allowing replacement dwellings in the countryside, since this could result in a loss of historic buildings. A criteria in the policy addresses this concern, together with Policy BE2 concerning buildings of historical importance.

5. Pollution

7.6.8 In relation to air quality, some proposals are identified as having the potential to exacerbate problems in identified areas of poor air quality. This relates to uses that could directly result in atmospheric emissions (such as employment uses) as well as those that would increase traffic levels in sensitive areas. Policy EN8 directly relates to air pollution issues, while Policy EN9 specifically relates to developments in central Port Talbot in order to address specific concerns. In addition, Policy BE1 and Policy TR2 require developments to make provision for walking, cycling and public transport in order to reduce dependence on the private car.

6. Community Cohesion

7.6.9 Some of the Plan proposals that could result in developments away from existing settlements and communities raise concerns about social exclusion. Again, design and access policies (BE1 and TR2) require improved linkages and provision for walking and cycling routes and criteria in the relevant policies address these issues. In relation to the Welsh language (SA objective 6b) a number of Plan proposals in the language sensitive areas have been identified as having a potential impact. This matter is considered in more detail in Chapter 8.

LDP Protection and Mitigation Policies

7.6.10 A number of policies have been incorporated in the LDP that address some of the concerns raised by the SA process, these policies include:

- SC1 Settlement Limits;
- SC2 Protection of Existing Community Facilities;
- I1 Infrastructure Requirements;
- OS1 Open Space Provision;

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- OS2 Protection of Existing Open Space;
- EN1 The Undeveloped Coast;
- EN2 Special Landscape Areas;
- EN3 Green Wedges;
- EN6 Important Biodiversity and Geodiversity Sites;
- EN7 Important Natural Features;
- EN8 Pollution and Land Stability;
- EN9 Development in the Central Port Talbot Area;
- TR2 Design and Access of New Development;
- BE1 Design;
- BE2 Buildings of Local Importance; and
- WL1 Development in Language Sensitive Areas.

8 Related Appraisals

8.0.1 As part of the SA process, assessments are made of the impacts of the Plan's policies and proposals on human health, equalities (including sex, age, race and disability issues) and on the Welsh language. Each of these aspects has been assessed alongside all the other sustainability and environmental issues, enabling the effects of the Plan to be fully assessed in detail. The findings have also been taken into account in the development of the Plan. Through this process, the SA has considered health, equalities and Welsh language matters in detail through relevant assessments.

8.1 Health Impact Assessment

8.1.1 Health and wellbeing are central to the delivery of a sustainable society and is considered an important component of the five underlying principles of sustainability and sustainable development. The World Health Organisation defines health as '*a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity*'. It is concerned with individual and community health and the opportunity for individuals to develop to their full potential within their community.

8.1.2 Specific determinants of wellbeing are identified by the World Health Organisation as access to and quality of services, lifestyles, social and community influences, living and environmental conditions as well as wider economic and environmental conditions. It is increasingly recognised that addressing these issues that influence whether we enjoy good health are potentially as important, if not more important, in addressing health and health inequalities than the provision of health services. The LDP has the potential to have a significant effect on health issues through supporting communities and community facilities, addressing accessibility issues in particular in relation to leisure/recreation and health facilities and improving prospects for employment.

8.1.3 Neath Port Talbot suffers from some of the worst health problems in Wales and contains within its boundaries two of the worst areas of multiple deprivation in the country. The LDP has identified poor health as a key issue and as a result has considered reducing people's exposure to the determinants of poor health and providing an environment that encourages healthy, active and safer lifestyles as an overarching objective within the Plan.

8.1.4 The SA has identified the following main issues relating to health within the County Borough:

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- Poor health outcomes are concentrated within specific areas of the County Borough particularly within the Valleys and parts of Port Talbot;
- The same areas suffer from higher reported crime and multiple deprivation, physical degeneration including vandalism and poorer access to services;
- Poor air quality is a particular issue in some parts of the County Borough which may be exacerbated by additional development and associated traffic;
- Age and health profiles vary significantly across the County Borough, but there is an ageing population with above average numbers claiming incapacity benefit;
- High unemployment levels and low levels of economic activity in some areas have a detrimental effect on health;
- Social exclusion problems are likely to increase;
- Employment opportunities have been restricted by a focus on the M4 coastal belt to the detriment of the Valleys;
- Good access to local recreational facilities, open space and health services is important for health as is community cohesion; and
- Adequate housing provision for all is needed, including affordable housing provision with pressure on good quality affordable and appropriate housing likely to increase.

8.1.5 In relation to these points, the SA has drawn attention to aspects of the Plan that could influence the situation, and measures that can be incorporated into the Plan to minimise any adverse affects and address existing problems. These include:

- The need to plan sustainable and self sufficient communities with good access to services and internal and external links through 'active' modes of travel such as walking and cycling. The Plan's settlement strategy and policies concerning the provision and safeguarding of open space, recreational and community facilities and walking and cycling routes help to address some of these issues;
- The strategy of providing for and encouraging a fairly high level of economic growth should facilitate the creation of jobs to help reduce unemployment and economic inactivity levels;

- Associated with the projected level of economic growth, the Plan should provide for an ambitious level of house building, enabling the maximisation of affordable housing provision; and
- The impacts of these high levels of growth and development have the potential to have adverse environmental and social effects. These need to be addressed where possible by policies to minimise pollution and traffic increases, safeguard and provide open space, recreational and community facilities and conserve biodiversity and the countryside.

8.1.6 As the SA process is a iterative one and has been carried out alongside the production of the LDP these points have been considered when formulating the LDP strategy, policies and considering the allocations. As part of the SA process, the Deposit LDP strategies, policies and proposals were assessed in terms of the SA health objectives. The table below summarises the main findings of the SA that relate to health matters. Further details and matrices of assessments on individual allocations and policies can be found in the SA background paper.

Table 8.1.1 Health Impact Assessment

SA Objective 7A: Improve physical and mental health outcomes for all	
Growth Strategy	The shift to a higher level of growth brings with it positive and negative impacts. In general terms the higher level of growth chosen scores relatively badly in relation to the environmental indicators, but positively for most of the social and economic indicators. Generally positive effects are identified in relation to health and wellbeing as it is considered that increasing population levels and higher levels of development will generally help to address health and wellbeing issues where lower growth or decline will exacerbate existing problems, especially in relation to provision of and access to facilities.
Spatial Strategy	Focusing on the Coastal Corridor while reinvigorating the valley communities has largely positive benefits in relation to a range of the SA objectives. This includes positive social and economic benefits through working with market forces, reducing impacts on resources and landscapes and addressing economic and social issues in the Valleys. The concentration of employment land along the Coastal Corridor is in line with market demand and will encourage the provision of new employment opportunities which will reduce unemployment and economic inactivity rates which is beneficial to health and wellbeing.
Overarching Policies	The strategic Health policy (SP2) sets out the overall LDP approach to health issues which are implemented through a range of detailed LDP policies. The policy seeks to promote the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework having a positive impact on accessibility to health and care services. This is coupled with improving accessibility within and between communities to encourage active travel which also

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SA Objective 7A: Improve physical and mental health outcomes for all	
	has a positive impact on health. The policy also looks to retain a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough which should have a positive impact on health and well being.
Area Based Policies	The Area-Based policies set out the differing approaches that will be applied in the two spatial areas (Coastal Corridor and Valleys) and the strategic areas and schemes in each. The policies implement the spatial strategy and should help to ensure that in both areas residents have improved access to recreational facilities, open space and good quality environments together with services and facilities. Concerns are expressed about the impacts of higher levels of development on the environment and pollution levels.
Topic Policies	<p>The effects of different locations for new housing development on health will mainly depend on the quality of environment that the residents will experience and the ease of access to health facilities and services. Some developments may be isolated from facilities and require residents to make car journeys whether in other locations access could easily be achieved by more active modes. Policy OS1 scores positively in terms of creating a high quality physical environment and promotes physical and mental wellbeing through ensuring the provision of open space with new development. Policy OS2 also has a positive impact in that it aims to protect existing open space provision.</p> <p>Environmental policies aimed at protecting the natural and built environment have a positive impact on health and well being. This includes policies designed to protect the countryside and undeveloped coast and biodiversity together with pollution control. Improving connectivity and access within the transport system will also have a positive impact through safeguarding walking and cycling routes which encourages a healthier lifestyle. This will reduce congestion and therefore pollution and encourage a healthier lifestyle.</p>
SA Objective 7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing	
Growth Strategy	In relation to the causes of ill health and poor wellbeing, the main influences that the LDP can have relate to the provision of facilities (including access to open space and recreation facilities); provision of employment; and the extent of new development within communities. In general terms, it is considered that higher levels of population growth and development give the best opportunity for improving these aspects through developer contributions, although it is likely that the effects will not be equally spread across the County Borough. An increase in growth may bring with it an increase in air, noise and light pollution from new industry, development and higher traffic levels. The Plan however contains policies aimed at ensuring these potential negative impacts are kept to a minimum.
Spatial Strategy	In relation to health and well being guiding development to the most sustainable locations will have a positive impact. Particular areas of poor health have been identified in the Valley communities. New development in the Valleys areas can

SA Objective 7A: Improve physical and mental health outcomes for all	
	bring with it better open space/walking/cycling provision and improvements to the quality of housing. The strategy to reinvigorate the Valleys therefore can have a positive impact on the health and well being of the community.
Overarching Policies	The overarching health policy seeks to promote the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework having a positive impact on accessibility to health and care services. This is coupled with improving accessibility within and between communities to encourage active travel which also has a positive impact on health. The policy also looks to retain a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough which should have a positive impact on health and well being.
Area Based Policies	The policies should help to ensure that in both spatial areas residents have improved access to recreational facilities, open space and good quality environments together with services and facilities, although these will continue to be an issue in some remote areas. Concerns are expressed about the impacts of higher levels of development on the environment and pollution levels.
Topic Policies	The effects of different locations for new housing development on ill health and poor wellbeing will mainly depend on the quality of environment that the residents will experience and the ease of access to health facilities. Policies concerning open space, environmental protection, transport and social issues seek to address negative impacts of increased growth levels.
SA Objective 7C: Reduce/minimise incidence and impacts of poverty by addressing the causes and consequences of poverty.	
Growth Strategy	In the case of NPT, it is considered that many of the issues relating to poverty relate to declining, ageing communities lacking access to facilities and employment and that this would best be remedied by higher levels of population growth. However, there are significant uncertainties about whether realistic population growth levels will have any substantial effect on the poorest communities.
Spatial Strategy	The strategy to encourage economic development in coastal corridor should make the most of existing market forces in growing the economic and addressing poverty issues, while measures to reinvigorate the Valleys should help to support valleys communities and areas of poverty. Affordable housing policies will help to alleviate some consequences of poverty.
Overarching Policies	Policies relating to sustainable communities and infrastructure should help to support communities in more disadvantaged areas by improving amenities and facilities and access, helping to address both causes and consequences of poverty
Area Based Policies	The policies should help to ensure that in both spatial areas economic growth is promoted and jobs created, and that access to facilities and services is improved, addressing some poverty issues. Concerns are expressed about the impacts of higher levels of development on the environment and pollution levels.

8 . Related Appraisals

SA Objective 7A: Improve physical and mental health outcomes for all

Topic Policies	<p>The Plan aims to deliver 2,500 affordable housing units through requiring housing developments to contribute to affordable housing provision and through affordable housing exception sites. A sufficient supply of affordable housing has a positive impacts on reducing poverty.</p> <p>Strategic Policy SP11 seeks to encourage employment growth both on the coastal belt and in the Valley areas. A flexible approach in the valley areas to employment development and tourism development will create new jobs in the areas, areas which particularly suffer from poor health. This will reduce unemployment and increase economic activity which is beneficial to the health and well being of the community.</p>
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Conclusions

8.1.7 The assessment has identified that the Plan adequately encourages sustainable and self sufficient communities with good internal and external links via a sustainable and integrated transport network that encourages 'active' modes of travel. The spatial strategy looks to guide future development to the most sustainable locations and promote the co-location of jobs and facilities whilst encouraging the development of community facilities and services in accordance with the settlement framework. The Plan's settlement strategy and policies concerning the provision and safeguarding of open space and walking and cycling routes will also have a positive impact on health and wellbeing.

8.1.8 A change to a higher level of growth and concentration of economic growth along the coastal corridor looks to create new employment opportunities which raises economic activity and with it have a positive impact on poverty and wellbeing. A higher level of new housing provision will raise the overall quality of the the housing stock and therefore standards of living. Whilst a higher level of development can cause negative impacts such as an increase in air, noise and light pollution and the loss of greenfield land, the Plan seeks to maximise the regeneration of brownfield land and includes policies aimed and ensuring that impacts are kept to a minimum in terms of pollution, loss of natural resources and congestion.

8.2 Equalities Impact Assessment

8.2.1 The focus of the appraisal of impacts on equalities issues has been on whether the LDP would address the needs of all groups within the community and whether it would adversely effect any of those groups.

8.2.2 The Equality Act 2010 requires that public bodies, under the public sector general duties, must have due regard to:

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity between different groups; and
- Foster good relation between different groups.

8.2.3 These 'different groups' or 'protected characteristics' are race, age, disability, sex, religion or belief, marriage and civil partnership, pregnancy and maternity, gender reassignment and sexual orientation. The SA and the LDP (in compliance with the Equality Act 2010) have considered the issues for the protected characteristics as well as other groups/community interests. It is important to note that people do not usually fit just within one protected characteristic, indeed there is usually an overlap between different characteristics, for example an older person who is from a black and minority community and who has a disability. So although this SA acknowledges that there appear to be no particular causes of worsening inequality due to ethnicity alone it is still likely that age and disability etc will have the same adverse impact as upon the rest of the population.

8.2.4 Groups within the community have been identified in relation to issues that have emerged from the preparation of the LDP and SA and their respective consultation exercises.

Age

8.2.5 Older persons (i.e. over retirement age): this group is growing significantly. While there are areas where this age group is concentrated, as with the other groups, the needs of older persons are relevant throughout the County Borough area.

8.2.6 Young People: it is important that the needs of young people (from babies in prams to teenagers) are addressed. This includes access to facilities and places to meet and congregate. It can also include protecting young people from developments that could be prejudicial to their health including fast food outlets.

Disability

8.2.7 People suffering from poor health, the disabled and people using wheelchairs and prams: Neath Port Talbot contains a higher percentage than the Welsh average of people who are disabled or suffering from poor health. Issues of access in the widest sense, to all places, amenities and facilities are key to ensuring equality.

8 . Related Appraisals

8.2.8 People with disabilities and access issues are spread across Neath Port Talbot's communities without particular geographic concentrations. Mothers with pushchairs, prams and young children face similar difficulties.

Race

8.2.9 Ethnic groups: Neath Port Talbot contains a variety of Black and Minority Ethnic Groups. They tend to be located within urban areas, but no particular areas of concentration or causes of worsening inequality have been identified.

Sex

8.2.10 Issues for men and women, boys and girls. No gender issues have been identified for the LDP to address to date.

Religion/Belief, Marriage/Civil Partnership, Pregnancy/Maternity, Gender Reassignment/Sexual Orientation

8.2.11 No adverse impact issues for the LDP to address have been identified.

Other Issues

8.2.12 People suffering from social and economic deprivation: this group is concentrated in particular localities: the Communities First areas provide a reasonable indication of the areas with the highest percentages.

8.2.13 Carers: a significant proportion of the population are paid or unpaid carers for people who are elderly, disabled or unwell and face similar concerns to the other identified groups.

8.2.14 People in employment but who are dependant upon lengthy daily journeys to work: these journeys restrict the time available to the persons involved for family, leisure, community and other activities and can take up a significant part of the household income.

Assessment of LDP Against SA Objectives in relation to Equality

8.2.15 The SA has addressed equalities issues through the Community Cohesion and Health and Wellbeing topics including the need to ensure that all sections of society should benefit from improved health and wellbeing and that inequalities should be reduced through addressing poverty issues. The LDP policies and proposals were assessed in terms of the following objectives and questions relevant to equalities issues:

- SA Objective 6A: Improve social inclusion and minimise the incidence of social exclusion by addressing the causes of social exclusion.
 - Will the proposed strategy/policy/proposal ensure provision of and access for all to a wide variety of experiences and social and cultural resources?
 - Will the proposed strategy/policy/proposal encourage and support intra and intergenerational community participation?
- SA Objective 7A: Improve physical and mental health outcomes for all.
 - Will the proposed strategy/policy/proposal enhance and maintain optimum levels of appropriate public health and care services accessible to all?
- SA Objective 7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.
 - Will the proposed strategy/policy/proposal create a clean, safe, high quality physical environment that promotes physical and mental wellbeing for all?
 - Will the proposed strategy/policy/proposal improve accessibility of and to key services such as shops and medical services as well as employment and education and reduce inequalities in access?
- SA Objective 7C: Reduce/minimise incidence and impacts of poverty by addressing the causes and consequences of poverty.
 - Will the proposed strategy/policy/proposal ensure that basic needs such as food, safety and shelter are met, are appropriate to the needs of individuals and support a sustainable way of living and working?
 - Will the proposed strategy/policy/proposal break the cycle of deprivation?

8.2.16 This analysis has resulted in the identification of the following main points relating to the potential impacts of the Plan which have been addressed where possible in the Plan's policies:

8 . Related Appraisals

- The Plan relates to the use and development of land and for the most part the proposals do not draw any distinctions between different groups in society but relate to spatial distributions, actively seeking where possible to ensure that disadvantaged areas are improved and spatial differences addressed rather than considering specific groups in society. Within Neath Port Talbot, there are no identified spatial concentrations of any particular societal groups that would be disadvantaged through this approach.
- An exception to this general approach is made in relation to Gypsies and Travellers, where specific provision is made for additional new pitches to meet the identified need, and allowance is made for specific lifestyle requirements in policy relating to dealing with associated applications. These provisions are in accordance with national policy and guidance and are considered to deal appropriately with the requirements of Gypsy and Traveller groups without causing significant harm to other groups.
- There are concerns that significant development within areas where the Welsh language is an important part of everyday life may have a detrimental effect on its use and importance by encouraging an influx of non-Welsh speakers. This is addressed in more detail in the Welsh Language Impact Assessment. However, in drawing up policies to address concerns about the Welsh language it has been important to ensure that non Welsh speaking people and groups do not suffer discrimination, for example by being prevented from moving to a particular area. This is considered in more detail as part of the Welsh Language Impact Assessment (see below).
- Policies and proposals relating to economic development are considered to be appropriate in terms of seeking to maximise job creation and to enhance the economy of the area, helping to provide additional jobs and to address poverty and inequality.
- In terms of detailed design, the SA has highlighted concerns about ensuring accessibility for all groups both to facilities amenities and services in particular areas and to individual sites and buildings. Plan policies relating to the development of a sustainable settlement hierarchy, with improved linkages by a range of modes, and improved distribution of services, facilities and amenities help to address the wider issue, although some aspects (such as the strategy for the provision of health care) cannot be addressed directly. The issue of access to specific sites and buildings and the achievement of 'inclusive' design is addressed by the design policy, although internal detailed design issues are covered by other regulations.

8.2.17 It is considered that the LDP has adequately considered equalities throughout and its strategy, policies and allocations satisfies the SA equalities objectives.

8.3 Welsh Language Impact Assessment

8.3.1 Welsh Government Planning Guidance⁽¹¹⁵⁾ advises that the Welsh language should be taken into account in the preparation of LDP strategies and policies relating to the location of new development. Planning Policy Wales (PPW) states that the future well being of the language will depend on various factors including education, demographic change, community activities and a sound economic base. The social effect of a development is particularly stressed and the local authority is required to consider whether it has communities where the use of the Welsh language is a part of the social fabric and as such needs to be taken into account when formulating land use policies within the LDP. Impacts on the language also need to be considered when assessing sites for their inclusion in the LDP and as part of the SA when assessing the impacts of the Plan against the SA objectives.

8.3.2 Due to the varying linguistic make up of Neath Port Talbot and in line with national guidance, it was deemed appropriate to only apply policies within identified Language Sensitive Areas where the language is a significant part of the social fabric of the community. As such the LDP focuses the Welsh language strategy and policies within the following communities:

- Pontardawe;
- Swansea Valley;
- Amman Valley; and
- The community of Crynant in the Dulais Valley.

8.3.3 These areas contain communities where the language is spoken by 25% or more of the population and where its tradition and culture is strong. They play an important role in providing a reservoir of fluent Welsh speakers within the County Borough and indeed for Wales but in recent years the language has been under threat. In addition a high proportion of the County Borough's Welsh medium schools are located within these communities with the demand for Welsh education high while the loss of Welsh speakers was identified as a concern during LDP stakeholder engagement.

8 . Related Appraisals

8.3.4 Due to the lack of evidence on the impacts a large housing development can have on the language the Authority, with financial support from the Welsh Language Board (now part of Welsh Government), commissioned Menter Iaith Castell Nedd Port Talbot to undertake a Welsh Language Impact Assessment. The Assessment focused on two sites, one a long established area of housing in Ystalyfera and the other a new housing site in Godre'r Graig. The study clearly identified that in the new housing development in Godre'r Graig:

- There is a significantly lower percentage of Welsh speakers;
- English is likely to be the language of the home in mixed language households;
- Welsh speakers are less likely to use the Welsh language outside the home; and
- A lower percentage of children are likely to go to Welsh medium schools when compared with the area of existing housing.

8.3.5 A similar study was prepared by Menter Iaith for Powys County Council comparing two housing sites in the nearby village of Ystradgynlais which borders Neath Port Talbot. This assessment further reinforces the conclusion that new large scale housing development in the Swansea Valley will tend to contain a lower percentage of Welsh speakers and as such will have an impact on the social fabric of the community.

8.3.6 The SA has assessed the impact of the Plan's policies and proposals as part of the Community Cohesion topic, through the following objective and question:

- SA Objective 6B: Protect and enhance the culture and character of local communities.
 - Will the proposed strategy/policy/proposal protect, enhance and support the use and development of the Welsh language?

8.3.7 This assessment identified the following sites presented by spatial area as having a potential negative impact on the language due to their scale and location. Having identified these sites as potentially having a detrimental impact on the Welsh language it was considered appropriate to assess the likely impact in more detail as part of the SA process. The additional criteria used and additional questions posed are derived from 'Planning and the Welsh Language: The Way Ahead'⁽¹¹⁶⁾.

116 Planning and the Welsh Language: The Way Ahead (2005)

Pontardawe

8.3.8 The spatial area of Pontardawe is focused on the historic town and the three surrounding wards of Rhos, Alltwen and Trebanos. The town of Pontardawe is the third largest settlement in the County Borough and the largest settlement in the Valley areas. It connects to the M4 / Coastal Corridor via the A4067 and acts as a transport hub with links to Neath, Swansea and is also a gateway to the Valleys beyond. According to the 2011 Census figures the spatial area of Pontardawe contains a total population of 11,601 and 4,904 households.

8.3.9 Pontardawe offers a wide variety of facilities, services, leisure facilities, education establishments and employment opportunities. In particular, the Alloy Industrial Estate remains a significant contributor to the local economy. There have been a number of recent regeneration initiatives in the area including refurbishment to existing facilities and enhancements to the public realm. This has created a high quality public space that is often used for festivals and events held throughout the year.

8.3.10 Pontardawe offers the potential to accommodate new housing development and is considered as a key growth point within the LDP strategy. Such development will reflect its function and growing status as a town and retail centre and it is anticipated that the area will act as a catalyst for additional investment in the Valley areas. A total of 399 housing units have been allocated for the period of the Plan at the following sites amounting to a 8.14% increase in households:

- H1/24 Bryn Morgrug (Phase 2) - 52 units;
- H1/25 Ynysymond Road - 50 units;
- H1/26 Cwmtawe School (Phase 2) - 32 units;
- H1/27 Waun Sterw / Waun Penlan - 115 units; and
- H1/28 Bryn Brych Farm - 150 units.

8.3.11 The spatial area of Pontardawe collectively has more than 25% Welsh speakers and acts as a hub for the Swansea Valley as a whole providing opportunities to use the language through Welsh language services and facilities. Consequently, these allocations have been assessed in more detail in relation to likely impacts on the language. The following table summarises the potential impact that the five allocations may have on the language within the area.

8 . Related Appraisals

Table 8.3.1 Assessment of the Impact of LDP Allocations on the Welsh Language in Pontardawe

WLIA Criteria	Comments	
Do the allocations affect the balance of English / Welsh speakers?	When considering the conclusions from the WLIA prepared by Menter Iaith, allocating such a significant amount of houses within the area is likely to have a negative impact on the linguistic balance in the area.	X
Do the allocations result in a permanent increase in the proportion of non-Welsh speaking households?	The conclusions from the WLIA prepared by Menter Iaith suggests that with such a significant amount of houses being allocated in the area it is likely to result in an increase the proportion of non-Welsh speaking households.	X
Do the allocations impact on in-migration?	Such a significant amount of housing will inevitably attract some in-migration into the area from other parts of the County Borough and beyond. It is impossible however to predict the linguistic ability of these residents.	0
Do the allocations impact on out-migration?	The introduction of new housing into the area can provide opportunities for existing Welsh speaking residents to remain in the area.	√
Are the allocations likely to lead to a change in age structure of the community?	It is difficult to determine the age structure of future residents.	0
Could the allocation potentially lead to local (Welsh speaking) businesses closing down?	A influx in new residents into the area can help increase custom and help sustain local businesses.	√
Are the allocation likely to have an impact on the average cost of housing?	Unlikely to have a significant effect.	0
Do the allocations threaten / secure local schools by altering the balance between Welsh speaking and non Welsh speaking students?	The spatial area of Pontardawe contains 2 Welsh medium primary schools. According to enrolment figures for the year 2012/13 'Ysgol Gynradd Gymraeg Pontardawe' had 292 pupils with 67 unfilled places. 'Ysgol Gynradd Gymraeg Trebanos' contained 85 pupils with 47 unfilled places. While this shows that there is space for new residents within these schools, the introduction of a significant amount of non-Welsh speaking pupils may impact on the linguistic balance of the schools and impact on the language of the play ground.	X
Do the allocations threaten / secure Welsh medium facilities and services?	A influx of new residents into the area can help sustain local facilities and services.	√

WLIA Criteria	Comments
Summary	<p>Both WLIA's prepared by Menter Iaith concluded that both large sites assessed contained a lower percentage of Welsh speakers compared to existing area of housing in Ystalyfera and Ystradgynlais. As such the amount of allocated housing within the LDP is likely to have a negative impact on the linguistic balance of the spatial area and result in an increase in the amount of non Welsh speakers in the area. While the evidence suggests such a trend, it is possible that the introduction of new housing into the area may provide opportunities for local Welsh speaking residents to stay in the area and a influx of new residents could help sustain local Welsh speaking businesses, facilities and services. A significant influx of new pupils into the area could impact on the linguistic balance of the Welsh language schools.</p> <p>Due to the significant amount of housing proposed in the area it is considered that this could have a negative impact on the Welsh language.</p>
Mitigation	<p>Developers will be required to submit a Language Action Plan under the provisions of Policy WL1. The Language Action Plan should include the following measures:</p> <ul style="list-style-type: none"> ● Support and funding for local Welsh medium schools to cater for additional numbers of non-Welsh speakers; and ● Support and funding for organisations and bodies that provide activities, facilities and education for Welsh speakers and learners to encourage non-Welsh speaking residents to learn the language.

Swansea Valley

8.3.12 The Swansea Valley comprises the wards of Cwmllynfell, Godre'r Graig and Ystalyfera. Ystalyfera is the focal point in the area and is located in close proximity to Ystradgynlais which lies across the administrative boundary in Powys. According to the 2011 Census figures the Swansea Valley contains a total population of 5,835 and 2,573 households.

8.3.13 Located adjacent to the A4067, Ystalyfera has good access to the M4 / Coastal Corridor and offers a range of services and facilities which complements the neighbouring communities. The area has recently seen the development of a large food superstore, creating an additional retail function in the area along with a number of employment opportunities. The following site has been allocated within the LDP in the Swansea Valley consisting of 120 units which amounts to a 4.66% increase in households:

- H1/29 Compar / GMF, Ystalyfera (120 units).

8 . Related Appraisals

8.3.14 The Swansea Valley has more than 25% Welsh speakers and consequently, this allocation has been assessed in more detail in relation to likely impacts on the language. The following table summarises the potential impact that the allocation may have on the language within the area.

Table 8.3.2 Assessment of the Impact of the LDP Allocation on the Welsh Language in the Swansea Valley

WLIA Criteria	Comments	
Does the allocation affect the balance of English / Welsh speakers?	When considering the conclusions from the WLIA prepared by Menter Iaith, it is considered likely to have a negative impact on the linguistic balance in the area.	X
Does the allocation result in a permanent increase in the proportion of non-Welsh speaking households?	The conclusions from the WLIA prepared by Menter Iaith suggests that a development of this size is likely to result in an increase in the proportion of non-Welsh speaking households.	X
Does the allocation impact on in migration?	Such an amount of housing will inevitably attract some in-migration into the area from other parts of the County Borough and beyond. It is however impossible to predict the linguistic make up of these residents.	0
Does the allocation Impact on out migration?	The introduction of new housing into the area can provide opportunities for existing Welsh speaking residents to remain in the area.	√
Is the allocation likely to lead to a change in age structure of the community?	It is difficult to determine the age structure of future residents.	0
Is the allocation likely to have an impact on the health of local people?	The allocation is likely to create a good quality environment for the new residents.	0
Is the allocation likely to have an impact on the amenity of the local area?	Development will be required to provide adequate open space provision in line with the provisions of Policy OS1. This is likely to have a positive impact on the amenity of the new residents, however the development may also lead to the loss of greenfield land which may have a negative impact. Overall the impacts would be neutral.	0
Could the allocation potentially lead to local (Welsh speaking) businesses closing down?	A influx of new residents into the area can help increase custom and help sustain local businesses.	√
Is the allocation likely to have an impact on the average cost of housing?	Unlikely to have a significant effect.	0

WLIA Criteria	Comments	
Does the allocation threaten / secure local schools by altering the balance between Welsh speaking and non Welsh speaking students?	Swansea Valley contains one Welsh Language Primary School, 'Ysgol Gynradd Gymraeg Y Wern'. According to enrolment figures for the year 2012/13 the school contained 130 pupils and 132 unfilled places. The only Welsh medium comprehensive school within the Borough is 'Ysgol Gyfun Ystalyfera' which is located in the Swansea Valley and in 2012/13 contained 1,015 pupils with 270 unfilled places. While this shows that there is space for new residents within these schools, the introduction of a significant amount of non-Welsh speaking pupils may impact on the linguistic balance of the schools and impact on the language of the play ground.	X
Does the allocation threaten / secure Welsh medium facilities and services?	A influx of new residents into the area can help sustain local facilities and services.	√
Summary	<p>Both WLIA's prepared by Menter Iaith concluded that both large sites assessed contained a lower percentage of Welsh speakers compared to existing area of housing in Ystalyfera and Ystradgynlais. As such the allocation may have a negative impact on the linguistic balance of the area and result in an increase in the amount of non Welsh speakers. While the evidence suggests such a trend, it is possible that the introduction of new housing into the area may provide opportunities for local Welsh speaking residents to stay in the area and a influx of new residents could help sustain local Welsh speaking businesses, facilities and services. A significant influx of new pupils into the area could impact on the linguistic balance of the Welsh language schools.</p> <p>Due to the amount of housing proposed in the area, it is considered that this could have a negative impact on the Welsh language.</p>	
Mitigation	<p>Developers will be required to submit a Language Action Plan under the provisions of Policy WL1. The Language Action Plan should include the following measures:</p> <ul style="list-style-type: none"> ● Support and funding for local Welsh medium schools to cater for additional numbers of non-Welsh speakers; and ● Support and funding for organisations and bodies that provide activities, facilities and education for Welsh speakers and learners to encourage non-Welsh speaking residents to learn the language. 	

8 . Related Appraisals

8.3.15 The Amman Valley comprises the wards of Gwaun Cae Gurwen and Lower Brynamman. The centre of Gwaun Cae Gurwen provides the focal point for the valley meeting the day to day needs of the residents. In terms of employment, there are a small number of workshop units in Cwmgors and the existing businesses offer employment opportunities.

Crynant

8.3.16 The community of Crynant lies at the lower end of the Dulais Valley and is considered as a language sensitive area due to the fact that it contains 25% or more Welsh speakers. Located on the main bus route, the settlement contains a number of shops, a Primary School, community facilities, open space and offers employment opportunities at the Workshops. The nearest Welsh language school is Ysgol Gynradd Gymraeg Blaendulais which is located in Seven Sisters.

8.3.17 As there are no allocations proposed in either the Amman Valley or Crynant, an assessment is not therefore required.

Conclusions

8.3.18 The Plan has identified communities within the County Borough where the language is an intrinsic part of the social fabric. Whilst small scale development will continue to take place in many of these areas, the LDP has allocated a significant amount of housing within the spatial areas of Pontardawe and Swansea Valley where it has been identified that such development is likely to have an adverse impact on the linguistic balance of the area. As such a policy has been incorporated into the Plan requiring developers to submit a Language Action Plan where the proposal is either for more than 10 dwellings; retail development of 1000 sqm or more; or commercial or industrial development.

8.3.19 It is however possible to mitigate any potential adverse impacts by drawing upon the recommendations set out in the WLIA Report prepared by Menter Iaith. The report advises that any Language Action Plan should include the following mitigation which has been incorporated into Policy WL1:

- Support and funding for local Welsh medium schools to cater for additional numbers of non-Welsh speakers;

- Support and funding for organisations and bodies that provide activities, facilities and education for Welsh speakers and learners (e.g. Language classes); and
- Ensuring a Welsh language service is provided within any commercial development.

8.3.20 Further details of these requirements will be set out in Supplementary Planning Guidance. Once provisions outlined within any Language Action Plan has been put in place, the effectiveness of their implementation should be closely monitored.

8.3.21 On balance, it is considered that these measures will effectively address concerns in relation to the impact of development on the Welsh language, while at the same time ensuring that no discrimination results.

8 . Related Appraisals

9 Likely Significant Effects of Implementing the LDP

9.0.1 The iterative approach to the SA process, undertaken in parallel with the development of the LDP has resulted in a choice of options, strategies, sites and policies informed by extensive analysis of background information, consideration of a wide range of possible impacts on features and characteristics of agreed importance, all driven by a comprehensive vision of what the desired outcomes should be for the County Borough. This includes the incorporation of safeguarding policies and policy criteria within the Plan requiring measures to be taken to avoid causing harm to features and characteristics of recognised importance, or to put in place mitigation or compensation measures. The SA input into this process is summarised in Chapter 7.

9.0.2 Taking into account these measures that are built into the Plan, the anticipated likely significant effects of the Plan as a whole are summarised below. The assessment considers short, medium and long term, permanent and temporary, positive and negative, and secondary, cumulative and synergistic effects. The summary follows the SA topic-based structure, with indications of how this covers the criteria set out in the SEA Regulations.

Population

9.0.3 Over recent decades, the population of Neath Port Talbot has tended to stagnate in terms of numbers, with an associated ageing structure and a tenancy for younger people to leave the area. This trend has tended to reverse in the last few years and the LDP sets ambitious targets for population growth, providing for an additional 535 homes to be built per annum. The level of growth is based on an economic-led strategy which is aspirational and is based on forecasts of economic changes over the Plan period and how this will equate to the need for employment land and new housing. The amount of new housing required comes largely from the established trend towards smaller average household size, but also encourages migration into the County Borough.

9.0.4 If this strategy succeeds, the slow general decline in population numbers will be reversed and an influx of population will take place, starting in the first part of the Plan period. This is intended to help to boost the local economy, attracting more industry and economic activity, reinvigorating the County Borough's towns and communities, maximising job growth in the local economy, and reversing the ageing process. More details on the growth strategy is given in the LDP and Population and Housing Topic Paper. The LDP proposals for development over the Plan period are based on this population growth.

9 . Likely Significant Effects of Implementing the LDP

Climate Change (SEA Regs: Climate Factors)

9.0.5 Although the impacts of climate change are still unclear, it is likely that they will become increasingly important in the longer term (2021 onwards). The LDP takes into account the anticipated effects of climate change as far as it is able to at this stage and this will shape the development of the built environment, settlements and communities over the Plan period with areas likely to be liable to flooding or exposed to storms being avoided where possible. This should make increasingly significant impacts on the area's resilience.

9.0.6 Similarly, the requirement to make the County Borough's settlements and communities as sustainable as possible, including minimising the production of greenhouses gases (the main significant way in which the LDP will influence the causes of climate change) has shaped the allocations and policies and hence will have a significant impact on the future character of the area. This includes location and design requirements and carbon reduction initiatives in the medium to long term from policies to co-locate energy users and energy production. Improved linkages and network connections by walking, cycling and public transport will also play an important part from the start of the Plan period.

Resources and Waste (SEA Regs: Soil and Water)

9.0.7 The Plan's land use allocations can have a significant effect on the loss of soil resources. The allocation of sites and encouragement of development on previously developed land will help to minimise the use of greenfield land that could be productive in terms of food or livestock, or of interest in biodiversity terms. A limited number of allocations are on greenfield sites, but these are generally not on high quality soils in agricultural terms and areas of biodiversity interest have been avoided where possible. The Plan policies that restrict development in the countryside will have long term positive cumulative effects in retaining productive and diverse countryside and soil resources.

9.0.8 Water resources and quality are likely to be less directly affected by Plan proposals and policies since these are controlled by other legislation and legislative bodies. There are no anticipated issues with water supply over the Plan period and new development should not cause significant issues in relation to water quality due to legislative controls and regulations, such as the widespread use of Sustainable Drainage Systems (SuDS), bringing long term cumulative and synergistic benefits.

9.0.9 In relation to waste generation and dealing with waste, the LDP makes provision for anticipated requirements and it is expected that waste volumes and disposal by traditional landfill methods will be significantly reduced over the Plan

period with benefits in terms of materials and energy recovery as well as reduced impacts on the environment and landscape. Planning controls in the LDP about the disposal of waste and the location of new facilities will have a synergistic and cumulative positive impact over the whole Plan period.

Biodiversity and Geodiversity (SEA Regs: Biodiversity and Flora and Fauna)

9.0.10 Since the LDP makes provision for all types of development, it has the potential to have an adverse effect on biodiversity across the Neath Port Talbot area. However, it will also protect habitats and species and can make provision for the creation of new habitats as part of the development process. The LDP will protect and enhance biodiversity through the following measures:

- Protecting the countryside through the identification of settlement limits, Green Wedges and Special Landscape Areas;
- Taking biodiversity into full account in the selection and shaping of allocations, avoiding where possible areas of importance and the fragmentation of habitats;
- The designation and protection of locally important areas in addition to nationally designated sites; and
- Requiring biodiversity mitigation and compensation where appropriate.

9.0.11 Some strategies and proposals, including the winning and working of mineral resources and the exploitation of renewable energy resources (e.g. wind) have the potential to have adverse impacts on habitats and wildlife, but careful attention to these matters and the implementation of mitigation and compensation measures as required in the biodiversity policies should address adverse effects and avoid any significant losses as far as possible. The same applies in relation to the Plan strategy of developing land for housing around existing urban areas, which will inevitably result in some loss of countryside and habitats: policies in the Plan should ensure that mitigation is undertaken on site wherever possible.

9.0.12 It is anticipated that adverse impacts will be reduced and enhancements achieved increasingly effectively in the medium to long term (5 - 15 years) as the policies take effect and the impact of existing operations and consents diminish. This should create cumulative and synergistic benefits as biodiversity in Neath Port Talbot is strengthened and enhanced.

9 . Likely Significant Effects of Implementing the LDP

Landscape, Townscape and Historic Character (SEA Regs: Landscape and Material Assets)

9.0.13 With regard to landscape, the Plan identifies Green Wedges to safeguard the setting of urban areas and prevent the coalescence of settlements, and Special Landscape Areas, strictly controlling developments in the designated areas to ensure that the best landscapes are conserved and enhanced. Notwithstanding these safeguards, it is anticipated that the County Borough's landscapes will be increasingly affected by windfarms, while the extraction of minerals will continue to have significant impacts. In the medium to long term period (2016 - 2026) it is likely that the extraction of minerals will create impacts, while in the longer term new features in the landscape will be created on sites as they are restored.

9.0.14 More generally, new development (primarily housing and some employment) on the edges of settlements will result in some encroachment into the landscape, although Plan policies require measures to be taken to minimise this as far as possible. Over the medium to long term (from 2016 onwards), a more integrated approach to the mitigation and compensation of habitat loss and policies to encourage the greening of urban areas should have a cumulative effect on enhancing the countryside and its landscapes.

9.0.15 Reshaping and protecting the area's material assets (primarily its buildings, townscapes, urban areas, infrastructure and economic activities) is key to delivering sustainable communities. The LDP incorporates policies for the protection of buildings of local importance and open spaces and features of significance to the historic character of areas, in addition to the existing statutory and regulatory protections for Ancient Monuments, Listed Buildings and Conservation Areas. Existing communities will be strengthened by policies and allocations leading to new development being located in existing settlements, which should enhance the built environment generally and improve the viability of communities and their assets. The outcomes for existing areas of development and existing building stock will therefore be indirect, and is likely to take place in the medium to long term.

Pollution (SEA Regs: Soil, Water, Noise and Air)

9.0.16 Due to its long industrial heritage, the County Borough has extensive areas of contaminated land. Large areas have been remediated, or are being dealt with, for example the site of Coed Darcy Urban Village and Baglan Bay employment area, and generally these improvements are made possible through the development process. The LDP, though its allocations and relevant pollution control policy will play an important role in facilitating this process, and should also help to ensure that further

contamination does not take place in the future. The Plan strategy of concentrating economic development along the Coastal Corridor helps to direct new development to these areas and should result in the significant re-use of former industrial land over the Plan period. In relation to water pollution, as indicated above this is mainly controlled through separate legislation and regulation, but the redevelopment of former polluting sites will have a positive effect.

9.0.17 The LDP identifies and protects designated quiet areas (generally public open spaces in urban areas) to ensure that they remain areas of tranquillity within built up parts of the County Borough. In addition, the general pollution policy requires new developments to have no unacceptable adverse effects in terms of noise pollution.

9.0.18 Neath Port Talbot has had air quality problems in some areas, largely as a result of traffic and industrial emissions. Measures are being taken to address these issues which should bring improvements in the short term, and the LDP pollution control policy includes criteria relating to air quality that should prevent new development causing any significant adverse effects. The Harbourside development in Port Talbot, while not in an area of particular air quality concern, is close to the designated Air Quality Management Area: additional controls imposed by the LDP on the construction phase of developments in central Port Talbot are intended to prevent works from exacerbating any air quality problems.

Community Cohesion (SEA Regs: Culture)

9.0.19 Through its settlement strategy and settlement framework, the LDP aims to consolidate and strengthen settlements and communities. However, there are concerns that a too rapid expansion of smaller communities could undermine cohesion and in some cases adversely affect use of the Welsh language. The Plan's Welsh language policies aim to address this issue, while policies safeguarding community facilities and requiring the retention and provision of open space and walking and cycling linkages are intended to help foster community cohesion.

9.0.20 Policies to conserve and enhance the area's built environment heritage and important local buildings mentioned above will also help to maintain a sense of place and character, with positive effects.

Health and Wellbeing (SEA Regs: Human Health)

9.0.21 Poor health is identified as a significant issue in Neath Port Talbot, partly due to inactive and unhealthy lifestyles and poor economic prospects in some areas. LDP policies can influence some aspects of this situation, although generally only in an indirect way. Policies and allocations concerning access to facilities, open space,

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cycling and walking opportunities and employment opportunities will all have a positive effect, although their impacts will be gradual and synergistic with other initiatives. Through involving communities in identifying and prioritising needs and the use of developer contributions the LDP will have an impact at a local level over the Plan period.

Economy

9.0.22 The LDP's strategies and policies will have a significant impact on the area's economy through encouraging and providing for as much growth and expansion as reasonably feasible. The Plan allocates some 96 ha of land specifically for employment uses of all types, and safeguards existing employment sites and uses, and aims to encourage a significantly higher rate of population growth than has been the case in recent decades. This should serve to boost economic activity in the area generally, including retail provision and local service industries in addition to the traditional, high tech and education sectors. Tourism is an important growth sector locally, and it is anticipated that it will play an increasingly important role in the local economy over the Plan period. Policies in the Plan to support and enhance tourism and leisure led developments should help to make the most of local assets and attractions.

9.0.23 The preferred spatial strategy of concentrating development along the Coastal Corridor should work with existing economic market forces and have the most favourable chance of improving the economy of the area while supporting the smaller valleys communities. However, the overall outcome will be dependant on wider national and international economic forces.

The Inter-Relationship between these Factors

9.0.24 Through controlling and directing new development across the County Borough, the LDP will have powerful effects on all the above factors. All the issues and impacts are closely inter-related and likely to be influenced by climate change and other external environmental, economic and social forces. Strategies and policies of the Plan that are intended to address specific issues are liable to have secondary knock-on effects on a range of other factors. The Plan aims to anticipate these effects and includes specific policies and criteria within policies to address them where possible and minimise any adverse impacts.

9.0.25 In order to deliver truly sustainable development, the whole range of impacts from each development will need to be addressed in an integrated manner. The LDP's policies and proposals have been developed in conjunction with the SA process in order to deliver this as far as possible. The impact of the LDP (and the range of other

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government strategies) in addressing, reducing and mitigating the issues will be gradual, but with tangible benefits likely to become apparent in the mid to long term period (from 2016 onwards).

9 . Likely Significant Effects of Implementing the LDP

10 Monitoring

10.0.1 Monitoring the environmental and other effects of the implementation of the LDP is a formal requirement both under the Regulations directing the LDP process and Article 17 of the Environmental Assessment of Plans and Programmes Regulations⁽¹¹⁷⁾ and Article 10 of the SEA Directive⁽¹¹⁸⁾.

10.0.2 The LDP Deposit Plan sets out a monitoring framework to meet both sets of Regulations. This will assess not only how effectively the LDP is performing but also the SA implications. This will, in turn, help inform the Authority when it considers the need to review and amend the LDP.

10.0.3 Monitoring is a key part of the LDP and SA processes to ensure that the impacts of the Plan are as intended and that any unforeseen and/or negative impacts are recognised and addressed. Monitoring systems are key mechanisms in developing a fuller understanding of the issues that impact upon communities and the extent to which existing policies are meeting their stated objectives leading to more effective future policy formulation.

10.0.4 Components of the monitoring framework include:

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

The Annual Monitoring Report

10.0.5 The Authority is required to produce LDP Annual Monitoring Report (AMR). The AMR will identify any policy that is not being implemented in the anticipated manner. It will outline steps that the Council intends to take to secure the implementation of the policy in question and any revisions to the LDP to replace or amend the policy.

117 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633).

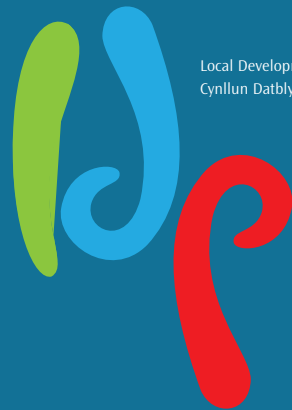
118 Directive 2001/42/EC.

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

Monitoring Indicators, Targets and Actions

10.0.7 In relation to the LDP, a series of monitoring indicators has been established that will allow the measurement of policy effectiveness and impact. Some of these indicators also serve to monitor the SA objectives, while additional indicators have been incorporated in the framework to cover SA objectives specifically.

10.0.8 Targets are identified for each indicator, together with an indication of the point or level at which any deviation from the identified target will trigger the need for action to be taken. These actions would normally include an analysis of the reasons for missing the target and a review of the policy in question. The LDP and SA monitoring framework will be undertaken jointly as many of the indicators and targets are shared. The full monitoring framework is set out in the SA background paper.



Local Development Plan
Cynllun Datblygu Lleol



Neath Port Talbot
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